Hampshire Water Transfer and Water Recycling Project

Draft Statement of Common Ground - Natural England

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1 Introduction

1.1 Overview of the project

1.1.1 Southern Water Services Limited (hereafter referred to as the 'Applicant') is developing proposals for the Hampshire Water Transfer and Water Recycling Project (the Project). The Project is a water supply scheme that will ensure the Applicant can maintain essential water supplies to customers, especially in a drought, while protecting the rare and sensitive River Test and River Itchen chalk streams.

1.1.2 The Project would use advanced treatment techniques to turn highly treated wastewater, that is usually pumped far out to sea, into purified recycled water at a new water recycling plant in Havant. This purified recycled water would be pumped via a pipeline to the Havant Thicket Reservoir where it would mix with spring water. Water from the reservoir would then be pumped along another pipeline to the Applicant's Otterbourne Water Supply Works where it would be treated to strict drinking water standards before being sent into supply.

1.2 Purpose of this Statement of Common Ground

1.2.1 The purpose of this Statement of Common Ground (SoCG) is to set out the areas of agreement and disagreement between the Applicant, and Natural England (NE) in relation to the Development Consent Order (DCO) application for the Project.

1.2.2 NE's role in the DCO process is to advise on the impacts of projects on protected sites, designated landscapes, and agricultural land, and by acting as the licensing authority for protected species. This document aims to support the examination process by setting out the areas of agreement and those requiring further discussion, specifically in relation to matters within NE's statutory remit.

1.2.3 This document has been updated at Deadline 1 to reflect further engagement, progress in resolving outstanding matters and any changes to the parties' positions following submission of the DCO application. References to other Application documents have been updated from the original submission. Please refer to the latest version of the Guide to the Application (Document reference 1.3, DCO Volume 1) for the list of current versions of documents.

1.2.4 This SoCG has been prepared with due regard to guidance issued under Section 50 of the Planning Act 2008 (PA 2008) concerning pre-application processes, including the Department for Levelling Up, Housing and Communities (2024) Planning Act 2008: Pre-application stage for Nationally Significant Infrastructure Projects ('Pre-application Guidance 2024'). This SoCG should be read alongside NE's Relevant Representation [RR-222], which sets out NE's detailed position on matters relevant to the Examination. References in this SoCG are intended to complement, and where appropriate cross-reference, the issues raised in that Relevant Representation.

1.3 Parties to this statement

1.3.1 This SoCG has been prepared by (1) Southern Water Services Limited as the Applicant and (2) Natural England.

1.3.2 Collectively, Southern Water Services Limited and Natural England are referred to as 'the parties'.

1.4 Terminology

1.4.1 Table 1-1 outlines the terminology in the status column of Table 3-1. It can be taken that any matters not specifically referred to in Table 3-1 are not of material interest or relevance to the parties' representation and therefore have not been considered in this document.

Table 1-1: Status terminology

Term	Explanation
Matter agreed with other party	Indicates that both Southern Water and NE have reached a consensus on the specific issue, with no disagreements.
Provisional agreement pending application evidence	Indicates that while consensus has been reached on certain issues, confirmation of agreement is contingent upon NE reviewing and accepting the supporting evidence.
Matters subject to further discussion	Indicates that the specific issues are still under discussion, and no final agreement has been reached yet.
Matter not able to be agreed	Indicates that an agreement on the specific issue has not been reached, and it is unlikely that further discussions will resolve the disagreement.

2 Record of post DCO submission engagement

2.1.1 The Applicant has engaged with NE throughout the development of the DCO application and continues to engage with NE following submission of the application.

2.1.2 A comprehensive record of pre-application engagement, including statutory consultation carried out under section 42 of the PA 2008, is provided in the Statement of Engagement (Statement of Commonality appended) [APP-072] and the Consultation Report [APP-029].

2.1.3 This version of the SoCG is submitted at Examination Deadline 1 (DL1). It represents an update to the draft SoCG submitted with the DCO application, which had a reporting cut-off date of 27 April 2026, and has been updated to reflect engagement with NE since that date, where appropriate. The SoCG is currently unsigned but has been reviewed and agreed by the relevant officer(s) at NE. The Applicant confirms that it accurately reflects the matters discussed and the current position between the parties. Formal agreement and signing of the SoCG will be progressed as engagement continues during the Examination.

2.1.4 Where appropriate, bilateral engagement with NE has continued since submission of the application on unresolved matters from the pre-application phase, matters arising during Pre-examination/Examination, and areas where further clarification is required. **Table 2-1** sets out this engagement. Engagement remains ongoing throughout the Examination, and this SoCG is a live document, which will be updated and resubmitted as appropriate to reflect ongoing discussions, progress in resolving matters, and any changes to the status of issues identified by the parties.

Table 2-1: Record of post-submission engagement

Name	Purpose	Date
SoCG Review Meeting 1	First review of the draft SoCG post-submission; to update the latest position and status of issues which had not been agreed in the pre-Examination phase.	06/08/2026
SoCG Review Meeting 2	Second review of the draft SoCG post-submission; to further update the latest position and status of issues not yet agreed. Relevant representation discussed.	28/09/2026
SoCG Review Meeting 3	Third review of the draft SoCG post-submission to reach agreement on the updates in advance of Examination Deadline 1.	16/11/2026

3 Statement of Common Ground

3.1.1 Table 3-1 provides a summary of the key matters discussed between the Applicant and NE in relation to the DCO application for the Project. Each matter is categorised according to its status, as defined in section 1.4. Table 3-1 aims to clearly present the areas of agreement, those still under discussion, and any unresolved issues.

Table 3-1: Summary of matters

Row ID	Topic	Summary of Natural England issue	Latest Position in Resolving the Issue	Application Document Reference	Status
Above ground plant, specific sites and pipeline					
NE-PEI-012	Washouts	Natural England is satisfied with the plans put in place for Invasive Non-Native Species (INNS) control to ensure INNS do not pass from Havant Thicket Reservoir to other watercourses via washout valves or to the River Itchen at Otterbourne or Chickenhall.	The planning of INNS management has been undertaken in collaboration with Portsmouth Water. Natural England has been engaged on the progress of INNS management and the INNS Biosecurity Plan via Technical Working Group meetings. Invasive Non Native Species INNS Biosecurity Plan [APP-425] is included in the DCO application. The Applicant provided information at the December 2025 Technical Working Group about the proposed INNS treatment of the Otterbourne waste stream, and the provision of space for any future legislative requirement for INNS pathogen treatment. It was confirmed that there will be no INNS pathway to Chickenhall because any INNS will be contained and treated at Otterbourne WSW. The Applicant provided an update at the February 2026 Technical Working Group about INNS treatment at Otterbourne WSW now being incorporated as part of the Project. Natural England's INNS specialist confirmed satisfaction with the proposed approach of the Project to INNS control.	Invasive Non Native Species INNS Biosecurity Plan [APP-425]	Matter agreed with other party
NE-PEI-013	Washouts	Natural England expressed expectation of appropriate mitigation for washouts so that discharges do not go straight into the River Itchen/other sensitive receptors, and to ensure that this mitigation is in place prior to the event of an emergency. Natural England confirmed satisfaction with the approach set out in management plans.	The Applicant's approach to pipeline washouts and Break Pressure Tank overflows has been engaged on via Technical Working Group meetings. Natural England's feedback has been discussed and Natural England confirmed that it will defer to the Local Planning Authority on the matter of appropriate washout locations (which will be at detailed design stage). The Applicant has presented the washout-related extracts of Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7) and Operational Environmental Management Plan [APP-422]. Natural England	Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7) Operational Environmental Management Plan [APP-422]	Matter agreed with other party

