Havant
BOROUGH COUNCIL

Statement of Common Ground

Portsmouth Water &
Havant Borough Council

May 2026

Introduction

This Statement of Common Ground (SoCG) reflects the joint agreed position between Portsmouth Water and Havant Borough Council in relation to the Pre-Submission Draft (Regulation 19) Havant Borough Building a Better Future Plan (BBFP).

Portsmouth Water (PW) is the company that supplies water to properties in the Havant Borough Council administrative area. They are also a substantial landholder, and it should be noted that Portsmouth Water are promoting a number of sites for development through the BBFP. This Statement of Common Ground is made between HBC and PW as infrastructure provider, not as landowner.

Background

Cooperative meetings have taken place during the formulation of the previous withdrawn Havant Borough Local Plan (HBLP), and draft versions of pertinent policies for the HBLP were shared with Portsmouth Water. The emerging policies within the Building a Better Future Plan heavily reflect the policies in the withdrawn HBLP.

Portsmouth Water did not raise any substantive objections, however, suggested a number of improvements to the plan, most of which have been agreed by HBC, and are discussed below.

Policy 17: Sustainable Construction Methods, Materials and Waste

Portsmouth Water support the above policy in principle, however, a number of comments/requests have been made.

A comment has been made in relation to “rainwater harvesting systems and greywater recycling” mentioned in the below statement which sets out one of the requirements for appropriate selection, use and sourcing of local and sustainable materials.

c) Optimises the use of sustainable construction materials, green walls and roofs, rainwater harvesting systems and greywater recycling;

It has been suggested that, where possible, these systems could be permanent installations (such as storage tanks) rather than temporary water butts that can be removed.

The Local Planning Authority notes that the policy does not specifically refer to water butts or any other temporary/short-lived solutions that can be easily removed. The policy expects optimisation of the systems which would allow to promote permanent installations. Therefore, it is considered that no change to policy wording is necessary in this regard.

In respect of paragraph 4.100 (full text below), Portsmouth Water advised that imported soil and/or ‘end of waste’ manufactured aggregates can contain a significant number of chemical and heavy metals which could result in groundwater pollution in an event of a leak. Therefore, an analysis report from a UCAS accredited laboratory and details on the frequency of testing by the manufacturer should be required prior to the use of the materials on site. The understand of the potential risks to groundwater should be demonstrated in a Materials Management Plan.

4.100 The Council encourages all developers to maximise resource efficiency and identify, source, and use environmentally and socially responsible materials. There are four principal considerations of the waste hierarchy that should influence the sourcing of materials:

The Local Planning Authority agrees that, where relevant, this information should be a part of a Construction Environmental Management Plan, which can be secured with an appropriately worded planning condition at a planning application stage. The wording of the supporting text to the Policy now includes the following statement:

Development consisting of one or more dwellings, mixed use sites and communal living schemes will be expected to submit a construction environmental management plan including but not limited to, details regarding materials management and demolition environmental management assessment.

In terms of waste from developments, Portsmouth Water supported the below statements and recommended that a Construction Environmental Management Plan should include details on the management of overland runoff, storage of hazardous materials, chemical and hydrocarbons on site. Temporary drainage infrastructure should also be provided to ensure that water resources are not put at risk from leaks or spillages. In addition, large developments should be required to provide a Materials Management Plan that sets out methods for stockpiling and storage and any mitigation measures.

g) The development reduces the level of construction waste, minimise environmental pollution (eg microplastics) and enhance recycling of construction waste, demonstrated through a construction environment management plan (CEMP);
4.99 When it comes to waste and recycling storage and management within development, these facilities should be accessible, suitable in size and location, discreet and designed for purpose. Sufficient dedicated space should be set out for current waste management and recycling needs.

The Local Planning Authority agrees that, where relevant, the required detail should be a part of a Construction Environmental Management Plan, which can be secured with an appropriately worded planning condition at a planning application stage. The wording of the supporting text to the Policy now includes the following statement:

Development consisting of one or more dwellings, mixed use sites and communal living schemes will be expected to submit a construction environmental management plan including but not limited to, details regarding materials management and demolition environmental management assessment.

