

# Hampshire Water Transfer and Water Recycling Project

## Draft Statement of Common Ground - East Hampshire District Council

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from  
**Southern  
Water** 

The Southern Water logo consists of three stylized, wavy blue lines of varying lengths, positioned to the right of the text 'Southern Water'.



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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 East Hampshire District Council (EHDC) in relation to the Development Consent Order (DCO) application for the Project.
- 1.2.2 The role of EHDC and the other host local authorities in the DCO process is to provide input on matters relating to local planning policy, land use, and the potential impacts of the Proposed Development on their administrative areas. 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 the local authorities' statutory remit.
- 1.2.3 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').

## 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) EHDC.
- 1.3.2 Collectively, Southern Water Services Limited and EHDC 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 EHDC 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 EHDC 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 EHDC throughout the development of the DCO 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) (Document reference 5.9, DCO Volume 5) and the Consultation Report (Document reference 5.1, DCO Volume 5).
- 2.1.3 This SoCG has been prepared for submission with a reporting cut-off date of 20 April 2026. Engagement with EHDC has continued beyond this date and will remain ongoing throughout the Examination. Accordingly, while this submitted version reflects all engagement up to 20 April 2026, the SoCG will continue to evolve as a live document, with further updates provided as additional discussions take place and outstanding matters progress.
- 2.1.4 This version of the SoCG is submitted in draft and unsigned form. The content of this version has nevertheless been reviewed by the relevant officer(s) at EHDC. The Applicant confirms that at the reporting cut-off date, this version 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.
- 2.1.5 Since the reporting cut-off date, where necessary, bilateral engagement with EHDC on unresolved matters from the pre-application phase, matters arising during Examination, and areas where further clarification is required has continued. Where engagement has occurred, any records relevant to these matters will be set out in future iterations of this section.

### 3 Statement of Common Ground

3.1.1 **Table 3-1** provides a summary of the key matters discussed between the Applicant and EHDC 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	EHDC Position	Latest Position in Resolving the Issue	Application Document Reference	Status
<b>Principle of development</b>					
EHDC-nsc-001	Principle of development	<p>EHDC recognises the concerns regarding water stress and supply deficit. EHDC supports the Project overall, as it will significantly reduce the amount of water taken from Hampshire chalk streams and help address the substantial water supply shortfall. However, EHDC notes serious concerns about public trust in Southern Water to deliver the scheme safely and about the use of Havant Thicket Reservoir for storing recycled water.</p> <p>Water recycling offers a valuable solution to mitigate nitrate discharge impacts from housing development on European designated sites in the Solent. Previous backlogs in housing development were only recently eased through mitigation schemes such as setting aside high-nutrient agricultural land and creating nutrient-absorbing areas. While these schemes provide benefits like biodiversity net gain and carbon storage, suitable sites are limited, and the loss of farmland raises concerns about food security. EHDC therefore welcomes water recycling as an additional, sustainable, and resilient mitigation option. EHDC in principle supports water recycling as a more sustainable and resilient option for water supply.</p>	<p>The Applicant welcomes EHDC's recognition of the benefits of the Project though notes the concerns raised.</p> <p>The Applicant and Portsmouth Water have been working together to assess the possible impacts on water quality within Havant Thicket Reservoir based on various operational scenarios. This investigation considers not only the implications for downstream drinking water treatment and supply systems, but also for the reservoir as an ecosystem, and the Hermitage Stream and Langstone Harbour, to which the reservoir shall be discharging a compensation flow.</p> <p>A detailed assessment of the potential impacts of the Proposed Development on water quality in Havant Thicket Reservoir is presented in ES Appendix 19.11 Havant Thicket Reservoir water quality modelling, Volume II (Document reference 6.2, DCO Volume 6), and potential impacts on water quality in water bodies that would receive compensatory flows from the reservoir is presented in ES Appendix 19.6 Havant Thicket Reservoir compensatory flows water quality modelling, Volume II (Document reference 6.2, DCO Volume 6).</p> <p>These assessments demonstrate that the Proposed Development would not result in significant adverse effects on water quality in Havant Thicket Reservoir and downstream water bodies such as Riders Lane Stream, Hermitage Stream, Langstone Harbour and the Solent. Furthermore, the Proposed Development would not result in deterioration in the status of any of these water bodies under the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017.</p> <p>Further discussion of the results of these assessments is provided in ES Chapter 19 Water environment, Volume I (Document reference 6.1,</p>	<p>ES Chapter 19 Water environment, Volume I (Document reference 6.1, DCO Volume 6).</p> <p>ES Appendix 19.11 Havant Thicket Reservoir water quality modelling, Volume II (Document reference 6.2, DCO Volume 6).</p> <p>ES Appendix 19.6 Havant Thicket Reservoir compensatory flows water quality modelling, Volume II (Document reference 6.2, DCO Volume 6).</p> <p>ES Appendix 19.2 Water Environment Regulations Compliance Assessment, Volume II (Document reference 6.2, DCO Volume 6).</p> <p>Consultation Report (Document reference 5.1, DCO Volume 5).</p> <p>Statement of Engagement (Document reference 5.9, DCO Volume 5).</p>	Matter agreed with other party

