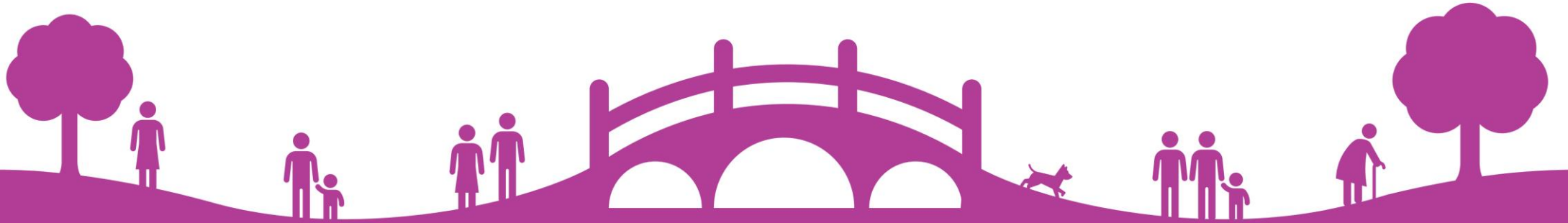


# BUILDING A BETTER FUTURE

Sustainability Appraisal  
of the Regulation 18 Draft Local Plan

February 2025



## Regulation 18 Draft 'Building a Better Future' Local Plan – Sustainability Appraisal Report (2025)

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# 1. Introduction and Non-Technical Summary

- 1.1 The purpose of the planning system is to contribute to the achievement of sustainable development. This involves balancing economic, social and environmental objectives.
- 1.2 This document is the Sustainability Appraisal (SA) Report accompanying the 2025 Regulation 18 consultation on the Building a Better Future Plan, the new Local Plan for Havant Borough. The new Local Plan establishes a spatial strategy for development for the period to 2043, identifies sites for housing, employment and infrastructure which deliver that strategy and establishes the policies against which planning applications will be determined.
- 1.3 It is a requirement alongside the production of a Local Plan that Sustainability Appraisal is undertaken in line with the [Environmental Assessment of Plans and Programmes Regulations 2004](#). Compliance of this report with the requirements of the 'Environmental Report' is confirmed through Appendix E.
- 1.4 SA is a mechanism for considering and communicating the likely effects of a draft plan, and alternatives to that plan, with a view to avoiding or mitigating adverse effects and maximising positive ones. It is a multi-stage process, most of which is undertaken in separate appraisals of each version of the plan as it evolves. [Government guidance on strategic environmental assessment and sustainability appraisal](#) sets out the process for local plans in a number of stages, as follows:

## **STAGE A: Setting the context and objectives, establishing the baseline and deciding on the scope**

- A1- Identify other relevant policies, plans and programmes and sustainability objectives
- A2- Collect baseline information
- A3- Identify sustainability issues and problems
- A4- Develop sustainability appraisal framework
- A5- Consult the consultation bodies on the scope of the sustainability appraisal report

## **STAGE B: Developing and refining alternatives and assessing effects**

- B1- Test the Local Plan objectives against the sustainability appraisal framework
- B2- Develop the Local Plan options including reasonable alternatives
- B3- Evaluate the likely effects of the Local Plan and alternatives
- B4- Consider ways of mitigating adverse effects and maximising beneficial effects
- B5- Propose measures to monitor the significant effects of implementing the Local Plan

## **STAGE C: Prepare the SA Report**

**STAGE D: Seek representations on the SA Report from consultation bodies and the public**

**STAGE E: Post adoption reporting and monitoring**

E1- Prepare and publish post-adoption statement

E2- Monitor significant effects of implementing the Local Plan

E3- Respond to adverse effects

- 1.5 This report represents stages B and C of this process. Stage A was undertaken in early 2022, and [the SA Scoping Report](#) is available alongside this report. The framework established through the scoping stage is repeated for ease at Appendix A.

**Non-technical summary**

This report accompanies the 2025 consultation on the draft 'Building a Better Future' Local Plan for Havant Borough. It is a procedural requirement to assess the economic, social and environmental effects of the emerging plan through a 'Sustainability Appraisal' (SA). A framework for doing so was established in 2022.

This report now assesses the likely effects of what the Council is seeking to achieve through the local plan (the 'plan objectives'; see section 2) and the overall way the local plan tries to meet these aims. It also compares the proposed approach with a number of possible ways ('alternative development strategies'; see section 3). From the chosen approach flow the draft policies that will guide the way proposals for development are assessed in Havant Borough (known as development management or topic policies), as well as the sites that the Council considers suitable for development for housing and employment (known as site allocations). The bulk of this report is dedicated to assessing the economic, social and environmental effects of these draft policies and the possible development sites. Section 4 of this report summarises the findings, with Appendices B and C setting out the detailed assessment.

In each part of the appraisal, a range of positive, neutral, uncertain and negative effects were found. Where possible, adjustments were made to the draft Local Plan to maximise beneficial effects and avoid or reduce negative ones (see in particular section 4 and Appendix D). Uncertainties may be addressed as further information becomes available as the Local Plan moves through further drafts, or in some cases, as planning applications are prepared.

Comments are invited on the draft Local Plan between 6 May 2025 and 1 July 2025. This Sustainability Appraisal report is published alongside that draft Local Plan, and comments on this report are also invited (see section 5).

## 2. Testing the Local Plan Objectives (SA Stage B1)

2.1 The first stage of the sustainability appraisal of a local plan is testing the objectives.

2.2 [The Council's Corporate Strategy 2024-2028](#) provides the overall vision for the Building a Better Future Plan:

### A Borough...

- **Whose communities are resilient and economically and socially vibrant**
- **That is made up of places that people and families want to live, work and enjoy**
- **Whose residents are proud to champion and respect their natural surroundings**

2.3 The vision is supported through three themes focusing on the outcomes the Council wants for Havant Borough:

- **Wellbeing**
- **Pride in Place**
- **Growth**

2.4 These three themes form the objectives for the Building a Better Future Plan.

### Corporate Strategy Theme and Local Plan Objective 1: **Wellbeing**

*"We want our residents to be able to live active, healthy lives. We want to support our communities to be resilient, which will enable them to help each other.*

*We know that housing is a key factor in determining health and wellbeing. Everyone deserves the right to live in a safe, good quality home, and we want to address long-standing issues with housing availability and quality in the borough."*

The Council aspires to achieve this objective in the following ways:

- a) Support people experiencing or threatened with homelessness and rough sleeping so that they can achieve stable housing solutions, ensuring suitability for residents and cost effectiveness for the council
- b) Encourage and enable the provision of social rent accommodation and affordable housing in the borough
- c) Support residents to pursue/ achieve active wellbeing
- d) Deliver support mechanisms for residents such as grant schemes and advice provision

### Corporate Strategy Theme and Local Plan Objective 2: **Pride in Place**

*“We know that when people are proud of where they live, it improves their personal wellbeing and motivates them to help protect and improve their local area. We want to keep our streets clean and safe, to celebrate the unique natural features and heritage of our area, and to safeguard it for future generations.*

*We want to make the borough a place that residents can be proud of and that visitors want to spend time in.”*

The Council aspires to achieve this objective in the following ways:

- a) Build resilience across our borough to our changing environment by improving our open and green spaces, to ensure they can be enjoyed by future generations
- b) Support and champion the regeneration of our town centres
- c) Act to protect the environmental quality in the borough
- d) Continue to deliver coastal protection and management schemes to help keep our communities safe and reduce the risk of flooding

## Corporate Strategy Theme and Local Plan Objective 3: Growth

*“We want to see a borough which is thriving and able to adapt for the future, with a Local Plan that gives priority to brownfield sites and infrastructure needs for our borough. We want to support our borough (both residents and businesses) to reduce our carbon footprint whilst helping to create opportunities for our young people in education, skills and training.”*

The Council aspires to achieve this objective in the following ways:

- a) Enable and support employment opportunities and local business growth
- b) Enable sustainable development and to support infrastructure improvements in our borough
- c) Support our residents and businesses to reduce greenhouse gas emissions

2.5 The Local Plan objectives were tested against the Sustainability Appraisal Framework, which had been established through the earlier scoping report (see paragraph 1.6 and Appendix A). The framework will be used at each stage of plan preparation to assess the impact of the proposed strategy and policies, as well as alternatives to them. The established SA themes and objectives are repeated below for ease of reference<sup>1</sup>.

<b>Sustainability Themes and Objectives</b>		
<b>1</b>	<b>The Natural Environment and Biodiversity</b>	To protect and enhance the natural environment and support biodiversity
<b>2</b>	<b>Climate Change</b>	To minimise the borough’s contribution to climate change and ensure resilience to the effects of climate change
<b>3</b>	<b>Homes for All</b>	To provide good quality homes for all
<b>4</b>	<b>Healthy and Safe Communities</b>	To promote healthy, inclusive and safe places
<b>5</b>	<b>Economy and Employment</b>	To support and enhance the local economy now and into the future
<b>6</b>	<b>Effective Transport and Communications</b>	To promote an efficient transport and communications network, which supports the move to a low carbon future
<b>7</b>	<b>Natural resources</b>	To protect natural resources from unsustainable levels and patterns of use
<b>8</b>	<b>Sense of Place (Landscape, Townscape and Heritage)</b>	To protect and enhance the landscape and townscape character of the borough and protect and enhance heritage assets

<sup>1</sup> The full framework includes further information on assessment criteria. See Appendix A.

- 2.6 The matrix below shows the results of the testing of the local plan objectives for their compatibility with the sustainability objectives.
- 2.7 It shows a high degree of compatibility, including many cases, where the objectives are fully aligned. This is perhaps unsurprising, as the role of the SA is to support sustainable outcomes from the local plan, and the role of the local plan is to promote sustainable development. Therefore, there is a high degree of overlap between the objectives of the SA framework and the objectives of the plan, which is reflected in assessment of compatibility.
- 2.8 Nevertheless, there are some areas of potential conflict. These potential conflicts largely reflect the fact that the nature of planning is to deal with competing interests in the use of land. The vast majority of the potential conflicts identified relate to this. Two very clear groups of potential conflict are apparent:
- 2.9 Firstly, a number of potential conflicts are noted against the Wellbeing plan objective, because one of its key components is housing delivery. While of course wellbeing relies to a very high degree on access to housing availability and security, the high need for housing and the objective to meet this need have the potential to conflict with objectives relating to other potential uses for the same land, such as green spaces, biodiversity or employment. Using land or resources to meet one of these needs reduces the ability to meet another. Development in itself also brings with it an intensive use of natural resources, both during construction and afterwards during human habitation. It also has the potential to change the way the local landscape and townscape feel (sense of place).
- 2.10 A further potential conflict was considered when assessing the compatibility of the Pride in Place objective against SA criterion 1a (protection international habitats). This is because the stated ambition to provide protection from tidal flood risk includes the potential for engineering solutions such as sea defences, which have the potential to conflict with objectives relating to protecting international habitats in the harbours. However, because the Pride in Pace objective overall includes ambitions to protect the local environment it is considered that, overall, this Local Plan and SA objective are compatible.
- 2.11 Similarly, other corporate / local plan objectives encompass the balancing of competing drivers: for example Plan Objective 1, while partially about housing delivery, is overall about wellbeing, and clearly notes the desire to support residents in leading active lives and therefore the need to protect open space for example; Objective 2 is all about Pride in Place and clearly supports the good design and a sense of place, the protection of environmental and historic assets; Objective 3 brings in considerations of the economy and infrastructure delivery to support development, and clearly states a desire to achieve sustainable development.
- 2.12 Overall, the Plan objectives and the SA objectives have a good level of compatibility, and the assessment raises no concerns or a need to amend the plan objectives. It is the role of the planning system and the local plan to balance any conflicts. They are not insurmountable. The local plan can be used as a tool to actively manage and minimise these conflicts. Policy writers, both of site allocations and thematic policies used the results of this phase of the SA to ensure that the flagged potential conflicts were addressed through relevant policies



which set what development must do to prevent, minimise or mitigate these impacts. A further assessment then took place of the draft policies (see section 4).

Council Priorities and Local Plan Objectives		Sustainability Objectives and decision-making criteria																																															
		1					2					3				4							5						6							7						8							
		a	b	c	d	e	a	b	c	d	e	a	b	c	d	a	b	c	d	e	f	g	a	b	c	d	e	f	a	b	c	d	e	f	g	a	b	c	d	e	f	a	b	c	d	e	f		
Wellbeing	Yellow	Yellow	Grey	Grey	Grey	Grey	Grey	Green	Grey	Green	Green	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Yellow	Yellow	Green	Grey	Green	Grey	Green	Green	Grey	Green	Grey	Grey	Grey	Green	Green	Green	Yellow	Green	Green	Grey	Yellow	Yellow	Green	Green	Green	Green	Yellow
Pride in Place	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Grey	Grey	Grey	Green	Green	Green	Grey	Grey	Grey	Green	Grey	Grey	Grey	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
Growth	Grey	Grey	Grey	Grey	Grey	Green	Green	Grey	Green	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Green	Green	Green	Green	Green	Green	Green	Green	Green	Grey	Green	Green	Green	Green	Grey	Grey	Green	Green	Green	Green	Grey	Grey	Green	Green	Green	Green	Grey

**Key**  fully aligned  compatible  no direct relationship  possible conflicts

### 3. Developing the Local Plan Options: Alternative Development Strategies (SA Stage B2)

- 3.1 [An earlier Regulation 18 Local Plan consultation](#) presented an intended approach for the Local Plan, with a sustainability appraisal of the approach to each policy theme and alternatives to it accompanying the consultation. Together with further research and evidence studies, the consultation on those proposed approaches was fundamental in forming the 2025 Regulation 18 full draft plan, in particular the overall development strategy which guides the plan.
- 3.2 Each strategy option considered brings together a coherent overall approach to:
- the characteristics of sites themselves (i.e. the type of land that would be affected by development eg brownfield or greenfield; any nature conservation, heritage or other protective designations etc);
  - locational matters (i.e. where development should take place in relation to other facilities, infrastructure needs etc) and
  - qualitative requirements (eg density and quality requirements for housing).
- 3.3 Four strategy options were developed and considered, ranging from a fully brownfield focussed option seeking to fully maximise environment protection, to a housing delivery market driven option with limited expectations for development quality or environmental considerations.

#### Simple Overview of the 4 Development Strategy Options Considered



3.4 The table below shows the expected housing supply under each of the strategy options. The supply figures in the table are derived from work on the Strategic Housing and Employment Land Availability Assessment (SHELAA), a study which considers what sites in the borough are suitable and available for development, and whether development is deliverable on that site. Where these three criteria are met, a site is considered to be 'developable'. *NB The table presented here is not found in the SHELAA. That is because the SHELAA itself is not designed to test options. Rather it serves to gather information on and assess a very high level whether sites are developable. The table presented here then makes further assumptions on what sites would be considered to be appropriate for development under each development strategy.*

<b>Housing Supply 2024-2043</b> (number of dwellings likely to be delivered under each development strategy option) (NB columns may not sum correctly due to rounding of individual rows)				
Sources of housing supply	Option 1	Option 2	Option 3	Option 4
Completions 2023/24	368	368	368	368
Commitments	1,142	1,142	1,142	1,142
Broad locations considered appropriate under the strategy option	1,003	2,406	2,406	2,406
Identified Sites considered appropriate for allocation under the strategy option	821	1,906	2,669	4,282
Small site within the urban area	29	37	37	37
Windfall	1,360	1,360	1,360	1,360
<b>Total housing supply</b>	<b>4,723</b>	<b>7,218</b>	<b>7,981</b>	<b>9,594</b>
Supply against standard method plan requirement of 17,840	<b>- 13,117</b>	<b>- 10,622</b>	<b>-9,859</b>	<b>-8,246</b>

- 3.5 Naturally, as the focus on housing delivery increases through the options, with fewer other balancing considerations taken into account as one moves from Option 1 through to Option 4, the amount of housing expected to be delivered through the Local Plan increases. However, crucially, it should also be noted that under none of the options is it possible to achieve delivery of the total need for housing, as set out in the standard method.
- 3.6 Housing supply is just one of many factors in assessing the suitability of a development strategy, particularly in the context of sustainability appraisal, whose purpose is to balance all the factors that make sustainable development. The same is true of the planning system as a whole. Paragraphs 7 and 8 of the NPPF (2024) clearly state that ‘the purpose of the planning system is to contribute to the achievement of sustainable development’ and that ‘achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives)’: an economic objective, a social objective and an environmental objective. Therefore, all objectives must be pursued and balanced in order to achieve sustainable development.
- 3.7 The wider sustainability effects of the alternatives considered are set in the tables below.