Row ID	Topic	Summary of Natural England issue	Latest Position in Resolving the Issue	Application Document Reference	Status
			confirmed satisfaction with the approach set out in these management plans.		
NE-PEI-014	Washouts	Natural England is in agreement that potential impacts from washout events do not need to be considered as an operational impact due to their exceptional/emergency nature.	The Applicant has explained that only in an emergency scenario (considered to be 'operationally exceptional' and not expected to occur during the operation of the project) would source water potentially be released via a washout valve or Break Pressure Tank (BPT) overflow to the environment. Therefore, the potential impacts of use of washouts/BPT overflows in an emergency scenario are considered as part of ES Chapter 14 Major accidents and disasters [APP-093] (and not assessed in any other ES chapters or the Habitats Regulations Assessment). Natural England is in agreement with this approach.	ES Chapter 14 Major accidents and disasters [APP-093]	Matter agreed with other party
NE-SCO-001	Cumulative effects	Natural England is in agreement that there are no cumulative effects of the Hampshire Water Transfer and Water Recycling Project and Sandown Water Recycling Project with regards to potential impacts on Special Protection Area and Ramsar sites.	The relevant Eastney Long Sea Outfall (LSO) modelling results are presented in ES Appendix 19.8 Hampshire Water Transfer and Water Recycling Project Eastney Long Sea Outfall - CORMIX Modelling for Chemicals Screened in via the Surface Water Risk Assessment Process [APP-203] and the assessment is presented in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) and ES Appendix 19.2 Water Environment Regulations compliance assessment (Document reference 6.2, DCO Volume 6, Version 1). It has been concluded that, given the modelling results indicate the distance to the Environmental Quality Standard (EQS) for screened in chemical parameters is 1-2m from the outfall, cumulative effects with other outfalls are not predicted. The potential for cumulative effects resulting from discharges from the Eastney (LSO) and those from the Sandown Water Recycling Project were not included in the cumulative effects assessment for the Project on the basis that Sandown is beyond the spatial extent of the marine biodiversity Zone of Influence (10km), for which qualifying 'Committed Developments are considered for the cumulative effects assessment. Natural England has expressed satisfaction having reviewed the relevant DCO documents.	ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) ES Appendix 19.2 Water Environment Regulations compliance assessment (Document reference 6.2, DCO Volume 6, Version 1) ES Appendix 19.8 Hampshire Water Transfer and Water Recycling Project Eastney Long Sea Outfall - CORMIX Modelling for Chemicals Screened in via the Surface Water Risk Assessment Process [APP-203]	Matter agreed with other party
Design and construction					
NE-ES-109	Scheme Development	Natural England is satisfied with the scheme development work and embedding of primary mitigation that has been undertaken to minimise impacts of the Project on sensitive environmental receptors.	Natural England has been engaged throughout the design development for the DCO via EIA Working Group and Technical Working Group sessions. Natural England input on avoidance criteria/primary mitigation has been fed into the scheme development process and incorporated	Scheme Development Report [APP-073] - [APP-075] ES Appendix 3.1 Primary mitigation [APP-103]	Matter agreed with other party

Row ID	Topic	Summary of Natural England issue	Latest Position in Resolving the Issue	Application Document Reference	Status
			as far as possible. Design decisions have been based on a multi-disciplinary assessment that weighs potential environmental and construction constraints and opportunities. Scheme Development Report [APP-073] - [APP-075] sets out in detail the process that has been taken to design the Project and it explains how alternatives have been considered. Primary mitigation is presented in ES Appendix 3.1 Primary mitigation [APP-103].		
NE-ES-024	Design and construction	Natural England is in agreement with the Applicant's position that it is not in the remit of this Project to assess potential Havant Thicket Reservoir over-topping and emergency drawdown into the Hermitage Stream catchment, and the potential impact on downstream designated sites.	The Applicant will not be the operator of Havant Thicket Reservoir; operational impacts fall under Portsmouth Water's Environmental Impact Assessment (EIA). The Applicant's assessment for the Project assumes no change to reservoir discharge patterns and considers only water quality effects relevant to the Project. Natural England is satisfied with this position.		Matter agreed with other party
NE-ES-044	Design and construction	Natural England noted that the pipeline route poses threat to Best and Most Versatile (BMV) agricultural land and that loss is only considered temporary if the land can be fully restored. Natural England sought reassurance that the design process adequately aimed to minimise BMV land loss and is satisfied with the approach taken.	Publicly available Agricultural Land Classification (ALC) mapping informed route selection, with avoidance of BMV land where practicable, and reinstatement assumed for the pipeline. Measures secured in the Outline Soil Resource Management Plan (appended to Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7)) ensure all soils, including BMV land, are restored to original condition. Natural England commented on the draft Outline Soil Resource Management Plan (appended to Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7)) and the Applicant has confirmed that detailed Soil Resource Management Plan measures will apply to all soil resources. Natural England raised no concerns with the presented approach and has agreed that the approach taken to the ALC assessment of the pipeline is appropriate (relying on sampling from Ground Investigation survey) and that detailed ALC surveys are confined to the areas of permanent development.	Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7)	Matter agreed with other party
NE-PEI-004	Watercourse crossings and methodologies	Natural England is satisfied with the decision-making regarding proposed watercourse crossing construction methodologies and the approach to assessing potential construction impacts on watercourses/designated sites.	The Applicant has engaged with Natural England on proposed watercourse crossing methodologies through the Technical Working Group meetings. Natural England raised no specific concerns other than a request for further information to justify the		Matter agreed with other party

Row ID	Topic	Summary of Natural England issue	Latest Position in Resolving the Issue	Application Document Reference	Status
			use of the open-cut construction method at one ordinary watercourse connected to the River Meon. The Applicant clarified that the potential winterbourne (former Crossing 10) will be crossed using trenchless construction as part of the wider Meon crossing.		
Consents and licences					
NE-PEI-008	Consents and licences	Natural England has issued Letters of No Impediment (LoNIs) for the draft hazel dormouse and draft badger licences. Natural England has confirmed that there is currently no licensable work related to bats and therefore no licence or LoNI is currently required for the Project in relation to bats.	Natural England has issued LoNIs for the draft hazel dormouse and draft badger licences. There is currently no licensable work related to bats and therefore no licence or LoNI is currently required for the Project. Surveys have confirmed the likely absence of great crested newt from any water bodies with the potential to be impacted within Havant Borough Council and Portsmouth City Council LPA areas and consequently licensing is not required for the Project in these locations. Within all other LPA areas through which the Project passes, GCN were screened out of the assessment because impacts on them will be covered by a District Licence issued by NatureSpace which has confirmed that such a licence can be issued for the Project. Natural England has expressed satisfaction with this approach.		Matter agreed with other party
Air quality and odour					
NE-ES-040	Air quality and odour - assessment	Natural England has provided its standard advice on air quality as regards deposition. Natural England is in agreement that air quality impacts to Portsdown Site of Special Scientific Interest (SSSI) via dust are not significant.	This site is considered in ES Chapter 6 Air quality and odour (Document reference 6.1, DCO Volume 6, Version 1) because it is within 200m of construction activities. It is therefore considered as a receptor in the dust risk assessment; a low level of dust risk is reported for earthworks and construction activities and a negligible risk for trackout activities. Measures commensurate with a high level of dust risk are secured in the Air quality and odour section of the Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7). These measures apply to the entirety of the construction and are designed to reduce any effects to be not significant. Therefore no significant effects relating to dust risk are anticipated at Portsdown SSSI. Road links within 200m of this SSSI trigger the need for detailed modelling, so it has also been assessed for construction road traffic emissions in ES Chapter 6 Air quality and odour (Document reference 6.1, DCO Volume 6, Version 1). ES Chapter 8 Terrestrial and freshwater biodiversity	ES Chapter 6 Air quality and odour (Document reference 6.1, DCO Volume 6, Version 1) ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1) Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7)	Matter agreed with other party

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			(Document reference 6.1, DCO Volume 6, Version 1) uses the findings from ES Chapter 6 Air quality and odour (Document reference 6.1, DCO Volume 6, Version 1) and reports that, based on minor anticipated increases in air pollutants for a temporary duration (approximately five year construction period), the Project is unlikely to result in any significant habitat degradation or impacts on interest features. Therefore the interest features of the SSSI will not be damaged or destroyed as a result of nitrogen deposition or atmospheric nitrogen. Overall, air quality impacts as a result of traffic changes during the construction of the Project are assessed to result in a temporary negligible impact, on a feature of High value; therefore there is a minor adverse effect which is not significant.		
NE-ES-082	Air quality and odour - assessment	Natural England's requirements and recommendations for the air quality and odour assessment methodology have been provided in its standard advice.	The Applicant has responded to Natural England's questions and requirements relating to the air quality cumulative assessment, including providing justification for the 3km Zone of Influence distance, reasoning for the exclusion of any committed developments, and a list of search terms used to identify non-road projects. Natural England's input has been incorporated into ES Chapter 6 Air quality and odour (Document reference 6.1, DCO Volume 6, Version 1).	ES Chapter 6 Air quality and odour (Document reference 6.1, DCO Volume 6, Version 1)	Matter agreed with other party
Archaeology, cultural heritage and heritage settings					
NE-ES-003	Archaeology and cultural heritage - mitigation	Natural England is satisfied that the Project will include appropriate restoration of historic parks and gardens after works completion. Engagement between the project team and relevant historic bodies should continue.	The Applicant has engaged with Historic England, Hampshire County Council's county archaeologist and Winchester City Council's lead archaeologist to ensure that impacts on the historic environment are avoided or minimised as far as practicable. Restoration of historic parks and gardens was included in this engagement, and in the work of the archaeological and cultural heritage topic specialists, and is secured in Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1). Engagement will continue as appropriate in the detailed design stage. Natural England has confirmed satisfaction with this approach.	Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1)	Matter agreed with other party
Habitats and ecology					
NE-ES-004	Scheme Development	Natural England expressed its expectation that the Project would avoid impacts on ancient woodland and trees as far as possible. Natural England is satisfied with the efforts made to avoid tree impacts.	The route of the Project avoids Ancient Woodland. Natural England has shared the planned updates to the Hampshire Ancient Woodland Inventory for the area relevant to the Project and these have		Matter agreed with other party