Row ID	Topic	EHDC Position	Latest Position in Resolving the Issue	Application Document Reference	Status
			<p>DCO Volume 6) and ES Appendix 19.2 Water Environment Regulations Compliance Assessment, Volume II (Document reference 6.2, DCO Volume 6).</p> <p>The Applicant has undertaken an extensive pre application consultation and engagement programme in order to ensure that the public and other stakeholders can understand and can comment on the Project.</p>		
<b>DCO and planning</b>					
EHDC-2024-SC-0008	Legacy and enhancements	EHDC would welcome the opportunity to discuss apprenticeships during construction and operation, and how they can help facilitate these, and ensuring that local people benefit from the opportunities brought by the potential development.	<p>The Applicant has engaged with EHDC in the development of the Outline Skills and Employment Plan (Document reference 7.9, Volume 7) through Environmental Impact Assessment Working Groups.</p> <p>The Outline Skills and Employment Plan (Document reference 7.9, Volume 7) include a commitment for the Contractor to work with local partners to explore funding or co-funding of relevant apprenticeships in key construction-related disciplines.</p>	Outline Skills and Employment Plan (Document reference 7.9, Volume 7).	Matter agreed with other party
<b>Design and construction</b>					
EHDC-2025-0007	Design and construction	<p>EHDC's comments reflect support for the structured and environmentally focused approach of the design principles, with ongoing engagement and some suggestions for further clarity and inclusion. The principles are comprehensive, covering general and site-specific requirements for environmental protection, landscape integration, heritage, water management, and operational safety.</p> <p>EHDC comments include suggestions to ensure all relevant parks (e.g. Staunton) are included in the principles; clearly set out the mitigation hierarchy for ecological impacts; and continue to refine and clarify commitments as the design evolves.</p>	<p>The Applicant engaged with EHDC on the General and Site-Specific Design Principles in April and September 2025.</p> <p>The Applicant confirmed that all commitments are now captured within the Mitigation Register, avoiding duplication with management plans in the design principles. The District Council noted that significant changes and deletions were made to the design principles following the bilateral meeting on 25 June 2025; as a result, previous comments and suggestions do not apply to the latest version.</p>		Matter agreed with other party
EHDC-2025-SC-0001	Design and construction	Following review of the updated consultation information, EHDC confirms that comments on revised environmental water quality data will be provided by Havant Borough Council. Of the 25 proposed design refinements, only Refinement 4 – Havant Thicket Reservoir – falls within the District Council's boundary. This refinement introduces a connection point and route from Staunton Country Park to the reservoir, extending the draft Limits of Deviation but not altering the draft Order Limits, which already cover the full reservoir site. As no	The Applicant has acknowledged EHDC's position. Following approval of Portsmouth Water's pipeline between Bedhampton Springs and Havant Thicket Reservoir in May 2025, the Project is no longer proposing any works or development in or around Havant Thicket Reservoir. The Applicant engaged with EHDC at a bilateral meeting on 25 June 2025, and EHDC agreed with this approach.		Matter agreed with other party