### Development Strategy - Option 1

**A borough with high quality, environmentally sensitive urban and sub-urban living, where the nature and location of development is driven by a desire for strong environmental protection and climate change adaptation and mitigation**

- Acknowledging environmental and infrastructure limits, and planning for local development needs within those limits
- Restricting development to established urban and developed areas and brownfield sites across the borough
- A pattern of development and improvements to the transport network which reduce car dependency, with housing development concentrated on sites with good access to public transport routes and/or services and facilities (sites with moderate or poor accessibility by sustainable modes should not be considered suitable for residential development)
- High development densities to make the most efficient use of land and promote sustainable transport accessibility
- A particular focus on development which will help to sustain and enhance the borough's town centres
- Development which promotes better self-containment and reduces the need to travel for communities, such as appropriately scaled commercial, retail and service uses
- Protecting and enhancing our unique coastline and harbours for wildlife; managing the coast with a focus on nature;
- Sustaining existing communities and protecting them from coastal erosion and sea level rise but responding to the effects of climate change by not adding to the level of risk through a presumption against new housing in areas that are at risk of flooding, now or in the future (due to the risk to the single access road on and off the island, this includes brownfield and greenfield sites on Hayling Island, which may not themselves be at risk)
- Safeguarding existing open spaces and expecting new developments to enhance them and/or provide new open spaces
- High standards of housing quality to provide good quality, healthy and affordable homes for all
- High standards of sustainable construction to minimise the environmental impact of development and maximise its resilience to the effects of climate change

### Sustainability Appraisal of Development Strategy – Option 1

1					2					3				4							5						6							7						8					
Biodiversity					Climate Change					Homes for All				Healthy Communities							Economy						Transport							Natural Resources						Landscape & Heritage					
a	b	c	d	e	a	b	c	d	e	a	b	c	d	a	b	c	d	e	f	g	a	b	c	d	e	f	a	b	c	d	e	f	g	a	b	c	d	e	f	a	b	c	d	e	f

Strategy Option 1 is a strategy driven by environmental protection and climate change adaptation and mitigation. The sustainability appraisal of this option bears this out, with environmental objectives under themes 1 (biodiversity) and 2 (climate change) showing the most likely positive effects. However, the SA also recognises that maintaining agricultural land in its present use could actually have worse nutrient neutrality effects than allowing development on such sites (1e).

Since a number of the decision-making criteria under theme 5 (healthy communities) relate to access to open spaces and natural areas, as well as the management of flood risk, very positive effects are also expected against this theme under this strategy option. Similarly, some criteria in theme 7 (natural resources) relate to avoiding pollution and preserving natural resources, as well as energy efficient construction, with positive sustainability gains expected from this strategy. Further gains are expected under this option in theme 5 (economy) and 6 (transport), based on this strategy’s focus for development in already built-up areas, in particular in town centres and areas of good accessibility.

It must be noted that the focus on higher densities in already developed areas to protect undeveloped areas also could have potential negative effects on local character within theme 8 (landscape & heritage). Most notably for the Local Plan, the appraisal shows that this option is unlikely to produce many positive effects against theme 3 (Homes for all). In particular, criteria measuring the delivery of homes (3a, 3b, 3c) is likely to be negatively affected by this strategy alternative, compared to others, since this option significantly limits the availability of land considered suitable for development, with greenfield development not considered to be acceptable. Housing standards should however help ensure high quality (3d).

Consistent through all 4 strategy alternatives, a number of assessment criteria are not expected to see any notable effects arising from this strategy option. That is because the alternatives presented are high level strategic options, which do not address in detail all matters

<p>covered by the SA. None of the strategy options are expected to have strong negative effects on any of the criteria. That is because all four alternatives are balanced to a degree through pre-existing requirements on what Local Plans or the planning system can or should achieve.</p>
<p>Overall, Development Strategy Option 1 is expected to produce many positive sustainability effects against most of the SA themes. However, the one theme where it does not perform well is them 3 'Homes for All'. Given the importance of meeting development needs within the planning system and as a key role for Local Plans, this strongly calls into doubt the suitability of this strategy alternative. It is not considered, despite the many positive effects, that this strategy could be defended under requirements of the NPPF.</p>

## Development Strategy - Option 2

**A sustainable pattern of high quality, environmentally sensitive urban and suburban living, where the nature and location of development is shaped by the need to provide homes for all, regenerate urban centres, address climate change and enhance the natural environment.**

- Positive planning for local development needs, as far as is sustainable within environmental and infrastructure limits
- Maximising development in established urban and developed areas and on brownfield sites across the borough
- A pattern of development and improvements to the transport network which reduce car dependency, with housing development concentrated on sites with good or moderate access to public transport routes and/or services and facilities, or where development could achieve significant infrastructure improvements
- High development densities in order to make the most efficient use of land and promote sustainable transport accessibility;
- A particular focus on development which will help to sustain and enhance the borough's town centres
- Development which promotes better self-containment and reduces the need to travel for communities, such as appropriately scaled commercial, retail and service uses
- Greenfield development only where it has no unacceptable impacts on international, national or local environmental designations, or national landscape designations (agricultural land value or local landscape value would not be considered an overarching constraint)
- Protecting and enhancing our unique coastline and harbours for wildlife; managing the coast with a focus on nature, balanced with support for the borough's coastal areas' traditional role as a visitor destination
- Sustaining existing communities and protecting them from coastal erosion and sea level rise but responding to the effects of climate change by not adding to the level of risk through a presumption against new housing in areas that are at risk of flooding, now or in the future (due to the risk to the single access road on and off the island, this includes greenfield sites on Hayling Island, which may not themselves be at risk; brownfield development would continue to be acceptable if the site itself is safe)
- Safeguarding existing open spaces and expecting new developments to enhance them and/or provide new open spaces
- High standards of housing quality to provide good quality, healthy and affordable homes for all
- High standards of sustainable construction to minimise the environmental impact of development and maximise its resilience to the effects of climate change



## Sustainability Appraisal of Development Strategy Option 2

Sustainability Appraisal of Development Strategy Option 2																																														
1					2					3				4							5					6							7					8								
Biodiversity					Climate Change					Homes for All				Healthy Communities							Economy					Transport							Natural Resources					Landscape & Heritage								
a	b	c	d	e	a	b	c	d	e	a	b	c	d	a	b	c	d	e	f	g	a	b	c	d	e	f	a	b	c	d	e	f	g	a	b	c	d	e	f	a	b	c	d	e	f	

Strategy Option 2 seeks to balance the need for land to meet development needs, in particular for housing, with a desire for strong environmental protection and climate change adaptation and mitigation. The sustainability appraisal of this option bears this out, with environmental objectives under themes 1 (biodiversity) and 2 (climate change) showing the most likely positive effects. Despite clearly defined environmental limits, this strategy also sees a number of positives against objective 3 (homes for all), in that it provides opportunities for development on a range of sites from brownfield to greenfield. Housing standards should help ensure high quality homes (3d).

Since a number of the decision-making criteria under theme 5 (healthy communities) relate to access to open spaces and natural areas, as well as the management of flood risk, very positive effects are also expected against this theme under this strategy option. Similarly, some criteria in theme 7 (natural resources) relate to avoiding pollution and preserving natural resources, as well as energy efficient construction, with positive sustainability gains expected from this strategy. Further gains are expected under this option in them 5 (economy) and 6 (transport), based on this strategy’s focus for development in already built-up areas, in particular in town centres and areas of good accessibility.

However, it must be noted that the focus on higher densities in already developed areas to protect undeveloped areas also could have potential negative effects on local character (8d).

Consistent through all 4 strategy alternatives, a number of assessment criteria are not expected to see any notable effects arising from this strategy option. That is because the alternatives presented are high level strategic options, which do not address in detail all matters covered by the SA. None of the strategy options are expected to have strong negative effects on any of the criteria. That is because all

<p>four alternatives are balanced to a degree through pre-existing requirements on what Local Plans or the planning system can or should achieve.</p>
<p>Overall, Development Strategy Option 2 is expected to produce positive sustainability effects against all of the SA themes. The appraisal shows that this strategy effectively balances a whole range of objectives, including delivering homes and other development. If this strategy is taken forward into the Local Plan, mitigation will be required to address the potential negative impacts on SA criterion 8d. This seeks to ensure 'appropriate density and scale of development, within the local context'. The strategy as originally intended placed great emphasis on high development densities. This SA has flagged that this could have negative consequences, so in drafting the final version of the strategy and associated policies, some flexibility will need to be integrated to allow for specific consideration of the local context.</p>

### Strategy Option 3

**A borough with urban and suburban living, where high quality development is promoted wherever suitable, taking into account only the strongest environmental constraints**

- Positive planning to meet local development needs, with a focus on housing delivery
- Development in established urban and developed areas and on brownfield sites across the borough but greenfield development also actively supported in most locations, except where restricted by environmental law (eg the Habitat Regulations)
- Development densities which make the most efficient use of land; lower densities also considered acceptable to support market driven housing supply
- Development of housing sites with relatively poor accessibility to sustainable transport, services and facilities considered acceptable
- Protecting our unique coastline and harbours for wildlife where legally required; support for the borough's coastal areas' traditional role as a visitor destination
- Sustaining existing communities and protecting them from coastal erosion and sea level rise, but responding to the effects of climate change by not adding to the level of risk through a presumption against new housing in areas that are at risk of flooding, now or in the future (however, housing development on Hayling Island on sites that are not themselves at risk is considered acceptable, despite the risk to the access road)
- Safeguarding existing open spaces and expecting new developments to enhance them and/or provide new open spaces;
- High standards of housing quality to provide good quality, healthy and affordable homes for all

### Sustainability Appraisal of Development Strategy Option 3

Sustainability Appraisal of Development Strategy Option 3																																																
1					2					3				4						5					6					7					8													
Biodiversity					Climate Change					Homes for All				Healthy Communities						Economy					Transport					Natural Resources					Landscape & Heritage													
a	b	c	d	e	a	b	c	d	e	a	b	c	d	a	b	c	d	e	f	g	a	b	c	d	e	f	a	b	c	d	e	f	g	a	b	c	d	e	f	a	b	c	d	e	f			

Strategy Option 3 is takes into account the need for environmental protection, and expects quality standards, in particular for housing developments, but is primarily driven by seeking to meet the development needs of the borough. Consequently, the strategy fares well against theme 3 (Homes for All) and 5 (Economy). Under this strategy, it is expected that a greater number of homes will be able to be delivered when compared to strategy options 1 and 2.

Theme 1 (biodiversity) is expected to see negative impacts from this strategy, since a number of environmental designations, where legally acceptable, would not be used to restrict development. This strategy would also likely have negative impacts on theme 6 (transport), making the use of sustainable transport less attractive, and potentially adding to issues on the highway network, since no consideration is taken of the location of development or relevant infrastructure improvements (3e and 6a,b,e,f). It would not promote sustainable construction methods (7f), or likely protect or improve people’s access to open space (4a,4b). This strategy could have undesirable effects on the character of the local environment (8f), with significant greenfield development expected.

Consistent through all 4 strategy alternatives, a number of assessment criteria are not expected to see any notable effects arising from this strategy option. That is because the alternatives presented are high level strategic options, which do not address in detail all matters covered by the SA. None of the strategy options are expected to have strong negative effects on any of the criteria. That is because all four alternatives are balanced to a degree through pre-existing requirements on what Local Plans or the planning system can or should achieve.

Overall, Strategy Option 3 is found to produce only limited sustainability gains. Notably, however, these are in the themes of Homes for All and Economy, both of which are key in meeting development needs, which is a key role for a Local Plan. Nevertheless, national policy is clear that these must be balanced against other policy objectives, and notably, this strategy performs poorly against Biodiversity objectives. Biodiversity protection and enhancement, including through the planning system, is now enshrined in the Environment Act, calling into question the appropriateness of this strategy approach.

#### Strategy Option 4

**Driven by housing need, a strategy which actively supports the market to deliver housing development wherever possible, with minimal restrictions and requirements**

- Positive planning to meet local development needs, with a focus on housing delivery
- Development in established urban and developed areas and on brownfield sites across the borough but greenfield development also actively supported in most locations, except where restricted by environmental law (eg the Habitat Regulations)
- Densities driven by market forces
- Development of housing sites with relatively poor accessibility to sustainable transport, services and facilities considered acceptable
- Protecting our unique coastline and harbours for wildlife where legally required; support for the borough's coastal areas' traditional role as a visitor destination
- Sustaining existing communities and protecting them from coastal erosion and sea level risk; flood risk managed on development sites on a site by site basis

### Sustainability Appraisal of Development Strategy Option 4

1					2					3				4							5						6							7						8									
Biodiversity					Climate Change					Homes for All				Healthy Communities							Economy						Transport							Natural Resources						Landscape & Heritage									
a	b	c	d	e	a	b	c	d	e	a	b	c	d	a	b	c	d	e	f	g	a	b	c	d	e	f	a	b	c	d	e	f	g	a	b	c	d	e	f	a	b	c	d	e	f				

Similarly to Strategy 3, Strategy Option 4 is driven by a focus on meeting development needs, in particular for housing. This strategy seeks to enable the market to deliver homes and other development, restricted only by legally required environmental restrictions. In this strategy, the Local Plan will be minimal in requiring development to meet particular quality, environmental, social or locational standards, in order to provide maximum flexibility to the market. Consequently, sustainability themes 3 (Homes for All) and 5 (Economy) perform well in this option. Under this strategy, it is expected that the greatest number of homes will be able to be delivered when compared to all the other strategy options.

Theme 1 (biodiversity) is expected to see negative impacts from this strategy, since a number of environmental designations would not be used to restrict development. This strategy would also likely have negative impacts on theme 6 (transport), making the use of sustainable transport less attractive, and potentially adding to issues on the highway network, since no consideration is taken of the location of development or relevant infrastructure improvements (3e and 6a,b,e,f). Theme 4 also is assessed as having potential negative effects against it, through the lack of standards for development set in this strategy.

Developers will be able to respond to the local context in terms of appropriate densities (8d). However, this strategy could have undesirable effects on the character of the local environment, with significant greenfield development expected, and no or few quality standards governing developments (8f).

