

Draft Drought Plan 2027

Annex 8: Habitats

Regulations Assessment

May 2026



from
**Southern
Water** 

IMPORTANT NOTE:

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

Annex 8 HRA	Description
Annex % Complete	5%
Work Completed	<ul style="list-style-type: none"> Drought Plan 2022 including its Habitats Regulations Assessment (HRA) were published in August 2025 Scope of works for the environmental assessments for Drought Plan 2027 issued to potential consultants in August 2025. Contracts signed in February 2026. Mott MacDonald (Motts) instructed to update the HRA for DP27 and submitted a Methodology Statement for regulator review on 13/03/2026. <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	Motts to deliver the full update to the HRA
External Deliverables	<p>Consultancy support</p> <ul style="list-style-type: none"> In addition to the plan level HRA, Motts is reviewing and updating the Strategic Environmental Assessment (SEA) and 10 of the drought permit/order HRAs for Isle of Wight, Kent and Sussex (excluding Pulborough). Atkins is reviewing and updating surface water triggers. Haskoning is updating 10 of the Environmental Assessment Reports (EARs) for the drought permits/orders for Isle of Wight, Kent and Sussex (excluding Pulborough). WSP is updating the Hampshire (ie; Test/Itchen/Candover) drought order HRAs and EARs. Atkins is updating the Pulborough drought order HRA and EAR. WSP Binnies (Binnies) is updating the plan level Water Framework Directive (WFD) Assessment.

	<p>Regulatory support</p> <ul style="list-style-type: none"> • Environment Agency (EA) and Natural England (NE) to review the methodology statement. • EA to review outcomes of trigger reviews for surface water, ground water and reservoirs • EA & NE to review draft EARs and HRAs for drought permits/orders and a live program for these updates has been shared with the regulators.
<p>Dependencies</p>	<p>The drought plan level HRA will be informed by updates to the project level drought permit/order HRAs and EARs and the final draft WFD Assessment. Due to their complexity and volume of work, the Hampshire and Pulborough HRAs and EARs have a longer timeline for delivery and are due to be complete in Autumn 2026. 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 this option will be updated following completion of the Test and Itchen updates.</p> <p>As a result, there is a risk that the drought plan HRA may need to rely on some older HRA and EAR assessments. If this is the case, it will be made clear within the assessment, and will be resolved by the time of final draft submission in 2027.</p> <p>The HRA update will also rely on updated drought trigger information.</p>
<p>Critical Path</p>	<p>The Hampshire HRA updates will assess impacts covering an extended timeframe for reliance on drought permits and orders from 2030 up to 2034. These updated HRAs will determine any new mitigation and compensation needed to secure the use of these options beyond 2030.</p> <p>However, the Itchen Drought Order HRA will be assessed using the current Hands-off Flow (HoF) whilst the new HoF is yet to be agreed/implemented and <i>without</i> the availability of the Candover scheme (due for delivery in 2027). The HRA will then need to be revised when either a) the HoF changes and/or b) the Candover scheme becomes available. This may happen before final DP27 is published and will therefore mean further changes to the plan are required. A further HoF change on the Itchen licence is also currently proposed for 2032, but this is likely to be a matter for DP32.</p>

	<p>The Test Drought Order HRA will be based on the HoF Conditions in the current Testwood Abstraction Licence and will require an update for April 2027 when the new HoF Conditions change, and again after the Licence is renewed in 2028 (if the Conditions change further).</p> <p>There is a risk of either delay or reliance on older data within the HRA and WFD assessments should any of the dependencies outlined above be delayed.</p> <p>Natural England have advised that assessments of the Hampshire drought orders beyond 2030 are required for the submitted drought plan to be compliant with Habitats Regulations.</p>
<p>Timeline</p>	<ul style="list-style-type: none"> • Majority drought permit/order EAR updates due end of May 2026 • Hampshire and Pulborough drought order HRA and EAR updates due Autumn 2026. The extended timeline for the delivery of these is due to the complexity and volume of work required. • Trigger updates for groundwater – completed March 2026, to be reviewed by EA • Trigger updates for reservoirs due end of July 2026 • Atkins trigger updates for surface water due in October 2026 • Motts draft HRA ready for SW review early August 2026 • Internally reviewed and assured draft HRA due October 2026
<p>Decision points, meetings and workshops</p>	<p>Fortnightly progress meetings with Motts are taking place, along with regular coordination/update meetings with other suppliers.</p> <p>Meetings with regulators will be arranged if required.</p> <p>Regular monthly meeting set up to discuss EAR/HRA progress with EA and NE.</p>