Furthermore, Portsmouth Water supported the below paragraph regarding re-using and recycling of materials on sites. In line with Portsmouth Water's recommendation, the supporting text has been amended to incorporate the requirement for details regarding materials management and demolition environmental management assessment.

4.104 Re-use of building materials is more environmentally friendly than recycling. Developers should re-use materials from the development site and use reclaimed or recycled materials wherever possible. The demolition of buildings should be minimised as far as possible and materials derived from any demolition should be re-used, such as crushed concrete and hardcore

as aggregate in the new foundations. The reuse of existing buildings is encouraged as this has many environmental benefits including reducing carbon emissions.

Policy 18: Water Efficiency

Portsmouth Water support this policy recognising the fact that water efficiency standards help to reduce water demand, particularly important during summer months. Portsmouth Water suggested that the currently proposed standard of 110 litres per person per day should be reduced to 100 litres per person per day.

The Local Planning Authority has carefully considered this suggestion. The current standard is supported by the Council's evidence base from WSP. However, it is noted that the current Building Regulations 2010, Part G standards may be revised in the near future with Defra consultation closing on 16 December 2025. The proposed by Defra water efficiency standards are lower than the standard in the emerging policy and includes the following:

- Water Efficiency Standard in new homes to be reduced from 125 litres per person per day to 105 litres per person per day
- Optional Technical Standard to be reduced from 110 litres per person per day to 100 litres per person per day

In light of these possible changes, the policy wording has been changed to recognise future national standards requiring less than 110 litres per person per day:

a) All proposals (including replacement dwellings, conversions and changes of use) which result in a net gain of overnight accommodation, include measures to achieve a water efficiency standard of future national standards per person per day or, of no more than 110 litres per person per day, whichever is lower;

Policy 27: Drainage

Portsmouth Water supports this Policy which sets out the relevant standard for developers, in terms of SUDs and Water Quality Assessments. It has been noted, however, that depending on the particular circumstances of a site, different standards and requirements may be applicable. In particular, Portsmouth Water highlighted their presumption against deep borehole soakaways.

In response, the relevant paragraph in the supporting text to the Policy has been revised to recognise the fact that site specific circumstances will dictate the final detailed design of SUDs on site.

However, it is acknowledged that some types of SuDS are not appropriate for every site, or every location within a site. For example, SuDS features must be outside tidal or fluvial flood zones and outside of areas with high groundwater tables to be effective, and Portsmouth Water have a presumption against deep borehole soakaways. SuDS should not be used where they pose an unacceptable environmental risk. In particular, sites within the identified Groundwater Source Protection Zones are sensitive to drilling operations and deep bore infiltration. Here, infiltration boreholes would be inappropriate, as they represent potential groundwater pollution pathways (see Policy 45). All applications for the construction and installation of deep bore soakaways should be

accompanied by an adequate risk assessment demonstrating how the risk to groundwater will be mitigated in the proposed design. In addition, SuDS which rely on overflows into controlled waters, must ensure adequate interception and retention to prevent pollution, and must be approved by the Environment Agency or the Lead Local Flood Authority, as appropriate. Where development affects a watercourse, Environment Agency or Lead Local Flood Authority consent is required for any works within 8 metres of 'top of bank', or 16 metres where tidal (see also Policy 26).

Policy 45: Aquifer Source Protection Zones

Portsmouth Water supports this policy. It has been noted, however, that this policy does not apply to householder applications. Portsmouth Water raised a concern that, as it stands, the Policy cannot be used to require aquifer protection and pollution mitigation from householder developments.

The Local Planning Authority notes that Portsmouth Water is not currently a consultee on householder applications within Source Protection Zones. Instead, Portsmouth Water currently comments on the following applications:

- All development within SPZ except householder
- Development within the Havant Thicket Pipeline buffer zone

Furthermore, Portsmouth Water requested that the list of sources of pollution of the chalk aquifer also includes a specific point: *construction activities.*

This has been added and the list now reads as follows:

- Industry (including agriculture);
- The disposal of effluent in soakaways;
- Construction activities;
- The disturbance of contaminated sites;
- Inappropriate storage of oil and chemicals during and post-construction;
- Development in the vicinity of solution features in the chalk (e.g. swallow holes) increasing groundwater turbidity;
- Piling and inappropriate foundation design;
- Inappropriate drainage systems (for example, infiltration drainage into the aquifer or bore hole soakaways);
- Failing sewage pipework.