Consistent through all 4 strategy alternatives, a number of assessment criteria are not expected to see any notable effects arising from this strategy option. That is because the alternatives presented are high level strategic options, which do not address in detail all matters covered by the SA. None of the strategy options are expected to have strong negative effects on any of the criteria. That is because all

<p>four alternatives are balanced to a degree through pre-existing requirements on what Local Plans or the planning system can or should achieve.</p>
<p>Overall, Strategy Option 4 is found to produce only limited sustainability gains. Notably, however, these are in the themes of Homes for All and Economy, both of which are key in meeting development needs, which is a key role for a Local Plan. Nevertheless, national policy is clear that these must be balanced against other policy objectives, and notably, this strategy performs poorly against Biodiversity objectives. It shows an even greater number of expected negative effects than Strategy 3. Biodiversity protection and enhancement, including through the planning system, is now enshrined in the Environment Act, calling into question the appropriateness of this strategy approach.</p>



- 3.8 The tables above demonstrate why Strategy Option 2 was selected and taken forward as the strategy for the draft plan. The development strategy proposed is considered to be the most appropriate strategy for the Building a Better Future Plan. It combines and balances in the most effective way key national and local objectives and overall represents the most sustainable strategy, when considered against the alternatives.
- 3.9 The spatial distribution of development planned for through the chosen option focusses on the existing built areas across the borough, including notably the borough's main town centres at Havant and Waterlooville, with the addition of less constrained greenfield land. In terms of greenfield sites, habitats and species protection and national landscape designations limit which areas are considered suitable for development. Flood risk provides a further key constraint given the borough's coastal location and evidence of climate change and sea level rise. On this basis, greenfield development is only considered suitable on less constrained land on the mainland. Greenfield land on Hayling Island is not being put forward for development, primarily on the basis of flood risk. Due to the risk to the single access road on and off the island, this includes greenfield sites on the island, which may not themselves be at risk.
- 3.10 The pattern of development proposed as a result also aligns with the strategic aim to ensure good accessibility by non-car modes and ensuring that the development strategy aligns with the principles of Local Transport Plan 4. The Local Highway Authority have indicated that development on Hayling Island would be car dependent, as Hayling Island has very limited modal choice and so does not encourage sustainable travel choices. Development here would rely on the highway network resilience of the single road on and off the island, and it is likely that there will be cumulative impact on the resilience of the highway network especially at the A27/Langstone junction.
- 3.11 A strongly expressed local drive to maximise environmental protection - both for people and nature itself was established in the 2022 consultation. This guided the Council away from the two options that sought to prioritise housing delivery over all other matters. The chosen strategy seeks to positively address the reality of climate change and the precarious state of the natural environment. On the other hand, it was concluded that the strategy with the greatest environmental focus would reduce too far the already constrained supply of available development land in the borough to meet housing need – a key national and local priority. The selected strategy strikes an appropriate balance between these two key competing drivers.

#### **4. Evaluating the likely effects of the Local Plan and alternatives (SA Stage B3) and considering ways of mitigating adverse effects and maximising beneficial effects (Stage B4)**

- 4.1 Sustainability Appraisal Stages B3 and B4 were undertaken as a single step.
- 4.2 Following the decision to pursue Strategy Alternative 2, a draft Local Plan was drawn up, providing detailed topic policies and identifying sites for development, known as 'site allocations', in line with the chosen strategy.
- 4.3 In parallel with the drafting of these policies and allocations, each of them was subject to testing against the sustainability appraisal framework. Each emerging policy was tested against the assessment criteria for each of the established sustainability objectives. Testing for the topic policies included commentary not only on the expected effects of the draft policy, but also compared this with a 'no policy' alternative, as well as other alternative variations on the policy that were considered. Testing for the site allocations assessed the likely effects that development of the site for its proposed use would have on the sustainability objectives.
- 4.4 The assessment was undertaken on spreadsheets, with separate tabs for each sustainability objective. The full assessment spreadsheets are published as appendices to this report: Appendix B for the topic policies and Appendix C for the site allocations.

#### **Findings of the sustainability appraisal of the emerging topic policies**

- 4.5 Appendix B to this report shows the full assessment spreadsheet for the emerging topic policies. This section provides an overview of the findings. Rather than policy by policy, they are presented here by SA objective, so as to paint an overall picture of the sustainability effects of the plan.

##### Objective 1: The Natural Environment & Biodiversity

- 4.6 The policies in the plan all either actively support the objective of protecting and enhancing the natural environment and supporting biodiversity, or where they do not, are considered neutral against this objective. Notably, the plan contains a swathe of policies to protect the natural environment in general, as well as notable and protected habitats and species from harm from development. These will apply to all relevant developments. Overall, the plan was considered to be strong in relation to this objective.
- 4.7 Nevertheless, improvements to outcomes against this objective were sought. It was found that in most instances introducing additional criteria to policies to strengthen them in relation to biodiversity outcomes would be unhelpful, as such additions would confuse the main focus of these policies and lead to less clarity. On this basis, it is acceptable for a large number of policies to be neutral against this objective.

- 4.8 A notable discussion within the assessment relates to Policy 5 – Amount of Housing and Policy 6 – Amount of Employment Land. Momentarily setting aside the evidence base on deliverability and focussing on sustainability outcomes, the policy could set out a higher or lower housing and/or employment land requirement in the plan. Although less development might be considered positive for biodiversity, it is not anticipated that a policy reflecting a lower number per se would make a difference to biodiversity outcomes. That is because national policy drivers would in any case require delivery of development, in particular of housing. Policies setting higher development requirements would likely lead to poorer outcomes for biodiversity, with more greenfield sites, potentially of great biodiversity value being required to meet those needs. It was concluded that the development target policies as proposed, taken together with the biodiversity specific policies in the plan successfully balanced a range of considerations to present development figures which is considered realistic, and that they should remain unchanged.
- 4.9 Improvements were made to the following policies after the initial assessment found that they could provide better outcomes in relation to biodiversity if amended:
- Policy 4 – Infrastructure and Environmental Mitigation to support development: Through the assessment it was noted that the list of infrastructure items did not specifically highlight environmental mitigation land and schemes. The policy and associated mapping was subsequently amended to highlight sites safeguarded for environmental mitigation. This will help prevent their loss to other forms of development and achieve better outcomes against the biodiversity objective.
  - Policy 7 - Five Year Housing Land Supply: The review of the policy through the SA highlighted that the Solent European Marine sites are directly mentioned, rather than a broader mentioned of habitats sites and sites needed to compensate for impacts on such sites. The wording was amended to refer to internationally designated habitats sites more generally. This will ensure adequate protection of these sites and avoid any real or perceived contradiction with national policy.
  - Policy 12- High Quality Design: The policy serves to pull together a number of matters that need to be considered in the design of a site, which have their own dedicated policy elsewhere in the plan. It was noted during the assessment that biodiversity themes were completely absent. Subsequently, a criterion was added to the policy requiring the effective integration of environmental mitigation and biodiversity features into the design of the buildings and landscaping. This will ensure this policy makes a positive contribution to the biodiversity objective.
  - Policy 20 – International and National Nature Conservation Sites: During the assessment it was noted that the policy wording focussed on individual protect sites. The assessment under SA criterion 1c flagged that these were not obviously being considered as a network as well as individually. Amendments were made to the policy wording to acknowledge the ecological network, with expected improvement in outcomes against this criterion.

## Objective 2: Climate Change

- 4.10 The vast majority of the policies in the plan are neutral against the objective to minimise the borough's contribution to climate change and ensure resilience to the effects of climate change. Positive contributions are unsurprisingly largely concentrated in those policies that are specifically designed to deal with climate change, such as sustainable construction methods and design and policies relating to trees and landscaping. Most other policies are considered to be neutral. Even the transport and flood risk policies in the plan, although inherently linked to climate change are judged as neutral, since their effects are measured under the assessment criteria of other SA objectives.
- 4.11 Improvements were made to the following policies after the initial assessment found that they could provide better outcomes in relation to climate change if amended:
- Policy 26 - Flood risk: The policy is concerned with the way developers assess, avoid and manage flood risk in their developments. Future flood risk is explicitly covered. However, climate change was only explicitly mentioned in the supporting text. Through this assessment it was suggest that alternative policy wording should be considered which more clearly mentions climate change in the policy test.
  - Policy 27 – Drainage: The policy is concerned with the way developers address the drainage needs in their developments. The policy is clear that the drainage needs for the lifetime of the development must be considered and addressed. The supporting text clarifies that this includes consideration of the climate change scenario. Through this assessment it was suggest that alternative policy wording should be considered which more clearly mentions climate change in the policy test.
  - Policy 52 - Renewable Energy Infrastructure: While the policy is designed to encourage renewable energy installations, this assessment showed that it did not actually state this explicitly, and instead listed what might appear to be hindering criteria. The review arrived at alternative policy wording which states explicitly that 'The installation of renewable energy infrastructure is supported in principle.' While this was always the intention of the policy, this alternative wording is considered likely to achieve better outcomes in relation to this objective.
- 4.12 A potential negative was found against Policy 30 – Heritage and the Historic Environment, on the basis that there is potential for conflict between the requirement to safeguard historic buildings from harm and introducing energy efficiency and climate change adaptations. Amendments were not made to this policy to address this negative effect. The policy is based on national law and policy objectives for historic assets, and it is considered that be effective in achieving the policies objective to protect those assets, some effects on the climate change objective are inevitable. In recognition of the potential conflicts, the policies in the plan relating to climate change measures do contain specific acknowledgement of how to address these matters in development affecting historic buildings.

### Objective 3: Homes for All

- 4.13 The assessment against this objective shows a mixed picture. Naturally policies concerned with housing targets and housing delivery are judged to be positive against the objective to provide good quality homes for all. Many of the proposed local plan policies are judged as neutral, most on the basis that either requirements are set nationally and therefore the local plan will have no additional effect on the objective, or because policy requirements are drafted to be sufficiently flexible so as not to create negative effects on housing delivery.
- 4.14 Nevertheless, a number of policies are expected – and accepted – to have potentially negative effects on housing supply. Policy 2 – Defined Urban Area; Policy 26 – Flood risk; Policy 28 – Development on the coast; Policy 29 – Designated landscapes; Policy 38 – Protecting employment uses; Policy 42 – Protecting existing community facilities; Policy 49 – Protecting Open Space; Policy 50 - Providing public open space in new development, are all judged to have the potential to restrict housing delivery. Variations to improve outcomes in relation to the Homes for All objective, for example by adding exception criteria, where considered. While these would improve outcomes in relation to housing delivery, they were not taken forward as these alternatives would reduce the effectiveness of these policies in relation to what they setting out to achieve i.e. the protection of particular types of land or uses from development. It is the purpose of the Local Plan to meet needs for all forms of development and infrastructure and provide protection to valued natural areas and community assets to create a vibrant mix of uses which makes places liveable and sustainable, so the potential negative effects on housing delivery of these policies are considered acceptable.
- 4.15 Policy 13 – Housing density is expected to have potentially negative effects on SA criterion 3d, which assesses the provision of healthy homes. This is because higher densities could work against the desire to create healthy homes with sufficient living, storage and amenity, good natural light etc. This potential negative is mitigated by inclusion of a policy on space standards. Alternative density levels were considered for inclusion in the policy. However, these were dismissed, as the chosen density levels are based on a study of a range of residential developments across different suburban and urban contexts in and around the borough and take into consideration of the national planning and design guidance. The option to omit the policy from the plan was not considered as a reasonable alternative, as higher densities are considered essential in aiming to meet housing needs, and to achieve sustainable transport aims.
- 4.16 Given that Policy 8 – Health and Climate Change is in part about health, it was notable that the policy provisions as assessed did not directly affect healthy homes (SA criterion 3d). It was considered whether healthy homes should be drawn out specifically in the criteria of this policy to achieve better outcomes against the homes objective. However, another strategic policy in the plan - 'new Homes for Sustainable Communities' already does this, so this alternative was not taken forward, leaving the policy instead focussed more clearly on climate change and external spaces.
- 4.17 Improvements were made to the following policies after the initial assessment found that they could provide better outcomes in relation to climate change if amended:

- Policy 9 - New homes for sustainable communities: The policy was unsurprisingly considered to make a positive contribution to all the criteria in the Homes for All objective. As such alternative approaches were not considered. However, in response to this assessment, amendments to the policy wording were made to explicitly include specialist housing needs (SA criterion 3b).
- Policy 34 - Retirement and specialist housing: The policy is intended to be supportive of specialist and retirement provision, yet the policy when assessed read as a restrictive one. Alternative policy wording was considered which actively supports retirement and specialist housing provisions, for which there is a high need in the borough, so as to maximise the benefits under SA criterion 3c. This alternative, stating that 'proposals for retirement housing and specialist accommodation within settlement boundaries will be supported in principle' was taken forward in the local plan to allow the anticipated uncertain / unknown effect to be upgraded to an anticipated positive effect.

#### Objective 4: Healthy and Safe Communities

- 4.18 The majority of the policies in the plan make a positive contribution to one or more criteria used to assess this objective. This is perhaps unsurprising, because two of the Local Plan's stated objectives are to 'secure high quality development design and layouts that support the wellbeing of all residents, encourage active lifestyles and foster a sense of place and community' and to 'provide safe, easy access to recreation and leisure facilities, children's play areas and outdoor spaces to support physical and mental health and boost wellbeing'.
- 4.19 A possible negative effect was noted against this objective from Policy 31: Trees, hedgerows and woodland. Criterion 4f seeks to design out crime – this generally favours clear sightlines, which trees and planting could obstruct. The policy was not amended as a result, so as not to undermine the purpose of the policy. However, it is considered that it will be possible to overcome or manage this conflict in the design of individual schemes.
- 4.20 Improvements were made to the following policies after the initial assessment found that they could provide better outcomes in relation to promoting healthy, inclusive and safe places if amended:
- Policy 4 – Infrastructure and Environmental Mitigation to support development: The policy already achieved multiple strong positive outcomes against the Healthy and Safe Communities objective. Nevertheless, through this assessment, it was noted that a positive outcome was not expected from the policy in relation to SA criterion 4d ('to promote inclusivity of provision and design of facilities and services'). This is perhaps surprising for an infrastructure policy. Alternative wording was therefore considered, and subsequently taken forward into the plan, to make the policy more explicit in relation to promoting inclusivity of provision and design of facilities and services, 'ensuring provision is inclusive and benefits the whole community'.
  - Policy 9 - New homes for sustainable communities: Alternative wording to strengthen the policy in relation to access to green space and avoidance of flood risk specifically, and the creation of healthy and safe communities more generally was considered. It was

concluded that very specific changes relating to green spaces and flood risk were too detailed for this strategic policy and would reduce the clarity of the policy. However, in response to this assessment, the policy as taken forward into the plan following this assessment now explicitly expects 'that all new homes are of a high quality, support residents' health, a good quality of life and are affordable, safe and comfortable for their occupants to live in'.

- Policy 37 - Gypsies, travellers and travelling showpeople: The policy sets out criteria which would make an application for a gypsy and traveller site acceptable. These include that the site has reasonable access to education, health, welfare and employment opportunities, facilities and infrastructure (SA criterion 4e) and that the site is not located in an area at high risk of flooding (SA criterion 4g). As a result of this assessment, an alternative was considered which required sites not to be at 'risk of flooding', rather than at 'higher risk of flooding'. This alternative was taken forward into the plan both because it achieves better outcomes in relation to SA criterion 4g, and because it brings this policy in line with the general flood risk policy which will apply to general housing.

#### Objective 5: Economy & Employment

- 4.21 The assessment against this objective shows a mixed picture. Naturally policies concerned with employment floorspace targets and employment land, regeneration and the borough's town centres are judged to be positive against the objective to support and enhance the local economy now and into the future.
- 4.22 Many of the proposed local plan policies are judged as neutral, most on the basis that they largely apply to housing proposals and therefore will not affect employment outcomes.
- 4.23 A number of policies in the Local Plan are expected to have negative effects on this objective:
- Policy 2 – Defined Urban Area: The policy restricts the location of development, which reduces flexibility and adaptability, and might also mean some types of businesses choose not to locate in the borough. Various versions of this policy were considered, with varying degrees of restrictions on specific uses, and application to different areas. It was considered whether to be more flexible in terms of the location of employment uses, in order to mitigate potential negative impacts on the local economy of the restrictive policy. In relation to the Employment and Economy objective this would provide improved outcomes. However, overall, it is considered that any development outside of existing settlements should be properly planned through allocations in a Local Plan, and the policy helps to prevent unplanned expansions of built-up areas. Some flexibility is already built into the policy wording for uses which explicitly require a location outside of the urban area. No change needed.
  - Policy 26 – Flood risk: The policy requires flood risk to be fully considered and addressed before development can take place. This will limit the supply of developable land including development on sites in employment areas and town centres. However, this negative effect is accepted; it would be inappropriate to make any additional amendments to the policy to achieve greater flexibility for

development on employment sites and town centres delivery, as this would undermine the policy objectives. It should be noted that it is not thought that limitation on development on Hayling Island arising from the policy would hamper efforts to support the tourism and visitor economy on the island, as the restriction only applies to residential development.

