



Havant Borough  
**Constraints Study**

For **Havant Borough Council**

August 2024

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**This document is formatted for double-sided printing.**

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# 1 Introduction

## Scope of work

- 1.1 The purpose of the Constraints Study is to support the work undertaken by the Council in responding to the significant challenge of meeting its development needs within its own boundary.
- 1.2 As with any Council in England, there is a pressing need for new homes and land to accommodate these homes. There is also a need to identify new land for industry, especially logistics, as consumer behaviour has shifted away from the traditional high street in recent years.
- 1.3 This study does not look to allocate land for development, nor does it directly inform the local plan's development strategy. It is not a site by site assessment of the suitability for development, that is addressed elsewhere in the Local Plan's evidence base and this report should not be taken as a definitive statement of the suitability of any one site for development. But it does paint a picture of how constrained the Borough is, and therefore the challenge facing the Borough when looking at individual sites and their suitability for development.

## Summary of Findings for Havant

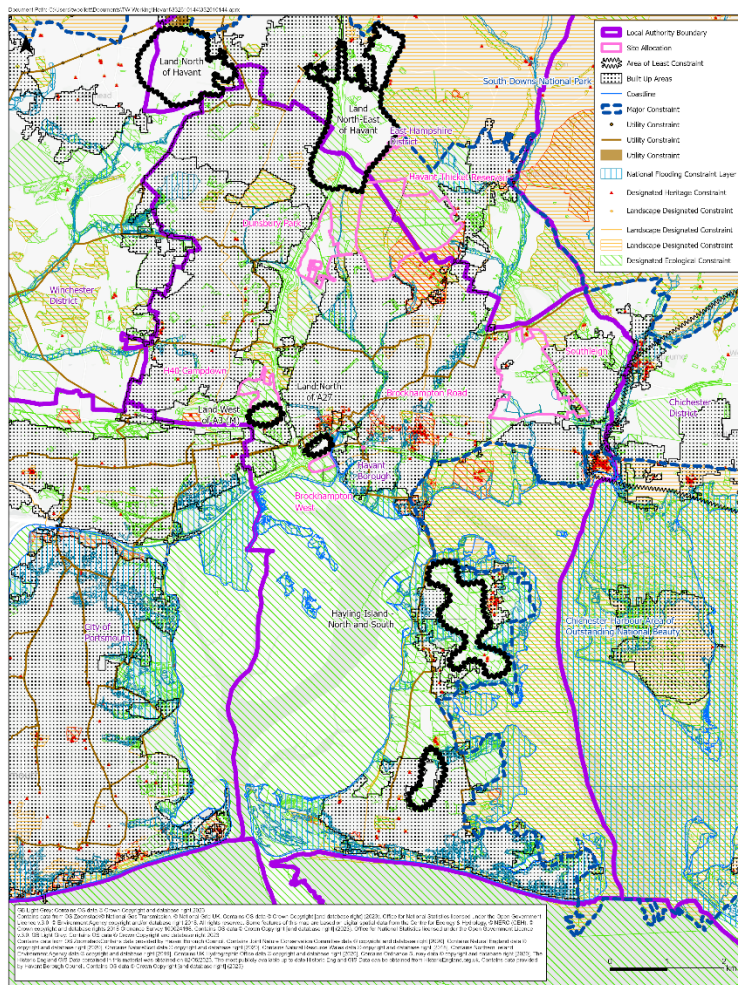
- 1.4 The Borough of Havant was designated 40 years ago (1973) as a new authority following the merging of Waterlooville and Havant into a single new style district. Since then, the Borough has seen extensive growth that has pushed the extent of the built-up area up to its administrative boundaries along most of its boundary.
- 1.5 In summary - our work confirms that Havant Borough is exceptionally constrained. The Borough is not washed over by any one strategic constraint but is subject to multiple competing constraints. The land within Havant is often within the Chichester Harbour Area of Outstanding Natural Beauty (AONB / National Landscape) and its setting, and/or the setting of the South Downs National Park (SDNP). Both present strong landscape constraints and are afforded weight in national planning policy accordingly.
- 1.6 At the same time, in the south of Havant, additional constraints relate to the coast in terms of flood risk but also, less obviously, ecology. This presents an unusual package of constraints and mitigating for waterfowl is a particular challenge. This is because birds move from protected SPA and Ramsar wetland areas to inland sites which provide a network of feeding and roosting resources. This extends beyond designated Special Protection Areas (SPA) to also include land that is functionally linked to the SPA, protecting migratory birds (and associated land) through the Habitats Regulations. This ecology evidence is a particularly complex topic and addressed in detail later in this report.<sup>1</sup>

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<sup>1</sup> Also see the detailed Solent Waders and Brent Goose Strategy (SWBGS)

- 1.7 While coastal constraints predominate in the south of Havant borough and South Hampshire more generally, seemingly undeveloped land in the north of Havant borough, land that could appear to be available for further development, is now no longer available to meet future 'business as usual' development needs.
- 1.8 While not a land constraint, previous rounds of plan making have, since the Borough was founded, filled in much of the undeveloped land. Emerging Plans, including the now withdrawn plan proposed to allocate for development a large share of the remaining undeveloped land in and around the Borough's built up areas.
- 1.9 The map below summarises our findings for Havant. To assist the reader, we have identified several areas of less constraint – land that does not appear constrained by virtue of the national land constraints set out in the NPPF. This does not mean that land within these areas is developable – only that our strategic work did not suggest that major constraints, as set out in the NPPF, were present. Note – all maps are also found in the appendix at A3 scale for ease of reading.

**Map 1 – Havant Borough Constraints (National Designations)**



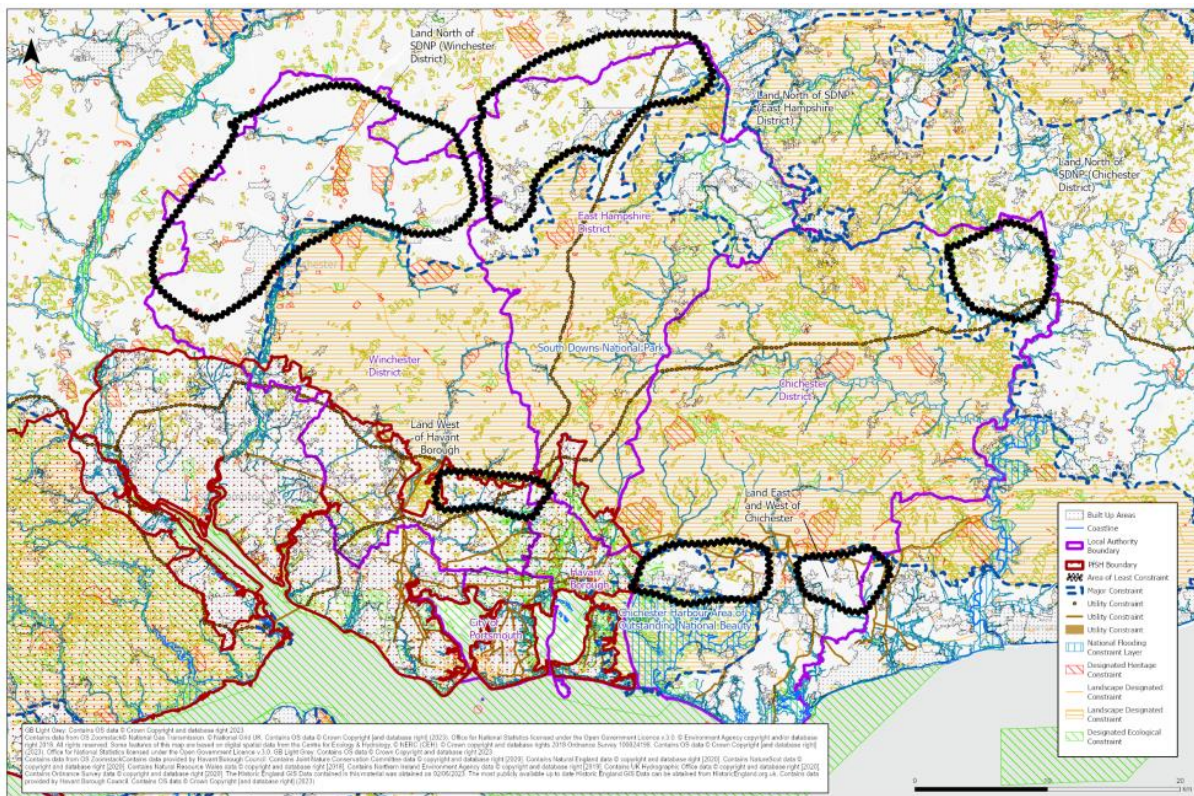
1.10 We also have shown some of the previously proposed land allocations, in the now withdrawn local plan. This is land that the Council has previously established is less constrained and could be developed. As the map shows, beyond these areas (shown purple on the map) there is little scope for further growth. Our work has identified a small number of additional areas, as areas of less constraint shown in black above.

1.11 This version of the map excludes ecology constraints relating to wading birds which we discuss in detail later in this report. The mapped constraints can (and may) flex as more data is collected around how the area functions. But also the 5.6km recreational buffer is not considered a land constraint because it can be mitigated.

## Summary of Findings for the Wider Area

1.12 The scope of this work also extends to the immediate neighbouring authorities. This is to put Havant Borough in context of the constraints that exist relative to its neighbouring districts<sup>2</sup>. So, as part of our brief we also consider the administrative areas of Winchester, East Hampshire and Chichester Districts. We also comment regarding Portsmouth although, as an island, it has very limited less constrained land. We have not been asked to consider Fareham, who adopted a new local plan in April 2023 or Gosport, both also within the wider Housing Market Area.

**Map 2 – Neighbouring Authorities Constraints (National Designations) -**



<sup>2</sup> The South Downs National Park is also formally a neighbouring Planning Authority although not expected to assist others with unmet development needs.

- 1.13 As with Havant we have developed a map illustrating the less constrained parcels within this wider area.
- 1.14 In the wider area the South Downs National Park is the most obvious constraint that crosses through neighbouring authority areas.
- 1.15 Outside of Havant, in the wider area, land to the north of the National Park is generally less constrained because it is remote from the additional coastal constraints found in the south. In general, the network of ecology constraints – overlapping with landscape (and Chichester Harbour adds an additional layer of complexity than is found closest to the coast).
- 1.16 As noted we cannot conclude that land in this wider area is developable, there may be additional constraints that we cannot consider – including practical constraints (infrastructure) and wider sustainability constraints that would discourage development of land for housing [noting that much of this land is remote from Havant and other major settlements so *may* if developed promote an unsustainable pattern of development].
- 1.17 In the next chapters we set out how much development Havant may need to accommodate to address objectively assessed need, and what may contain its ability to deliver this by reference to national policy and thematic topics on application of specific constraints.
- 1.18 Finally we conclude on where land may be less constrained and so where Havant, working with neighbours may need to support our strategic work with more detailed site/area by area analysis.



## 2 How much Development?

### Housing Need

- 2.1 For this work we are not allocating land nor seeking to meet a target. This analysis is required mainly to understand how homes could sustainably be delivered around the constraints that exist. But it is helpful to understand the scale of the challenge.
- 2.2 The Borough is currently required to seek land for more than 500 homes per annum ('Objectively Assessed' Housing Need, 2014 based). The Government's standard method for calculating the number of homes required is controversial. The current calculation is based on out-of-date demographic assumptions and, some suggest, presents a level of housing delivery that is not credible in many areas. But the fact that the data is out of date is not sufficient to set the calculation aside<sup>3</sup>. A change to a 'stock based' approach – as suggested by the NPPF 2024 consultation suggests an even higher need approaching 900 (874) Havant Borough has not delivered over 500 homes per annum since 2016 so this is a considerable challenge, particularly given the limited development land remaining. This is not unknown to Government who, alongside the NPPF consultation noted that Havant's historic completion rate was 338 when proposing a higher housing need.
- 2.3 Care is also needed when looking to express housing numbers into land because development densities can vary. But to illustrate the land at Southleigh – proposed for allocation in the withdrawn plan, looked to accommodate 2,100 homes across 152 ha of land or 24 homes per hectare. The extent of the previously proposed allocation is shown on Map 1, but to meet 20 years of 2014 based housing need in full would require a further 5 similar sized site allocations or 416ha of land.
- 2.4 So; even before we have considered constraints in any detail the scale of the ask – c., 500 dpa per annum and possibly upto 900 is a significant challenge for a small, largely urban, local planning authority.

### Economic Need

- 2.5 In addition to meeting its housing need, which could exceed 400ha for a 20 year plan period, the Council also needs to ensure that it maintains a supply of land for its economic needs.
- 2.6 In recent years there has been a shift in how much land is needed for economic needs. Demand for industrial land is now increasing as manufacturing rebounds and retailers adjust their supply chains away from retail high streets and into logistics units.
- 2.7 This shift, partly related to Covid, presents a challenge for planners who, after many years of brownfield first policy (including changes to permitted development rights) have seen former industrial property as a source of housing land supply. But with

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<sup>3</sup> Since the Method was introduced the ONS have provided several rounds of more recent, and so upto date, sets of population and household projection. The ONS no longer claims that the 2014 set is extant. But, regardless, the PPG still requires the use of the 2014s. The NPPF was slightly amended in late 2023 to expand on when LPAs may promote an alternative.

renewed demand for industrial and logistics property, there is now a competing need for this land. In many areas, with industrial land in short supply, any net land losses for alternative uses simply results in displaced need that still requires land elsewhere. Current estimates; flowing from the Councils economic evidence, is that the Borough needs to allocate a further land for economic purposes. This is in addition to land for housing discussed above. Also, as regards economic need, our map baseline is slightly out of date because in the last few years land allocated in previous plans at Dunsbury has rapidly been taken up – so is no longer available to meet future needs. In addition the extent of the current allocation, and unallocated land northwards, has been included in the Freeport Tax site. The Freeports are a national policy intervention to boost national economic growth.