Row ID	Topic	Summary of Natural England issue	Latest Position in Resolving the Issue	Application Document Reference	Status
			been included in the assessment. This data confirmed that none of the newly designated woodlands in the inventory are in close proximity to the Project. No further updates to the route were required.		
NE-ES-008	Marine biodiversity - assessment	Natural England is satisfied that potential operational impacts on Langstone Harbour Site of Specific Scientific Interest (SSSI), Chichester Harbour SSSI, South Wight Maritime SAC and Bembridge MCZ in relation to the Eastney Long Sea Outfall (LSO) discharge are appropriately reported in the marine biodiversity chapter of the Environmental Statement.	Potential operational impacts on Langstone Harbour SSSI and Chichester Harbour SSSI from Eastney LSO are assessed in ES Chapter 9 Marine biodiversity (Document reference 6.1, DCO Volume 6, Version 1). No likely significant operational effects are reported. Natural England reviewed the dispersion modelling shared at the Spring 2025 Consultation and was broadly supportive. Following review of the draft benthic ecology and eDNA reports (ES Appendix 9.10 Eastney Long Sea Outfall benthic ecology survey [APP-145] and ES Appendix 9.11 Eastney Long Sea Outfall environmental DNA sampling and analysis [APP-146]) in autumn 2025, Natural England confirmed it is supportive of the conclusions regarding potential impacts on marine biodiversity for the South Wight Maritime SAC and Bembridge MCZ set out in Habitats Regulations Assessment – Stage 2 Appropriate Assessment and Marine Conservation Zone – Stage 1 Assessment (Document reference 5.2, DCO Volume 5, Version 2).	Habitats Regulations Assessment – Stage 2 Appropriate Assessment and Marine Conservation Zone – Stage 1 Assessment (Document reference 5.2, DCO Volume 5, Version 2) ES Chapter 9 Marine biodiversity (Document reference 6.1, DCO Volume 6, Version 1) ES Appendix 9.10 Eastney Long Sea Outfall benthic ecology survey [APP-145] ES Appendix 9.11 Eastney Long Sea Outfall environmental DNA sampling and analysis [APP-146]	Matter agreed with other party
NE-SCO-003	Marine biodiversity - assessment	Natural England is satisfied that there is no risk to prey availability as a result of the proposed change to the discharge at the Eastney Long Sea Outfall (LSO).	The following statutory designated sites (with birds or assemblages of birds as a qualifying feature) have connectivity to the Solent and the Eastney LSO: • Solent and Dorset Coast SPA • Solent and Southampton Water SPA • Portsmouth Harbour SPA and Ramsar • Chichester and Langstone Harbour SPA and Ramsar Effects on the designated sites and their qualifying features (including bird feeding habits) are assessed in ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1) as minor adverse, which is not significant. Natural England is in agreement with the conclusions regarding the potential impacts to marine biodiversity at Eastney LSO, having reviewed ES Appendix 9.10 Eastney Long Sea Outfall benthic ecology survey [APP-145] and ES Appendix 9.11 Eastney Long Sea Outfall	ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1) ES Appendix 9.10 Eastney Long Sea Outfall benthic ecology survey [APP-145] ES Appendix 9.11 Eastney Long Sea Outfall environmental DNA sampling and analysis [APP-146]	Matter agreed with other party

Row ID	Topic	Summary of Natural England issue	Latest Position in Resolving the Issue	Application Document Reference	Status
			environmental DNA sampling and analysis [APP-146] (including the Benthic Survey Report).		
NE-ES-099	Terrestrial and freshwater biodiversity - scope	Natural England is in agreement that the scope of the terrestrial and freshwater biodiversity assessment is appropriate.	Natural England has been engaged throughout the stages of the Environmental Impact Assessment via EIA Working Group and Technical Working Group sessions. Its comments on the terrestrial and freshwater biodiversity assessment scope, including receptors, categories of effect and pathways of effect, have been sought and incorporated. Natural England is in agreement that the scope of the terrestrial and freshwater biodiversity assessment is appropriate.		Matter agreed with other party
NE-ES-101	Terrestrial and freshwater biodiversity - baseline and methodology	Natural England has not raised any issues with the baseline and methodology of the terrestrial and freshwater biodiversity assessment.	Natural England has been engaged throughout the stages of the Environmental Impact Assessment via EIA Working Group and Technical Working Group sessions. Its comments on the terrestrial and freshwater biodiversity assessment baseline and assessment methodology, including data sources and coverage, have been sought and incorporated. Natural England has not raised any issues with the baseline and methodology of the terrestrial and freshwater biodiversity assessment.		Matter agreed with other party
NE-ES-094	Terrestrial and freshwater biodiversity - methodology	Natural England has expressed its support for the bat assessment methodology.	Natural England's Habitat Suitability Modelling expectations have been addressed by the Applicant and Natural England has confirmed satisfaction with the bat assessment methodology. In July 2025, the Applicant notified Natural England that MaxEnt software could not be used due to technical issues and provided information and mapping outputs for a revised Circuitscape-based methodology. Natural England confirmed satisfaction with the switch to Circuitscape, provided it is used alongside the other survey methods previously outlined by the Applicant, which was agreed.		Matter agreed with other party
NE-EPD-003	Terrestrial and freshwater biodiversity - methodology	Natural England is in agreement that irreplaceable habitat will not be permanently affected.	As secured in measure TFB19 of the Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7), the Project will ensure there is no loss or deterioration of irreplaceable habitat (the only irreplaceable habitats present, as currently defined, are ancient woodland and ancient and veteran trees). Natural England has reviewed ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1) and confirmed agreement.	ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1) Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7)	Matter agreed with other party

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NE-ES-097	Terrestrial and freshwater biodiversity - surveys	Natural England has been kept informed and consulted on the ecology survey methodologies, extents and assumptions that underpin the terrestrial and freshwater biodiversity assessment.	Ecology survey coverage and the precautionary approach to habitats and species have been reviewed and agreed by Natural England, including provision for fish rescue during open-cut works. The spatial extent of unsurveyed areas was shared with Natural England; Natural England confirmed it was satisfied with the survey coverage and assumptions. Surveys were conducted between 2023 and 2025. The Applicant considers that all surveys remain valid for the assessment, particularly given that there will be an extensive pre-construction survey programme, secured through Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7) measure TFB5, to ensure the ecology baseline is updated. This approach has been presented to Natural England and Natural England has expressed satisfaction. Beavers were scoped out in the Scoping Opinion with Natural England's agreement. However, given species' ongoing range expansion, pre-construction surveys will detect any presence and allow mitigation if needed. Natural England has expressed satisfaction with this approach.	Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7)	Matter agreed with other party
NE-ES-107	Terrestrial and freshwater biodiversity - assessment	Natural England is in agreement that the terrestrial and freshwater biodiversity assessment findings and mitigation proposals are appropriate.	Natural England has been engaged throughout the stages of the Environmental Impact Assessment via EIA Working Group and Technical Working Group sessions. The 'no surprises' approach to engagement on all aspects of the terrestrial and freshwater biodiversity assessment has enabled the Applicant to have confidence in Natural England's support of the findings of the assessment regarding effects and appropriate mitigation. Natural England is in agreement that the terrestrial and freshwater biodiversity assessment findings and mitigation proposals are appropriate having reviewed ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1).	ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1)	Matter agreed with other party
NE-ES-012	Terrestrial and freshwater biodiversity - mitigation	Natural England advised that construction compounds be located away from watercourses and designated sites, the appropriate storage of chemicals and fuels should be considered in the Construction Environmental Management Plan, compounds should be the smallest required size and sites should be restored. Natural England is	Compound locations have been chosen to avoid sites designated for nature conservation where possible. Where avoidance has not been possible, footprints have been reduced and standard, good practice mitigation is applied in Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7) to	Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7)	Matter agreed with other party