- Policy 41 – Food, drink and entertainment uses: By limiting certain food and drink uses, the policy might have a minor negative effect on local employment opportunities (SA criterion 5c). However, the policy would not be effective in achieving health objectives without this restriction, so on balance, this negative effect is considered acceptable.

#### Objective 6: Effective Transport and Communications

- 4.24 A significant number of policies in the Local Plan are judged to be neutral against this objective. These are those policies that deal with topics unrelated to transport or the location of development.
- 4.25 The suite of policies also achieves a number of positive outcomes. In particular those policies concerned with the location of development, those providing support for good design prioritising people’s health and wellbeing, those encouraging active travel for both climate change and health reasons and of course those relating to transport and infrastructure directly all achieve positive effects.
- 4.26 The assessment flagged that Policy 12 - High Quality Design could be improved in relation to transport outcomes by setting out that cycle storage should be conveniently located and well integrated into the design. It was also considered whether greater transport sustainability gains may be achieved if the policy specifically spelled out a need for good accessibility by all modes, or if it emphasised sustainable modes. The policy put forward refers to all modes, with the transport policy referring more directly to sustainable modes being prioritised. It is considered that this strikes the right balance overall.
- 4.27 Several uncertainties / unknowns are also flagged through this assessment. This is because at this stage of the Local Plan, the strategic transport assessment has not yet been completed. It is therefore not possible to judge what effects the policies relating to the quantum and distribution of development will have on SA criteria 6d, 6e and 6f, which are concerned with the effects of development on highways safety, the demand on transport infrastructure and the impacts of development on the transport network. It will be possible to assess these criteria through the SA of the next Local Plan stage.

#### Objective 7: Natural Resources

- 4.28 The majority of the policies are judged as being either neutral or positive against this objective.
- 4.29 However, Policy 30 - Heritage and the Historic Environment is noted as being potentially negative against SA criterion 7f. The consideration of heritage matters could potentially make the use of sustainable materials and methods more difficult. This is however, mitigated in the policy, the supporting text explicitly recognising the need for new and modern development in the historic environment.



- 4.30 The assessment flagged that Policy 12 - High Quality Design could be improved in relation to natural resources, and in particular waste management (SA criterion 7e) if the policy specifically required the convenient location of waste and recycling bins in new development.
- 4.31 It was also noted that in Policy 35 – Residential Annexes amenity is only mentioned in the context of amenity space for the residents of the site. Through this assessment it was suggested that alternative policy wording should be considered to specifically note and consider the amenity impacts on neighbours of the intensified use of land to improve outcomes in relation to SA criterion 7c (pollution).

Objective 8: Landscape, Townscape and Heritage

- 4.32 A significant number of policies in the Local Plan are judged to be neutral against this objective. These are those policies that are unlikely to influence the build form of development.
- 4.33 Those policies that seek good design and high build quality in their various forms are, perhaps unsurprisingly, judged to have positive effects on this objective.
- 4.34 A number of uncertainties are noted. These relate to matters where the detail cannot be assessed until a detailed scheme is being considered, such as the exact design of regeneration schemes or low carbon measures.
- 4.35 Improvements were made to the following policies after the initial assessment found that they could provide better outcomes in relation to landscape, townscape and biodiversity if amended:
- Policy 3 – Regeneration: The assessment found that the policy was lacking in relation to density and design in the town centre regeneration areas. Strengthening these provisions would also afford an opportunity to make clearer references to sense of place (SA criterion 8f), which is identified as uncertain.
  - Policy 12 - High Quality Design: Through this assessment it was noted that heritage considerations were only reflected in the supporting text, rather than the policy requirements itself. This makes the policy weaker than it could be in this regard. Additional wording was added to the policy text to strengthen it in relation to SA criterion 8b.
  - Policy 16 - Preventing Overheating: Other similar policies in the plan directly reference heritage consideration in the supporting text. In order to prevent adverse heritage outcomes, this was replicated as a change to this policy also.

## Findings of the sustainability appraisal of the emerging site allocations

- 4.36 The assessment of sites forms an important step between the identification of a site as 'developable' in the [Strategic Housing and Economic Land Availability Assessment \(SHELAA\)](#) and its proposed 'allocation' in the plan, denoted by a policy in the plan identifying the site as suggested for development for a particular use.
- 4.37 The SHELAA serves to assess, at a high level, what land in the borough is 'suitable', 'available' and 'deliverable', together taken to mean that it is potentially 'developable'. The next step is then to consider in much more detailed whether each of these sites is in line with the development strategy (discussed in the Local Plan itself and in chapter 3 above), and whether the possible effects of developing the site are acceptable, both at a site level and taken as a collective.
- 4.38 All the sites considered developable in the SHLAA were therefore put through the sustainability appraisal process. Planning officers, as well as expert advisors in such matters as ecology, heritage, landscape, transport and environmental health fed into this process to screen sites and identify potential effects.
- 4.39 This section provides an overview of the findings. Rather than site by site, they are presented here by SA objective, so as to paint an overall picture of the sustainability effects of the plan. Appendix C to this report shows the full assessment spreadsheet for the developable sites.
- 4.40 Sites with expected negative effects are highlighted specifically in Appendix D. That table also indicates the measures proposed to mitigate these effects, or in a limited number of cases suggest that the site should not be taken forward. These were also guided by expert input in the relevant topic.

### Objective 1: The Natural Environment

- 4.41 The Council's ecologist reviewed and assessed all the proposed sites, noting any designations on or near the site, and the likely or known presence of protected species.
- 4.42 It is acknowledged that development on the vast majority of sites is likely to have an effect of some kind on biodiversity and the natural environment. However, it would be overly cautious to consider that in all cases, a negative effect should be assumed.
- 4.43 In assessing sites, a distinction was made between those sites where protected species are likely to be present, and those sites that have a specific site designation and/or protected species are known to be present. The Council's ecologist also considered the prospect of successful mitigation.

- 4.44 Broadly speaking, where a site is not protected in its own right and species are not confirmed to be present, the site was noted as uncertain against the objectives of protecting designated species and protected sites from development related harm and protecting and enhancing ecological networks (SA objectives 1a-c). That is because the exact form of development as well as the proposed mitigation is not known at the allocation stage and therefore remains uncertain. It is considered likely that once appropriate mitigation is agreed, these sites could be assessed as neutral.
- 4.45 By contrast, sites that are subject to a site level protective designation, or where protected species have been confirmed to be present on site were noted as having a negative impact against protecting designated species and protected sites from development related harm and protecting and enhancing ecological networks (SA objectives 1a-c), as these sites are considered to be particularly sensitive.
- 4.46 That said, no site is marked as 'strongly negative', or the issue as insurmountable. On this basis, the sites have still been put forward for allocation. The relevant policy will provide guidance as to the nature of the mitigation required to make the site acceptable. Only if this mitigation is delivered as part of the planning proposal will these sites considered to be acceptable for development.
- 4.47 It should be noted that at the time of writing a Local Nature Recovery Strategy (LNRS) is under preparation. This will identify land that is of value to the local ecological network and opportunities for enhancement. Once the strategy is finalised (expected in summer 2025), this Sustainability Appraisal should be updated to review any additional effects and/or mitigation against SA criteria 1b and 1c (protection and enhancement of the ecological networks). These updates should inform the next iteration of the SA, which will accompany the Regulation 19 Local Plan.
- 4.48 In relation to supporting biodiversity net gain (SA objective 1d), all sites were judged to be neutral on the basis that this can only be readily assessed at the detailed development stage. It is a requirement in law to achieve at least 10% biodiversity net gain on all sites.
- 4.49 Development must also be nutrient neutral as a result of case law. On this basis, all sites could be considered neutral against SA objective 1e. However, since agricultural use is inherently nutrient intensive, those greenfield sites currently in agricultural use score positively when development is considered, while brownfield sites and other non-agricultural uses score as neutral. Even those with positive effects will need to demonstrate at the application stage that they are nutrient neutral.

#### Objective 2: Climate Change

- 4.50 The outcomes against this objective are largely influenced by the chosen design and construction of any particular development, and therefore remain uncertain until the planning application stage. Topic policies in the plan set out the requirements all development must meet to achieve positive and avoid negative effects. While the location and nature of the site will have some bearing on this, it is not considered significant enough to distinguish between sites at the site assessment or allocation stage.

### Objective 3: Homes for All

- 4.51 Given that the purpose of a site allocation is to support development of a site for the proposed use in principle, all the potential housing allocation sites attract a positive assessment in relation to the Homes for All objective, in particular those criteria (3a-c) designed to measure delivery of housing numbers, affordable housing and specialist housing.
- 4.52 Whether a site is considered to be positive or strongly positive in terms of its likely contribution to housing delivery was based on the site capacity, with sites of an expected yield of 50 or more being assessed as more strongly positive than smaller sites. Similarly, the same size of site would attract requirements for specialist housing through topic policies in the plan, and therefore these sites are considered to have a potential positive effect on criterion 3c, the provision of specialist homes. Sites that are explicitly proposed for specialist accommodation or known to be capable of accommodating uses such as retirement accommodation or care homes, are noted as strongly positive. Other sites may also contribute to meeting this need but are noted as neutral at this stage of plan making.
- 4.53 All potential allocation sites are large enough to attract a policy requirement for affordable housing and therefore are considered to make a positive contribution to criterion 3b. Greenfield sites are known – in general terms – to have greater value, so delivery of affordable housing is more likely to be viable than on brownfield sites. The sites SA distinguished between strongly positive and positive on this basis.
- 4.54 Sites proposed for employment use are considered to be neutral against the Homes for All objective. While use for employment rather than homes could be seen as negative against the housing objective, it is considered more appropriate to score the effect as neutral. This is because all the employment sites being assessed are being promoted by the landowner for employment use only, not housing. Housing delivery is therefore not a reasonable alternative. The purpose of this assessment is then to assess the relative merits of allocation sites against each other. In terms of housing delivery all are neutral.
- 4.55 Criterion 3d under this objective seeks to assess a site's contribution to providing healthy homes with good amenity, space, storage, accessibility, access to private open space etc. Since the quality of homes on all sites remains uncertain at the plan making stage, as this depends on detailed proposals, all sites are judged to be neutral against this criterion. Topic policies in the plan set requirements to achieve positive outcomes in this regard.

### Objective 4: Healthy and Safe Communities

- 4.56 This SA objective covers a wide range of indicators designed to assess whether policies and sites help to promote healthy, inclusive and safe places. A number of these are deemed not possible to assess at the allocation stage, so attract an uncertain or unknown rating at this stage (criteria 4c, d and f, relating to promoting healthy lifestyles, inclusivity of provision and design of services and designing out crime).

- 4.57 One of the measures is 'protecting access to natural spaces, green spaces, parks, leisure open spaces and recreational facilities' (criterion 4a). Where development would result in the loss of public open space or sports and leisure facilities, these sites are noted as having a negative effect on this objective. The same applies, where Public Rights of Way could be affected. It should be noted that a large number of the sites are undeveloped land, and some of these are used informally by local residents. These sites have not attracted a negative assessment in this SA. Although it is acknowledged that loss of such access would have a detrimental effect on residents' access to such spaces, landowners could enforce this through control measures at any time, not necessarily linked to development of the site. It is also not possible to be consistent about assessing access, where access is not formally permitted. Finally, it is also acknowledged that the presence of open and undeveloped spaces can have health benefits, whether they are accessible or not by providing green outlooks and 'breathing space' from built up areas. However, Criterion 4a, specifically measures 'access to' such spaces. The loss of open spaces, countryside etc in the visual sense is measured under SA Objective 8.
- 4.58 A similar criterion (4b), which relates to improving resident's access to open and recreational spaces is judged as neutral for all possible allocation sites, because topic policies in the plan set out requirements for the provision of open space on and/or off-site. It is therefore not a distinguishing feature between sites at the allocation stage.
- 4.59 Criterion 4e considered whether a site supports equal and safe access to facilities and services, particularly by walking and cycling. The SA of potential site allocations used accessibility mapping to determine the SA score for each site, with those considered to be poorly accessible noted as negative against this objective. Town centre locations and those that are on main bus routes and/or close to railway stations score well here.
- 4.60 Criterion 4g is designed to assess flood risk to sites. Flood risk can arise from a multiplicity of sources, including most commonly the sea (tidal), rivers (fluvial), surface water from rainfall (pluvial) and groundwater, as well as interaction between these sources.
- 4.61 The assessment of the full range of flood risks has been set out at the strategic level through a Strategic Flood Risk Assessment of the possible allocations sites, which allows the complexity of this topic to be considered in a more nuanced and detailed way. That work provided a summary of the risk at each sites for use in this SA. The SA reflects the risk to a site in terms of tidal, fluvial or surface water risk now or in the future with climate change taken into account. It has also been considered whether the site is currently greenfield or brownfield (with greenfield development noted to be likely to change surface water run-off more dramatically than brownfield development), and whether the site lies in an area where drainage is more likely to be an issue (drainage priority areas as identified in the LLFA Catchment Management Plan).
- 4.62 It is notable, compared to other SA criteria, that none of the sites has been judged as positive. This is because every site assessed is affected by flood risk of one form or another. Naturally this varies in severity, for example some sites are affected directly by risk of

flooding from the sea or a river, while others might not be at risk themselves, but have the potential to increase risk elsewhere. Sites across the board have therefore attracted negative or uncertain SA scores.

- 4.63 A number of strong negative effects are noted, namely against the sites on Hayling Island. The review of sites through the Strategic Flood Risk Assessment of Local Plan sites highlighted the significant flood risk to the access road to the island. It found that this would make voluntary movement of people on or off the island as well as emergency access by road at the time of a flood event impossible. It was not considered that this risk could be satisfactorily addressed by the development, or that the risk is outweighed by any notable sustainability benefits to the community, even when taking into account the contribution the site could make to meeting housing need. The SFRA Sites Review considered it unlikely that these sites could pass the exception test, which is reflected in the strong negative effects in the SA against criterion 4g.
- 4.64 Finally, it should be noted that at the time of writing the publication of National Assessment of Flood Risk (NaFRA2) is expected. This will be available on the National Flood Map for Planning and will provide information for risk of flooding from rivers and sea in the present day and the future, and risk of flooding from surface water. Once this data is available, assessors should compare the information from the Council's Strategic Flood Risk Assessment which was used for this iteration of the Sustainability Appraisal with the NaFRA data, to check whether any changes are necessary. The appraisal should then be updated to review any additional effects and/or mitigation against SA criteria 4g. These updates should inform the next iteration of the SA, which will accompany the Regulation 19 Local Plan.

#### Objective 5: Economy & Employment

- 4.65 The proposed housing sites are considered neutral against a number of Economy & Employment objectives. SA objective 5a assesses whether the policy or allocation would be flexible and adaptable to economic changes. It is not considered that anything distinguishes one site from another in this regard, and therefore all sites are considered to be neutral. The housing sites are also considered neutral against SA objectives 5b (strengthen the function of the Borough's employment areas) and 5d (support the tourism and visitor economy), as none of the housing sites directly affects employment land, or land obviously directly related to the visitor economy. This is with the exception of the sites on Hayling Island where uncertainties are noted against the effects the development of sites, either individually or cumulatively could have on the attractiveness of Hayling Island as a visitor destination.
- 4.66 Housing sites and broad locations in or very close to the borough's town centres are judged to be potentially positive against SA criterion 5e (supporting the long term viability of town centres), and the broad locations specifically linked to a regeneration programme are judged as strongly positive in relation to enhancing the quality and vitality of town centres (SA criterion 5f). Employment floorspace near town

centres is judged as uncertain against SA criterion 5e – they could be positive, for example because workers may use the town centre at lunchtime or after work; however, depending on the uses, they might also compete with the town centre.

- 4.67 Housing sites likely to deliver more than 50 dwellings are considered likely to support local employment prospects (SA criterion 5c), as they meet the policy requirements for Employment & Skills plans. Naturally, the employment sites are all judged as positive or strongly positive against this criterion. Similarly, the vast majority of employment sites lie in or adjacent to existing employment areas and are thus judged to support their function (SA criterion 5b).
- 4.68 No negative effects are expected from any site against the employment and economy objective.