Row ID	Topic	EHDC Position	Latest Position in Resolving the Issue	Application Document Reference	Status
		new or different effects are anticipated compared to those outlined in the Summer 2024 Preliminary Environmental Information Report, and as construction will occur within the existing reservoir site, the District Council has no concerns or comments on the proposed refinements.			
<b>Biodiversity and nature conservation</b>					
EHDC-2024-0001	Biodiversity Net Gain/Environmental Net Gain	EHDC welcomes the commitment in the Environmental Impact Assessment to achieving the mandatory 10% biodiversity net gain and the forthcoming Outline Landscape and Ecology Management Plan (LEMP), which will detail habitat protection, enhancement, and retention alongside the Habitats Regulations Assessment. EHDC supports continued work to manage operational effects on the water environment, the Solent, and Havant Thicket Reservoir, but emphasises the need to clearly distinguish impacts and mitigation measures between this Project and the reservoir scheme, while ensuring integration where necessary. EHDC currently has no Biodiversity Net Gain (BNG) sites and is exploring options outside the applicant's boundary, working with Hampshire Biodiversity Information Centre (HBIC) to assess potential Sites of Importance for Nature Conservation land. A recent BNG call for sites generated limited interest.	<p>The Applicant recognises that the geographical overlap with EHDC is minimal, primarily involving the reservoir and pipeline connections. The Applicant appreciates the District Council's strong support for the concept of Environmental Mitigation and Enhancement Areas. The DCO submission includes an Outline Construction Environmental Management Plan (CEMP) (Document reference 7.1, DCO Volume 7), 30 Environmental Mitigation and Enhancement Areas (EMEAs), and a Design Principles Document (Document reference 5.11, DCO Volume 5), all cross-referenced with the Outline Landscape and Ecology Management Plan (LEMP) (Document reference 7.5, DCO Volume 7).</p> <p>The Applicant has acknowledged EHDC efforts in working with the Hampshire Biodiversity Information Centre (HBIC) to assess potential Sites of Important Nature Conservation (SINC) for BNG opportunities. In December 2024, the Applicant engaged with Hampshire County Council (HCC) in a bilateral meeting to explore opportunities for working with partners to deliver BNG, as well as additional enhancements and green infrastructure in the Project.</p> <p>Given that these sites are outside the Project boundary, the Applicant requested confirmation from the District Council if there were other potential sites that could be accommodated within the Project's Order Limits.</p> <p>EHDC confirmed on 3 March 2025 that it has no proposed BNG opportunity sites at the present time within their boundary. EHDC confirmed at a bilateral meeting with the Applicant on 25 June 2025 that there are no proposed BNG opportunity sites within the District Council's boundary.</p>	<p>Outline CEMP (Document reference 7.1, DCO Volume 7).</p> <p>Outline LEMP (Document reference 7.5, DCO Volume 7).</p> <p>Design Principles Document (Document reference 5.11, DCO Volume 5).</p>	Matter agreed with other party
<b>Landscape and visual impact</b>					