Row ID	Topic	Summary of Natural England issue	Latest Position in Resolving the Issue	Application Document Reference	Status
		satisfied that these measures have been incorporated as far as practicable.	ensure impacts are minimised. Natural England has expressed its satisfaction.		
NE-ES-113	Terrestrial and freshwater biodiversity - mitigation	Natural England is supportive of the proposed mitigation approach to Open Mosaic Habitat (OMH) loss at the Water Recycling Plant (WRP) site.	There is 4.32ha of OMH at the WRP site, all of which will be lost through the construction of the Project. The Applicant proposes to create c0.8ha of OMH on the green/brown roof and c1.5ha at the eastern end of the WRP site to mitigate the loss. At the December 2025 Technical Working Group, the Applicant explained that the existing OMH at the WRP site is unmanaged and subject to scrub encroachment. The Applicant explained that the proposed approach will deliver mitigation that creates a smaller but better quality OMH than existing at the WRP site, and that a detailed management plan will be implemented to ensure long-term maintenance of the OMH at the WRP site. Natural England has confirmed that it is satisfied with the proposed approach for open mosaic habitat reprovision.		Matter agreed with other party
NE-ES-115	Terrestrial and freshwater biodiversity - mitigation	Natural England is in agreement that the approach to reptile translocation from the Water Recycling Plant (WRP) site is ecologically appropriate.	There is a substantial population of slow worm at the WRP site. The design of the Project will not leave enough of the site to support the population, so reptile translocation is proposed. At the March 2026 Technical Working Group the Applicant explained that the reptile translocation site will be outside of the order limits of the Project. The translocation site will be secured post DCO submission via a relevant Requirement. Natural England expressed satisfaction with the approach to reptile translocation and were provided an example from a similar project where this approach was taken and approved.		Matter agreed with other party
NE-ES-095	Terrestrial and freshwater biodiversity - mitigation	Natural England requested that soil seed banks are used across the Project. Natural England is in agreement that proposed management of soils and the seed banks they contain is appropriate.	The methodology to ensure appropriate management across the Project of soils and the seed banks they contain is set out in the Outline Soil Resource Management Plan, an appendix to the Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7), and Outline Landscape and Ecology Management Plan (Document reference 7.5, DCO Volume 7, Version 1), which is included in the DCO application. Natural England is in agreement that proposed management of soils and the seed banks they contain is appropriate having reviewed the Outline	Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7) Outline Landscape and Ecology Management Plan (Document reference 7.5, DCO Volume 7, Version 1)	Matter agreed with other party

Row ID	Topic	Summary of Natural England issue	Latest Position in Resolving the Issue	Application Document Reference	Status
			Soil Resource Management Plan (appended to the Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7)) and Outline Landscape and Ecology Management Plan (Document reference 7.5, DCO Volume 7, Version 1).		
NE-ES-001	Habitats Regulations Assessment / Marine Conservation Zone Assessment	Natural England (which sits on the Solent Waders and Brent Goose Strategy Sites Steering Group) has provided advice on mitigation plans for loss of the Solent Waders and Brent Goose Strategy sites affected by the Project (i.e. land functionally linked to the coastal SPA and Ramsar sites in the wider Solent area) and has confirmed satisfaction with the proposed mitigation. Natural England has reviewed the Solent Waders Brent Goose Strategy sites mitigation approach summary and confirmed agreement in principle. We understand that the Applicant may be limited in the amount of information they can publicly share in relation to this mitigation proposal. We advise that, to provide the decision maker with maximum certainty, the mitigation strategy should include details of: the exact area and location, details of how the site will be managed, who will undertake the management, how the habitat will be monitored, any necessary remedial measures, and details of how all of this will be secured and funded. We welcome the inclusion of Requirement 17 which guarantees that the proposed mitigation can be secured. The decision maker will ultimately need to guarantee the mitigation has enough certainty it can be delivered as part of their assessment.	An off-site location has been identified for mitigation of affected Solent Waders and Brent Goose Strategy sites, particularly H08 on the Water Recycling Plant site which will be permanently lost. Natural England has confirmed that this approach constitutes mitigation rather than compensation. The ownership and management of the off-site location would ensure it is consistently available to the birds and in a good condition. A minimum of 2.5ha of the site would be secured and managed as high quality, optimal habitat (permanent grassland, managed with a low sward) suitable not only for brent geese but also waders. Southern Water will contract a specialist company to purchase the requisite area of the site and secure its management for at least the lifetime of the asset delivered by the Project. The Applicant has presented a summary of its approach to Solent Waders Brent Goose Strategy (SWBGS) sites mitigation and updated the approach based on Natural England's comments. Natural England has confirmed agreement with the principles set out in the draft Habitats Regulations Assessment – Stage 2 Appropriate Assessment and Marine Conservation Zone – Stage 1 Assessment (Document reference 5.2, DCO Volume 5, Version 2) and ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1), secured by the Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7) measure TFB23. Further detail on the mitigation plan and the delivery of this plan is secured by Requirement 17 under Schedule 2 of the Draft Development Consent Order [APP-023]. The Applicant welcomes and agrees with Natural England’s comment that Requirement 17 guarantees that the proposed mitigation can be secured. The Applicant further notes Natural England’s comments regarding the matters that should be detailed in the submission made to the relevant planning authority under Requirement 17	Draft Development Consent Order [APP-023] Habitats Regulations Assessment – Stage 2 Appropriate Assessment and Marine Conservation Zone – Stage 1 Assessment (Document reference 5.2, DCO Volume 5, Version 2) ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1) Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7) The Applicant’s responses to Relevant Representations from local authorities, parish councils, and statutory consultees (Document reference 8.5, DCO Volume 8, Version 0)	Provisional agreement pending application evidence

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			and agrees that such matters would be covered accordingly. The Applicant has provided a more detailed response in The Applicant's responses to Relevant Representations from local authorities, parish councils, and statutory consultees (Document reference 8.5, DCO Volume 8, Version 0) and will continue engaging with Natural England on this matter, as required. .		
NE-ES-015	Habitats Regulations Assessment / Marine Conservation Zone Assessment	Natural England is satisfied that the Applicant has provided clarity in the updated Habitats Regulations Assessment – Stage 2 Appropriate Assessment and Marine Conservation Zone – Stage 1 Assessment (Document reference 5.2, DCO Volume 5, Version 2) on the disturbance mitigation measures (i.e. for noise and visual disturbance) for areas near to any designated habitat sites which feature bird species as their Qualifying Features.	Natural England requested that visual screening/acoustic barriers are used to mitigate potential noise and visual disturbance impacts on the nearby SPA and functional sites in line with Solent Waders and Brent Goose Strategy Guidance on Mitigation and Offsetting Requirements. Natural England recommended conformity with BS4142:2014 when developing noise mitigation measures. The Solent Waders and Brent Goose Strategy has been taken into account in the assessment of impacts on biodiversity that is set out ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1) and ES Chapter 13 Landscape and visual [APP-092]. The Solent Waders and Brent Goose Strategy has also informed the design of environmental mitigation secured in measure TFB23 of the Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7) and Habitats Regulations Assessment – Stage 2 Appropriate Assessment and Marine Conservation Zone – Stage 1 Assessment (Document reference 5.2, DCO Volume 5, Version 2). This includes the use of acoustic barriers to mitigate against both noise and visual disturbance and watching briefs during the non-breeding bird season. The detail of approach to undertaking watching briefs will be discussed and agreed under consultation with Natural England prior to any noisy works commencing. Natural England's comments on the second draft of the Stage 2 Habitats Regulations Assessment were discussed in the January 2026 Technical Working Group and subsequent meetings. Amendments have been made and accepted by Natural England. These have been incorporated	Habitats Regulations Assessment – Stage 2 Appropriate Assessment and Marine Conservation Zone – Stage 1 Assessment (Document reference 5.2, DCO Volume 5, Version 2) ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1) ES Chapter 13 Landscape and visual [APP-092] Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7)	Matter agreed with other party