#### Objective 6: Effective Transport and Communications

- 4.69 All sites are judged as neutral against decarbonising the transport system eg through electrification etc (SA criterion 6c) and supporting and facilitating communications technology (SA criterion 6g). It is not considered that anything distinguishes one site from another in this regard.
- 4.70 Criteria 6a and 6b are designed to assess how accessible a site is. The SA of potential site allocations used accessibility mapping to determine the SA score, taking into account the proximity of town centres, bus routes and train stations. On top of this map-based review the Local Highway Authority reviewed each of the sites, providing commentary based on knowledge of particular issues at sites, as well as consideration of the principles enshrined in Local Transport Plan (LTP) 4. Town centre locations and those that are on main bus routes and/or or close to railway stations score generally perform well against these objectives, although a few detailed concerns were noted on individual sites. The assessment highlighted that a few sites were considered to be poorly accessible and in need of significant infrastructure improvements for development to be acceptable here. In addition, the sites on Hayling Island are noted as strongly negative on the basis of in principle concerns raised by the Local Highway Authority.
- 4.71 The vast majority of sites remain uncertain in relation to SA criteria 6d, 6e and 6f, which measure avoiding or mitigating adverse effects of development on highways safety; avoiding the effects of increased demand on transport infrastructure; and avoiding severe residual cumulative impacts of development on the transport network. Pending the strategic transport assessment, which will accompany the final version of the Local Plan, and the detailed transport assessments of the sites which will be required to accompany any planning application, these all remain uncertain. Again, sites on Hayling Island are noted as strongly negative against these objectives, based on in principle concerns about the suitability of these sites raised by the Local Highway Authority.

#### Objective 7: Natural Resources

- 4.72 This objective considered the likely impact of development on proposed sites on a range of natural resources – land, air and water.

- 4.73 Sustainable construction and waste management are also considered here, though these latter two are noted as uncertain against all sites, as the detail of approaches to these matters will not be known until a planning application is made. One site was noted as a potential negative, as it encroached on the buffer zone of a waste management site safeguarded through the Hampshire Minerals and Waste Plan.
- 4.74 The Council's Environmental Health team screened the sites for the presence of course of contamination and sensitive receptors.
- 4.75 In relation to SA criterion 7a (protecting water bodies and systems as a valuable resource), it was found that every site has at least one, and often multiple, of the following receptors present on site or nearby:
- Main river adjacent
  - Main river on site
  - Ordinary water course on site
  - Coastal water within 25m
  - Secondary aquifer on site
  - Principal aquifer on site
  - SPZ (Excl. 1C) on site
  - SPZ1C on site
- 4.76 Policies in the plan as well as other control regimes require assessment of the impact of any proposed development on these natural resources. However, the effects cannot be fully assessed until the application stage, when the detail of proposals is known. As such, while the presence of these features is noted, the effect of development remains uncertain on all sites.
- 4.77 A number of sites are noted as uncertain against the criterion of protecting and improving air quality (SA criterion 7b). Again, the effects cannot be fully assessed until the planning application stage, when the detail of proposals is known. However, sites are noted where air quality is likely to be a particular consideration. Where this is not the case based on currently available evidence, the site was assessed as positive.
- 4.78 Since water and air are considered specifically under SA criteria 7a and 7b, the assessment of SA criterion 7d ('avoiding all sources of pollution'), focussed on contaminated land and Radon exposure. Sites where the Environmental Health review noted potential contamination (either suspected or recorded, on site or adjacent to the site) or the need for radon protection, were noted as uncertain. As with water and air quality detailed assessments will be required at the application stage. NB – in terms of other pollution, noise matters were also considered as part of the screening but were found to be a likely consideration on the vast majority of the sites, making it not a



useful measure to distinguish sites by. Matters such as construction noise will be dealt with at the planning application stage through other control regimes in any case.

- 4.79 SA criterion 7c, designed to assess the desire to avoid the irreversible loss of access to or overuse of natural resources (minerals, waste, soil, water), was approached in a similar manner. Assessors considered whether the site was in the Minerals Safeguarding Area under Hampshire County Council's Minerals and Waste Plan and noted any likely presence of minerals under the site. Since this is not considered a constraint on development, these sites were not noted as having negative impacts. However, an uncertain effect against the loss of minerals was noted, and a development requirement will be highlighted in any site allocations that the extraction of minerals prior to development should be considered, to avoid the permanent sterilisation of the site.
- 4.80 Under this same criterion, the site screening noted whether a site was brownfield or greenfield, i.e. whether greenfield was being lost to development. This did not however attract a negative score, as the loss of greenfield land does not *per se* constitute a reason not to develop; rather, these were considered to be neutral. (NB the loss of open space, which is in many cases synonymous with greenfield land is considered both under SA objective 4 'healthy & Safe Communities', as well as SA objective 8 'Landscape 7 Townscape, and negative effects noted in relation to its loss).
- 4.81 It should be acknowledged that ideally, the assessment of this criterion would also have included a review of whether land was Best and Most Versatile Agricultural Land. However, due to the age of the publicly available data and subsequent change in agricultural classifications, this was not considered to be a useful tool by which to differentiate sites.

#### Objective 8: Landscape, Townscape and Heritage

- 4.82 The final SA objective considered whether development will protect and enhance the landscape and townscape character of the borough and protect and enhance heritage assets.
- 4.83 Naturally, since this it is not only the location of the site itself, what surrounds it and what its proposed use is compared to the current use, a full assessment of impacts against this objective cannot be made until proposed designs and layouts emerge at the application stage. For this reason, SA criteria 8c, d and e, relating to making best use of land; ensuring appropriate density and scale of development, within the local context and striving for excellent design and the use of high-quality materials respectively are not considered suitable for differentiating sites at the allocations stage. All sites are noted as uncertain against these criteria.
- 4.84 The assessment of sites focusses then on SA criteria relating to impact on landscape, heritage assets and sensitivity to the local environment and sense of place.

- 4.85 Against SA criterion 8a ('protect and enhance valued landscape') and criterion 8f ('sensitive to the local environment and promote a sense of place') have been considered together. The former focussed on impacts to formal landscape designations (the South Downs National Park and the Chichester Harbour AONB National Landscape). The latter took a more local view, a considered the change in character that development of a site would bring about, as well as possible impacts on particular features such as Public Rights of Way. Only a small number of sites was judged to have possible negative impacts on formally 'values landscapes', while naturally, a number of greenfield sites were considered to have likely negative effects on local character and sense of place. While it is acknowledged that if development is accepted, the loss of the feeling of openness in an area is unavoidable. However, mitigation in the form of sensitive layouts, separation distances, protection of existing planting and boundary screening can address some of the visual effects of a change from an undeveloped to a developed site.
- 4.86 Criterion 8b considered heritage assets and archaeological potential. While some possible effects are identified, and some sites are noted as more sensitive than others, mitigation of harm is considered possible on all proposed sites.

Summary of mitigation proposals for identified potential negative effects for allocation sites

- 4.87 The table at Appendix D summarises all the potential allocation sites where potential negative effects were noted through the SA and how these will be mitigated to make allocation for development acceptable. These mitigation measures should be reflected in any allocations drawn up for the Local Plan to ensure that negative effects are avoided or mitigated. In this context, it should be noted that securing mitigation does not rely solely on the allocation policies, but that the topic policies in the plan also address these issues and require them to be satisfactorily addressed before development may be considered acceptable and sustainable.
- 4.88 This table also shows where certain effects are not considered mitigatable either at an individual site level or more broadly. For those sites it is suggested that the site should not be allocated for development through the Local Plan.

## 5. Consultation (SA Stage D) and Next Steps

### Consultation

- 5.1 Havant Borough Council is undertaking a 'Regulation 18' consultation on its draft Local Plan from 6 May 2025 to 1<sup>st</sup> July 2025.
- 5.2 This SA report and the SA Scoping Report that preceded this report are being made available as part of that consultation, in fulfilment of required SA stage D (see paragraph 1.5). The contents of this report can be used as a tool to help consultees understand why a particular course of action is being proposed.
- 5.3 Consultees are invited to comment on the plan, the SA report or both. Details of the consultation, and how to respond can be found at <https://www.havant.gov.uk/local-plan>.
- 5.4 If you have any questions about the consultation, or the content of this document in particular, please email the Planning Policy Team at [policy.design@havant.gov.uk](mailto:policy.design@havant.gov.uk).

### Next Steps

- 5.5 Following the consultation, the Borough Council will consider all the responses received. These, together with a new and updated evidence base, will influence the content of the draft (Regulation 19) Local Plan. When the Regulation 19 plan is published, it will be accompanied by a full SA report, in fulfilment of the Stage B to D of Sustainability Appraisal (see section 1.5). That SA report will again be subject to consultation.

## Appendix A: Local Plan Sustainability Appraisal Framework

The framework set out below was established during the scoping phase of the SA, through the [Sustainability Appraisal Scoping Report \(2022\)](#)

Sustainability Theme and Objective		Decision Making Criteria: <i>'Does the policy or allocation help to...'</i>		Key Indicators and Possible Assessment Tools	
1	<b>The Natural Environment and Biodiversity</b>	To protect and enhance the natural environment and support biodiversity	1a	protect designated sites and protected species from development related harm?	Extent and condition of SSSIs, SPAs, SACs and Ramsar sites Extent and condition of locally designated sites (SINCs and LNRs) Development proposals avoiding loss or impact on habitats and species Habitat and species monitoring through HBIC
			1b	protect ecological networks?	Mapping of species / habitats / ecological networks Extent of ancient woodland Habitat and species monitoring through HBIC Achievement of BAP targets
			1c	enhance ecological networks?	
			1d	promote or support biodiversity net gain?	Proportion of development achieving biodiversity net gain Amount of biodiversity habitat delivered through Local Plan strategic site allocations
			1e	promote or support nutrient neutral development?	Implementation of HBC nutrient neutrality mitigation plan Nitrate levels in Solent SPA / SAC
2	<b>Climate Change</b>	To minimise the borough's contribution to climate	2a	promote sustainable construction methods?	Level of emissions from homes and other buildings

		change and ensure resilience to the effects of climate change	2b	reduce carbon emissions from buildings? (NB transport covered elsewhere)	Average annual consumption of gas Average annual consumption of electricity Houses improved for energy efficiency and affordable warmth EPC ratings Percentage of new build homes built to 'zero-carbon ready' standard or equivalent
			2c	reduce water use?	Average water use in homes Availability of sufficient water supply Prevalence of water metering Homes fitted with water use reductions measures
			2d	support the switch to low carbon, renewable sources of energy?	Micro-generation [of electricity] Larger scale renewable energy electricity generation Homes with EV charging Publicly availability of EV charging, including rapid charging
			2e	promote climate change resilience measures for buildings, infrastructure and public spaces? (NB flood risk covered elsewhere)	Tree planting and other natural shade Drought-resistant planting schemes Climate change conscious building design Properties adversely affected by the impacts of climate change (eg extreme weather; flooding etc)
<b>3</b>	<b>Homes for All</b>	To provide good quality homes for all	3a	provide homes for the people of Havant? (number, type, tenure, size)	Housing Need Housing Supply Types and sizes of dwellings

					Built-up areas and environmental constraints
			3b	provide affordable homes?	Affordable housing need Affordable housing supply Tenure of dwellings Affordability ratio Households on the Housing Register
			3c	provide homes for those with specialist needs?	Developments meeting increased accessibility standards Age and health profile of population, now and projected Supply of sheltered accommodation, care homes and nursing homes
			3d	provide healthy homes? (amenity, space, storage, accessibility, access to private open space)	Developments meeting national space standards Affordable homes meeting Decent Homes standard
<b>4</b>	<b>Healthy and Safe Communities</b>	To promote healthy, inclusive and safe places	4a	protect residents' access to natural spaces, green spaces, parks, leisure open spaces and recreational facilities?	Number and location of natural spaces, green spaces, parks, leisure open spaces and recreational facilities Facilities lost or protected from loss
			4b	improve residents' access to natural spaces, green spaces, parks, leisure open spaces and recreational facilities?	Accessibility by sustainable modes of natural spaces, green spaces, parks, leisure open spaces and recreational facilities
			4c	enable and support healthy lifestyles?	Health data (life expectancy; obesity; self harm, deprivation etc) Number and location of hot foot takeaway outlets Number and location of gambling venues

					Participation in physical activities and sport Levels of active travel
			4d	promote inclusivity of provision and design of facilities and services?	Reported sense of community Reported social exclusion
			4e	support equal and safe access to facilities and services, particularly by walking and cycling?	Extent of public vs private provision Accessibility of facilities and services by sustainable modes
			4f	design out crime?	Crime Fear of Crime
			4g	avoid and/or mitigate flood risk?	Areas at risk of flooding now and in the future Flood risk management schemes delivered New development in areas at risk of flooding (or refusals of such) Frequency and nature of flooding events
5	<b>Economy and Employment</b>	To support and enhance the local economy now and into the future	5a	be flexible and adaptable to economic changes?	Business density Re-use of buildings
			5b	strengthen the function of the Borough's employment areas?	Vacancies in office and industrial buildings Supply and availability of office and industrial buildings Loss of office and industrial buildings Business start-ups and move-ons
			5c	Support the employment prospects of the local community?	Gross Value Added per head Unemployment and economic activity Universal credit claimants Average earnings

					Educational attainment levels Types of jobs Job creation
			5d	support the tourism and visitor economy	Number of visitors Tourist expenditure Employment in the tourism sector
			5e	support the long-term viability of town centres?	Anticipated needs for retail, leisure, office and other main town centre uses
			5f	enhance the quality and vitality of town centres?	Vacancy rates Pedestrian footfall Qualitative assessment centres Amount and location of existing and new retail floorspace Amount and location of existing and new floor space for other types of town or local centre uses Accessibility of/to town and local centres
<b>6</b>	<b>Effective Transport and Communications</b>	To promote an efficient transport and communications network, which supports the move to a low carbon future	6a	ensure shops, jobs, services and facilities are within easy reach of homes?	Distance of homes to key facilities Accessibility by sustainable modes between homes and key facilities
			6b	make the use of sustainable modes of transport attractive?	Improvements to cycling, walking and bus network Availability of bus services Access to good quality cycle parking
			6c	decarbonise the transport system (electrification, road materials etc)?	Main mode of travel to work Proportion of journeys (to work) on foot or by cycle



					EV charging points in homes Public EV charging points, including rapid charging
			6d	avoid or mitigate adverse effects of development on highways safety?	Improvements to cycling, walking and bus network
			6e	address the effects of increased demand on transport infrastructure?	Delivery of transport improvement schemes Congestions and delays
			6f	avoid severe residual cumulative impacts of development on the transport network?	Road traffic accidents
			6g	support and facilitate communications technology?	Super fast and FTTP coverage Digital exclusion
<b>7</b>	<b>Natural resources</b>	To protect natural resources from unsustainable levels and patterns of use	7a	protect water bodies and systems as a valuable resource?	Waterbodies meet “good” status or above under WFD Bathing Water Quality Discharge and pollution incidents Nitrate levels in Solent SPA / SAC
			7b	protect and improve air quality?	Air quality monitoring AQMA declared
			7c	avoid irreversible loss of access to or overuse of natural resources (minerals, waste, soil water)?	Development on BMV agricultural land Average water consumption levels Prior extraction of minerals
			7d	minimise all sources of pollution?	Air quality monitoring Noise monitoring Water quality monitoring Contaminated land monitoring

