

River Test Drought Permit Public Hearing.

Southern Water - Summary of case for the permit.

3rd August 2022

Summary of case for the drought permit

References in the form Doc§ App§ etc. are to the individual application documents within the suite of application documents.

Southern Water is applying for a drought permit under Section 79A the Water Resources Act (WRA) 1991 to make temporary amendments to abstraction licence 11/42/18.16/546 (Doc 1.1 App 6) to abstract water from the River Test. The terms of the proposed draft permit are at Doc 1.1. App 1.

The suite of documents which form the application for the drought permit follows the requirements set out in **Appendix E** of the **EA guidance on Drought permit and drought orders**, which was issued in 2019 and revised in 2021 (Environment Agency, 2021). The EA has confirmed the application is valid. The notice/consultation requirement set out in para 1 of Schedule 8 of the WRA have been complied with.

The proposed drought permit, sought for a period of six months from the date of issue, will involve an amendment to one condition of the abstraction licence, to:

- Reduce the River Test 'hands-off' flow condition (Condition 9.1) from 355 000 cubic metres per day to 265 000 cubic metres per day.

In making this application the company has: -

- Followed its drought plan, including its triggers and expected actions (Doc 1.4).
- Engaged customers and enhanced water efficiency promotion (Doc 1.4 App 1).
- Enhanced leakage reduction activity (Doc 1.4 section 3.4).
- Effectively managed outage (Doc 1.4 section 3.5).
- Considered other options and risks (Doc 1.4 section 3.7).
- Considered, prepared and appropriately implemented water use restrictions and the preparatory steps for the permit application, with respect to the Hampshire Section 20 (S 20) Operating Agreement with the Environment Agency (Doc 1.4 section 3.9).

In addition to the submitted applications documents, Southern Water is providing the following updates to the Environment Agency approximately weekly. (The latest versions of these have been provided to the Public Hearing Inspector and the Objectors):-

- Communications plan progress and update.
- Abstraction, demand and transfers data.
- Leakage data.
- Water quality station data.
- River flow forecast,

The application addresses the two 'tests' that there has been an 'exceptional shortage of rain' and that there is a 'threat to supplies'.

Our analyses of antecedent rainfall data finds that there has been an exceptional shortage of rain, especially from November 2021 through to July 2022; that nine month period being the second lowest within 131 years of record (the equivalent period of 1975-76 being the lowest) (Doc 1.3 ESOR case section 3.4 and ESOR Addendum 1 dated 25 July 2022).

We also demonstrate the threat to supplies (Doc 1.2 section 6). This relates straightforwardly to the river flow recession of River Test. There is a credible risk the river flow could recede to and below the flow of 355 MI/d (Total Test Flow) at which, with no drought permit in place, the abstraction licence requires abstraction to stop. That poses a threat to supplies despite all the measures we can reasonably apply to manage our customers' demands and our need for abstraction from the river. The threat to supply is characterised by some key factors (Doc 1.2 section 6.2):-

- The River Test abstraction is the only source of water that Southern Water has supplying Southampton West supply area. The company has no current material means to support this supply area from neighbouring supply areas and their sources.
- The company needs to continue sufficient abstraction from the River Test to maintain supplies to meet customer demand of Southampton West supply area and, the bulk transfer required to support (dependency) of supply on the Isle Wight.
- An average abstraction of 55 MI/d is considered necessary from the River Test under the drought permit but, reserving the need to take higher volumes, up to 80 MI/d (as allowed on the normal abstraction licence) during periods of high demand, such as experienced in the very hot dry weather from 7th July to 19th July 2022.
- Without the drought permit, reduction of the desired abstraction will translate directly to difficulty maintaining supply to customers. Initially this will be noticed only marginally, in that service reservoir drawdown may cover it for a day or two but, gradually service pressure and water quality problems will grow, and parts of the network will experience direct problems maintaining supply to local customers.
- The whole 168,000 household population of Southampton West supply area and its businesses could become significantly affected by restricted water supply within days, with impacts on the Isle of Wight following as well. Soon after, there would effectively be no water supply at all in the Southampton West supply area.

In recognition of the risk of environmental impact of the abstraction under the drought permit (Doc 2.1), a range of environmental monitoring and permanent mitigation (river and riparian habitat and, ecological drought resilience) measures are being put in place, with the committed programme started in 2018 (Doc 1.1 App 5 and App 6). In the wider River Test catchment the Environment Agency, Hampshire and Isle of Wight Wildlife Trust and Wessex River Trust, as delivery partners with Southern Water, have progressed the mitigation and Habitats Regulations compensation measures (the latter associated with potential River Itchen drought orders), improving the river and the resilience of its ecology. Further summary of progress is provided in the application document set (Doc 2.3).

Progress has also included the full expected suite of ecological monitoring in the Lower Test area in 2019 and, some riparian land mitigations in line with the drought permit granted in 2019. Since 2019, Southern Water has also enhanced real time water quality monitoring in the Lower Test area and this drought permit application is made with that foundation of enhanced access to real-time data to aid its monitoring and reactive action implementation. This is detailed in the drought Monitoring and Mitigation Plan supporting the permit application (Doc 2.2 and Appendices).

We apply for the drought permit due to threat to public water supply but, with reassurance that the permit will be operated in the context of careful monitoring and mitigation of any environmental impacts.

End