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			into the final version of Habitats Regulations Assessment – Stage 2 Appropriate Assessment and Marine Conservation Zone – Stage 1 Assessment (Document reference 5.2, DCO Volume 5, Version 2). Natural England is satisfied with the disturbance mitigation measures proposed and will consult on the detail at the relevant design and construction stages. The Applicant recognises Natural England's advice in their relevant representations that further clarity is required on which specific measures will be implemented around particular Solent Waders and Brent Goose Strategy sites. This is addressed in updates to Habitats Regulations Assessment – Stage 2 Appropriate Assessment and Marine Conservation Zone – Stage 1 Assessment (Document reference 5.2, DCO Volume 5, Version 2) which Natural England has confirmed satisfaction with.		
NE-ES-031	Habitats Regulations Assessment / Marine Conservation Zone Assessment	Natural England advised that ammonia from traffic emissions should be included for assessment within the Habitats Regulations Assessment and is satisfied with the Applicant's approach.	The Applicant has engaged with Natural England and sought its input throughout the Habitats Regulations Assessment process. Natural England returned comments on the second draft of the Stage 2 Habitats Regulations Assessment and the Applicant discussed how these comments have been addressed in the January 2026 Technical Working Group. After that meeting, it was confirmed that the APIS website had recently been updated with new critical ammonia levels and that this data has been incorporated into the final version of Habitats Regulations Assessment – Stage 2 Appropriate Assessment and Marine Conservation Zone – Stage 1 Assessment (Document reference 5.2, DCO Volume 5, Version 2). Natural England confirmed satisfaction with the Applicant's approach to ammonia impact assessment in the Habitats Regulations Assessment.	Habitats Regulations Assessment – Stage 2 Appropriate Assessment and Marine Conservation Zone – Stage 1 Assessment (Document reference 5.2, DCO Volume 5, Version 2)	Matter agreed with other party
Marine environment					
NE-ES-010	Design and construction	Natural England expressed expectation that a full Horizontal Directional Drilling (HDD) feasibility study would be undertaken to ensure the pipelines beneath the Hermitage Stream remains buried. However, as HDD is not proposed, it is agreed that this is not required.	HDD is not proposed for the pipelines between Budds Farm Wastewater Treatment Works and the Water Recycling Plant site. It is proposed that the tunnel for these pipelines will be driven through the underlying chalk using microtunnelling. Natural England has expressed satisfaction with this approach.		Matter agreed with other party
NE-ES-005	Design and construction	Natural England is satisfied with the broad approach to the design and construction of the Water Recycling Plant Sustainable Drainage System (SuDS) outfall and notes that it will be	No construction work is required at the Eastney Long Sea Outfall. The Water Recycling Plant Sustainable Drainage	Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7)	Matter agreed with other party

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		consulted on the detail at the relevant design and construction stages prior to works commencing.	System (SuDS) outfall is in the tidal environment. Final construction methods will not be confirmed until detailed design, but any potential sedimentation impacts have been assessed by the Applicant and are mitigated through agreed tertiary measures (MB1, MB2, MB3 and MB4) secured in Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7). A marine licence for the Project is being drafted and covers the construction and maintenance of the SuDS outfall. Natural England is satisfied with the broad approach.		
NE-ES-027	Marine biodiversity - scope and baseline	Natural England is in agreement that seagrass in the areas between Baker's Island and South Binness Island has been appropriately included in the EIA.	The Applicant has incorporated seagrass survey findings, undertaken by Hampshire and Isle of Wight Wildlife Trust (HIWWT) on behalf of Natural England in 2023, into the marine biodiversity baseline and presented this at the November 2024 EIA Working Group. The presence of seagrass in the areas between Baker's Island and South Binness Island is confirmed and the Applicant does not consider that any further survey is required. Natural England requested that additional seagrass data from HIWWT be considered if possible. Despite multiple attempts, this data has not been provided by HIWWT. Natural England has agreed that this matter can be closed.		Matter agreed with other party
NE-ES-103	Marine biodiversity - scope and baseline	Natural England is in agreement that the scope, baseline and methodology of the marine biodiversity assessment are appropriate.	Natural England has been engaged throughout the stages of the Environmental Impact Assessment via EIA Working Group and Technical Working Group sessions. Its comments on the scope, baseline and methodology of the marine biodiversity assessment, have been sought and incorporated. Natural England is in agreement that the scope, baseline and methodology of the marine biodiversity assessment are appropriate.		Matter agreed with other party
NE-EPD-006	Marine biodiversity - methodology	Natural England is in agreement that the marine biodiversity survey methodologies, extents and assumptions are appropriate.	Marine biodiversity survey methodologies, extents, assumptions and limitations have been consulted on via EIA Working Group and Technical Working Group sessions and Natural England has raised no concerns in these forums or via its Summer 2024 Consultation response. Natural England is in agreement that the marine biodiversity survey methodologies, extents and assumptions are appropriate.		Matter agreed with other party
NE-PEI-005	Marine biodiversity - methodology	Natural England supports the use of video and imaging techniques to determine whether suitable	The Applicant has kept Natural England updated on the Peacock Tail (Padina pavonica) habitat	ES Appendix 9.10 Eastney Long Sea Outfall benthic	Matter agreed with other party

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		habitat that could support Peacock's Tail (Padina pavonica) is present within the study area. This technique only confirms whether the habitat is suitable and not whether Peacock's Tail (Padina pavonica) is present.	survey findings and assessment and has shared draft ES Appendix 9.10 Eastney Long Sea Outfall benthic ecology survey [APP-145] and ES Appendix 9.11 Eastney Long Sea Outfall environmental DNA sampling and analysis [APP-146] (including the Benthic Survey Report). Natural England has confirmed satisfaction with the approach and appendices.	ecology survey [APP-145] ES Appendix 9.11 Eastney Long Sea Outfall environmental DNA sampling and analysis [APP-146]	
NE-PEI-007	Marine biodiversity - methodology	Natural England expressed reservations about the sand eel survey and assessment methodology, noting that the benthic survey report does not specifically address presence or absence of sand eel habitat. Natural England is satisfied with the response of the Applicant on this matter and is now satisfied with the sand eel assessment approach.	Draft ES Appendix 9.10 Eastney Long Sea Outfall benthic ecology survey [APP-145] and ES Appendix 9.11 Eastney Long Sea Outfall environmental DNA sampling and analysis [APP-146] (including the Benthic Survey Report) have been reviewed by Natural England. Natural England noted that no information in the reports suggests sand eel presence but stated that the methods and quality of the data do not allow for any confidence in this conclusion. The Applicant confirmed that in the absence of direct survey for sand eel presence, a precautionary approach to the environmental assessment has been undertaken where the presence of sand eel has been assumed in the area around the Eastney Long Sea Outfall (LSO). No Primary Impact Zone is identified as there are no changes to the habitat via sediment removal or change but a Secondary Impact Zone due to the potential changes in water quality was assessed. Water quality changes from the discharge at the Eastney LSO are localised and have been assessed as not significant, therefore any potential effects on sand eel which may be present within the 500m buffer are considered minor. Given the reasonable worst-case assumptions, it is not considered proportionate to carry out specific sand eel surveys as even confirmed presence would not alter the assessment findings. Natural England has confirmed satisfaction with this approach and assessment result.	ES Appendix 9.10 Eastney Long Sea Outfall benthic ecology survey [APP-145] ES Appendix 9.11 Eastney Long Sea Outfall environmental DNA sampling and analysis [APP-146]	Matter agreed with other party
NE-ES-037	Marine biodiversity - assessment	Natural England is satisfied that potential impacts on fish from underwater noise and vibration have been appropriately assessed and are satisfied that risks from underwater noise and vibration will be mitigated.	The Applicant has assessed underwater noise and vibration impacts using accepted guidance (Popper et al. 2014) and additional scientific research presented at multiple Technical Working Groups. Measured vibration levels from comparable tunnelling (1.4mm/s) are an order of magnitude below thresholds associated with fish egg mortality, supported by review of the Alaska Blasting Protocols and Canadian Guidelines. The assessment by the Applicant concludes no likely significant effects from underwater noise and	ES Chapter 9 Marine biodiversity (Document reference 6.1, DCO Volume 6, Version 1)	Matter agreed with other party