### How much land in total is available in Havant

- 2.8 In this report, we go on to consider land constraints as set out in the NPPF. But before doing so it is useful to put Havant’s land supply in context.
- 2.9 We have estimated that to deliver the number of homes needed in Havant over the next 20 years may require at least 400ha (not including requirements for economic and other need). We have already observed that Havant is effectively ‘built up’. To put this in context: the full extent of the district is around 5,500 ha – so the c. 400 ha requirement for homes alone is around 7% of the Borough.
- 2.10 The table below shows, expressed as percentages, the share of land that is and is not ‘available’ for development within Havant, Hampshire, and comparisons at the national and regional level. These figures are taken from the Office of National Statistics (and Ordnance Survey) Land Use Statistics. Land considered unavailable for development comprises all currently developed land, alongside residential gardens; forest, open land, and water; and outdoor recreation. Land that is considered available for development is listed either as ‘undeveloped’ within the statistics, or as undeveloped agricultural use.
- 2.11 As these figures show, the amount of Havant’s land available for development is less than 25%, and significantly lower than the national figure (64.0%) and the South East figure (59.6%). At a local authority level, only Southampton, Rushmoor, Portsmouth and Gosport have less available land (all of which are much more ‘urban’ in character than Havant).

**Table 2.1 – Land Available in Havant**

<b>Local Authority</b>	<b>Unavailable for development (%)</b>	<b>Available for development (%)</b>
<i>Southampton</i>	94.7	5.0
<i>Rushmoor</i>	90.0	9.3
<i>Portsmouth</i>	88.8	11.1
<i>Gosport</i>	85.7	14.2
<b>Havant</b>	<b>74.6</b>	<b>24.6</b>
<i>Eastleigh</i>	69.7	29.2
<i>New Forest</i>	64.5	35.4
<i>Fareham</i>	64.1	35.7
<i>Hart</i>	51.6	48.1
<i>Chichester</i>	40.6	59.3
<b>SOUTH EAST</b>	40.2	59.6
<i>East Hampshire</i>	38.4	61.5
<b>ENGLAND</b>	35.8	64.0
<i>Test Valley</i>	32.2	67.7
<i>Basingstoke and Deane</i>	31.7	68.3
<i>Winchester</i>	29.0	70.7

*Source – OS Land Use Statistics*

- 2.12 While this analysis clearly confirms that there is undeveloped land in Havant, the quantum / share of developed/undeveloped land is more reflective of a London Borough or City Council area than a rural district. With a greater extent of the Borough already developed, there is less choice of land to accommodate further rounds of growth. The pool of development options has shrunk over time and so for the new Local Plan, the Council will need to consider the remaining undeveloped land within the local policies and constraints that exist.
- 2.13 The 24.6% of land which is undeveloped sums to only 1,375 ha - of which 400ha may be needed for 20 years of future housing growth.
- 2.14 In several of the maps shown in this report we illustrate the extent of the formally proposed land allocations, in the now withdrawn plan. These obviously have no status and are not constraints in themselves. But it remains useful to illustrate them because it demonstrates that the last plan, without the benefit of this analysis, had already selected the less constrained areas for development and, that difficult choices were in the process of being made as regards local gaps and infilling development between existing communities. The maps also show the extent of the Havant Thicket Reservoir

proposal that means that land here is not available for development regardless of its constraints.

## Duty to Co-operate

- 2.15 In theory, where one area cannot meet its needs in full then it should work with neighbours to move unmet need across a boundary to an area less constrained. Paragraph 61 of the NPPF (2023) simply states:

*“...In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for”*

- 2.16 The mechanism to do this is process is called the Duty to Co-operate (‘the Duty’). We do not discuss this in any detail here because this element of planning policy is already expected to be revised and it is widely understood that the Duty follows no set format – so there is no right or wrong approach. At the time of writing the Duty is a legal requirement of the plan preparation process, where Councils need to evidence how they have worked together to address strategic (cross boundary) plan making issues. While the Duty follows no set format, at examination, Inspectors need to see evidence of co-operation that is beyond a ‘tick box’ exercise<sup>4</sup> and what decisions have been reached by Councils and why.
- 2.17 For this report, we note that regardless of the formal policy and legislation, it remains a sensible planning objective for Councils to work collaboratively to meet identified needs as far as possible and, at the time of writing, this remains a requirement. So, the uncertainty in national policy and legislation does not undermine this study’s objective to paint a picture of Havant Borough and its neighbours nor the need for Havant to assist this process by commissioning constraint evidence such as this.

## Summary

- 2.18 Havant is physically a small Borough that, according to official land use data, is largely built up. The Land Use Change data we have used to illustrate this above is not definitive and, for example, it is not necessarily the case that the land we have quantified above cannot be developed but the limited amount of obviously undeveloped land illustrates that Havant is running out of development land when compared with others.
- 2.19 However; such simple analysis is not enough to demonstrate that a local planning authority can or cannot accommodate its needs in full. In the next sections we look at how, in the context of national planning policy, Havant may be constrained.
- 2.20 Our analysis reflects constraints as defined in the current (July 2024) version of national policy. There is considerable re-drafting of policy now but changes to the

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<sup>4</sup> See [for further detail re the DTC] <https://www.local.gov.uk/sites/default/files/documents/simple-guide-strategic-pl-557.pdf>

national constraints are not expected. Changes to national Greenbelt policy is not relevant in this area.

## 3 Methodology

- 3.1 Building on the above, Havant Borough Council requires a robust understanding of its NPPF constraints and its ability to sustainably accommodate housing need. Further, if Havant Borough is to seek the assistance of neighbours, it needs to do so with an understanding of their relative constraints as well as its own.
- 3.2 We focus on ‘national constraints’ referenced in footnote 7 of the NPPF with respect to plans applying a presumption in favour of development because, as set out below, these (if present) provide Councils with a sound justification not to meet development needs in full. The previous Interim Inspectors’ Report<sup>5</sup> noted that Havant needed evidence as to why it may not be able meet needs in full and to assist with cross boundary engagement (para 52).
- 3.3 Our evidence is intended to help inform this – putting Havant and its land supply into a wider area context.
- 3.4 So, this work is presented thematically by topic area and in two broad parts:
- Firstly, for each topic area, a strategic overview of Havant Borough and its immediate neighbours – identifying to what extent the area is constrained in line with the NPPF and its constraints footnote 7.
  - Secondly, a more detailed ‘drill down’ into Havant Borough, to consider the local constraints and potential mitigation in more detail.
- 3.5 As we set out below ‘constraints’ are split into two broad types. Firstly, the national constraints set out in the NPPF where the presence of these constraints can limit a Councils ability to meet development needs.
- 3.6 Secondly there are always further constraints – constraints not specifically cited in the NPPF but where present, can limit an areas ability to meet needs. This includes local policy designations (e.g. locally defined settlement gaps) and the ability to deliver (infrastructure).
- 3.7 The main difference in practice is that the second, local constraints, should be reviewed by reference to development needs and ‘flex’ where necessary. This could include redrafting constraint policies and addressing constraints via new infrastructure provision. These constraints may ultimately limit an area’s ability to address development needs but the expectation is that planning, and their development plans, should look to positively overcome these.

### Where are national constraints defined?

- 3.8 The approach to identifying land in development plans is set out at Paragraph 11 of the NPPF (December 2023) which states that:
- a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the*

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<sup>5</sup> <https://www.havant.gov.uk/media/8718/download?inline>

*environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;*

- b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas (footnote 6), unless:*
- i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area (footnote 7); or*
  - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*

3.9 In summary – Councils should ‘seek to meet’ their development needs but the paragraph sets out circumstances where this may not be possible.

3.10 Footnote 7 of the NPPF expands on which policies can or should constrain development:

*The policies referred to are those in this Framework [the NPPF] (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 181) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 68); and areas at risk of flooding or coastal change.*

3.11 Paragraph 181 notes that the following should be given the same protection as habitats sites, however none of the following exist in Havant:

- a) potential Special Protection Areas and possible Special Areas of Conservation;*
- b) listed or proposed Ramsar sites<sup>6</sup>; and*
- c) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.*

3.12 In this report, we have grouped constraints into several thematic topic areas and discuss in detail how we have assessed the relevant constraint:

- Landscape and Visual
- Heritage
- Ecology
- Water (flooding)

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<sup>6</sup> Havant does however have Ramsar sites

- 3.13 In the introduction to this report we noted that ecology, and particularly wading birds are a complex issue within the borough. Most of the footnote 7 constraints are formally designated and identified on the accompanying plans, but the paragraph 181(c) constraints require local evidence and an understanding of how the SPA areas operate including, in this area, functionally linked land. Functionally linked land is a term often used to describe areas of land or sea occurring outside a designated site which is critical to, or necessary for, the ecological or behavioural functions in a relevant season of a qualifying feature for which a Special Areas of Conservation (SAC)/ Special Protection Area (SPA)/ Ramsar site has been designated. These habitats are frequently used by SPA species and supports the functionality and integrity of the designated sites for these features.
- 3.14 The Solent Waders and Brent Geese Strategy<sup>7</sup> sets out an approach to mitigation and off-setting requirements to protect the network should sites come forward for development. For plan making, the strategy is helpful because it has defined the extent of the issue and identified land that may, subject to development proposals, require mitigation. But mitigation often needs new suitable land, and as noted in the introduction, Havant is short of undeveloped land. We return to this in the dedicated ecology section of this report.

### Local Policy Constraints

- 3.15 Our focus is around the NPPF footnote 7 constraints introduced above. There are, in addition to national polices, many local policy constraints frequently identified in development plans. Most obviously the settlement gaps and non-statutory heritage assets.
- 3.16 The Borough's Core Strategy Policy CS11 (Adopted Local Plan) seeks to protect undeveloped gaps between settlements and locally defined landscape and heritage assets, but councils are required to re-assess and update these constraints as part of local plan reviews.
- 3.17 For our work, the main distinction from nationally defined constraints is that these local designations can be reviewed, and are expected to 'flex' in line with development plan needs and priorities. They do not represent an absolute constraint to development.
- 3.18 This is not to say that areas covered only by local policy constraints should be universally developed. Nonetheless, the NPPF makes a clear distinction between the approach to allocating development in areas affected by NPPF Footnote 7 constraints compared to those where only local policy constraints are evident.

### Other constraints not considered

- 3.19 Several possible constraints should be considered but are not addressed in this report, such as:

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<sup>7</sup> <https://solentwbg.wordpress.com/#:~:text=Home,wetlands%20of%20the%20Solent%20coast.>



- social and community infrastructure where it may be argued that a lack of capacity should limit further development (or that additional land be required for associated infrastructure);
- transport capacity (road and rail); and
- utility infrastructure capacity (as opposed to utility infrastructure constraining development).
- Constraints that cannot be mapped – e.g. nutrient neutrality.

3.20 This report does not consider these constraints because there is general principle that new development should be accompanied by its associated infrastructure – and that this should be provided alongside the development. For example, if there are insufficient school places, any new homes should make an appropriate contribution to new school places – either financially providing for a nearby school to expand or by accommodating a school within a development site, with a consequent loss in developable land.

3.21 We also need to assume that development is viable including appropriate mitigation, for example payments associated with recreational disturbance to SPA species and impact on water quality.

3.22 In reality it may not be possible to viably access or service land but the report cannot consider this level of economics.

## **Brownfield land**

3.23 In this report we have expressed ‘need’ in terms of the amount of land required.

3.24 If Havant were able to rely on brownfield land it would not need to consider land outside of the urban area that is subject to other constraints – local or national. However, even if the Council seeks to focus as much development on brownfield land, this will be very unlikely to be sufficient to address the scale of development need.

3.25 However here we set out how brownfield land can be used to accommodate new development but why it will also be an increasingly hard source of supply to identify and rely on.

## **Former Industrial Land**

3.26 Nationally the main historic source of brownfield land is former industrial land. But after many years of the UK economy de-industrialising, there are some signs that this trend is stopping or even reversing as the UK industrial sector returns to growth. Also, the buoyant logistics sector is recycling former factories into warehouses with older industrial stock previously having defaulted to housing when there was no other viable economic use.

3.27 The UK Institute of Export and International Trade notes that ‘reshoring’<sup>8</sup> has been driven by a new need for firms to strengthen their supply chains following recent

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<sup>8</sup> <https://www.export.org.uk/news/605495/Manufacturers-call-for-new-supply-chain-resilience-taskforce-as-survey-highlights-reshoring-trend.htm>

- economic shocks (including Brexit and most recently the pandemic). The pandemic illustrated the fragility of global supply chains that were based on very low freight rates.
- 3.28 Less related to international trade is the fact that the pandemic ‘supercharged’ the UK logistics sector. Logistics have long been the growth sector that partly offset declining manufacturing demand for land. But the pandemic supercharged this. It did so in two main ways, firstly firms looked to bolster their supply chains by increasing UK held inventory. The NHS stockpiling PPE is the most obvious example, but many firms looked to increase their UK based inventory.
- 3.29 This very sharp peak in demand is dissipating, but the pandemic has also resulted in long term shifts in demand that are not expected to revert. Covid fuelled last mile logistics as consumers took retailing online and away from the High Street. Consumer e-commerce now accounts for 30% of the total UK retail market compared to 20% pre-Covid.<sup>9</sup>
- 3.30 All macro-economic signals suggest the UK is no longer creating surplus former industrial, brownfield land that can be used for new homes because industrial land is now back in demand.
- 3.31 The Council’s emerging economic evidence base, supported by local agents, points to a growing industrial market and a demand for more – not less – land for industrial uses. So this suggests, looking forward, care is needed when considering the future role that Brownfield land may have and the rate that it can be recycled for alternative uses.