Policy 46: Contaminated Land

Portsmouth Water supported this policy and recommended that the policy captures a wider range of risk receptors, including groundwater, surface water and human health.

The Local Planning Authority notes that the Policy covers different types of receptors. The supporting text to the Policy specifically lists human health, ground water and water supply. In

response to Portsmouth Water comments, supporting text to the policy has been amended to also include surface water.

Allocation 8: Palk Road

Portsmouth Water highlighted that the site lies in Source Protection Zone 1 and lies next to Portsmouth Water's Bedhampton Springs which are used for public water supply. As such, Portsmouth Water wishes to be consulted on any planning application for any proposed development of this site.

It was also noted that the site lies next to sensitive springs and any piling or ground improvements may result in pollution and water quality impacts and could potentially affect groundwater and spring flows. In addition to this, the land may be affected by contamination and appropriate ground investigations, groundwater risk assessments and remediation strategy would need to be developed.

As per the current consultation arrangements set out above, Portsmouth Water would be a statutory consultee on this site, given its location within the Source Protection Zone.

Notwithstanding the above, the Allocation includes the site's location within the Source Protection Zone in Key Features list. Moreover, the Plan includes a separate policy on Source Protection Zones which sets out the requirement for consultation with Portsmouth Water. Therefore, no change to this Policy is required.

Havant Thicket Reservoir

The withdrawn Plan included a policy which safeguarded the Havant Thicket Reservoir site and the associated pipeline route to protect this strategically important water resource site designed to meet the long-term water supply needs across the South East. This policy was welcomed by Portsmouth Water.

Whilst it is recognised that the delivery of the entire project will take place over an extended period of time, construction works on the site has already commenced and a number of elements of the wider project are in advanced stage of delivery. Consequently, the current BBF Plan no longer includes a safeguarding policy for the site.

It is noted that Portsmouth Water commented in regard to this significant infrastructure project raising concern that the BBF Plan "*does not provide the necessary level of recognition or protection for a strategic regionally significant water infrastructure project*." It has been specifically highlighted that works on the associated strategic pipelines has not yet commenced. Portsmouth Water requested to be consulted on any planning applications that may affect the reservoir site or pipeline corridors, and suggested an ongoing dialogue with the Council to achieve adequate support for the delivery and protection of the Havant Thicket Reservoir.

The Local Planning Authority notes that Portsmouth Water is currently a consultee on all applications for development within the Havant Thicket Pipeline buffer zone. Furthermore, it is noted that the delivery of the project has reached an advanced stage following the grant of a series of planning permissions, including:

APP/20/00990 - Approved 15.10.2021 - Hybrid application seeking: 1) Full Planning permission for development of a reservoir for raw water storage, a pumped storage reservoir, with the minimum required total storage capacity of 8,700 million litres (Ml), to support the planned bulk supply transfer of at least 21Ml/d in extreme (currently defined as 1:200 year) drought conditions; construction of an earth embankment adjacent to Staunton Country Park; construction of an overflow discharge/spillway at the south-western side of the reservoir and associated works; construction of a new junction on the B2149 Manor Lodge Road and a new junction on Swanmore Road. Provision of viewing areas on the southern embankment and western edge of the reservoir. 2) Outline application for (matters to be considered outlined in Table 2.2 in the submitted Development Specification) control house partially incorporated within landscaped earth mounding adjacent to the south west embankment; together with provision of other earth embankments. Construction of a visitor centre / cafe, with storage areas and welfare facilities to the northwest of the reservoir to be used for recreational and education purposes; provision of picnic area(s) and children's play area(s). Access routes from both junctions to the visitor car park; visitor car park comprising 193 car parking spaces and between 70 and 75 overflow spaces plus spaces for staff, coach/minibus and disabled drivers sited to the north west of the reservoir. Creation of a permanent wetland on the northern side of the reservoir and construction of bird watching hide/screen(s); recreational facilities for public amenity. Provision of perimeter tracks and a network of bridleways, cycle paths and footpaths; construction of a slipway on the western bank of the reservoir for operational use only and a small section of the proposed pipeline (210m).