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			vibration on fish (including migrating eel and other protected fish species) and no need for mitigation monitoring. This has been included in ES Chapter 9 Marine biodiversity (Document reference 6.1, DCO Volume 6, Version 1). Natural England is satisfied that potential impacts on fish from underwater noise and vibration have been appropriately assessed and are satisfied that risks from underwater noise and vibration will be mitigated.		
NE-ES-104	Marine biodiversity - assessment	Natural England is in overall agreement that the marine biodiversity assessment findings and mitigation proposals are appropriate.	Natural England has been engaged throughout the stages of the Environmental Impact Assessment via EIA Working Group and Technical Working Group sessions. The 'no surprises' approach to engagement on all aspects of the marine biodiversity assessment has enabled the Applicant to have confidence in Natural England's overall support of the findings of the assessment regarding effects and appropriate mitigation.		Matter agreed with other party
Biodiversity and nature conservation					
NE-ES-013	Biodiversity Net Gain / Environmental Net Gain	Natural England advised that it is best practice to submit a biodiversity gain plan and completed biodiversity metric with a DCO Application.	The DCO submission includes Biodiversity Gain Plan [APP-426] (including Habitat Management and Monitoring Plan) with the Statutory Biodiversity Metric Spreadsheets appended. This aligns with the Defra consultation on Biodiversity Net Gain (BNG) for Nationally Significant Infrastructure Projects (NSIPs). Natural England's comments on the early draft BNG Plan have been addressed and Natural England has raised no objections to the BNG approach for this project. The Applicant will align with any statutory requirements in relation to BNG applicable to the Project.	Biodiversity Gain Plan [APP-426]	Matter agreed with other party
NE-ES-048	Biodiversity Net Gain / Environmental Net Gain	Natural England is satisfied with the Applicant's approach to exploring opportunities for the creation of additional chalk grassland using any chalk arisings from the construction process.	The Applicant is actively engaging with Portsmouth City Council to discuss opportunities for the creation of chalk grassland in the Portsdown Hill area. Portsdown Hill is a focus area for proposed mitigation and enhancement works so is included in the Environmental Mitigation and Enhancement Areas (EMEAs). The EMEAs are listed in Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1) and the mitigation elements are secured through Works plans [APP-012] - [APP-014]. Consideration of the re-use of tunnelling spoil is included in Outline Landscape and Ecology Management Plan (Document reference 7.5, DCO Volume 7, Version 1).	Works plans [APP-012] - [APP-014] Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1) Outline Landscape and Ecology Management Plan (Document reference 7.5, DCO Volume 7, Version 1)	Matter agreed with other party

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			The Applicant is continuing to engage with Portsmouth Water on mitigation in areas where there is overlap between the Project and Portsmouth Water's proposals to ensure the best outcomes for biodiversity. This could include any works at Farlington (if required). At the February 2026 Technical Working Group, Natural England confirmed satisfaction with the Applicant's engagement approach.		
NE-ES-093	Biodiversity Net Gain / Environmental Net Gain	Natural England is satisfied with the Project's Environmental Net Gain (ENG) assessment methodology.	The Applicant presented the ENG methodology during a Technical Working Group and requested Natural England's feedback. Natural England confirmed satisfaction with the ENG methodology. This is set out in Environmental Net Gain Statement [APP-427]	Environmental Net Gain Statement [APP-427]	Matter agreed with other party
NE-ES-029	Biodiversity Net Gain / Environmental Net Gain	Natural England advised that the Project should avoid Sites of Importance for Nature Conservation (SINC) and Road Verges of Ecological Importance (RVEI) wherever possible and restore these sites if damage does occur. Natural England is satisfied that any damage to SINCs will be restored.	ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1) provides a detailed impact assessment on terrestrial and freshwater biodiversity features including Sites of Importance for Nature Conservation and Road Verges of Ecological Importance. Outline Landscape and Ecology Management Plan (Document reference 7.5, DCO Volume 7, Version 1) includes a Reinstatement Strategy for the Project which details how the Applicant intends to leave the route once construction is complete. The Applicant has used Technical and EIA Working Groups to present how the Project avoids all but two SINCs and all RVEIs. Fielders Farm (Eastleigh) SINC will suffer temporary habitat loss during construction. The habitat lost will be reinstated and improvements through scrub and INNS removal will be undertaken. Field to West of Gillman Road SINC may be affected if there is a need to build a shaft for the construction of the WRP to Portsdown Hill tunnel. Temporary habitat loss will be fully reinstated. Natural England is satisfied that any damage to SINCs will be restored having reviewed ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1) and Outline Landscape and Ecology Management Plan (Document reference 7.5, DCO Volume 7, Version 1).	ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1) Outline Landscape and Ecology Management Plan (Document reference 7.5, DCO Volume 7, Version 1)	Matter agreed with other party
NE-ES-006	Legacy and enhancements	Natural England support the proposed habitat enhancements which include woodland, chalk grassland and parkland creation. Natural England suggest various options for river restoration and support seasonal pond restoration.	The Applicant is actively engaging with a number of relevant local planning authorities and non-governmental organisations to discuss Biodiversity Net Gain (BNG) and enhancement opportunities across the Project.	Works plans [APP-012] - [APP-014] Design Principles Document (Document	Matter agreed with other party

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			Mitigation is secured through Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1) and Works plans [APP-012] - [APP-014]. Biodiversity Gain Plan [APP-426] (including Habitat Management and Monitoring Plan), with the Statutory Biodiversity Metric Spreadsheets appended accompanies the DCO application. Final BNG delivery to be confirmed at detailed design. The Applicant assessed the opportunity to deliver BNG at Bow Lake Stream river and concluded it is unsuitable, as doing so would increase required riparian BNG units and make meeting a 10% uplift more difficult. The area may instead be treated as offsite BNG to simplify delivery. Natural England has confirmed in principle that it is satisfied with the Project's habitat mitigation and enhancement proposals.	reference 5.11, DCO Volume 5, Version 1) Biodiversity Gain Plan [APP-426] (including Habitat Management and Monitoring Plan)	
NE-ES-023	Legacy and enhancements	Where possible, Natural England expect biodiversity enhancement plans to link to Local Nature Recovery Strategies (LNRS). However, Natural England acknowledge the limited temporal and spatial overlap of Hampshire's LNRS with the Project and ais satisfied with the approach the Applicant has taken.	The Applicant continues to engage with local planning authorities and non-governmental organisations on Biodiversity Net Gain (BNG) opportunities. Hampshire County Council's Local Nature Recovery Strategy (LNRS) was only published in December 2025, making it challenging for the Project to align with because much of the Project development had already been done. However, Hampshire's BNG Opportunity Areas have been used where practicable and at the December 2025 Technical Working Group, the Applicant outlined how chalk grassland creation at Portsdown Hill SSSI and neutral grassland restoration at Fielders Farm SINC align with emerging LNRS priorities. Natural England is satisfied with the Applicant's approach on this matter.		Matter agreed with other party
NE-ES-035	Legacy and enhancements	Natural England provided advice on the design, delivery and management of green and blue infrastructure, signposting to the Natural England Green Infrastructure Framework. Natural England recommend that the Project should meet its 15 Green Infrastructure Principles and have a Green Infrastructure Plan. Natural England is satisfied with the Project approach.	The Applicant has applied an environment-led approach to the design of the Project from the outset, drawing on the Green Infrastructure Principles and other relevant best-practice guidance. This is explained in Outline Landscape and Ecology Management Plan (Document reference 7.5, DCO Volume 7, Version 1), which sets out the Green Infrastructure Strategy and details on long-term delivery. This underpins the approach to delivering environmental mitigation which delivers multiple benefits and with reference to local authority Green Infrastructure	Outline Landscape and Ecology Management Plan (Document reference 7.5, DCO Volume 7, Version 1)	Matter agreed with other party