### Former Office Supply

- 3.32 The exception to this positive demand for economic space remains the office portfolio.
- 3.33 Whereas Covid supercharged the demand for industrial land, the opposite occurred with offices. The increased trend for homeworking in Covid is well known – the pandemic forced firms and employees to change their working practices and work from home. But it is less clear whether, two years post the peak of the crisis, whether working patterns will return to a pre-Covid normal, with many workers remaining at home for at least part of the working week. Research looking at the Central London office market in late 2022 found that office attendance was only 50% of that seen before Covid. For anyone looking to estimate future need for office space, this simple statistic is complicated because many workers have adopted a ‘midweek’ office policy with offices poorly utilised at either end of the week.
- 3.34 In this area, Havant has comparably little office stock, which has been in long term decline since reaching a peak in the early 2010s. In 2013 Havant accommodated 115,000 sqm of office stock which was around 5% of Hampshire’s stock – falling to 98,000 in 2022.
- 3.35 In this report we cannot discount the possibility that further losses of office stock will make a contribution to future development needs in Havant, but with a small stock additional office conversions are unlikely to eliminate the strategic need for new land. It

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<sup>9</sup> <https://www.trade.gov/country-commercial-guides/united-kingdom-ecommerce#:~:text=Consumer%20eCommerce%20now%20accounts%20for,Population%3A%2068.05M>

is also the case that the Borough's office stock is largely occupied. So, if office space is used for housing supply, this only displaces office sector firms who may need to find new space.

- 3.36 As an illustration: even were 100% of Havant's office stock converted to homes, the c.100,000 sqm of stock would address only a few years of housing need<sup>10</sup>. Such a calculation can only be illustrative, but demonstrates that even in a poor office market with no office demand, converting all the floorspace is unlikely to remove the need for further greenfield land development.

### Former Retail space

- 3.37 In our experience many retail occupiers and their landlords are actively looking at repurposing or redeveloping their stock for new uses. This includes town centre retail space, which was often vacated in Covid and is unlikely to be brought back into retail use. But it also includes larger 'retail warehouse' redevelopment proposals. The move online means that many of these previously successful schemes are now looking at how to rationalise their retail floorspace. This report does not assess the Borough's retail portfolio, but we note that other Council-led workstreams may identify further sources of policy-acceptable supply. The future need (and format) of retail space is also an issue we expect to be tested through the update of the Council's Town Centres Study.

### Summary

- 3.38 National policy sets out a list of constraints that, where present can provide an indication of environmental and social limits and an areas ability to meet development needs.
- 3.39 There are other constraints, not cited in the NPPF, that could also legitimately restrict the areas' ability to meet development needs. The key difference between the two levels of constraints is that the Council can consider reviewing local constraints to deliver development need in the balance. Local constraints should be reviewed and may need to flex when the Council comes to addressing the planning balance. There may also be cases where more detailed constraint work can overcome constraints – making previously unsustainable solutions sustainable.
- 3.40 As an example – it is not for Havant to consider the extent of the designated National Landscape which is already defined and clearly cited as a constraint in the NPPF. But Havant should review land constraints not listed in the NPPF, for example settlement gaps, and redraft them in response to the scale of development need.
- 3.41 Havant's Adopted Local Plan currently identifies gaps between urban areas, but given the scale of need that exists that these will need to be reviewed. Over recent years the

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<sup>10</sup> The 100,000 sqm of stock, if all converted at 65sqm per unit presents headline yield of c1,500 homes or less than three years of housing need. 65sqm is the average size of a converted (from another use) flats identified by the 18/19 English Household Survey.

Council has enabled the early release of housing sites within these gaps to address need.

- 3.42 We have briefly considered the extent to which brownfield land may limit the need for identifying new greenfield land in Havant – and so avoid land that is nationally or locally constrained. Our view from the Council’s economic evidence is that brownfield land has only limited potential to address the need for new development land. Industrial land is now in demand for employment uses, assisted by the Solent Freeport. This means that there is less likelihood of new portfolios of surplus industrial space being created that can be used for housing.
- 3.43 Office conversions may assist and boost supply but will not negate the need for development on greenfield sites. Offices as a source of supply are much more significant for districts with large stocks. Where previous plans or strategies made new allocations prior to Covid, they may struggle to deliver these in this current economic climate. Havant is a small office market which was already shrinking in terms of floorspace before Covid.
- 3.44 We understand that workstreams led by the Council will look to confirm what brownfield supply is available to inform the new plan. This will include a review of vacant and derelict land, as well as other sources of land which is in public ownership through the Council’s Strategic Housing and Economic Land Availability Assessment. Although Havant Borough Council has historically very little land and no significant portfolio that could be re-purposed.
- 3.45 In the next sections we look in detail at the thematic constraints across our wider area and Havant in more detail. This analysis is focused on identifying development land as opposed to redevelopment opportunities.

## 4 Landscape and Visual Constraints

“The policies referred to are those in this Framework (the NPPF) (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 181) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, **an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast**; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 68); and areas at risk of flooding or coastal change. (Footnote 7 of the NPPF)

- 4.2 The above quote is taken directly from the NPPF and in this section we explore landscape and visual constraints.

### Introduction

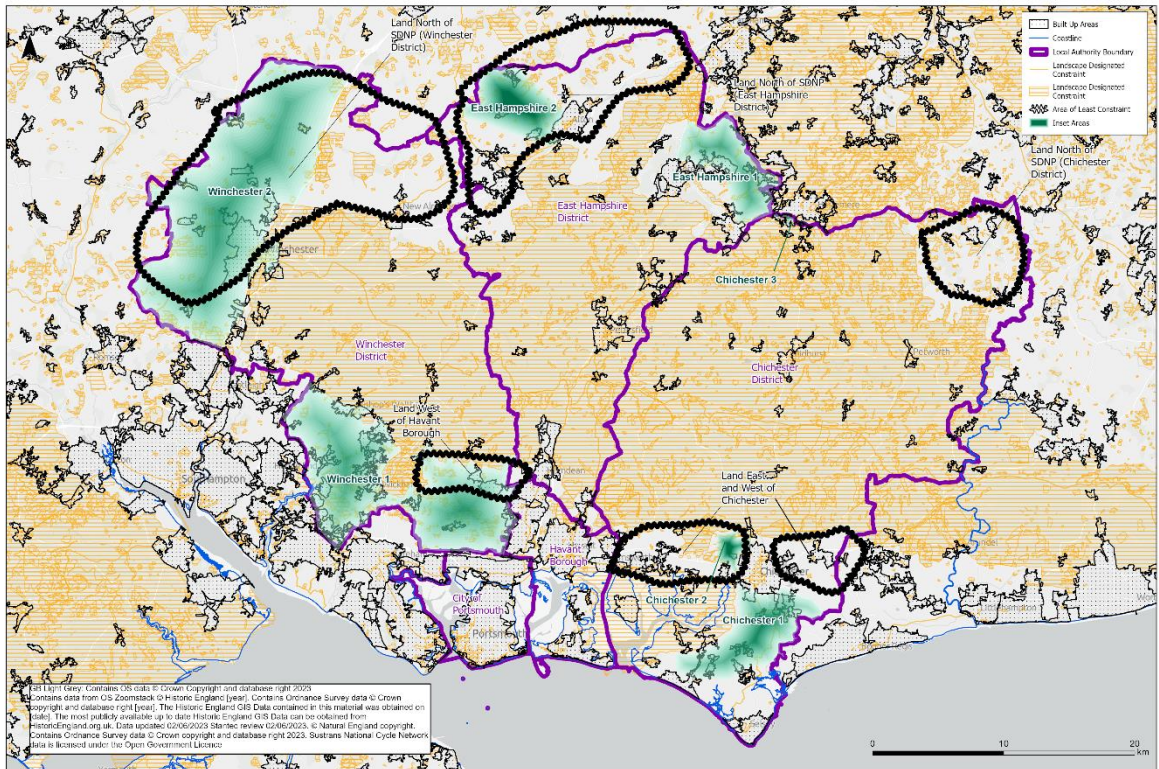
- 4.3 The first thematic area we explore relates to landscape and visual constraints.
- 4.4 Because there are too many layers to show individually, and many overlap, the constraints have been grouped into two sets.
- 4.5 Cultural heritage features which have a landscape and visual setting are considered in this section as landscape and visual constraints. It should be noted that these will have some overlap with the heritage section of this report.

### National Landscape Constraints: Protected Landscape / Heritage / Green Infrastructure

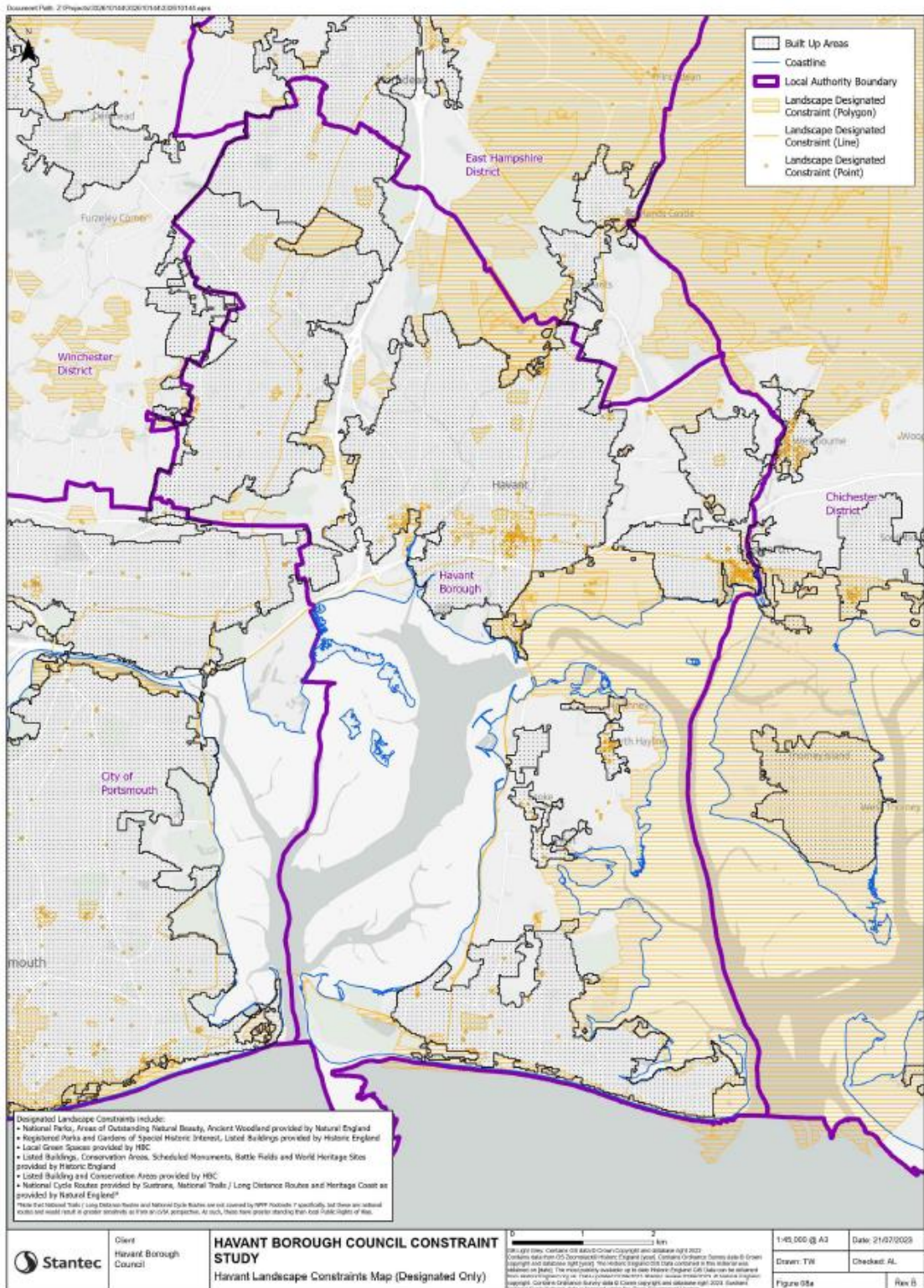
- 4.6 These are national designations or ‘defined’ areas, which seek to protect, conserve and enhance landscape, cultural heritage and green infrastructure assets.
- 4.7 These are relevant to the National Planning Policy Framework (NPPF), including Footnote 7, and would result in high sensitivity to new development being applied to landscape and visual receptors.
- 4.8 The designations and defined areas are:
- National Parks
  - National Landscapes (Areas of Outstanding Natural Beauty (AONB))
  - Register of Parks and Gardens of Special Historic Interest
  - Regional Parks
  - Local Green Spaces
  - Ancient Woodland
  - Listed Buildings
  - Conservation Areas
  - Scheduled Monuments
  - National Cycle Routes

- National Trails / Long Distance Routes
- 4.9 There are no World Heritage Sites, Battle Fields or Heritage Coasts within the Study Area.
- 4.10 These designations and defined areas form notable landscape and visual constraints to new housing development, with the presumption set in the NPPF policies to protect these areas from inappropriate development (that is, development within those areas and / or adjacent to those areas), and to conserve and enhance the assets.
- 4.11 Additionally, the landscape settings of National Parks and National Landscapes (AONBs) will also be constraints to housing development; however, the extent of those settings is not possible to define through this high-level mapping exercise as they will vary according to the specific landform, character, visual links and landscape features in the vicinity of each National Park and National Landscape (AONB). However, given the physical proximity of Havant to these features it is very likely most of the Borough will be in the setting of one of these features and while this does preclude development, it may complicate delivery and reduce yields where lower density formats need to be promoted.
- 4.12 In addition to national policies, settings to National Parks and National Landscape (AONBs) are usually protected from inappropriate development through local plan policies. Furthermore, where key views or strategic view cones are identified in planning policy or character assessment, these should also form a constraint to housing development, e.g. key views to or from National Parks, National Landscapes, Conservation Areas, and designed views from, or to Registered Parks and Gardens of Special Historic Interest.
- 4.13 There is potential for appropriate mitigation measures to be incorporated into design proposals for new housing, which could reduce some of the significant adverse landscape and visual effects which are likely to arise from new housing developments within or in proximity to the designated / defined areas. However, this very much depends on the specific development proposals and the nature of the site and its surrounding context. Typically, not all significant landscape and visual impacts which are likely to arise from new housing development within or in proximity to these designated / defined areas could be mitigated.
- 4.14 The maps below also illustrate, in green, areas of land we discuss in more detail in the text that follows.