			7e	support efficient management for all types of waste?	Waste arising Recycling rates
			7f	Promote the use of sustainable materials and construction methods	Number of schemes meeting sustainable construction standards
8	<b>Sense of Place (Landscape, Townscape and Heritage)</b>	To protect and enhance the landscape and townscape character of the borough and protect and enhance heritage assets	8a	protect and enhance valued landscape?	Number and type of development in the AONB Retention of valued landscape and townscape features Use of landscape impact assessments Protection or loss of trees and/or woodland
			8b	conserve and enhance the borough's heritage assets?	Number and location of designated heritage assets Number and location of non-designated heritage assets Assets on the Heritage at Risk Register and planned actions Loss or damage to heritage assets or their setting Conservation Areas supported by up to date character appraisal and management plan
			8c	make best use of land?	% of development on greenfield vs brownfield land
			8d	Ensure appropriate density and scale of development, within the local context?	Density of development
			8e	strive for excellent design and the use of high-quality materials?	Preparation of local design guidance
			8f	be sensitive to the local environment and promote a sense of place?	Retention of valued landscape and townscape features

Appraisal symbol	Assigned where...
++	<p><b>Strong Positive</b></p> <ul style="list-style-type: none"> <li>notable sustainability gains are expected to arise from the policy or development of the site; and/or</li> <li>the policy strongly supports the sustainability objective; and/or</li> </ul>
+	<p><b>Positive</b></p> <ul style="list-style-type: none"> <li>some sustainability gains are expected to arise from the policy or development of the site; and/or</li> <li>the policy supports the sustainability objective; and/or</li> </ul>
+/-	<p><b>Neutral</b></p> <ul style="list-style-type: none"> <li>no or minimal effects against the sustainability objective are anticipated from the policy or development of the site; and/or</li> <li>the policy neither works against nor supports the sustainability objective; and/or</li> <li>if negative effects could arise from the policy, the policy also requires mitigation; and/or</li> <li>the policy might have both minor positive or negative effects, but on balance is neutral</li> </ul>
?	<p><b>Uncertain or Unknown</b></p> <ul style="list-style-type: none"> <li>effects are uncertain or unknown (at the time of the assessment)</li> </ul>
-	<p><b>Negative</b></p> <ul style="list-style-type: none"> <li>some sustainability losses are expected to arise from the policy or development of the site; and/or</li> <li>the policy works against this sustainability objective</li> </ul>
--	<p><b>Strong Negative</b></p> <ul style="list-style-type: none"> <li>notable sustainability losses are expected to arise from the policy or development of the site; and/or</li> <li>the policy works strongly against the sustainability objective</li> </ul>

## **Appendix B: Full sustainability appraisal of emerging topic policies**

See Excel spreadsheet published as separate file

## **Appendix C: Full sustainability appraisal of possible site allocations**

See Excel spreadsheet published as separate file

## Appendix D: Summary of mitigation proposals for identified negative effects for allocation sites

Potential Allocation Site	Expected Negative Impact (relevant SA criteria & nature of effect)	Proposed Mitigation
BL01 Havant Town Centre Broad Location	4g There is risk of fluvial and surface water flooding on the site. The site lies in an identified drainage priority area.  8b Sensitive heritage environment and strong archaeological potential	Any site allocation / topic policies should require that areas at risk of flooding are avoided for development and all floor levels, access routes, drainage systems and flood mitigation measures are designed with an allowance for climate change. Any site allocation / topic policies must require development to address the risk of surface water flooding on the site and ensure that surface water management systems restrict runoff to below the pre-development rate of flow. The risk to the site will need to be considered in detail through a site specific FRA at the application stage and avoidance and mitigation measures identified.  Potential to mitigate harm through layout, design, building heights, separation distances, landscape buffers. Require assessment of the archaeological potential, including past impacts.
BL02 Civic Campus Broad Location	4g There is risk of surface water flooding on the site. The site lies in an identified drainage priority area.	Any site allocation / topic policies must require development to address the risk of surface water flooding on the site and ensure that surface water management systems restrict runoff to below the pre-development rate of flow. The risk to the site will need to be considered in detail through a site specific FRA at the application stage and avoidance and mitigation measures identified.
BL03 Waterlooville Town Centre Broad Location	4g There is risk of surface water flooding on the site. The site lies in an identified drainage priority area.	Any site allocation / topic policies must require development to address the risk of surface water flooding on the site and ensure that surface water management systems restrict runoff to below the pre-development rate of flow. The risk to the site will need to be considered in detail through a site specific FRA at the application stage and avoidance and mitigation measures identified.
BL04 Leigh Park Town Centre Broad Location	4g There is risk of surface water flooding on the site. The site lies in an identified drainage priority area.	Any site allocation / topic policies must require development to address the risk of surface water flooding on the site and ensure that surface water management systems restrict runoff to below the pre-development rate of flow. The risk to the site will need to be considered in detail through a site specific FRA at the application stage and avoidance and mitigation measures identified.

BL05	Southleigh Broad Location	1a, 1b	Potential for harm to protected sites, species and/or the ecological network	Avoidance and mitigation measures will need to be flagged in any allocation to avoid negative effects and make development acceptable. As a substantial site, Southleigh will require a detailed ecological assessment and fully integrated mitigation/compensation/enhancement strategy. This will need to include: maintenance and enhancement of green corridor linking north-south between Southleigh Forest environs and A27 and south to Warblington undeveloped coast; Retention of extensive areas of semi-natural habitat, especially wood pasture in north; Retention and enhancement of habitat linkages through site and with surrounding landscape; Sensitive lighting strategy to ensure unlit habitat corridors; Native-led landscaping, taking into account local distinctiveness and conservation priority; embedded biodiversity enhancements within new structures.
		4e	Does not support equal and safe access to facilities and services due to poor accessibility	Although parts of the site are currently considered to be poorly accessible, the location and scale of the development may make it possible to address deficiencies. Significant infrastructure improvements will be required to make the site acceptable in accessibility terms. A comprehensive transport assessment and access strategy, focussed on sustainable and active modes will need to be agreed with the Highway Authorities prior to development commencing.
		4g	There is risk of fluvial and surface water flooding on the site. Development of this greenfield site has the potential to increase flood risk off-site. The site lies in an identified drainage priority area.	Any site allocation / topic policies should require that areas at risk of flooding are avoided for development and all floor levels, access routes, drainage systems and flood mitigation measures are designed with an allowance for climate change. Any site allocation / topic policies must require development to address the risk of surface water flooding on the site and ensure that surface water management systems restrict runoff to the greenfield rate of flow. The risk to the site will need to be considered in detail through a site specific FRA at the application stage and avoidance and mitigation measures identified.
		6a, 6b	The site has poor accessibility and would require significant transport infrastructure improvements to make the site accessible by sustainable transport modes.	Any allocation must require the early drawing up of a vision, masterplan and comprehensive movement strategy for the site, focussed on sustainable transport options, both in the site and connecting to the surrounding areas, to the satisfaction of the Highway Authorities.

		8a, 8f	Potential impact on significant landscape designation, and development would result in a significant change in character locally, likely to be perceived as negative	It is not possible to mitigate for the loss of 'openness' when development takes place. However, there is the potential to mitigate character harm through layout, building heights, separation distances, landscape buffers, and screening. Any allocation policy / topic policies should highlight particular vulnerable features and require mitigation. Potential to mitigate harm through layout, design, building heights, separation distances, landscape buffers; requirement to retain, improve quality of and access to parkland
		8b	potential for loss of historic parkland setting - opportunity to provide access to enhances parkland	
EM01	Land north of Long Copse Lane (western site)	1a, 1b	Potential for harm to protected sites, species and/or the ecological network	Avoidance and mitigation measures will need to be flagged in any allocation to avoid negative effects and make development acceptable. This will need to include provision of an ecological and landscape buffer between the woodland and the developed area to mitigate the impact of protected species, woodland and Southleigh Forest SINC, and proposals provide a sensitive lighting strategy.
		4e	Does not support equal and safe access to facilities and services due to poor accessibility	The site is currently considered to be poorly accessible. Infrastructure improvements will be required to make the site acceptable in accessibility terms, focussed on sustainable and active mode, which will need to be agreed with the Highway Authorities prior to development commencing.
		6a, 6b	The site has poor accessibility and would require significant transport infrastructure improvements to make the site accessible by sustainable transport modes.	To be in accordance with LTP4 policies to reduce car dependency there must be high quality walking and cycling routes from the site to Emsworth town centre and other key destinations with an enhanced bus service serving the Southleigh Road area. Any allocation must require the provision of these and any other improvements identified through a site specific transport assessment to be delivered to make the site acceptable.
		8a, 8f	Potential impact on significant landscape designation, and development would result in a significant change in character locally, likely to be perceived as negative	It is not possible to mitigate for the loss of 'openness' when development takes place. However, there is the potential to mitigate character harm through layout, building heights, separation distances, landscape buffers, and screening. Any allocation policy / topic policies should highlight particular vulnerable features and require mitigation.
EM02	Land north of Long Copse Lane (main site)	1a, 1b	Potential for harm to protected sites, species and/or the ecological network	Avoidance and mitigation measures will need to be flagged in any allocation to avoid negative effects and make development acceptable. This will need to include provision of an ecological and landscape buffer between the woodland and the developed area to mitigate the impact of protected species, woodland and Southleigh Forest SINC, and proposals provide a sensitive lighting strategy; retention and enhancement of boundary vegetation along Long Copse Lane.



		4e	Does not support equal and safe access to facilities and services due to poor accessibility	The site is currently considered to be poorly accessible. Infrastructure improvements will be required to make the site acceptable in accessibility terms, focussed on sustainable and active mode, which will need to be agreed with the Highway Authorities prior to development commencing.
		4g	There is risk of surface water flooding on the site. Development of this greenfield site has the potential to increase flood risk off-site. The site lies in an identified drainage priority area.	Any site allocation / topic policies must require development to address the risk of surface water flooding on the site and ensure that surface water management systems restrict runoff to the greenfield rate of flow. The risk to the site will need to be considered in detail through a site specific FRA at the application stage and avoidance and mitigation measures identified.
		6a, 6b	The site has poor accessibility and would require significant transport infrastructure improvements to make the site accessible by sustainable transport modes.	To be in accordance with LTP4 policies to reduce car dependency there must be high quality walking and cycling routes from the site to Emsworth town centre and other key destinations with an enhanced bus service serving the Southleigh Road area. Any allocation must require the provision of these and any other improvements identified through a site specific transport assessment to be delivered to make the site acceptable.
		8a, 8f	Potential impact on significant landscape designation, and development would result in a significant change in character locally, likely to be perceived as negative	It is not possible to mitigate for the loss of 'openness' when development takes place. However, there is the potential to mitigate character harm through layout, building heights, separation distances, landscape buffers, and screening. Any allocation policy / topic policies should highlight particular vulnerable features and require mitigation.
EM06	West of Coldharbour Farm	1a, 1b	Potential for harm to protected sites, species and/or the ecological network	Avoidance and mitigation measures will need to be flagged in any allocation to avoid negative effects and make development acceptable. This will need to include an ecological buffer to mitigate the impact to Emsworth Recreation Ground SINC; Retention of semi-natural grassland. Native-led landscaping, taking into account local distinctiveness and conservation priorities. Sensitive lighting strategy; embedded biodiversity enhancements within new structures.
		4a	Loss of open space or recreational space / routes	Any site allocation / topic policies to require the retention of the Public Right of Way, together with buffers and/or screening to maintain its character as far as possible.
		4g	There is risk of fluvial and surface water flooding on the site. Development of this greenfield site has the potential to increase flood risk off-site. The site lies in an identified drainage priority area.	Any site allocation / topic policies must require development to address the risk of surface water flooding on the site and ensure that surface water management systems restrict runoff to the greenfield rate of flow. The risk to the site will need to be considered in detail through a site

				specific FRA at the application stage and avoidance and mitigation measures identified.
HA02	Helmsley House	4g	There is risk of surface water flooding on the site. Development of this partially greenfield site has the potential to increase flood risk off-site.	Any site allocation / topic policies must require development to address the risk of surface water flooding on the site and ensure that surface water management systems produce a 50% betterment on the pre-development rate of flow (PDL part) / restrict the rate of flow to greenfield rates (greenfield part). The risk to the site will need to be considered in detail through a site specific FRA at the application stage and avoidance and mitigation measures identified.
HA03	Southleigh Park House	1a, 1b	Potential for harm to protected sites, species and/or the ecological network	Avoidance and mitigation measures will need to be flagged in any allocation to avoid negative effects and make development acceptable, including providing an ecological buffer to mitigate the impact on protected species.
		4e	Does not support equal and safe access to facilities and services due to poor accessibility	The site is currently considered to be poorly accessible. Infrastructure improvements will be required to make the site acceptable in accessibility terms, focussed on sustainable and active mode, which will need to be agreed with the Highway Authorities prior to development commencing.
		4g	There is risk of surface water flooding on the site.	Any site allocation / topic policies must require development to address the risk of surface water flooding on the site and ensure that surface water management systems restrict runoff to below the pre-development rate of flow. The risk to the site will need to be considered in detail through a site specific FRA at the application stage and avoidance and mitigation measures identified.
		6a, 6b	The site has poor accessibility and would require significant transport infrastructure improvements to make the site accessible by sustainable transport modes.	Any site allocation / topic policies must require the provision of pedestrian and cycle links to the south to Southleigh and north to the Bartons Road cycle corridor, as well as any other improvements identified through a site specific transport assessment.
HA06	Land East of Castle Avenue	1a, 1b	Potential for harm to protected sites, species and/or the ecological network	Avoidance and mitigation measures will need to be flagged in any allocation to avoid negative effects and make development acceptable. This will need to include a mitigation package for wintering birds.

		4g	There is risk of surface water flooding on the site. Development of this greenfield site has the potential to increase flood risk off-site.	Any site allocation / topic policies must require development to address the risk of surface water flooding on the site and ensure that surface water management systems restrict runoff to the greenfield rate of flow. The risk to the site will need to be considered in detail through a site specific FRA at the application stage and avoidance and mitigation measures identified.
		8f	Development would result in a significant change in character locally, likely to be perceived as negative	It is not possible to mitigate for the loss of 'openness' when development takes place. However, there is the potential to mitigate character harm through layout, building heights, separation distances, landscape buffers, and screening. Any allocation policy / topic policies should highlight particular vulnerable features and require mitigation.
HA10	Oak Park School (main site)	4g	There is risk of fluvial and surface water flooding on the site. The site lies in an identified drainage priority area.	Any site allocation / topic policies should require that areas at risk of flooding are avoided for development and all floor levels, access routes, drainage systems and flood mitigation measures are designed with an allowance for climate change. Any site allocation / topic policies must require development to address the risk of surface water flooding on the site and ensure that surface water management systems produce a 50% betterment on the pre-development rate of flow. The risk to the site will need to be considered in detail through a site specific FRA at the application stage and avoidance and mitigation measures identified.
HA14	Palk Road	4g	There is risk of fluvial and surface water flooding on the site. The site lies in an identified drainage priority area.	Any site allocation / topic policies should require that areas at risk of flooding are avoided for development and all floor levels, access routes, drainage systems and flood mitigation measures are designed with an allowance for climate change. Any site allocation / topic policies must require development to address the risk of surface water flooding on the site and ensure that surface water management systems produce a 50% betterment on the pre-development rate of flow. The risk to the site will need to be considered in detail through a site specific FRA at the application stage and avoidance and mitigation measures identified.
		6d, 6e, 6f	The Local Highway Authority have raised concerns about the impact of the development on the operational safety of Palk Road/West Street junction and the interaction with the Bedhampton level crossing, which is also a concern to Network Rail.	Any allocation should flag these constraints / concerns specifically, and development would need to address these to avoid negative effects.

