

Drought Plan 2027: Annex 3

Our case for IROPI

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from
**Southern
Water** 

IMPORTANT NOTE:

This Annex is incomplete and the table below describes progress, along with work still to be completed.

Annex 3: Our case for IROPI	Description
Annex % Complete	10%
Work Completed	<p>WSP are progressing work on the Test and Itchen Drought Orders Environmental Assessment Report (EAR) and Habitats Regulations Assessment (HRA) updates - this is ongoing and not yet complete.</p> <p><i>This Annex is in draft form only. As indicated below, the content remains subject to further analysis, regulatory input and evidence and may be amended prior to finalisation of the Drought Plan. Southern Water does not invite reliance on this section in its current form.</i></p>
Work Remaining	<p>This Annex will require substantial updating so that it summarise the case for Imperative Reasons of Overriding Public Interest (IROPI) for the Test, Itchen and Candover Drought Orders. As such, finalised updates to the Test, Itchen and Candover EAR and HRAs are needed to complete this Annex.</p> <p>Revision of the Section 20 Agreement is needed as this is due to expire in 2030 but reliance on the Hampshire drought orders will continue beyond the timeframe covered by DP27 (2027-2032).</p>
External Deliverables	<p>Consultancy support</p> <ul style="list-style-type: none"> WSP are updating the Hampshire (ie; Test/Itchen/Candover) drought order HRA and EARs.
	<p>Regulatory support</p> <ul style="list-style-type: none"> The Environment Agency (EA) and Natural England (NE) will review the EAR and HRAs once they are complete EA and NE agreement needed on compensation and mitigation measures
Dependencies	<p>The speed at which this work can progress is dependent on resources and resource constraints. A team of experts at WSP are relied upon for delivering this work, which can only progress at the pace at which their team can deliver it.</p>

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	<p>Changes are proposed to the Itchen Licence include a raising of the Hands-off Flow (HoF). If implemented, this will have the following implications for the revision of this Annex;</p> <ul style="list-style-type: none"> • The Itchen HRA is being updated on the basis of the current HoF for the purposes of drought application readiness in 2026. • The Limited Extension of Validity on the Itchen licence is currently extended to 30 June 2026. • Beyond this, there is currently no agreed mechanism as to how to address IROPI in circumstances where a Drought Order application is likely to be made every year as a result of a raised HoF; • Following any implementation of a HoF change, the Itchen HRA will need to be updated to account for the new HoF, and the compensation/mitigation package will need to be revisited. • There is currently no agreed mechanism to implement the Candover Augmentation Scheme (the Candover Scheme) based on the proposed change to the HoF. • The use of the Candover Scheme is reliant on the outcomes of the Itchen licence renewal and HoF change. • The availability of the Candover Scheme is also dependent on the outcomes of a site inspection planned for June 2026 which will assess the condition of the assets and determine remedial works that are needed. This is dependent on EA agreeing access with the landowner to enable SWS teams to inspect the assets. • Sequencing of the updates to the Candover and Itchen HRAs pursuant to any confirmed HoF change cannot be established at this stage. • A final decision on the Itchen HoF will need to be incorporated into a revised S20 Agreement. • The HoF Conditions in the current Testwood Abstraction Licence are due to change from April 2027 and the whole Licence will need to be renewed for 2028 which may trigger further HoF changes.
<p>Critical Path</p>	<p>The Test drought order HRA and EAR have been prioritised by WSP to ensure drought application readiness for 2026. As the Candover drought option won't be available until 2027, the HRA and EAR for</p>

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	<p>Candover will be updated following completion of the Test and Itchen updates.</p> <p>Further updates to the Itchen and Candover HRAs and EARs will be required following the pending Itchen Licence change.</p> <p>Revisions to S20 would follow the Itchen Licence change.</p>
<p>Timeline</p>	<p>Earliest date for completion of this Annex would be anticipated for Autumn 2026, excluding updates to the Candover HRA.</p>
<p>Decision points, meetings and workshops</p>	<p>A decision on the Itchen Licence is needed in order to inform revisions to the Section 20 Agreement</p>

1. Introduction

This section will be updated when the HRA for the Test sources, Lower Itchen sources and Candover Augmentation Scheme drought orders have been completed.

2. Appropriate Assessment of Western area drought orders

This section will be updated when the HRA for the Test sources, Lower Itchen sources and Candover Augmentation Scheme drought orders have been completed.