### Map 3 – Neighbouring Authorities Landscape Constraints (National Designations)



### Map 4 – Havant Borough Landscape Constraints (National Designations)





## Regional / Local Landscape Constraints: Borough Landscape & Green Infrastructure

- 4.15 The regional / local designations and defined areas are:
- Country parks
  - Significant woodland<sup>11</sup>
  - Other open / green spaces e.g. public parks and gardens, amenity space, natural and semi-natural greenspace
  - Golf courses
  - Sports pitches
  - Public Rights of Way
  - National Landscape Character Areas
- 4.16 County and Borough Landscape Character Areas should also be considered in terms of those which are of high quality and / or which have high sensitivity to housing development, but are not shown in the mapping here. Any very high or high sensitivity character areas should be zoned out on the basis that, typically, those areas would have little to no capacity to successfully accommodate new housing development without significant harm to landscape character, even with mitigation measures in place. The specific capacity of a landscape character area to accommodate new housing development will vary according to the character area's landform, visual links and landscape features, and thus should be considered on a case-by-case basis. Unfortunately, there is no dataset for County and Borough Character Areas available, so they are not illustrated on the high-level Constraints Maps.
- 4.17 Protection to these assets and features is usually through local plan policies. There is potential for appropriate mitigation measures to be incorporated into design proposals for new housing, which would be expected to minimise or reduce significant adverse landscape and visual effects that are likely to arise because of new housing developments.
- 4.18 We have only plotted the above listed constraints for Havant Borough and mainly for local context because, as noted above, they are not absolute constraints and may be expected to flex to accommodate development.

### Summary of Findings - Wider area

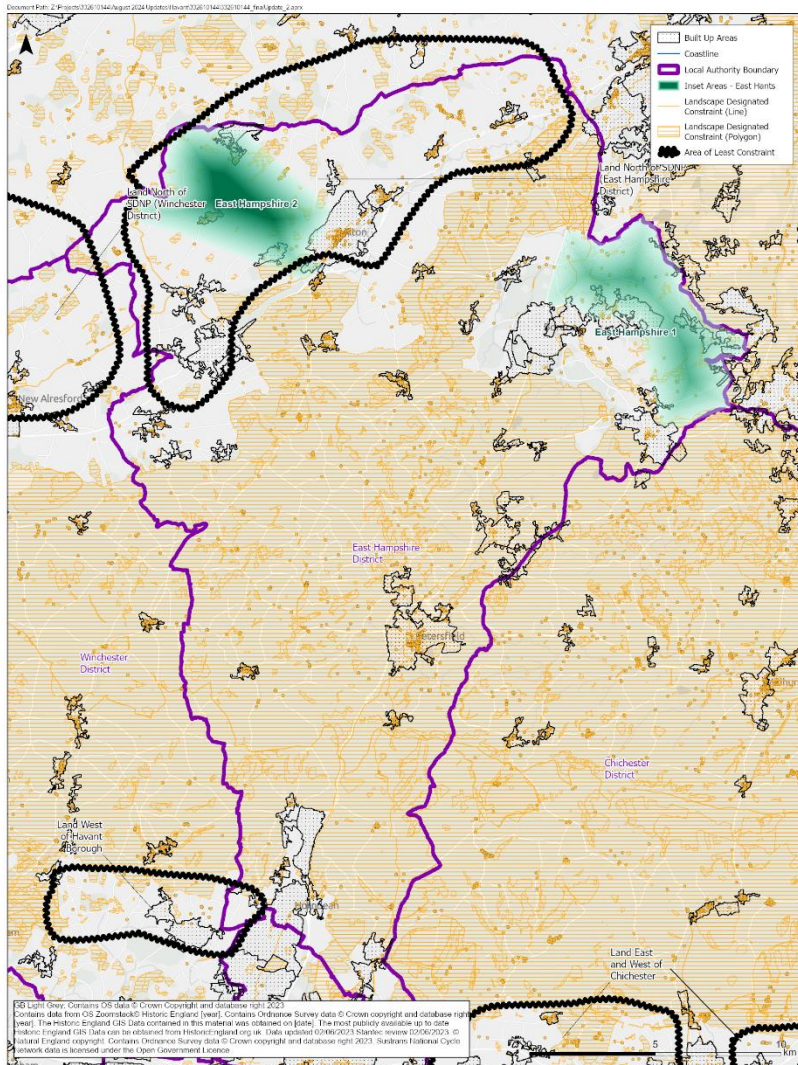
- 4.19 Below we provide a summary of the landscape constraints by Council area – starting with East Hampshire District Council (hereafter referred to as 'East Hants').

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<sup>11</sup> i.e. woodland as indentified on Ordnance Survey maps. Note that woodland is an ecological constraint as well as a landscape one.

## East Hants

### Map 3a – Neighbouring Authorities Landscape Constraints (East Hampshire inset)



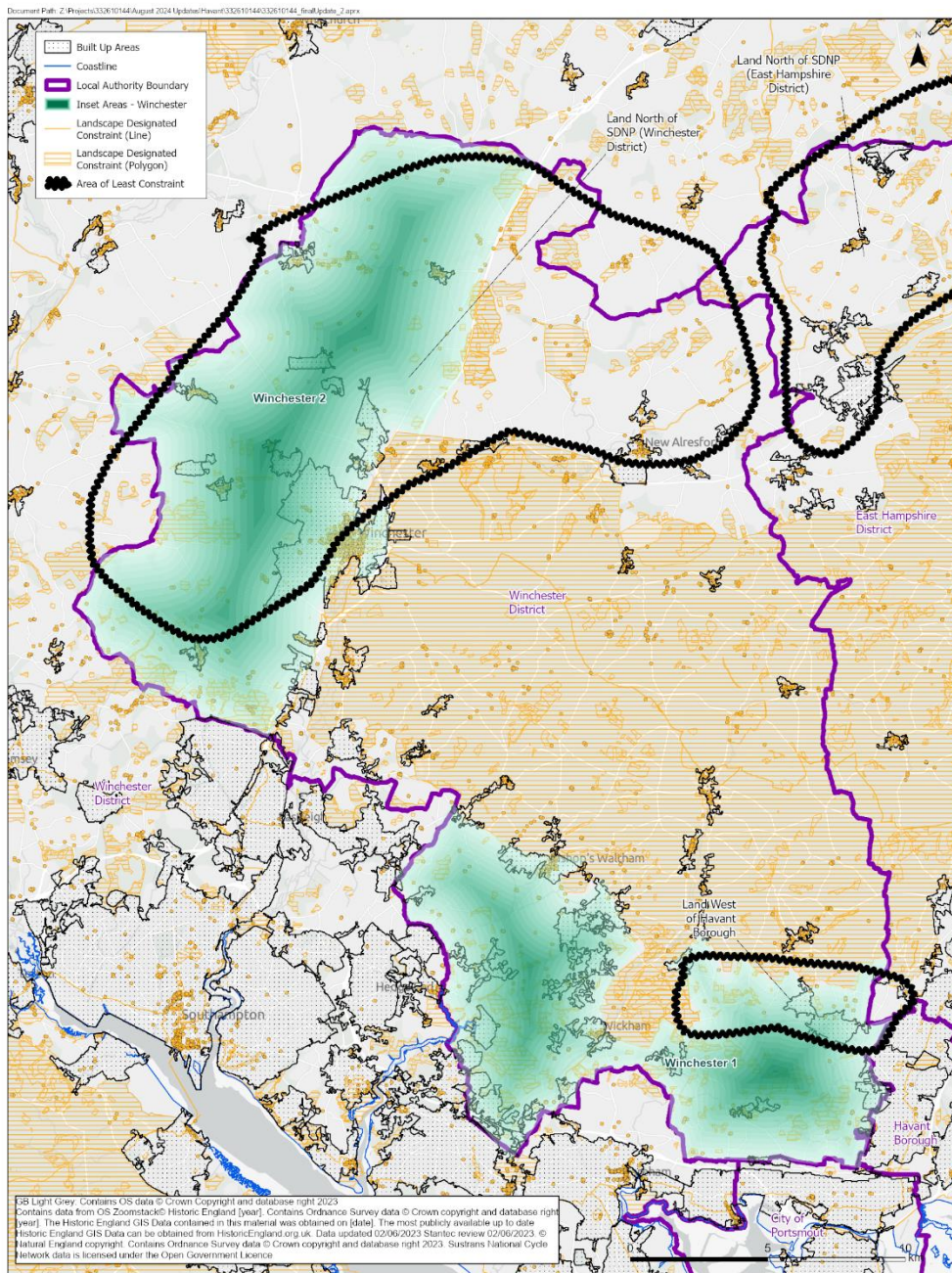
4.20 The South Downs National Park (referred to as ‘the Park’ herein) covers most of this district. Exceptions are a strip of land in the south of the district which borders Havant borough. In the north of the East Hampshire district, outside of the National Park are two broad areas which we simply introduce as areas 1 and 2.

- 1) East Hampshire Area 1: area to the east of the South Downs National Park, east of the A325 Farnham Road north of Bordon to the district boundary; north of Headley Down and the B3002 road to the district boundary; the area between the south of Headley Down to the A3 road; and the area between northeast Liphook to the A3 road. Strategic areas of green infrastructure (open spaces such as Commons), Ancient Woodlands and Conservation Areas would need due consideration. Parts of this area would likely be identified as landscape setting to the South Downs National Park and / or Surrey Hills National Landscape (AONB).

- 2) East Hampshire Area 2: the area between the northern district boundary and the South Downs National Park boundary, northwest of Alton and the A31. The landscape setting of the South Downs National Park, as well as Ancient Woodlands, Registered Parks and Gardens of Special Historic Interest and Conservation Areas would need due consideration.
- 4.21 We also note that there is a small quantum of less constrained land East of Horndean (Southern East Hampshire) – although as we note elsewhere this land is already proposed for development in the adopted East Hampshire’s Adopted Local Plan with a proposal to extend development to include most of this remaining parcel. So, while this land is less constrained, it is pragmatically not available for further development.

## Winchester

### Map 3b – Neighbouring Authorities Landscape Constraints (Winchester inset)



4.22 The South Downs National Park extends into the central area of Winchester district from the western boundary, terminating at the city of Winchester. The national park designation covers circa 50% of the district and this is a major constraint to housing development.

4.23 Other notable national designations / defined areas include:

- Registered Battlefield: Battle of Cheriton 1644 (1st Civil War), Winchester
- Scheduled Monuments: scattered across the district, several Scheduled Monuments near to settlements in the north of the district and in and around Winchester.
- Registered Parks and Gardens of Special Historic Interest: including Avington Park, Magdalen Cemetery, Lainston House, Sparsholt Manor Garden, Stratton Park, The Grange Northington, Old Alresford House, Bramdean House, Warnford Park, Cranbury Park.
- Several Conservation Areas and areas of Listed Buildings.
- Several areas of Ancient Woodland / Replanted Ancient Woodland.

4.24 The high-level constraints mapping exercise shows there are two areas in the district, which are least constrained by national landscape constraints. As with East Hampshire, there is land beyond the National Park, and its setting. But this land is remote from Havant.

- 1) Winchester District Area 1: Unlike East Hampshire there is a strip of land between the southern boundary of the South Downs National Park and the southern boundary of the Winchester district. However, this area does contain some Ancient Woodland and it is anticipated that parts of the area would be identified as setting to the South Downs National Park. More detailed studies would be required to determine the landscape capacity of these two broad opportunity areas for strategic housing growth. This area, although mostly in Winchester, could include a very small amount of land in East Hampshire (west of Waterlooville).
- 2) Winchester District Area 2: which lies to the north, west and south of Winchester, west of the M3 motorway, west and north of the South Downs National Park western and northern boundaries, up to the western and northern boundaries of Winchester district; though again this area contains Ancient Woodland areas and parts of the area would be identified as setting to the South Downs National Park.

## Portsmouth

4.25 The major constraint for Portsmouth, being an island and the most densely populated area outside of inner London, is the extent of the existing and dense urban area. There are Scheduled Monuments aligning a narrow strip of steep slopes of open space at the northern boundary of the Portsmouth district, including Fort Purbrook, Fort Widley, and Fort Southwick, these being located on the top of the higher landform and overlooking the coast; and to the south of the M27 the Scheduled Monument and Conservation Area at Hilsea Lines. Conservation Areas, Registered Parks and Gardens of Special Historic Interest and Scheduled Monuments are also located in the southern extents of Portsmouth City.