		8f	Development would result in a significant change in character locally, likely to be perceived as negative	It is not possible to mitigate for the loss of 'openness' when development takes place. However, there is the potential to mitigate character harm through layout, building heights, separation distances, landscape buffers, and screening. Any allocation policy / topic policies should highlight particular vulnerable features and require mitigation.
HA15	Belmont Castle Rest Home, 18-20 Portsdown Hill	8f	Development would result in a significant change in character locally, likely to be perceived as negative	It is not possible to mitigate for the loss of 'openness' when development takes place. However, there is the potential to mitigate character harm through layout, building heights, separation distances, landscape buffers, and screening. Any allocation policy / topic policies should highlight particular vulnerable features and require mitigation.
		8b	Potential impact on multiple heritage assets, including two Scheduled Ancient Monuments (Bevis Grave and Camp Down Roman Villa)	Require mitigation measures through landscape buffers, design and layout including building materials to be sympathetic to listed building; require retention and enhancement of boundary vegetation / mature trees to retain existing character and to protect the settings of the Scheduled Monuments
HA17	Land at the western end of Lower Road, Bedhampton	4g	There is risk of fluvial flooding on the site.	Any site allocation / topic policies should require that areas at risk of flooding are avoided for development and all floor levels, access routes, drainage systems and flood mitigation measures are designed with an allowance for climate change. The risk to the site will need to be considered in detail through a site specific FRA at the application stage and avoidance and mitigation measures identified.
		8f	Development would result in a significant change in character locally, likely to be perceived as negative	It is not possible to mitigate for the loss of 'openness' when development takes place. However, there is the potential to mitigate character harm through layout, building heights, separation distances, landscape buffers, and screening. Any allocation policy / topic policies should highlight particular vulnerable features and require mitigation.
HA18	Old Manor Farm, Lower Road (phase 2)	4g	There is risk of surface water flooding on the site. Development of this greenfield site has the potential to increase flood risk off-site. The site lies in an identified drainage priority area. More detailed modelling will be needed to establish the future risk of fluvial flooding.	Any site allocation / topic policies should require that areas at risk of flooding are avoided for development and all floor levels, access routes, drainage systems and flood mitigation measures are designed with an allowance for climate change. Any site allocation / topic policies must require development to address the risk of surface water flooding on the site and ensure that surface water management systems restrict runoff to the greenfield rate of flow. The risk to the site will need to be considered in detail through a site specific FRA at the application stage, and avoidance and mitigation measures identified.

		8f	Development would result in a significant change in character locally, likely to be perceived as negative	It is not possible to mitigate for the loss of 'openness' when development takes place. However, there is the potential to mitigate character harm through layout, building heights, separation distances, landscape buffers, and screening. Any allocation policy / topic policies should highlight particular vulnerable features and require mitigation.
HA20	Kingscroft Farm	4a	Loss of open space or recreational space / routes	Any site allocation / topic policies to require the retention of the Public Right of Way, together with buffers and/or screening to maintain its character as far as possible.
		4g	There is risk of fluvial and surface water flooding on the site. Development of this greenfield site has the potential to increase flood risk off-site. The site lies in an identified drainage priority area.	Any site allocation / topic policies should require that areas at risk of flooding are avoided for development and all floor levels, access routes, drainage systems and flood mitigation measures are designed with an allowance for climate change. Any site allocation / topic policies must require development to address the risk of surface water flooding on the site and ensure that surface water management systems restrict runoff to the greenfield rate of flow. The risk to the site will need to be considered in detail through a site specific FRA at the application stage and avoidance and mitigation measures identified.
		8f	Development would result in a significant change in character locally, likely to be perceived as negative	It is not possible to mitigate for the loss of 'openness' when development takes place. However, there is the potential to mitigate character harm through layout, building heights, separation distances, landscape buffers, and screening. Any allocation policy / topic policies should highlight particular vulnerable features and require mitigation.
HA21	Portsmouth Water Headquarters	1a, 1b	Potential for harm to protected sites, species and/or the ecological network	Avoidance and mitigation measures will need to be flagged in any allocation to avoid negative effects and make development acceptable. This will need to include a mitigation package for wintering birds.
		4g	There is risk of fluvial and surface water flooding on the site. The site lies in an identified drainage priority area.	Any site allocation / topic policies should require that areas at risk of flooding are avoided for development and all floor levels, access routes, drainage systems and flood mitigation measures are designed with an allowance for climate change. Any site allocation / topic policies must require development to address the risk of surface water flooding on the site and ensure that surface water management systems produce a 50% betterment on the pre-development rate of flow. The risk to the site will need to be considered in detail through a site specific FRA at the application stage and avoidance and mitigation measures identified.

HI05	Land adjacent to Havant Road and Castlemans Lane	4e	Does not support equal and safe access to facilities and services due to poor accessibility	The site is currently considered to be poorly accessible. Infrastructure improvements will be required to make the site acceptable in accessibility terms, focussed on sustainable and active mode, which will need to be agreed with the Highway Authorities prior to development commencing.
		4g	There is risk of tidal flooding on the site. The single access route onto Hayling Island is also at tidal risk. Development of this greenfield site has the potential to increase flood risk off-site.	At a site level, it may be possible to mitigate through development requirements: Any site allocation / topic policies should require that areas at risk of flooding are avoided for development and all floor levels, access routes, drainage systems and flood mitigation measures are designed with an allowance for climate change. Any site allocation / topic policies must require surface water management systems to restrict runoff to greenfield runoff rates. The risk to the site will need to be considered in detail through a site specific FRA at the application stage and avoidance and mitigation measures identified. However, it is not considered viable or possible for development to address the risk to the access road onto the island, either individually or cumulatively. <b>Do not allocate.</b>
		6a, 6b, 6d, 6e, 6f	Development in this location does not accord with the principles of Local Transport Plan 4, as it would create car dependent development. Hayling Island has very limited modal choice, so does not encourage sustainable travel choices. Development on the site would rely on the highway network resilience of one road on and off the island. It is likely that there will be cumulative impact on the resilience of the highway network especially at the A27/Langstone junction.	It is not considered viable or possible for likely negative effects to be mitigated. <b>Do not allocate.</b>
		8f	Development would result in a significant change in character locally, likely to be perceived as negative	It is not possible to mitigate for the loss of 'openness' when development takes place. However, there is the potential to mitigate character harm through layout, building heights, separation distances, landscape buffers, and screening. Any allocation policy / topic policies should highlight particular vulnerable features and require mitigation.
HI07	Land between Manor Road	1a, 1b	Potential for harm to protected sites, species and/or the ecological network	Avoidance and mitigation measures will need to be flagged in any allocation to avoid negative effects and make development acceptable. This will need to include a mitigation package for wintering birds.

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|-----------------------------|---|---|
| 4g                          | <p>There is risk of tidal flooding on the site. The single access route onto Hayling Island is also at tidal risk.</p> <p>Development of this greenfield site has the potential to increase flood risk off-site. The site lies in an identified drainage priority area.</p>   | <p>At a site level, it may be possible to mitigate through development requirements: Any site allocation / topic policies should require that areas at risk of flooding are avoided for development and all floor levels, access routes, drainage systems and flood mitigation measures are designed with an allowance for climate change. Any site allocation / topic policies must require surface water management systems to restrict runoff to greenfield runoff rates. The risk to the site will need to be considered in detail through a site specific FRA at the application stage and avoidance and mitigation measures identified. However, it is not considered viable or possible for development to address the risk to the access road onto the island, either individually or cumulatively. <b>Do not allocate.</b></p> |
| 6a,<br>6b,<br>6d,<br>6e, 6f | <p>Development in this location does not accord with the principles of Local Transport Plan 4, as it would create car dependent development. Hayling Island has very limited modal choice, so does not encourage sustainable travel choices. Development on the site would rely on the highway network resilience of one road on and off the island. It is likely that there will be cumulative impact on the resilience of the highway network especially at the A27/Langstone junction.</p> | <p>It is not considered viable or possible for likely negative effects to be mitigated. <b>Do not allocate.</b></p>   |
| 7e                          | <p>The north west of the site is affected by the buffer zone of a safeguarded waste site (Manor Farm HV043).</p>  | <p>Any site allocation / topic policies must stipulate that development of the site must avoid inappropriate encroachment on the safeguarded site.</p>  |
| 8f                          | <p>Development would result in a significant change in character locally, likely to be perceived as negative</p>  | <p>It is not possible to mitigate for the loss of 'openness' when development takes place. However, there is the potential to mitigate character harm through layout, building heights, separation distances, landscape buffers, and screening. Any allocation policy / topic policies should highlight particular vulnerable features and require mitigation.</p>  |

HI08	North of Saltmarsh Lane	4g	There is risk of tidal and surface water flooding on the site. The single access route onto Hayling Island is also at tidal risk. Development of this greenfield site has the potential to increase flood risk off-site. The site lies in an identified drainage priority area.	At a site level, it may be possible to mitigate through development requirements: Any site allocation / topic policies should require that areas at risk of flooding are avoided for development and all floor levels, access routes, drainage systems and flood mitigation measures are designed with an allowance for climate change. Any site allocation / topic policies must require development to address the risk of surface water flooding on the site and ensure that surface water management systems restrict runoff to the greenfield rate of flow. The risk to the site will need to be considered in detail through a site specific FRA at the application stage and avoidance and mitigation measures identified. However, it is not considered viable or possible for development to address the risk to the access road onto the island, either individually or cumulatively. <b>Do not allocate.</b>
		6a, 6b, 6d, 6e, 6f	Development in this location does not accord with the principles of Local Transport Plan 4, as it would create car dependent development. Hayling Island has very limited modal choice, so does not encourage sustainable travel choices. Development on the site would rely on the highway network resilience of one road on and off the island. It is likely that there will be cumulative impact on the resilience of the highway network especially at the A27/Langstone junction.	It is not considered viable or possible for likely negative effects to be mitigated. <b>Do not allocate.</b>
		8f	Development would result in a significant change in character locally, likely to be perceived as negative	It is not possible to mitigate for the loss of 'openness' when development takes place. However, there is the potential to mitigate character harm through layout, building heights, separation distances, landscape buffers, and screening. Any allocation policy / topic policies should highlight particular vulnerable features and require mitigation.
		1a, 1b	Potential for harm to protected sites, species and/or the ecological network	Avoidance and mitigation measures will need to be flagged in any allocation to avoid negative effects and make development acceptable. This will need to include retention of habitat for Solent Wader and Brent Goose Strategy birds or mitigatory habitat. Achieving mitigation on this core site is considered to be difficult.
HI10	West of Glebe Close	1a, 1b	Potential for harm to protected sites, species and/or the ecological network	Avoidance and mitigation measures will need to be flagged in any allocation to avoid negative effects and make development acceptable. This will need to include a mitigation package for wintering birds.



		4g	There is risk of tidal and surface water flooding on the site. The single access route onto Hayling Island is also at tidal risk. Development of this greenfield site has the potential to increase flood risk off-site. The site lies in an identified drainage priority area.	At a site level, it may be possible to mitigate through development requirements: Any site allocation / topic policies should require that areas at risk of flooding are avoided for development and all floor levels, access routes, drainage systems and flood mitigation measures are designed with an allowance for climate change. Any site allocation / topic policies must require development to address the risk of surface water flooding on the site and ensure that surface water management systems restrict runoff to the greenfield rate of flow. The risk to the site will need to be considered in detail through a site specific FRA at the application stage and avoidance and mitigation measures identified. However, it is not considered viable or possible for development to address the risk to the access road onto the island, either individually or cumulatively. <b>Do not allocate.</b>
		6a, 6b, 6d, 6e, 6f	Development in this location does not accord with the principles of Local Transport Plan 4, as it would create car dependent development. Hayling Island has very limited modal choice, so does not encourage sustainable travel choices. Development on the site would rely on the highway network resilience of one road on and off the island. It is likely that there will be cumulative impact on the resilience of the highway network especially at the A27/Langstone junction.	It is not considered viable or possible for likely negative effects to be mitigated. <b>Do not allocate.</b>
		8f	Development would result in a significant change in character locally, likely to be perceived as negative	It is not possible to mitigate for the loss of 'openness' when development takes place. However, there is the potential to mitigate character harm through layout, building heights, separation distances, landscape buffers, and screening. Any allocation policy / topic policies should highlight particular vulnerable features and require mitigation.
HI15	Fathoms Reach	4g	There is risk of surface water flooding on the site. The single access route onto Hayling Island is at tidal risk. Development of this greenfield site has the potential to increase flood risk off-site. The site lies in an identified drainage priority area.	At a site level, it may be possible to mitigate through development requirements: Any site allocation / topic policies must require development to address the risk of surface water flooding on the site and ensure that surface water management systems restrict runoff to the greenfield rate of flow. The risk to the site will need to be considered in detail through a site specific FRA at the application stage and avoidance and mitigation measures identified. However, it is not considered viable or possible for development to address the risk to the access road onto the island, either individually or cumulatively. <b>Do not allocate.</b>

		6a, 6b, 6d, 6e, 6f	Development in this location does not accord with the principles of Local Transport Plan 4, as it would create car dependent development. Hayling Island has very limited modal choice, so does not encourage sustainable travel choices. Development on the site would rely on the highway network resilience of one road on and off the island. It is likely that there will be cumulative impact on the resilience of the highway network especially at the A27/Langstone junction.	It is not considered viable or possible for likely negative effects to be mitigated. <b>Do not allocate.</b>
		8f	Development would result in a significant change in character locally, likely to be perceived as negative	It is not possible to mitigate for the loss of 'openness' when development takes place. However, there is the potential to mitigate character harm through layout, building heights, separation distances, landscape buffers, and screening. Any allocation policy / topic policies should highlight particular vulnerable features and require mitigation.
HI16	Rook Farm	1a, 1b	Potential for harm to protected sites, species and/or the ecological network	Avoidance and mitigation measures will need to be flagged in any allocation to avoid negative effects and make development acceptable. This will need to include retention of habitat for Solent Wader and Brent Goose Strategy birds or mitigatory habitat. Achieving mitigation on this core site is considered to be difficult.
		4a	Loss of open space or recreational space / routes	Any site allocation / topic policies to require the retention of the Public Right of Way, together with buffers and/or screening to maintain its character as far as possible.
		4g	There is risk of surface water flooding on the site. The single access route onto Hayling Island is also at tidal risk. Development of this greenfield site has the potential to increase flood risk off-site. The site lies in an identified drainage priority area.	At a site level, it may be possible to mitigate through development requirements: Any site allocation / topic policies must require development to address the risk of surface water flooding on the site and ensure that surface water management systems restrict runoff to the greenfield rate of flow. The risk to the site will need to be considered in detail through a site specific FRA at the application stage and avoidance and mitigation measures identified. However, it is not considered viable or possible for development to address the risk to the access road onto the island, either individually or cumulatively. <b>Do not allocate.</b>

		6a, 6b, 6d, 6e, 6f	Development in this location does not accord with the principles of Local Transport Plan 4, as it would create car dependent development. Hayling Island has very limited modal choice, so does not encourage sustainable travel choices. Development on the site would rely on the highway network resilience of one road on and off the island. It is likely that there will be cumulative impact on the resilience of the highway network especially at the A27/Langstone junction.	It is not considered viable or possible for likely negative effects to be mitigated. <b>Do not allocate.</b>
		8f	Development would result in a significant change in character locally, likely to be perceived as negative	It is not possible to mitigate for the loss of 'openness' when development takes place. However, there is the potential to mitigate character harm through layout, building heights, separation distances, landscape buffers, and screening. Any allocation policy / topic policies should highlight particular vulnerable features and require mitigation.
LP01	Cabbagefield Row	1a, 1b	Potential for harm to protected sites, species and/or the ecological network	Avoidance and mitigation measures will need to be flagged in any allocation to avoid negative effects and make development acceptable. This will need to include compensatory grassland/scrub habitat to mitigate impacts to Hazel Dormouse and nesting birds; an ancient woodland buffer zone; management plan for adjacent SINC grassland to north.
		8f	Development would result in a significant change in character locally, likely to be perceived as negative	It is not possible to mitigate for the loss of 'openness' when development takes place. However, there is the potential to mitigate character harm through layout, building heights, separation distances, landscape buffers, and screening. Any allocation policy / topic policies should highlight particular vulnerable features and require mitigation.
LP02	Strouden Court	4g	There is minor risk of fluvial flooding on the access to the sites, and risk of surface water flooding on the site. Development of this greenfield site has the potential to increase flood risk off-site. The site lies in an identified drainage priority area.	Being at the edge of the site and very small, it would be possible to avoid the area that might be at risk of fluvial in a development scheme. The risk to the site will need to be considered in detail through a site specific FRA at the application stage and avoidance and mitigation measures identified.
LP03	West of Hulbert Road	1a, 1b	Potential for harm to protected sites, species and/or the ecological network	Avoidance and mitigation measures will need to be flagged in any allocation to avoid negative effects and make development acceptable. Will need to include retention of extensive areas of semi-natural habitat, as well as substantial buffering and protection of adjacent woodland and grassland SINCs; Retention and enhancement of habitat linkages through site and with surrounding landscape.