Row ID	Topic	EHDC Position	Latest Position in Resolving the Issue	Application Document Reference	Status
EHDC-2024-SC-0005	Landscape and visual impact - baseline	EHDC appreciates that consideration of the location of the proposed project has considered the proximity of the South Downs National Park (SDNP) and the potential impacts on its setting, hence the location of the proposal falls outside the South Downs National Park. However, it is important to note that landscape impacts are not only local but cover a wider area and subject to further changes to the project, this may impact further on the landscape.	ES Chapter 13 Landscape and visual, Volume I (Document reference 6.1, DCO Volume 6), assesses potential impacts on the landscape at local, county, and national scales. This assessment has informed the iterative design process from the outset, helping to avoid adverse effects and embedded good design principles. The Applicant engaged with EHDC at a bilateral meeting on 25 June 2025, and EHDC agreed with this approach.	ES Chapter 13 Landscape and visual, Volume I (Document reference 6.1, DCO Volume 6).	Matter agreed with other party
<b>Traffic and transport</b>					
EHDC-2024-SC-0006	Traffic and transport - methodology	Although no proposed junctions, compounds and storage areas are proposed in EHDC, the Council would defer to Hampshire County Council and National Highways for detailed comments on highway implications of the Project, and any suggested amendments to the proposals.	The Applicant has acknowledged EHDC's position and confirms that has engaged with the highway's authorities on the traffic and transport impacts of the Project.		Matter agreed with other party
<b>Flood risk and water environment</b>					
EHDC-nsc-002	Water environment - impacts of recycled water	EHDC requests assurances that the process does not recycle pollutants such as toxic compounds, pharmaceutical residues and microplastics back into drinking water.	The Applicant can confirm that the Water Recycling Plant (WRP) will use advanced treatment techniques to convert treated wastewater into highly purified recycled water. Special membranes are used to remove salts and a range of other impurities. Drinking water is treated to strict regulatory standards, ready for supply to domestic and non-domestic customers.		Matter agreed with other party
<b>Cumulative and in-combination effects</b>					
EHDC-2025-0006	Cumulative effects assessment	EHDC clarified that some of the sites listed in East Hampshire were potential allocations in the draft Regulation 18 Local Plan. EHDC is now progressing to the next stage of the Plan, and it remains uncertain whether all of the original allocations will be carried forward into the Regulation 19 version. This is being actively tested through our Integrated Impact Assessment at present. Therefore, EHDC confirmed that the longlist was appropriate as of May 2025 but some sites in future may be subject to change. The District Council agreed with the sites/schemes that have been taken forward from the longlist to the shortlist but noted that some of the sites may or may not come forward (not those with planning permission) under Reg 19 Local Plan. The sites are currently being tested through our Integrated Impact Assessment process. EHDC agreed that due to the number of developments that have been identified for the longlist, the Environmental Statement will include a figure showing only the location of those developments that have been	The Applicant has engaged with EHDC and sought agreement on the CEA longlist, shortlist, and methodology (Document reference 6.1, DCO Volume 6). The Applicant has shared an updated CEA longlist giving response to all EHDC comments. EHDC has agreed that the longlist was appropriate as of May 2025 and that sufficient engagement has taken place. The District Council has agreed with the sites / schemes that have been taken forward from the longlist to the shortlist.  Due to the number of developments that have been identified for the longlist, ES Figure 20.1 Projects considered as part of the cumulative effects assessment - short list, Volume III (Document reference 6.3, DCO Volume 6) shows only the location of those developments that have been shortlisted for the CEA. This approach has been considered acceptable by EHDC. EHDC also noted that some of the sites listed in East Hampshire were potential allocations in the draft Regulation 18 Local Plan. EHDC is now	ES Chapter 20 Cumulative and in-combination effects, Volume I (Document reference 6.1, DCO Volume 6).  ES Figure 20.1 Projects considered as part of the cumulative effects assessment – short list, Volume III (Document reference 6.3, DCO Volume 6).	Matter agreed with other party

Row ID	Topic	EHDC Position	Latest Position in Resolving the Issue	Application Document Reference	Status
		shortlisted for the Cumulative Effects Assessment (CEA).	progressing to the next stage of the Plan, and it remains uncertain whether all of the original allocations will be carried forward into the Regulation 19 version. This is being actively tested through our Integrated Impact Assessment at present.		
<b>Multiple issues</b>					
EHDC-2024-SC-0009	General Comment	EHDC welcomes measures continuing to work to understand and manage the operational effects on the water environment, the Solent and new Havant Thicket Reservoir. There will, however, be a need to clearly differentiate between impacts and mitigation/compensation/enhancement measures arising from this project and the related reservoir scheme. There will need to be a degree of integration between Southern Water elements and the Havant Thicket Reservoir scheme.	Following approval of Portsmouth Water's pipeline between Bedhampton Springs and Havant Thicket Reservoir, the Project is no longer proposing any works or development in or around Havant Thicket Reservoir. The Applicant is only seeking use of Havant Thicket Reservoir for the storage of recycled water and should be clear that any impacts and mitigation required for the construction or design of Havant Thicket Reservoir are captured by the Havant Thicket Reservoir Environmental Statement and planning application. ES Chapter 3 Description of the Proposed Development, Volume I (Document reference 6.1, DCO Volume 6) sets out the principal components of the Project and the integration between the two schemes. Appendix 20.1 List of 'other developments' – longlist and shortlist, Volume II, of the ES (Document reference 6.2, Volume 6) shortlisted the Havant Thicket Reservoir Project as relevant to the cumulative effects assessment (under ref. HBC PC001). The Applicant engaged with EHDC at a bilateral meeting on 25 June 2025, and EHDC agreed with this approach.	ES Chapter 3 Description of the Proposed Development, Volume I (Document reference 6.1, DCO Volume 6).  ES Appendix 20.1 List of 'other developments' – longlist and shortlist, Volume II (Document reference 6.2, DCO Volume 6).	Matter agreed with other party

## 4 Signatories

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

Signed for EHDC
Name
Position
Date
Duly authorised for and on behalf of EHDC

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



from  
Southern  
Water. 

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