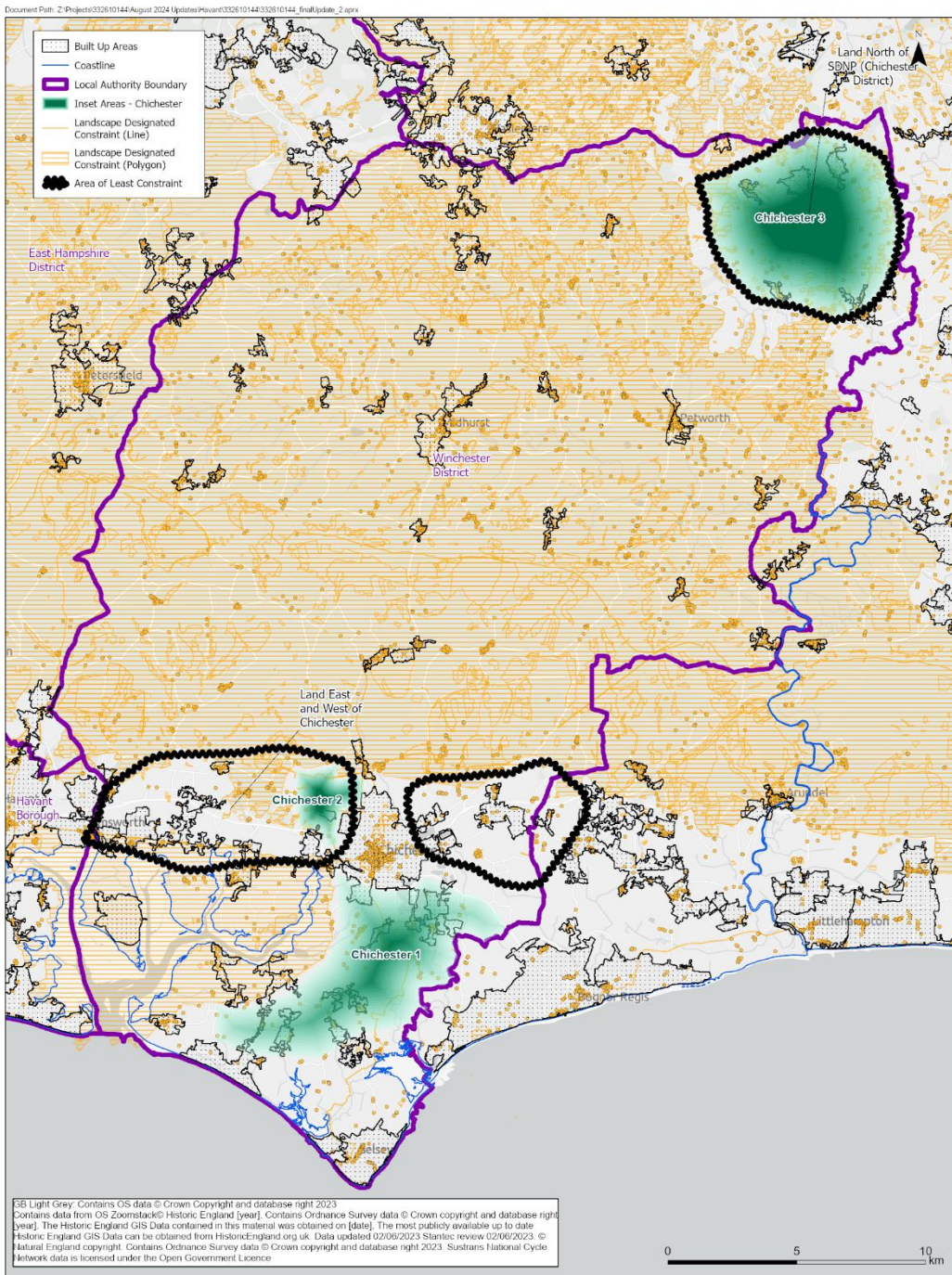
4.26 Based on the high-level constraints mapping exercise, no areas of search for housing development in Portsmouth district have been identified.

4.27 Immediately to the north of Portsmouth is a strip of undeveloped land around Fort Purbrook. This is owned by the City Council and accommodates Portsmouth Golf

Course which falls within Havant Borough. This is considered as part of Havant and it is therefore not discussed under Portsmouth.

### Chichester

**Map 3c – Neighbouring Authorities Landscape Constraints (Chichester inset)**



- 4.28 The South Downs National Park covers approximately 70% of the Chichester district, running east/west across the centre of the district and forming a major constraint to new housing development. The north of the district falls within the area known as ‘the Weald’. To the south of the district ‘The Downs’ fall away towards the coastal plains. For this work we consider the far north of the district (outside the national park) to be remote from Havant. While we have plotted the local constraints in the far north of Chichester district, the land is clearly in a different housing (and economic) market area and would be a poor substitute for land around Havant.
- 4.29 In the south, Chichester Harbour National Landscape (AONB) is in the southern part of the district, covering the whole of the Chichester Harbour area; the northern boundary of the National Landscape (AONB) broadly follows the A259 road, south of the West Coastway Line railway and A27 road. This is also a major constraint to new housing development.
- 4.30 The geography of the National Park and National Landscape (AONB) presents a corridor of land between Westbourne and Chichester, which lies between the southern boundary of the South Downs National Park and the northern boundary of the Chichester Harbour National Landscape (AONB). The land is outside the National Park and contains some small areas of Ancient Woodland. The land would form part of the landscape setting to the adjacent National Park and / or National Landscape (AONB).
- 4.31 The high-level constraints mapping exercise shows there are three areas in the district, which are less constrained by national landscape constraints.
- 1) Chichester District Area 1: Located to the east of Chichester Harbour National Landscape (AONB) and north of Medmerry Nature Reserve, in the area which lies to the north of East Wittering and Selsey up to the A27 and A259, and the southeastern district boundary. There are small Conservation Areas, Ancient Woodland and scattered Listed Buildings in this area which would need due consideration along with the landscape setting of the National Landscape (AONB).
  - 2) Chichester District Area 2: Located between the A27 north of Fishbourne and the southern boundary of the South Downs National Park, up to the western edge of the urban area of Chichester. The landscape settings of the National Park and National Landscape (AONB) would need due consideration. This would also be in the area west of Chichester but we have discussed them separately because the impact of the National Landscape (AONB) would likely differ between the two. We also note that ‘area 1’, running up to the Medmerry Nature Reserve would not form part the A27 corridor – which provides access from south Chichester into Havant and would be much less accessible as a location to accommodate Havant’s needs.
  - 3) Chichester District Area 3: A northeastern corner of the district, between the northwestern boundary of the South Downs National Park and the district boundary. The landscape setting of the National Park and the network of Ancient Woodlands would need to be considered. As with Winchester and East Hampshire this would be a remote location to accommodate Havant related growth. [note this is incorrectly drawn on the map 3c – and the green area should relate to the area in the North East of the district)

## Summary

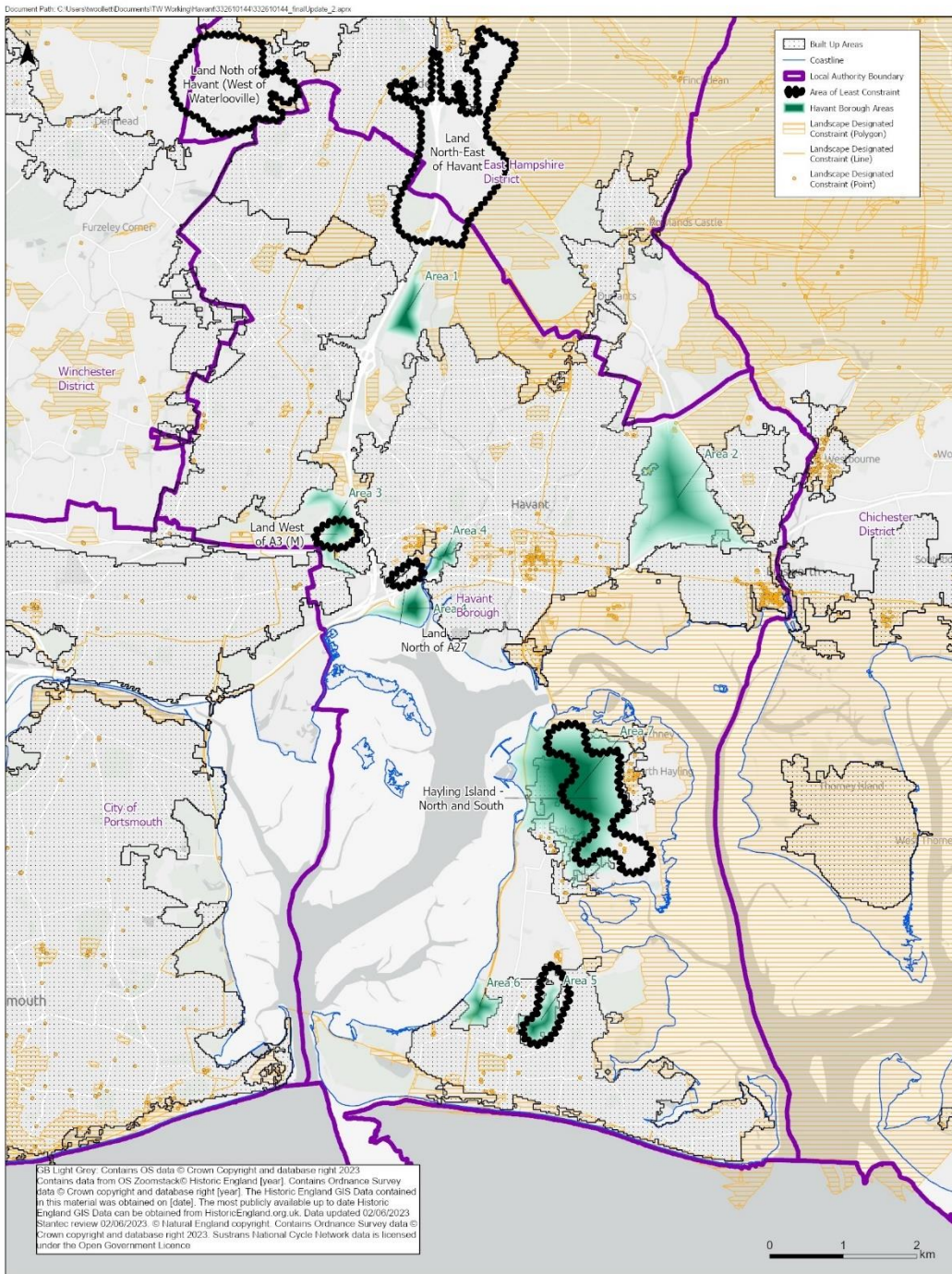
- 4.32 The analysis of the neighbouring districts highlights two broad types of area. Firstly, land remote from Havant – beyond the National Park. This includes a large amount of land around Winchester and in the north of East Hampshire and Havant. This land has been highlighted because it is outside the National Park but within neighbouring authority areas. As land outside the National Park, it is less constrained, but not free of constraints. In this section the network of woodlands (outside the Park) is the most obvious secondary constraint. Pragmatically, the strong network of woodlands will limit development capacity and would limit the ability of this land to accommodate significant development needs.
- 4.33 We have also highlighted land around Bordon (East Hampshire Area 1) as being less constrained but note that this land parcel has a greater extent of ecology constraints than the other Chichester parcels and possible development parcels, avoiding the already built-up areas are close to designated landscape areas, and so within the designated landscapes' setting. While our high-level mapping shows some degree of least constrained land here, the fact the Bordon area is surrounded by the National Park or National Landscape (AONB) (and so within their settings) and the need to preserve the settings and the need to respond to other constraints may effectively limit development potential in this area.
- 4.34 Secondly, we have highlighted a narrow band of land between the Park and the sea to the south. This band includes land (mainly) in the South of Winchester district and in the South of Chichester district.

## Summary of Findings - Havant Borough

- 4.35 While landscape is a major constraint in this area - largely driven by the National Landscape (AONB) and the setting of the National Park, there are areas that are still reasonably unconstrained in Havant.
- 4.36 For Havant Borough, we look in more detail and consider regional and local landscape and visual constraints (as set out in paragraph 4.15-4.18 above – although as noted in the introduction local constraints may flex. The map below shows both the designated landscape assets and the regional / local constraints.



### Map 5 – Havant Borough Landscape Constraints



4.37 The South Downs National Park lies adjacent to the Borough boundary at Emsworth Common Road, to the northern corner of Hollybank Woods. The northeast area of the Borough includes the Staunton Country Park, part of which is on the Register of Parks and Gardens of Special Historic Interest, and includes land and Ancient Woodland of

Havant Thicket and part of the Forest of Bere. These are major constraints to housing development. There are also 14 Conservation Areas in Havant Borough which can potentially constrain delivery.