		4g	There is risk of surface water flooding on the site. Development of this greenfield site has the potential to increase flood risk off-site. The site lies in an identified drainage priority area.	Any site allocation / topic policies must require development to address the risk of surface water flooding on the site and ensure that surface water management systems restrict runoff to the greenfield rate of flow. The risk to the site will need to be considered in detail through a site specific FRA at the application stage and avoidance and mitigation measures identified.
		6d, 6e, 6f	The Local Highway Authority have indicated the site should not be allocated due to poor accessibility and connectivity	The principle of development has been established here through an outline consent despite accessibility shortcomings; consent secured some mitigation. The site allocation should require agreed solutions to be implemented, together with any further detailed requirements arising at the reserved matters stage. Wider connectivity will need to be addressed as part of strategic planning of the network.
		8f	Development would result in a significant change in character locally, likely to be perceived as negative	It is not possible to mitigate for the loss of 'openness' when development takes place. However, there is the potential to mitigate character harm through layout, building heights, separation distances, landscape buffers, and screening. Any allocation policy / topic policies should highlight particular vulnerable features and require mitigation.
LP06	Former Dairy Crest Depot, Dunsbury Way	4g	There is minor risk of fluvial flooding of the site, and risk of surface water flooding . The site lies in an identified drainage priority area.	Being at the edge of the site and very small, it would be possible to avoid the area at fluvial risk in a development scheme. Any site allocation / topic policies should require surface water management systems to produce a 50% betterment on the pre-development rate of flow. The risk to the site will need to be considered in detail through a site specific FRA at the application stage and avoidance and mitigation measures identified.
		8f	Development would result in a significant change in character locally, likely to be perceived as negative	It is not possible to mitigate for the loss of 'openness' when development takes place. However, there is the potential to mitigate character harm through layout, building heights, separation distances, landscape buffers, and screening. Any allocation policy / topic policies should highlight particular vulnerable features and require mitigation.
LP07	Former Electricity Board, Bartons Road	4g	There is risk of surface water flooding on the site. The site lies in an identified drainage priority area.	Any site allocation / topic policies must require development to address the risk of surface water flooding on the site and ensure that surface water management systems produce a 50% betterment on the pre-development rate of flow. The risk to the site will need to be considered in detail through a site specific FRA at the application stage and avoidance and mitigation measures identified.

WA03	Padnell Grange	4a	Loss of open space or recreational space / routes	Any site allocation / topic policies to require the retention of the Public Right of Way, together with buffers and/or screening to maintain its character as far as possible.
		4g	There is risk of surface water flooding on the site. The site lies in an identified drainage priority area.	Any site allocation / topic policies must require development to address the risk of surface water flooding on the site and ensure that surface water management systems produce a 50% betterment on the pre-development rate of flow (PDL part) / restrict the rate of flow to greenfield rates (greenfield part). The risk to the site will need to be considered in detail through a site specific FRA at the application stage and avoidance and mitigation measures identified.
		8f	Development would result in a significant change in character locally, likely to be perceived as negative	It is not possible to mitigate for the loss of 'openness' when development takes place. However, there is the potential to mitigate character harm through layout, building heights, separation distances, landscape buffers, and screening. Any allocation policy / topic policies should highlight particular vulnerable features and require mitigation.
WA04	Cowplain School	4a	Loss of open space or recreational space / routes	The loss of the school playing field was considered during the planning application for development (ref APP/22/00837), which was granted in January 2024.
		4g	There is risk of surface water flooding on the site. The site lies in an identified drainage priority area.	Any site allocation / topic policies must require development to address the risk of surface water flooding on the site and ensure that surface water management systems produce a 50% betterment on the pre-development rate of flow. The risk to the site will need to be considered in detail through a site specific FRA at the application stage and avoidance and mitigation measures identified.
WA06	Blue Star	4a	Loss of open space or recreational space / routes	Any site allocation / topic policies to require the retention of the Public Right of Way, together with buffers and/or screening to maintain its character as far as possible.
		4g	There is risk of surface water flooding on the site. Development of this greenfield site has the potential to increase flood risk off-site. The site lies in an identified drainage priority area.	Any site allocation / topic policies must require development to address the risk of surface water flooding on the site and ensure that surface water management systems restrict runoff to the greenfield rate of flow. The risk to the site will need to be considered in detail through a site specific FRA at the application stage and avoidance and mitigation measures identified.

WA06	Blue Star	8f	Development would result in a significant change in character locally, likely to be perceived as negative	It is not possible to mitigate for the loss of 'openness' when development takes place. However, there is the potential to mitigate character harm through layout, building heights, separation distances, landscape buffers, and screening. Any allocation policy / topic policies should highlight particular vulnerable features and require mitigation.
WA11	MDA Newlands Phase 1 Hambleton Road (Phases 4 and 8)	1a, 1b	Potential for harm to protected sites, species and/or the ecological network	Avoidance and mitigation measures will need to be flagged in any allocation to avoid negative effects and make development acceptable. This will need to include Protection and buffering of SINCs, including from recreational impacts. Retention of semi-natural habitats.
WA13	Land north of Highbank Avenue	1a, 1b	Potential for harm to protected sites, species and/or the ecological network	Avoidance and mitigation measures will need to be flagged in any allocation to avoid negative effects and make development acceptable. This must include protection and buffering of SINCs, including from recreational impacts; retention of semi-natural habitats. Any site allocation / topic policies must require development to address the risk of surface water flooding on the site and ensure that surface water management systems restrict runoff to the greenfield rate of flow. The risk to the site will need to be considered in detail through a site specific FRA at the application stage and avoidance and mitigation measures identified. The access onto the A3 is the only possible access to the site. Without Highway Authority support it is not considered viable or possible for likely negative effects to be mitigated. <b>Do not allocate.</b>
		4g	There is risk of surface water flooding on the site. Development of this greenfield site has the potential to increase flood risk off-site. The site lies in an identified drainage priority area.	
		6d, 6e, 6f	The Local Highway Authority has indicated that it would not support a new access onto the A3 London Road for this site or any larger combined site in WCC. LTP4 does not support new accesses onto 'A' roads. The access would also negatively impact on the existing bus lane which is a key bus priority corridor.	
		8f	Development would result in a significant change in character locally, likely to be perceived as negative	It is not possible to mitigate for the loss of 'openness' when development takes place. However, there is the potential to mitigate character harm through layout, building heights, separation distances, landscape buffers, and screening. Any allocation policy / topic policies should highlight particular vulnerable features and require mitigation.
WA15	Campdown	1a, 1b	Harm to protected sites, species and/or the ecological network	Avoidance and mitigation measures will need to be flagged in any allocation to avoid negative effects and make development acceptable. This will need to include retention of habitat for Solent Wader and Brent Goose Strategy birds or mitigatory habitat.

WA15	Campdown	4g	There is risk of surface water flooding on the site. Development of this greenfield site has the potential to increase flood risk off-site. The site lies in an identified drainage priority area.	Any site allocation / topic policies must require development to address the risk of surface water flooding on the site and ensure that surface water management systems restrict runoff to the greenfield rate of flow. The risk to the site will need to be considered in detail through a site specific FRA at the application stage and avoidance and mitigation measures identified.
		8f	Development would result in a significant change in character locally, likely to be perceived as negative	It is not possible to mitigate for the loss of 'openness' when development takes place. However, there is the potential to mitigate character harm through layout, building heights, separation distances, landscape buffers, and screening. Any allocation policy / topic policies should highlight particular vulnerable features and require mitigation.
		8b	Potential impact on multiple heritage assets, including two Scheduled Ancient Monuments (Bevis Grave and Camp Down Roman Villa)	A detailed heritage assessment has identified the need to: Demonstrate that the impact of new built massing does not adversely affect the quality of views from key vantage points, especially from the north end of the site through accompanying site sections and visual representations; Preserve and manage the Roman villa scheduled monument and any associated open space, including the Roman road Preserve the views from the scheduled monument site in agreement with Historic England; Identify areas of potential archaeological interest through non-invasive geophysical surveys of the site and determine the nature and significance of any suspected archaeological remains through a targeted archaeological evaluation
ED01	Waterloo Park Elettra Avenue, Waterlooville	4g	There is surface water flood risk on the site. The site lies in an identified drainage priority area. More detailed modelling will be needed to establish the future risk of fluvial flooding.	Risk on site and the access route will need to be considered through a site specific FRA, and where possible areas at risk avoided for development. In any case, as a less vulnerable use, employment development is not considered incompatible with flood risk in principle. Development should produce a 50% betterment on the pre-development surface water rate of run-off flow.
ED03	Dunsbury Park Phases 1 & 2	4a	Loss of open space or recreational space / routes	Any site allocation / topic policies to require the retention of the Public Right of Way, together with buffers and/or screening to maintain its character as far as possible.

		4g	There is surface water risk on the site and fluvial flood risk on the site and the access road. Development of this greenfield site has the potential to increase flood risk off-site. The site lies in an identified drainage priority area.	Risk on site and the access route will need to be considered through a site specific FRA, and where possible areas at risk avoided for development. In any case, as a less vulnerable use, employment development is not considered incompatible with flood risk in principle. Development should produce a 50% betterment on the pre-development surface water rate of run-off flow.
		8f	Development would result in a significant change in character locally, likely to be perceived as negative	It is not possible to mitigate for the loss of 'openness' when development takes place. However, there is the potential to mitigate character harm through appropriate mitigation including landscape buffers and ensuring that development is offset from the Public Right of Way to retain character. Tree planting should be used to soften the visual impact of large units.
ED04	Dunsbury Park Phase 3	4a	Loss of open space or recreational space / routes	Any site allocation / topic policies to require the retention of the Public Right of Way, together with buffers and/or screening to maintain its character as far as possible.
		4g	There is surface water risk on the site and fluvial flood risk on the access route to the site. Development of this greenfield site has the potential to increase flood risk off-site.	Risk on site and the access route will need to be considered through a site specific FRA, and where possible areas at risk avoided for development. In any case, as a less vulnerable use, employment development is not considered incompatible with flood risk in principle. Surface water management systems should ensure that the post development rate of flow is restricted to the greenfield run-off rate.
		8f	Development would result in a significant change in character locally, likely to be perceived as negative	It is not possible to mitigate for the loss of 'openness' when development takes place. However, there is the potential to mitigate character harm through appropriate mitigation including landscape buffers and ensuring that development is offset from the Public Right of Way to retain character. Tree planting should be used to soften the visual impact of large units.
ED05	Former Colt site	4g	There is fluvial and surface water flood risk on the site and on the access route. The site lies in an identified drainage priority area.	Access should be possible from the north via Bartons Road. The whole estate is served by New Lane, so technical solutions on a wider scale are likely to be found if it becomes necessary. In any case, as a less vulnerable use, employment development is not considered incompatible with flood risk in principle. Surface water risk on site will need to be addressed. Development should produce a 50% betterment on the pre-development rate of run-off flow.



ED07	Gas Holder Site, Downley Road, New Lane	4g	There surface water risk on the site. More detailed modelling will be needed to establish the future risk of fluvial flooding. The site lies in an identified drainage priority area.	Flood Risk on the site will need to be considered in detail, but since the area at risk relates directly to the shape of the former gas holder, it appears likely that the identified risk is based on the characteristics of that structure. This could be addressed in a new development. In any case, as a less vulnerable use, employment development is not considered incompatible with flood risk in principle. In terms of access, the whole estate it served by new Lane, so technical solutions on a wider scale are likely to found if it becomes necessary. Surface water management systems should produce a 50% betterment on the pre-development rate of run-off flow.
ED17	Langstone Technology Park	4g	There is tidal, fluvial and surface water flood risk on the site.	Risk on site and the access route will need to be considered through a site specific FRA, and where possible areas at risk avoided for development. As a less vulnerable use, employment development is not considered incompatible with flood risk in principle. Surface water management systems should ensure that the post development rate of flow is restricted to below the pre-development rate of flow.
ED19	Interbridges West	4g	There is fluvial and surface water flood risk on the site and the access road. Development of this greenfield site has the potential to increase flood risk off-site. The site lies in an identified drainage priority area.	As a less vulnerable use, employment development is not considered incompatible with flood risk in principle. Risk on site and the access route will need to be considered through a site specific FRA, and where possible areas at risk avoided for development. As a less vulnerable use, employment development is not considered incompatible with flood risk in principle. Surface water management systems should ensure that the post development rate of flow is restricted to the greenfield run-off rate.
ED20	Interbridges East	4g	There is fluvial and surface water flood risk on the site. Development of this greenfield site has the potential to increase flood risk off-site. The site lies in an identified drainage priority area.	Risk on site and the access route will need to be considered through a site specific FRA, and where possible areas at risk avoided for development. As a less vulnerable use, employment development is not considered incompatible with flood risk in principle. Surface water management systems should ensure that the post development rate of flow is restricted to the greenfield run-off rate.
ED23	Gas Site, Palmers Road	4g	There is fluvial and surface water flood risk on the site. The site lies in an identified drainage priority area.	Risk on site and the access route will need to be considered through a site specific FRA, and where possible areas at risk avoided for development. As a less vulnerable use, employment development is not considered incompatible with flood risk in principle. Development should produce a 50% betterment on the pre-development surface water rate of run-off flow.

## Appendix E: Legal Compliance

It is a requirement alongside the production of a Local Plan that Sustainability Appraisal is undertaken in line with the [Environmental Assessment of Plans and Programmes Regulations 2004](#), which transpose into national law the EU Strategic Environmental Assessment (SEA) Directive. These regulations remain in force after the UK has left the European Union.

[Schedule 2 of Regulations 2004](#) sets out the requirements of the report that must be prepared, known as the 'Environmental Report'. The table below shows how these requirements have been met in this report.

Schedule 2 requirement for the Environmental Report	Where has this requirement been addressed
1. An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes	The <a href="#">SA Scoping Report (2022)</a> linked at paragraph 1.5 of this report and section 2 of this report
2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme	The current state of the environment and trends without the Local plan taken into account are outlined in the <a href="#">SA Scoping Report (2022)</a> , linked at paragraph 1.5 of this report
3. The environmental characteristics of areas likely to be significantly affected	The full assessments of the proposed thematic policies and development allocations in Appendices B and C of this report, summarised in section 4
4. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as a European site (within the meaning of regulation 8 of the Conservation of Habitats and Species Regulations 2017)	The <a href="#">SA Scoping Report (2022)</a>
5. The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.	The <a href="#">SA Scoping Report (2022)</a> established the relevant environmental considerations, and included them in a framework for assessing the Local Plan. The framework is summarised at paragraph 2.5 and set out at Appendix A of this report.

Schedule 2 requirement for the Environmental Report	Where has this requirement been addressed
	Assessment of the compatibility of the plan objectives with the SA objectives in section 2 of this report.
6. The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects, on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above	<p>Assessment of the effects of the alternative development strategies in section 3 of this report.</p> <p>The full assessments of the proposed thematic policies and development allocations in Appendices B and C of this report, summarised in section 4.</p>
7. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	The full assessments of the proposed thematic policies and development allocations in Appendices B and C of this report, summarised in section 4. Appendix D focusses on negative effects and mitigation requirements for any site allocations specifically.
8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	Sections 2,3 and 4 of this report
9. A description of the measures envisaged concerning monitoring in accordance with regulation 17.	This SA report accompanies a first draft (Regulation 18) Local Plan and monitoring mechanisms have not yet been developed. These will be added at the next stage of the Local Plan and the accompanying Environmental / Sustainability Appraisal Report
10. A non-technical summary of the information provided under paragraphs 1 to 9	The whole report is written in a non-technical style. A summary is provided on p. 4.