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			strategies. Natural England has confirmed satisfaction with the Applicant's environment-led approach to the Project design.		
NE-ES-041	Legacy and enhancements	Natural England suggested opportunities near Portsdown Site of Special Scientific Interest for Biodiversity Net Gain and nature recovery and are satisfied with the Project approach.	The Applicant is considering Portsdown Hill area when looking at potential wider benefits of the Project. At Biodiversity and Water Environment EIA Working Group Session 11, the Applicant presented on how Portsdown Hill is a focus area for proposed mitigation and enhancement works so is included in the Environmental Mitigation and Enhancement Areas (EMEAs) listed in Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1). The mitigation elements are secured through Works plans [APP-012] - [APP-014]. Natural England has confirmed satisfaction with the Applicant's approach to incorporating Biodiversity Net Gain and nature recovery in the Project, including for Portsdown Hill.	Works plans [APP-012] - [APP-014] Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1)	Matter agreed with other party
NE-ES-025	Legacy and enhancements	Natural England encourage the incorporation of measures to help improve people's access to the natural environment.	Mitigation and enhancement measures including footpath and cycle path improvements are secured through Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1). Natural England is satisfied with the proposed mitigation measures having reviewed Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1).	Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1)	Matter agreed with other party
Contamination and land quality					
NE-ES-045	Site 72 land contamination	Natural England is satisfied that suitable construction methods and mitigation are proposed for the Site 72 historic landfill, to minimise as far as possible the risk of causing increased contamination from leachate.	The Applicant has outlined construction methods for the Water Recycling Plant site on the historic landfill (Site 72), including minimal disturbance of the capping material, use of piled foundations into chalk, and diaphragm-wall shafts designed to prevent preferential pathways for leachate or gas. No increase in leachate generation or offsite migration is anticipated, with a reduction expected due to reduced infiltration. The Applicant has supported its case for the construction methods being appropriate by providing examples of other projects involving development through landfills, to help provide reassurance that this is manageable, and additional illustrative construction methodology information. The trenchless crossing beneath the Hermitage Stream and associated works would not create new migration pathways, with void-treatment (measure WE3) and multiple groundwater protection measures secured through Outline	ES Appendix 19.9 Outline Water Monitoring Plan [APP-204] Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7) Outline Foundation Works Risk Assessment [APP-417] - [APP-419]	Matter agreed with other party

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			Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7). Further detail is provided in Outline Foundation Works Risk Assessment [APP-417] - [APP-419], and surface and groundwater monitoring is secured through ES Appendix 19.9 Outline Water Monitoring Plan [APP-204]. Relevant extracts from ES Appendix 19.9 Outline Water Monitoring Plan [APP-204] have been shared and Natural England has confirmed that the Plan has an acceptable level of information for the outline design stage. Natural England expect to be consulted at a later date as outlined in the Plan. Natural England has expressed satisfaction that the construction methods for the Water Recycling Plant site on the historic landfill (Site 72) are appropriate after reviewing relevant information shared by the Applicant.		
Land use and agriculture					
NE-ES-007	Land use and agriculture - baseline	Natural England is satisfied that clarity on the total study area and breakdown of the land take into permanent and temporary losses has been provided.	Permanent and temporary land take within the study area is shown in Works plans [APP-012] - [APP-014] and assessed in ES Chapter 12 Land use and agriculture [APP-091]. Temporary and permanent loss of agricultural land required for the Project is assessed in ES Chapter 12 Land use and agriculture [APP-091]. Natural England has expressed satisfaction having reviewed the Works plans [APP-012] - [APP-014] and ES Chapter 12 Land use and agriculture [APP-091].	Works plans [APP-012] - [APP-014] ES Chapter 12 Land use and agriculture [APP-091]	Matter agreed with other party
NE-ES-021	Land use and agriculture - methodology	Natural England is satisfied that the Agricultural Land Classification survey has informed the Soil Resource Management Plan.	The Agricultural Land Classification and soils data has informed the Outline Soil Resource Management Plan, an appendix to Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7), and account has been taken of the Institute of Sustainability and Environmental Professionals (ISEP) (formerly the Institute of Environmental Management and Assessment (IEMA)) guidance in determining soil sensitivity. However, the criteria used are not an exact replica of those in the guidance in order to allow greater detail. For example, the ISEP guidance states that 'mineral soils' are of medium sensitivity - in this case, all	Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7)	Matter agreed with other party

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			soils affected are mineral soils. Natural England has confirmed satisfaction with this approach.		
NE-ES-026	Land use and agriculture - methodology	Natural England advised that a detailed Agricultural Land Classification Survey be undertaken across the full study area and that Best and Most Versatile (BMV) land should be returned to the same quality as far as reasonably practicable. Natural England is satisfied with the survey coverage and approach to BMV land restoration.	A soils survey update was presented to Natural England at the August 2024 Technical Working Group, outlining the methodology (ALC survey was undertaken for areas of permanent land take; GI soil data were used for areas of temporary land take) and the progress to date, including typical soil profiles found and a summary of Agricultural Land Classifications. Natural England confirmed that it was happy with the approach presented. The Outline Soil Resource Management Plan, an appendix to Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7), outlines mitigation of potential adverse impacts on all soils, including BMV land, and the contractor will need to comply with a detailed SRMP to ensure that this mitigation is put in place.	Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7)	Matter agreed with other party
NE-ES-077	Land use and agriculture - methodology	Natural England requested that the Applicant change from use of Design Manual for Roads and Bridges (DMRB)-derived agricultural land assessment criteria to use and assessment criteria advised by Natural England and is satisfied that this has been actioned.	The Applicant and Natural England have discussed Natural England's dissatisfaction with the agricultural land assessment criteria used at the preliminary environmental information stage. The Applicant has updated ES Chapter 12 Land use and agriculture [APP-091] to use the assessment criteria advised by Natural England. The Applicant used ES Appendix 12.1 Agricultural Land Assessment Criteria, Volume II (Document reference 6.2, DCO Volume 6) to outline the comparison between the original methodology and the Natural England recommended methodology which has been adopted. Natural England is satisfied with the updated agricultural land assessment criteria having reviewed ES Appendix 12.1 Agricultural Land Assessment Criteria, Volume II (Document reference 6.2, DCO Volume 6).	ES Chapter 12 Land use and agriculture [APP-091] ES Appendix 12.1 Agricultural Land Assessment Criteria, Volume II (Document reference 6.2, DCO Volume 6)	Matter agreed with other party
NE-ES-110	Land use and agriculture - methodology	Natural England is in agreement that the methodology of the Agricultural Land Classification survey is appropriate.	Natural England has been engaged throughout the stages of the Environmental Impact Assessment via EIA Working Group and Technical Working Group sessions. Natural England's input to the Agricultural Land Classification methodology was sought and comments on the methodology were incorporated, including in planning the 2025 surveys. A soils survey update was presented to Natural	Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7)	Matter agreed with other party

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			England at the August 2024 Technical Working Group, outlining the progress to date, including typical soil profiles found and a summary of Agricultural Land Classifications. Next steps presented included detailed survey of Above Ground Plant sites which have fed into the Outline Soil Resource Management Plan, an appendix to Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7). Natural England is in agreement that the methodology of the Agricultural Land Classification surveys is appropriate.		
NE-ES-111	Land use and agriculture - assessment	Natural England is in overall agreement that the agricultural land assessment findings are appropriate having reviewed these in full in ES Chapter 12 Land use and agriculture [APP-091].	Natural England has been engaged throughout the stages of the Environmental Impact Assessment via EIA Working Group and Technical Working Group sessions. The 'no surprises' approach to engagement on all aspects of agricultural land assessment has enabled the Applicant to have confidence in Natural England's support of the findings of the assessment regarding effects and appropriate mitigation.	ES Chapter 12 Land use and agriculture [APP-091]	Matter agreed with other party
NE-ES-034	Land use and agriculture - mitigation	Natural England advised that commitments should be made by the Applicant to safeguard soil resources, including the provision of an appropriately experienced soil specialist to advise on and supervise soil handling, including identifying when soils are dry enough to be handled. Natural England is satisfied with the inclusion of these commitments in the Outline Soil Resource Management Plan.	This commitment is included in the Outline Soil Resource Management Plan that is appended to Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7) and Natural England has expressed its satisfaction.	Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7)	Matter agreed with other party
NE-ES-075	Outline Soil Resource Management Plan	Natural England is satisfied that the Applicant has incorporated its recommendations for the Outline Soil Resource Management Plan, including the avoidance of works on soil during the wetter months, and agrees that the proposed management of soil across the Project is appropriate.	A draft Outline Soil Resource Management Plan was shared with Natural England and comments received highlighted best-practice soil handling, maintaining soil functions, and the need for extended monitoring and aftercare. The Applicant subsequently confirmed that the Outline Soil Resource Management Plan, an appendix to Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7), includes requirements for dry-weather soil handling, contractor procedures for assessing soil conditions, and measures to safeguard soil functions. Updates requested by Natural England on soil monitoring periods have been incorporated and Natural England has confirmed no concerns with the Applicant's approach. Natural England is in agreement that proposed management of soil across the Project is appropriate.	Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7)	Matter agreed with other party