In relation to this consent, a number of submissions to discharge planning conditions have been submitted, including:

- Request to discharge conditions 4, 6, 9, 10, 12 (received 22.9.22).
- Request to discharge conditions 5, 29 (received 26.9.22).
- Request to discharge conditions 21, 22, 23 [Phase 1] (received 8.12.22)
- Request to discharge conditions 21, 22, 23 [Subsequent phases] (received 3.5.23)
- Request to discharge condition 4 [Phasing] (received 29.2.24).
- Request to discharge conditions 5, 6, 9, 10, 12, 27, 36 and 39 (received 11.3.24).
- Request to discharge conditions 5, 12, 20 relating to Temporary Worker Accommodation (received 16.4.24).
- Request to discharge condition 26 (Drowning Risk Review)(received 24.5.24).
- Request to discharge condition 32 (Construction Phase Flood Risk & Drainage Plan)(received 30/05/2024).
- Request to discharge condition 28 (Landscaping for Wetlands Phase 2)(received 7.6.24).
- Request to discharge condition 20 (Construction Lighting Strategy)(17.06.24).
- Request to discharge condition 36 (Ecological mitigation, compensation and enhancement measures)(18/06/24).
- Request to discharge condition 32 (Phase 3 Drainage Management Plan) (28.06.24).
- Request to discharge condition 35 (On site emergency plan)(24.7.24)
- Request to discharge condition 28 (Landscaping - Phase 3)(8.8.24)
- Request to discharge condition 25 (Enhancement & Interpretation of Historic Environment)(8.8.24)
- Request to discharge condition 13 (Access Scheme, received 22/01/2025)

APP/20/00991 – Approved 15.10.2021 - Outline application for (matters to be considered outlined in Table 2.2 in he submitted Development Specification) development of a new pipeline to transfer water from edhampton Springs to fill the reservoir in the winter and draw it off to treat and supply

when needed in the summer comprising: Construction of an underground, bi-directional pipeline linking the reservoir with the existing pumping station at Bedhampton; Emergency drawdown discharge structure at Hermitage Stream; Upgrades to existing culverts; Washout and air valve chambers (typically below ground).

In relation to this consent, two submissions to discharge planning conditions have been submitted, including:

- Request to discharge conditions 4, 12, 16, 21 and 22 (12.3.24).
- Request to discharge conditions 5, 6, 7, 8, 10, 13, 14, 19 and 20 (26.3.24).

APP/24/00312 – Approved 6.12.2024 - Application under Section 73 of the Town and Country Planning Act 1990 in respect of Conditions 2 and 3 of the Hybrid permission planning reference APP/20/00990 dated 15th October 2021 for proposed changes to the size and alignment of the main reservoir embankment.

In relation to this consent, submissions to discharge planning conditions have been submitted, including:

- Request to discharge conditions 4, 5 (CEMP Temp. Workers Accom), 5 (CEMP), (6, 9, 10, 12, 27, 36, 39), 20, 25, 26, 28 (phase 2), 28 (phase 3), 32 (phase 2), 32 (phase 3), 35, 36 (phase 3) - (recd 23.12.24).
- Request to Discharge condition 4 (Phasing Plan) (rcvd 23.06.25).
- Request to Discharge Conditions28 & 36 (Phase 3) received 21/10/2025 (See APP/25/00856).
- Request to Discharge Condition 11 RCVD 04.12.25 (See APP/25/00998)
- Request to discharge conditions 20, 28,29,32 and 36 (APP/25/00989) received 1.12.25.