- 4.38 The Chichester Harbour National Landscape (AONB) extends over the eastern Havant Borough boundary, over Emsworth and up to Langstone, over Langstone Harbour and up to the bridge, and over the eastern and northern edges of Hayling Island (from Sandy Point to Tournerbury Wood and Plantations to Mill Green, to Eastney Park Farm Nature Reserve, and to Northney and North Common). Strategic development would not be appropriate in the National Landscape (AONB).
- 4.39 The northern area of the borough comprises the existing dense urban areas of Cowplain, Waterlooville and Purbrook, these all lying to the west of the A3(M) road. The area to the east of the A3(M), between the Staunton Country Park and the A27 road, is primarily an urban area, from The Warren / Warren Park to Bedhampton and the historic centre of Havant, bordered by the A27 south. The urban areas of Langstone, Hermitage Park, Langstone Technology Park, Budds Farm Waste Water Treatment Works and Havant Borough Council Southmoor Offices and Depot which lie adjacent to Southmoor Nature Reserve on the coast, are situated south of the A27. Hayling Island is connected to the mainland via a road bridge and is located to the south of the mainland coast.
- 4.40 Regional / local constraints relating to landscape and green infrastructure features and assets have also been identified and mapped for Havant Borough. These include other areas of woodland, golf courses, playing fields, other country parks and other types of green space. This more detailed constraints mapping highlights the linear network of woodland and open spaces which run alongside the A3(M) corridor, golf courses at Waterlooville Golf Club in the north of the district and Portsmouth Golf Course south of the A27, and the pockets of green and amenity spaces scattered throughout the urban areas. Due to the dense, urban nature of the Borough on the mainland, these green infrastructure features will be of local importance.
- 4.41 The national, regional and local constraints which protect landscape, cultural heritage and green infrastructure within Havant Borough, combined with the existing urban areas in the district leave few areas of opportunity in landscape terms, for strategic housing growth.
- 4.42 Areas which have been identified as less constrained are summarised below, from north to south:
- 1) Havant Borough Area 1: Land to the east of the A3(M), between the northern edge of Dunsbury Park to woodland which lies to the south and west of Bells Copse, to the west of Calshot Road and north of Fitzwygram Way. Public rights of way cross this area and would need due consideration.
  - 2) Havant Borough Area 2: Land between Bartons Road to the A27 and the railway line where it is situated south of the A27, bordered by existing housing at Denvilles, and new housing development off St Georges Avenue at the western edge of the area, and Horndean Road / New Brighton housing at West Brook View, at the eastern edge of the area. This area contains some pockets of woodland, but otherwise appears relatively free from landscape and green infrastructure constraints. [this land is known

as Southleigh and is identified as a potential strategic development location in the PfSH Spatial Position Statement having been previously proposed for allocation].

- 3) Havant Borough Area 3: Land between College Road to the A3(M) Waterlooville Bypass, north of the Portsmouth Golf Course, extending southwards to the B2177 Portsdown Hill Road, but excluding the Scheduled Monuments (Roman Villa and Roman Road, south of Little Park Wood and Bevis's Grave) and their landscape settings (including that of the nearby Fort Purbrook), and the setting of the Listed Building at Belmont Castle (The Towers). This area could also extend into the area of undeveloped land, between the B2177 and the A2030 Havant Road, which appears unconstrained in landscape terms.
  - 4) Havant Borough Area 4: Land between the railway to the north of the A27, to the western edge of the area bordering the industrial / commercial warehouses at Ridgeway and Marples Way and recent housing at Doyle Close and Longcroft Way, but excluding the Listed Building (The Old Mill House) and Conservation Area. South of the A27, the area extends to Harts Farm Way / A2030 and beyond to the coast. There are woodland areas around the complex highway network which divides this area, and a Conservation Area and Listed Building which would all need due consideration.
  - 5) Havant Borough Area 5: Land at Hayling Island (south), between the Hayling Island Holiday Park and existing housing at St. Mary's Road and Elm Grove. Public rights of way cross this area, and there are two areas of woodland, which would need due consideration.
  - 6) Havant Borough Area 6: Land at Hayling Island (west) between the coastal edge and existing housing at Northshore Road, Sinah Lane, Furniss Way, Dances Way, West Lane and Saltmarsh Lane. There is Local Green Space, areas of woodland, public rights of way and the National Cycle Network which would all need due consideration.
  - 7) Havant Borough Area Area 7: Land at Hayling Island (north and central), comprising undeveloped land to the south and west of the Chichester Harbour National Landscape (AONB) through to the western coast of the island, excluding Listed Buildings and Conservation Areas, and the setting of the National Landscape. Additionally, there are public rights of way, areas of woodland and green amenity spaces which would need to be considered.
- 4.43 More detailed studies would be required to determine the landscape capacity of these seven broad opportunity areas for strategic housing growth.

## Overall Summary

- 4.44 Our landscape analysis has identified some less constrained land in the wider areas outside of Havant Borough. The National Park does not cover all the land in the neighbouring authorities and so some land is free of this significant constraint. But most of this land is remote from Havant and would require a c.50km trip in each direction to move between Winchester city (for example) and Havant town. From a landscape perspective, much of this land will be in the setting of the National Park but

obviously the further it is away from the Park the less the likely impact. West of Winchester is unlikely to be influenced by the National Park but, as with wider South Hampshire, it is not free from constraints with a network of Ancient Woodland to work around.

- 4.45 From a landscape perspective, there is a strip of land in the south of Winchester and Chichester that will be in the setting of the National Park, but otherwise not strategically constrained. As we will discuss later, this land, being close to the coast, has other constraints but from a landscape perspective lacks the protection that National Landscapes (AONB) and National Parks afford elsewhere.
- 4.46 As with regards to Havant our analysis has highlighted a number of less constrained parcels – the largest has already been proposed for allocation (Area 2) and Area 1 is also being considered as a new economic allocation as part of the Freeport Tax Site. Land West of the A3(M) has also previously been proposed. So they don't represent a new opportunity. Land North of the A27 is the only 'new' parcel we have identified on the mainland. Our analysis has also highlighted how the Island is generally less constrained by landscape designations but, as noted elsewhere has a network of ecology constraints that will complicate development here – most likely dramatically reducing developable land to accommodate mitigation. We have noted areas of the Island as less constrained but do not underestimate the challenge of providing development on a small island in very close proximity to environmental constraints in addition to physical separation and access concerns.

## 5 Historic Environment

*“The policies referred to are those in this Framework (the NPPF) (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 181) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 68); and areas at risk of flooding or coastal change. (Footnote 7, NPPF)”*

### Introduction

- 5.2 Heritage assets are defined by the NPPF as “A building, monument, site, place, area, or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing)”.

#### Designated assets

- 5.3 Designated assets are significant at a national level; and listed buildings, conservation areas and scheduled monuments are afforded statutory protection in legislation. Local planning authorities have a duty to preserve their heritage significance, and in the case of listed buildings any contribution made by their setting.
- 5.4 The preservation of the remaining designated assets and their setting is enshrined in local and national planning policy. Listed buildings and scheduled monuments are designated by the Secretary of State.
- 5.5 We have mapped both designated (listed buildings, conservation areas, scheduled monuments, registered parks and gardens, registered battlefields, protected wrecks, and world heritage sites), and non-designated heritage assets (locally listed buildings, known archaeological assets) across Havant and the immediately surrounding Districts.
- 5.6 It should be noted that further site specific analysis will be required in order to gain an informed understanding of the identified heritage constraints, including an appreciation of any contribution made by setting. This could take the form of a series of detailed Heritage Impact Assessments or Settings Studies.

#### Non designated assets

- 5.7 Non-designated heritage assets are generally significant at a local level. Whilst they are a material consideration in the planning process, they are not afforded any statutory protection. However, footnote 68 of the National Planning Policy Framework does state that where non-designated heritage assets of archaeological interest have been demonstrated to be of equivalent significance to scheduled monuments, then in policy terms the tests relating to impact on designated heritage assets should be applied. The data for non-designated heritage assets has been provided by each

County Council Historic Environment Record and comprises of 'ALERT' data. This is a more focussed data set which is used by the local planning authority to 'trigger' consultation with the Archaeological Advisory teams. It is this data that has been mapped and informed this report.

- 5.8 In this report, professional judgement has been used regarding non-designated archaeological assets, to identify key risks of assets being of sufficient significance to be regarded as equivalent to scheduled monuments.

### Setting

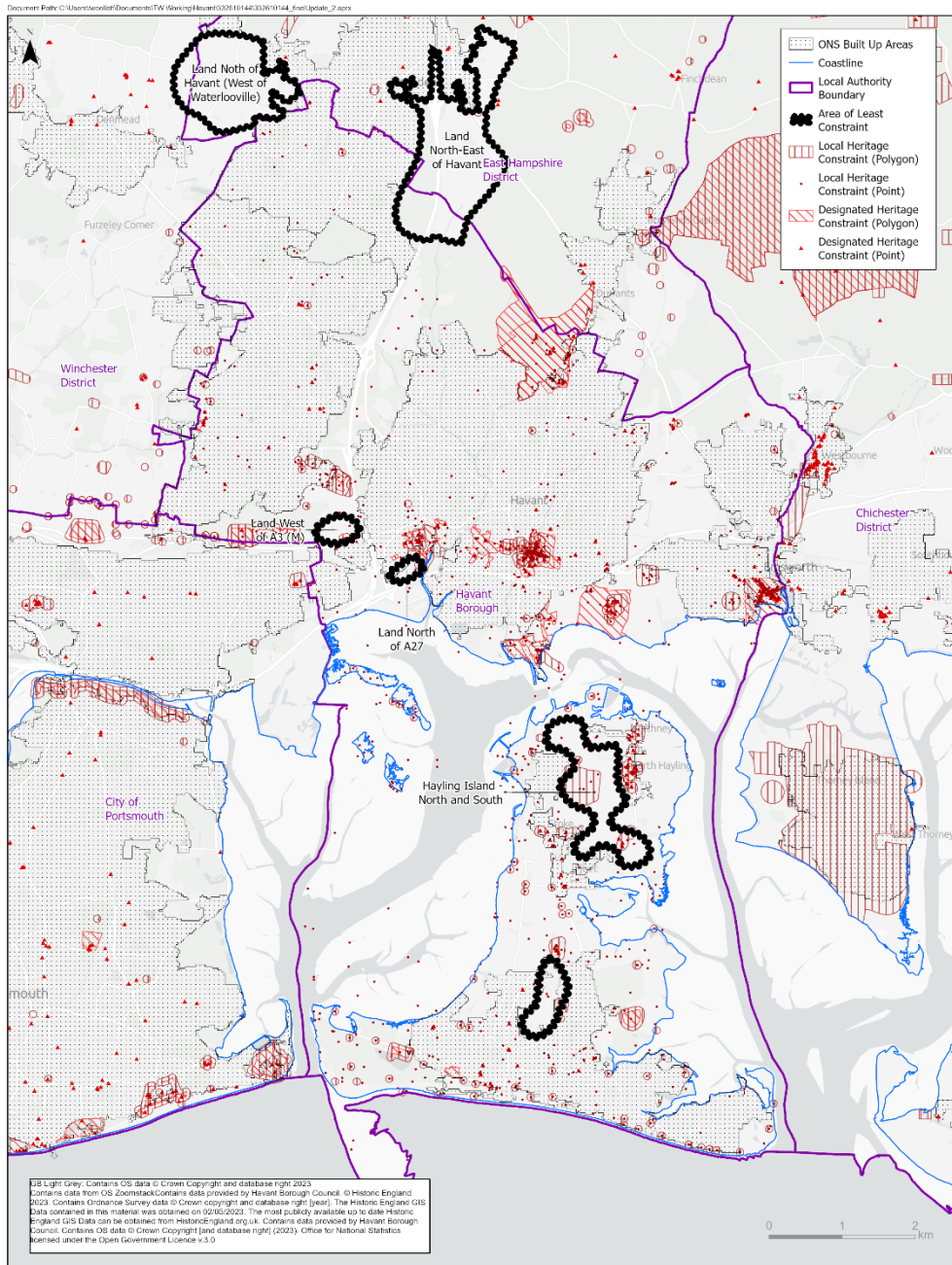
- 5.9 For the purposes of this exercise, the main consideration is the potential for development parcels to impact the setting and by extension significance of heritage assets. The setting of a heritage asset is described in Annex 2 of the NPPF as:

*"The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance may be neutral."*

- 5.10 Setting is the way in which the asset is understood (i.e. evidential, and historical interests) and experienced (aesthetic and communal values). It is not an asset and differs from curtilage (historic/present property boundary), context (association with other assets irrespective of distance), and historic character (sum of all historic attributes, including setting, associations, and visual aspects).

## Havant Summary of Results

Map 6 – Havant Borough Heritage Constraints



5.11 We have not shown the allocations in the adopted and withdrawn plan above but were we to do so this would be in areas that are generally free of heritage constraints – with the exception of a number of local assets that are unlikely to significantly constrain development – subject to further work.

5.12 Regarding Dunsbury previous archaeological investigations have identified potential for archaeological remains to be present, including the presence of a large enclosure to

the north. Further archaeological investigations are likely to be required to better understand the archaeological resource that may be present in this area before a definitive view on acceptability for development can be reached. We have not shown this as an area of less constraint because it is within the Tax Site but our analysis would suggest that it should be considered otherwise.