Row ID	Topic	Summary of Natural England issue	Latest Position in Resolving the Issue	Application Document Reference	Status
Traffic and transport					
NE-ES-038	Public Rights of Way	Natural England has requested that consideration is given to potential impacts on access land, common land, rights of way and coastal access routes, as well as impacts on National Trails, and appropriate mitigation incorporated. Natural England is in agreement that the assessment findings and mitigation proposals related to Public Rights of Way are appropriate, having reviewed the Framework Rights of Way Management Plan.	A Framework Rights of Way Management Plan, appended to Framework Construction Traffic Management Plan [APP-415], outlines changes to the Public Rights of Way network associated with the construction of the Project. It includes the likely length of closure and an alternative route (where relevant). This is included with the DCO application. Natural England is in agreement that the assessment findings and mitigation proposals related to Public Rights of Way are appropriate, having reviewed the Framework Rights of Way Management Plan appended to Framework Construction Traffic Management Plan [APP-415].	Framework Construction Traffic Management Plan [APP-415]	Matter agreed with other party
Flood risk and water environment					
NE-ES-100	Water environment - scope and baseline	Natural England is in agreement that the scope, baseline and methodology of the water environment assessment are appropriate.	Natural England has been engaged throughout the stages of the Environmental Impact Assessment via EIA Working Group and Technical Working Group sessions. Its comments on the water environment assessment scope (including receptors, categories of effect and pathways of effect), the water environment assessment baseline (including data sources and coverage), and the water environment assessment methodology have been sought and incorporated. Natural England is in agreement that the scope, baseline and methodology of the water environment assessment are appropriate.		Matter agreed with other party
NE-SCO-002	Water environment - methodology	Natural England is in agreement with the geomorphological methods used having reviewed the DCO application.	A geomorphological walkover survey method was circulated to the Environment Agency and Natural England in July 2023. No specific written comments were received. A walkover survey of reaches of Riders Lane Stream, Hermitage Stream, River Wallington, River Hamble, River Meon, Bow Lake, Brambridge Stream and River Itchen that intersect with the Project red line boundary was undertaken in September 2023. The findings of the geomorphological survey are presented as part of ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1). Natural England is in agreement with the geomorphological methods used having reviewed the DCO application.	ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1)	Matter agreed with other party
NE-ES-098	Water environment - surveys	Natural England has been kept informed and consulted on the water environment survey methodologies, extents and assumptions that underpin the water environment assessment.	Water environment survey methodologies, extents, assumptions and limitations have been consulted on via EIA Working Group and Technical Working Group sessions and feedback		Matter agreed with other party

Row ID	Topic	Summary of Natural England issue	Latest Position in Resolving the Issue	Application Document Reference	Status
		Natural England is in agreement that the survey methodologies, extents and assumptions are appropriate.	from the Natural England has been taken onboard. Natural England is in agreement that the water environment survey methodologies, extents and assumptions are appropriate.		
NE-ES-028	Water environment - assessment	Natural England is satisfied that water bodies downstream of Havant Thicket Reservoir would not be adversely impacted by potential chemistry changes.	Water quality modelling presented at the Spring 2025 Consultation has informed the assessment presented in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) and ES Appendix 19.2 Water Environment Regulations compliance assessment (Document reference 6.2, DCO Volume 6, Version 1), including offshore modelling at Eastney. Natural England's Spring 2025 Consultation response welcomed phosphorous-reduction measures and deferred detailed modelling review to the Environment Agency. Updated modelling presented by the Applicant in the November 2025 Technical Working Group shows no deterioration in WFD status for Havant Thicket Reservoir or downstream water bodies, and this is reflected in ES Appendix 19.2 Water Environment Regulations compliance assessment (Document reference 6.2, DCO Volume 6, Version 1). Natural England is satisfied that the downstream water bodies would not be adversely impacted by potential chemistry changes.	ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) ES Appendix 19.2 Water Environment Regulations compliance assessment (Document reference 6.2, DCO Volume 6, Version 1)	Matter agreed with other party
NE-ES-087	Water environment - assessment	Natural England noted in its Spring 2025 Consultation feedback that there was a large increase in Dissolved Inorganic Carbon in Langstone Harbour in the Water Quality report. Natural England requested further clarification on the reasons for this and an explanation of the impacts to the harbour. Natural England also requested additional information on associated pH effects. Natural England is satisfied that updated modelling since the Spring 2025 Consultation shows no significant water quality changes.	The most recent modelling, presented in the November 2025 Technical Working Group, shows no significant change in water quality or any deterioration in WFD status in Langstone Harbour following the release of water from the Water Recycling Plant (including in relation to DIC or pH). Natural England confirmed this resolves the issue.		Matter agreed with other party
NE-ES-019	Water environment - assessment	Natural England is satisfied that potential hydrological linkages to Site of Special Scientific Interest units not within the redline boundary have been appropriately considered.	The potential for indirect effects on the Site of Special Scientific Interest identified by Natural England are considered in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) and ES Appendix 19.3 Hydrogeological Impact Assessment [APP-198] (covering both surface and subsurface connectivity). Natural England is satisfied having reviewed ES Chapter 19 Water environment (Document	ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) ES Appendix 19.3 Hydrogeological Impact Assessment [APP-198]	Matter agreed with other party

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			reference 6.1, DCO Volume 6, Version 1) and ES Appendix 19.3 Hydrogeological Impact Assessment [APP-198].		
NE-ES-108	Water environment - assessment	Natural England is in agreement that the water environment assessment findings and mitigation proposals are appropriate.	Natural England has been engaged throughout the stages of the Environmental Impact Assessment via EIA Working Group and Technical Working Group sessions. The 'no surprises' approach to engagement on all aspects of the water environment assessment has enabled the Applicant to have confidence in Natural England's support of the findings of the assessment regarding effects and appropriate mitigation. Natural England is in agreement that the water environment assessment findings and mitigation proposals are appropriate having reviewed ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1).	ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1)	Matter agreed with other party
NE-SCO-004	Water environment - assessment	Natural England has provided input to the nutrient assessment methodology and is in agreement with the assessment findings, having reviewed ES Appendix 19.7 Nutrient Assessment [APP-202] in full.	The Applicant and Natural England have engaged on this matter through the Technical Working Groups and draft document sharing. Natural England's comments on the draft assessment methodology were sought and incorporated in Summer 2025. At the March 2026 Technical Working Group the Applicant presented the nutrient assessment findings: overall the Project is nutrient neutral and no mitigation is required for nitrogen or phosphorus. Natural England expressed agreement to the Applicant's approach to nutrient assessment having reviewed ES Appendix 19.7 Nutrient Assessment [APP-202].	ES Appendix 19.7 Nutrient Assessment [APP-202]	Matter agreed with other party
Multiple issues					
NE-ES-032	Scheme Development	The Rivers Test and Itchen are over abstracted and have reduced flow as a result. This impacts the river habitat and species such as Atlantic Salmon. Natural England sees this project as one of the schemes needed to improve the condition of the Test and Itchen in the future and to reduce abstraction pressures. In Natural England's view, at the current time there are no alternative schemes which would provide the amount of water needed to reduce abstraction pressures on the Test and Itchen, whilst being fully compliant with the Habitat Regulations. We therefore deem this scheme the most viable option as outlined in Natural England's WRMP responses and response to the Summer 2024 Statutory Consultation. Natural England continues to work with the Applicant to limit environmental impacts of this Project and on future water needs across the region.	The Applicant welcomes Natural England's position.		Matter agreed with other party

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NE-ES-020	Design and construction	Natural England is satisfied with the approach to Construction Environmental Management Plan development prior to starting works.	Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7) is submitted with the DCO application, and a detailed version(s) will be prepared by the Contractor and submitted for approval in accordance with the corresponding requirement in Schedule 2 to the draft DCO.	Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7)	Matter agreed with other party

4 Signatories

4.1.1 This SoCG is agreed between Southern Water Services Limited (the Applicant) and NE on the date below.

Signed for NE
Name
Position
Date

Signed for Southern Water Services Limited
Name
Position
Date
Duly authorised for and on behalf of Southern Water Services Limited


WATER
for LIFE®
from
Southern
Water®