APP/24/00405 – Approved 12.05.2025 - Hybrid application seeking: 1) Full permission for development of new pipelines to transfer water from Bedhampton Springs to fill the reservoir in the winter and draw it off to treat and supply when needed in the summer, comprising: construction of two predominantly underground pipes in tunnels linking the reservoir with the existing pumping station at Bedhampton with associated infrastructure including: emergency drawdown discharge structure at Hermitage Stream; construction of eight access shafts; washout and air valve chambers (typically below ground), new plant at Bedhampton Pumping Station, modifications to Bedhampton 2 operational building and permanent diversion of Footpath 34 at Bedhampton Pumping Station.
2) Outline application for an associated underground cross-connection chamber and above ground kiosk at the reservoir site with vehicular accesses for maintenance; and upgrades to existing culverts close to shafts five, six and eight to manage flood risk (amended description 6th March 2025). An Environmental Statement has been submitted with the application under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

In relation to this consent, a number of submissions to discharge planning conditions have been submitted, including:

- Request to discharge conditions 6, 26 and 38 and partially discharge conditions 20, 25 and 33 (recd 6.10.25 see APP/25/00796)
- Request to discharge conditions 5, 27 and 32 and partially discharge condition 30 (recd 29.10.25 see APP/25/00895)

- Request to discharge conditions 8, 15, 29 and 33 (Submission 2B) (recd 16.12.25 see APP/25/01027)
- Request to discharge condition 22 received 16/01/2026 (See APP/26/00027).

APP/25/00837 – Approved 12.02.2026 - Non-Material Amendment application for the Section 73 permission reference APP/24/00312 (which amended APP/20/00990) for the Havant Thicket Reservoir development to enable proposed changes to the Western Embankment and Transition Zone (relating to alterations to embankment slopes, fencing and gates, viewing platform, reed beds and amphitheatre).

In addition, the following pending application benefits from a Planning Committee (12.03.2026) resolution to grant planning permission:

APP/25/00988 –Application for approval of all Reserved Matters (siting, scale, external appearance and landscaping) relating to Phase 5 (Control House) of the Thicket Reservoir development pursuant to condition 2 of the S73 consent planning reference APP/24/00312 dated 6th December 2024.

In light of the number of extant and implemented planning permissions on site, the ongoing support of the Council for the delivery of the project and the advanced works on the site itself, any future third party applications that would jeopardise or prejudice timely completion of the project or would lead to any potential conflict with the current or future operational requirements of the facility would not be approved without a prior consultation with Portsmouth Water. In respect to works on the associated strategic pipelines, whilst they have not commenced yet, it is understood that they are scheduled to start in the summer 2026. Therefore, even if there was to be a delay in the commencement of these works, these will most likely start before the emerging Plan is adopted.

Drawing the above considerations together, it is no longer considered necessary or justified to include a policy safeguarding the delivery of the project in the emerging Local Plan.

Biodiversity Net Gain

Portsmouth Water noted that the draft Local Plan includes a detailed policy on Biodiversity Net Gain (BNG). Portsmouth Water is concerned that replicating the requirements of the Environment Act 2021 within local planning policy introduces unnecessary duplication and risks long-term inflexibility. Embedding these requirements in the Local Plan — which may not be updated for many years — could result in policies becoming misaligned with future legislation or national guidance. We recommend that the plan refer to national BNG requirements in principle, but avoid setting rigid local thresholds or procedural details that may quickly become out of date.

The Local Planning Authority has considered this suggestion carefully and it is concluded that the BNG policy is not specific to the detailed legislation. The elements of the legislation that it refers to are highly unlikely to change within the Plan period. On this basis, no change to the Policy is proposed.

Further Amendments

Portsmouth Water is aware that the amendments set out in this agreement have been reflected in the emerging Plan which will be the subject of a further Regulation 19 consultation. Portsmouth

Water may choose to make further comments during that consultation where they deem it necessary for the plan to be made sound and legally compliant. However, this is not anticipated at the time of this agreements, broad agreement having been reached on the content of the plan through continued engagement both at formal stages of plan making and detailed informal cooperation.

Signatories

This statement has been prepared and agreed by the following organisations	
Havant Borough Council	**Portsmouth Water**
Signature (when complete) 	Signature (when complete) 
Name: David Hayward Title: Strategic Planning Manager	Name Simon Deacon Title Catchment & Environment Manager
Date 12/05/2026	Date 07/05/2026