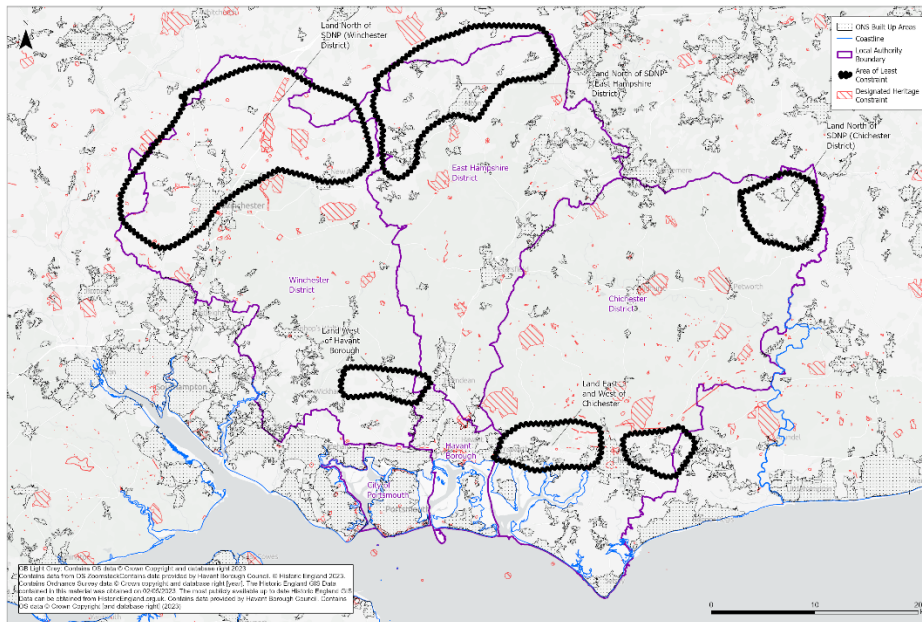
- 5.13 The analysis illustrates how the developable area at Land West of the A3(M) is more constrained by underground heritage assets than may first appear and hence why our area of less constraint here is so small. Our landscape analysis, discussed above, may have suggested a larger area but this was without consideration of underground heritage assets connected with the fort. Also, pragmatically and aside from any constraint work, land around the Roman Villa (which is a designated SAM) is already identified for potential development. We understand that working around the constraints in this area is challenging, hence the delay. We understand that development here is subject to a more detailed understanding of the setting of these heritage assets, and the need for development to leave space around them.
- 5.14 Our analysis also notes a heritage constraint east of Stoke (Hayling Island). This falls within an area we considered that, for landscape alone, was less constrained. This primarily relates to potential for archaeological remains and is a local constraint related. However, the wider setting of listed buildings and conservation areas to the east and west would also have to be considered. As such, for our analysis they are key considerations for any development in this location, which may affect the potential for development accordingly.
- 5.15 To the south of Havant town – the cluster of heritage assets (including the Grade 1 listed St Johns church) already overlaps with our landscape constraints (which are not shown on this map)
- 5.16 While the map shows several assets within the other Havant broad areas, they are not considered to be overriding constraints to development. The assets noted at Dunsbury Park, for example, relate to previous archaeological dig sites which don't prevent future development.

## Wider Area Summary of Results

- 5.17 The map below shows where we have identified 'designated heritage assets' as a constraint in the wider area. The map does not show the National Landscape (AONB) or National Park because these are not related to heritage, but were these to be added then this would, coupled with the scattered heritage assets, constrain most of the 'wider' area.



## Map 7 – Neighbouring Authorities Heritage Constraints



- 5.18 When considering Havant relative to neighbouring local authorities, there are similarities between the extent of designated assets present across both Havant and Portsmouth local authorities which is not unexpected given they are both geographically small and urban areas. However, it should be noted that whilst the distribution and extent of assets is similar, both areas are significantly different in terms of the type of remains and historic character which defines their local distinctiveness.
- 5.19 Portsmouth is particularly constrained, with the historic core and naval docks, although the greatest constraint is the lack of land. Redevelopment and intensification is the main route for development delivery in Portsmouth and the network of heritage assets may limit where this can take place. Viability and the practicality of ongoing brownfield redevelopment will always be a limitation to development in Portsmouth.
- 5.20 Both Winchester and Chichester include registered parks and gardens but these are generally within the National Park or towards the west/north of Winchester district. There are no large designated heritage assets close to Havant Borough that are not already constrained by either the National Landscape (AONB) or National Park.
- 5.21 Within Chichester and Winchester, areas around existing settlements are less constrained in heritage terms than Havant, with potential to accommodate growth. Where conservation areas in these settlements exist, they are generally concentrated on the historic core and contain concentrations of listed buildings, meaning that development on the periphery of such settlements may be subject to consideration of their settings. In more rural areas of the districts, archaeological considerations have the potential to impact development opportunities. However, it should be noted that in the most part these are non-designated archaeological remains and as such there may be greater scope for mitigation.

- 5.22 In the wider area, the distribution and nature of heritage assets would not appear unusual. There are no large designated assets that would remove, on heritage grounds, the broad areas (geographies) we have so far discussed.
- 5.23 It is notable that in southern Winchester, the strip of land (including a small part of East Hampshire) does not appear to have any major heritage constraints.

### Summary

- 5.24 In the wider area, heritage would not appear be a strategic constraint in neighbouring authorities. The data illustrates the historic character of nearby towns and cities (as evidenced by the number of listed buildings and conservation areas). These may hinder redevelopment and intensification in its centres, but this does not prevent development elsewhere on the edge of settlements or rural areas of an administrative area.
- 5.25 Given the character of Havant borough, there are limited opportunities for strategic growth sites when compared to the larger districts of Winchester and Chichester.

## 6 Ecology

*“The policies referred to are those in this Framework (NPPF) (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 187) and/or designated as Sites of Special Scientific Interest (SSSI); land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 68); and areas at risk of flooding or coastal change.”*  
(footnote 7 of paragraph 11 of NPPF)

### Introduction

- 6.1 Ecology is perhaps the most complex of the thematic topics we need to consider because of the number and variety of features. Some are static features – for example designated nature conservation sites, but not all ecological constraints are as immediately obvious. In this area, land for migratory birds and associated mitigation is a key constraint given the area’s coastal location, the limited land available, and the seasonal and spatial changes in the birds’ distribution. The Stantec ecology team have prepared a detailed appendix which provides additional commentary around the numerous constraints and how they should be addressed. This chapter seeks to summarise this.
- 6.2 To inform consideration of constraints and supply analysis, an ecological desk study has been undertaken, drawing on the following resources:
- Freely available ecological data from Multi-Agency Geographic Information for the Countryside (MAGIC) website, Natural England website and Joint Nature Conservation Committee (JNCC) website;
  - Ecological data obtained from Havant Borough Council (HBC), including ecological data from Hampshire Biodiversity Information Centre (HBIC); and
  - OS mapping (1:25,000) and aerial photography.
- 6.3 Data considered during the ecological desk study in relation to both Havant and the surrounding Authorities (the wider area) is set out in Tables 1 and 2.
- 6.4 The data set out in Table 1 relates to designated sites protected by national legislation or planning policy and which are referenced in the NPPF<sup>12</sup>, along with associated buffer zones defining potential impact risk zones to these designated sites. The data set out in Table 2 relates to designated sites which are not specifically mentioned in the NPPF, but are nonetheless a consideration at the Local Plan level and are considered for both Havant and the wider area.

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<sup>12</sup> Specifically NPPF Footnote 7 and paragraph 187.

**Table 6.1 – Ecological Sites (nationally designated in the NPPF)**

<b>Ecological Features</b>	<b>Summary Description</b>
<i>Ecological features for which consideration is made within the National Planning Policy Framework (NPPF), footnote 7, and / or paragraphs to which footnote 7 refers.</i>	
Special Protection Areas (SPA) / Potential SPA / Marine SPA	Area originally classified under the Wild Birds Directive and now form part of the National Site Network which conserves and protects our rarest and most threatened bird species.
Special Areas of Conservation (SAC) / Possible SAC / Marine SAC	Areas originally designated under the Habitats Directive and now form part of the National Site Network which conserves and protects our rarest and most threatened species and habitat types.
Ramsar Sites / Proposed Ramsar Sites	Wetlands of international importance designated under the Convention on Wetlands of International Importance, especially as waterfowl habitat.
Sites of Special Scientific Interest (SSSI) / SSSI Impact Risk Zones	Areas selected and notified of being of importance for wildlife, geology or landform of special interest on a national scale and their associated potential Impact Risk Zones which define potential Zones of Influence and impact risks.
Solent Waders and Brent Goose Strategy Sites	Sites that provide a supporting role to the internationally important wintering bird populations associated with National Site Network European sites within and surrounding the Solent coast. These sites are functionally important for the integrity of the internationally important areas. They are graded according to their level of importance as 'Functionally Linked Land'.
Ancient Woodland	Areas of ancient and semi-natural woodland (an 'irreplaceable habitat') and / or ancient replanted woodland.

**Table 6.1 – Ecological Sites (locally designated)**

<b>Ecological Features</b>	<b>Summary</b>
<i>Ecological features not mentioned in the NPPF, which are nonetheless a consideration at the Local Plan level (Considered for all Local Authorities discussed in this Technical Note, where data is available).</i>	
National Nature Reserves (NNR)	Areas designated as key places for wildlife and natural features in England.
Local Nature Reserves (LNR)	Areas of importance for wildlife, geology, education or public enjoyment within the local area.
Sites of Importance for Nature Conservation (SINC)*	Areas recognised as being of importance to wildlife and biodiversity within the local area.

\* SINC data provided for this study limited to HBC boundary and immediate surroundings. It is anticipated that all Authorities will have SINC's to consider within their boundary based on previous experience.

6.5 The data set out in Table 3 further informs the constraints and supply analysis specific to Havant regarding Table 1 and 2 designations. The data described in Table 3 has been provided by Havant Borough Council (for the Havant area only) as the Local Plan must demonstrate consideration of The General Biodiversity Objective and enable delivery of Biodiversity Net Gain and protected species mitigation considerations.

**Table 6.2 – Ecology Sites (additional data)**

Supplementary Ecological Data	Summary
<i>Ecological features not mentioned in the NPPF, which are nonetheless a consideration at the Local Plan level and/or relevant to plan-led allocation or project development (Considered for Havant Borough Council only and discussed in this Technical Note):</i>	
Priority Habitats	Priority Habitats or Habitats of Principal Importance (HPI) are habitats that are identified to be the most threatened, requiring conservation.
Ecological Network Mapping	This is a biodiversity opportunity map, led by the Hampshire Biodiversity Information Centre. This data set is likely to evolve into Nature Recovery Network / Biodiversity Opportunity Area mapping, and identifies areas which may be used to focus future ecological mitigation and enhancement.
Bechstein's Bat Consultation Zone	Areas within 3km of a known Bechstein's Bat <i>Myotis bechsteinii</i> roost (rare bat with distribution restricted to southern counties of England), within which, further consideration for this species (e.g., bespoke survey and mitigation) may be required to inform allocation and/or development.

6.6 Following the compilation of data, a two-level approach to the analysis of the data has been undertaken, as follows:

**Level 1:**

6.7 Ecological data described in Tables 1 and 2 has been subject to a high-level review to determine which of the identified ecological features, or buffers within which strategic mitigation is required, are located within the local authority areas surrounding Havant, as well as within Havant itself.

6.8 The results of this high-level review are presented in Table 4 , with reference to figures illustrating the designated areas.

**Level 2:**

6.9 A detailed review of ecological data described in the tables above has been undertaken for land within Havant alone. This identifies land within Havant which is constrained by any of the identified ecological features either directly (i.e., land subject to designation), or indirectly (i.e., land identified within the Solent Waders and Brent Goose Strategy).

- 6.10 The results of this detailed review are provided in the commentary within the results section below, with reference to Figures illustrating the identified ecological constraints.
- 6.11 Taking account of the Level 1 and Level 2 analysis, conclusions are then derived which seek to determine:
- Whether the constraints identified are significant and / or likely to be limiting to development in the Havant Local Plan; and
  - Whether Havant is more or less constrained than surrounding boroughs
- 6.12 For this assessment we do not show nutrient neutrality as a constraint although large parts of our study area are within catchments (The Solent and River Itchen) where mitigation would be required. Without a continuing supply of mitigation, it could slow down or even prevent development across these catchments. As this is a constraint across Havant, it provides little clarification on areas suitable for development; only land east and south of Chichester is outside an affected Solent catchment.
- 6.13 The 5.6km Solent SPA recreational disturbance catchment zone is not included here. This is a well-established strategic mitigation measure implemented via financial contributions and is therefore not a land constraint.

## Summary of Findings - Havant

- 6.14 The presence of some designated assets and additional land for mitigation limits the capacity of otherwise unconstrained land in Havant to be delivered. This is exacerbated by the identified potential development sites largely infilling the remaining undeveloped gaps in Havant Borough.
- 6.15 The results of the detailed review for Havant Borough Council are described in the section below and illustrated in the mapping figure which shows international, national and local designations and other ecology constraints for Havant.

