



**Hampshire &
Isle of Wight
Wildlife Trust**

Environment Agency Permitting and Support Centre,
Water Resources Team,
Quadrant 2, 99 Parkway Avenue,
Parkway Business Park,
Sheffield,
S9 4WF

Beechcroft House
Vicarage Lane
Curridge
Hampshire
SO32 2DP

Submitted by email to: psc-waterresources@environment-agency.gov.uk

01489 774400
27th July 2022

To whom it may concern,

We understand that Southern Water has applied for a drought permit which, if granted, would immediately reduce the level of protection afforded to the River Test SSSI by enabling the company to abstract beyond the current hands off flow level (HOF) of 355 megalitres per day, to 265 megalitres per day. It is important to note that the current HOF has been determined by the Environment Agency to ensure that sufficient flow remains within the river system to meet the ecological needs of the chalk river habitat and species it supports.

We remain unconvinced that the drought permit won't have a detrimental impact on the River Test SSSI. Accordingly due to the number of concerns about the above application, The Hampshire & Isle of Wight Wildlife Trust are requesting to register a holding objection until these concerns can be satisfied.

The Trust has been working alongside Southern Water to deliver some of the mitigation measures as part of the Section 20 order, but we remain concerned that Southern Water hasn't undertaken all practical steps and mitigation measures since the last drought permit was granted in September 2019.

All parties need greater confidence that Southern Water has delivered existing mitigation measures as part of the Section 20 agreement and therefore satisfied the necessary regulatory requirements to seek out this further drought permit.

We consider that Southern Water must reduce reliance on short-term mitigation measures in future and provide better long-term resilience for our internationally important chalk streams.

We must strongly reiterate the importance of water efficiency measures, reducing leakage of supply pipes, water recycling and bulk water transfers to ensure that abstraction to a potentially damagingly low HOF level is truly a last resort measure.

Given that only a third of people believe the UK is vulnerable to water shortages, according to a 2022 Ofwat & Consumer Council for Water survey, we also feel more could have been done to raise public awareness of the potential risk posed to our chalk rivers given the prevailing weather conditions and Southern Water could have provided more support their customers to help them become more water-efficient in the lead-up to this application.

It's vital that Southern Water secure an alternative water supply as soon as possible to protect the River Test SSSI, yet the draft Water Resource Management Plan for 2024 outlines that no additional large scale water resource solutions will be available until early 2030. We consider that Southern Water's efforts so far haven't

been sufficient, considering that the most recent Environment Agency water and sewage companies environmental report found Southern Water to be performing significantly below target on security of water supply, the worst performing company in the country. We would like to reemphasise to the Environment Agency and Southern Water that under Section 20, Southern Water are legally required to use all best endeavours to find an alternate water resource.

Given our role as a key delivery partner of Southern Water's mitigation measures, we would also like to highlight our concern around the lack of communication from Southern Water in the lead up to this drought permit application. Furthermore, given the quantity of documents to review, we consider that a one-week consultation period is insufficient to ensure that all concerned stakeholders can meaningfully respond to the drought permit application.

We hope that you will take these concerns on board. Please do not hesitate to contact us regarding this response.

Yours sincerely,

Hannah Terrey
Director of Advocacy and Engagement
Hampshire & Isle of Wight Wildlife Trust