### Summary of Level 2 Results:

- 6.16 Present within the borough of Havant are the following statutory designated areas for nature conservation:

Internationally designated areas for nature conservation:

- Chichester and Langstone Harbours SPA (including Marine) and Ramsar
- Solent Maritime SAC (including Marine)
- Solent and Dorset Coast SPA (including Marine)

Nationally designated areas for nature conservation:

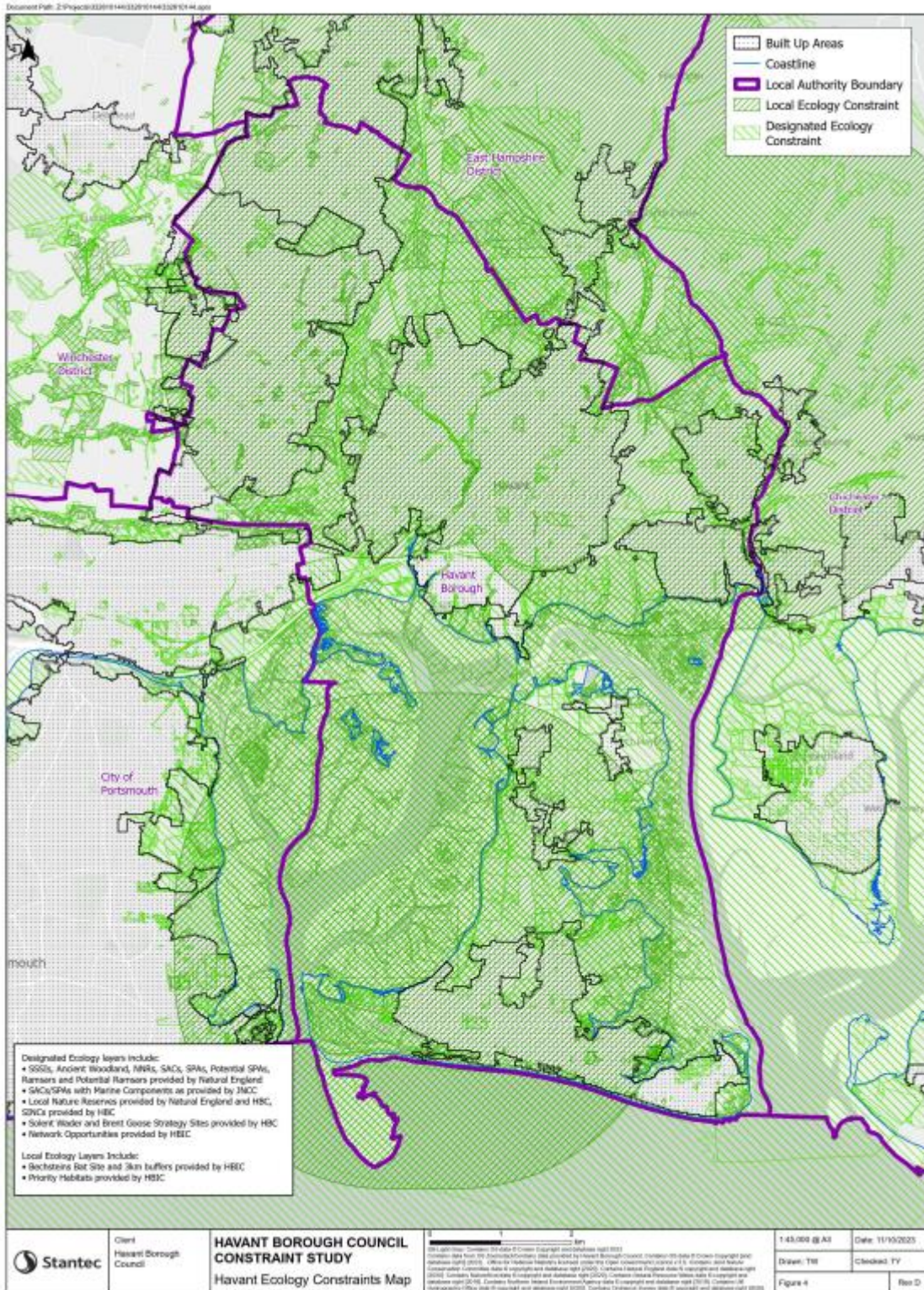
- Langstone Harbour SSSI
- Warblington Meadow SSSI
- Sinah Common SSSI
- Chichester Harbour SSSI

Locally designated areas for nature conservation:

- Farlington Marshes LNR

- The Kench, Hayling Island LNR
- Hayling Billy LNR
- West Hayling LNR
- Gutner Point LNR
- Sandy Point LNR
- Brook Meadow, Emsworth LNR

Map 8 – Havant Borough Ecology Constraints





- 6.17 As shown in the ecology constraints map, the majority of Havant is subject to some form of identified ecological constraint. Almost the entirety of the borough's coastline is designated at the international or national level as SPA, SAC, Ramsar site, or SSSI; covering marine, intertidal and coastal terrestrial habitats.
- 6.18 The borough's SPA and Ramsar sites support internationally important populations of wintering bird species. As discussed above, these species also occur on terrestrial habitats not covered by formal designations. These habitats are instead afforded protection through the Solent Waders and Brent Goose Strategy and are treated as being functionally linked to the SPA/Ramsar sites.
- 6.19 Apart from Brook Meadow (Emsworth) LNR, LNRs in the borough are associated with coastal areas on Hayling Island and are overlain by the international and national designated sites within Langstone and Chichester Harbours.
- 6.20 We have included sites identified in the Solent Waders and Brent Goose Strategy as a constraint due to the high number and density of SWBGS sites across the borough. Whilst it is possible for additional investigation to amend the status of SWBGS sites, this is unlikely to significantly reduce the potential constraints on substantial areas of land. This is especially the case where the loss of SWBGS sites may, but not always, require an equivalent area of land to be made available elsewhere as mitigation.
- 6.21 Whilst land in the northern extent of Havant<sup>13</sup> is potentially less constrained (i.e. not subject to the same levels of statutory designation or inclusion within the Solent Waders and Brent Goose Strategy), the vast majority is nonetheless located within both the Solent nutrient neutrality catchment (wholly) and/or the 5.6km recreational disturbance buffer attributed to the Solent SPAs, and therefore subject to indirect impact and mitigation consideration within those buffers.
- 6.22 Furthermore, the northern extent of Havant supports proportionately more SINCS and pockets of ancient woodland than the southern extent. In addition, the Bechstein's Bat 3km Consultation Zone is also focussed within the northern part of the borough, due to the presence of this rare bat species within the extensive wooded habitats in the north of the borough.
- 6.23 Priority Habitat Mapping mainly echoes the designated site areas, with Priority Habitats being identified across the borough. Similarly, Ecological Network Mapping identifying areas for potential biodiversity enhancement across the borough, with more extensive opportunities in the northern extent. The Local Nature Recovery Strategy (LNRS) for Hampshire is being developed, following their introduction by The Environment Act (2021). The LNRS will provide a mechanism for planning and delivering the National Nature Recovery Network and will confirm local priorities for nature delivery. The first draft of the LNRS for Hampshire as a whole is due to be published in summer 2024, with the LNRS finalised and published in July 2025<sup>14</sup>.

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<sup>13</sup> Including a swathe of land to the east and west of the A3(M), land to the north of the Leigh Park area of Havant, and land between Emsworth (to the east) and the town of Havant, to the north of the A27.

<sup>14</sup> <https://www.hants.gov.uk/landplanningandenvironment/nature-recovery-hampshire/timeline>

- 6.24 Our assessment has concluded that the limited (undeveloped) land in the borough means that accommodating additional development is a challenge – not only because of the land needed for built development, but also associated mitigation land. Looking forwards, if any more undeveloped land were developed, it is unclear where within the borough additional mitigation land could be identified.
- 6.25 This suggests that the borough has a finite capacity to accommodate additional development – not only because there is limited land to accommodate the built development itself but also the land for environmental mitigation.

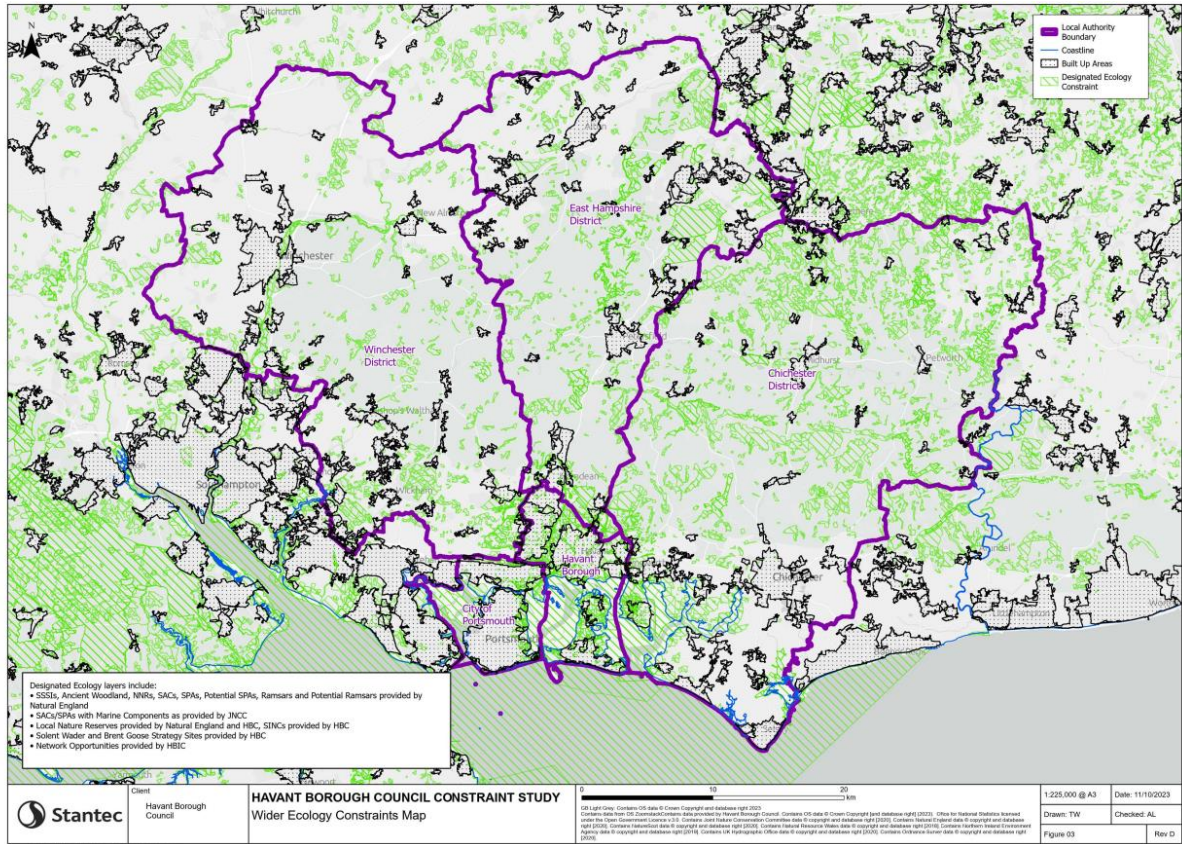
### Summary of Findings - Wider Area

- 6.26 Table 4 below presents the findings of the high-level review, identifying comparatively which of the ecological features are present within each of the Local Authority areas considered in this study. Only internationally designated areas for nature conservation are identified by name, given that they are the most substantial constraint on account of their high level of legal and planning policy protection (see Appendix A). Full details of the features for which they are designated are provided within Appendix B. The locations of the ecological features described are also mapped below.
- 6.27 There are significant constraints that apply to large parts of the wider area and are particularly related to the area's coastal location. In general, coastal areas are more constrained by ecology, particularly due to the presence of internationally important bird populations and coastal habitats.
- 6.28 Those areas are located along the coastal plain, bounded to the south by the Solent (Portsmouth, Havant and Chichester), all contain SPAs, SACs and Ramsar sites and their constituent SSSIs (which broadly follow the same boundaries) and are located wholly or almost wholly within the Solent catchment and the 5.6km recreational disturbance buffer attributed to the Solent SPA<sup>15</sup>.

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<sup>15</sup> As noted – we have not shown the buffers nor the catchments on our maps.

### Map 9 – Neighbouring Authorities Ecology Constraints



**Table 6.3 – Ecological Analysis (Havant and Neighbouring Authorities)**

Ecological Features	Havant	Portsmouth	Winchester	East Hants	Chichester
<b>Special Protection Areas (SPA)</b>					
<i>Chichester and Langstone Harbours</i>	✓	✓	x	x	✓
<i>Portsmouth Harbour</i>	x	✓	x	x	x
<i>Solent &amp; Southampton Water</i>	x	x	✓	x	x
<i>Wealden Heaths Phase II</i>	x	x	x	✓	✓
<i>Pagham Harbour</i>	x	x	x	x	✓
Potential SPA	x	x	x	x	x
<b>Marine SPA</b>					
<i>Solent and Dorset Coast</i>	✓	✓	x	x	✓
<i>Chichester and Langstone Harbours</i>	✓	✓	x	x	✓
<i>Portsmouth Harbour</i>	x	✓	x	x	x
<i>Solent and Southampton Water</i>	x	x	✓	x	x
<i>Pagham Harbour</i>	x	x	x	x	✓
<b>Special Areas of Conservation (SAC)</b>					
<i>Solent Maritime</i>	✓	✓	✓	x	✓

Ecological Features	Havant	Portsmouth	Winchester	East Hants	Chichester
<i>Solent &amp; Isle of Wight Lagoons</i>	x	✓	x	x	x
<i>River Itchen</i>	x	x	✓	x	x
<i>Woolmer Forest</i>	x	x	x	✓	x
<i>East Hampshire Hangers</i>	x	x	x	✓	x
<i>Buster Hill</i>	x	x	x	✓	x
<i>Shortheath Common</i>	x	x	x	✓	x
<i>Rook Clift</i>	x	x	x	x	✓
<i>The Mens</i>	x	x	x	x	✓
<i>Ebernoe Common</i>	x	x	x	x	✓
<i>Kingley Vale</i>	x	x	x	x	✓
<i>Duncton to Bignor Escarpment</i>	x	x	x	x	✓
<i>Singleton and Cocking Tunnels</i>	x	x	x	x	✓
Possible SAC	x	x	x	x	x
Marine SAC					
<i>Solent Maritime</i>	✓	✓	✓	x	✓
<i>Solent &amp; Isle of Wight Lagoons</i>	x	✓	x	x	x
Ramsar Sites					
<i>Chichester and Langstone Harbours</i>	✓	✓	x	x	✓
<i>Portsmouth Harbour</i>	x	✓	x	x	x
<i>Solent &amp; Southampton Water</i>	x	x	✓	x	x
<i>Pagham Harbour</i>	x	x	x	x	✓
Proposed Ramsar Sites	x	x	x	x	x
Sites of Special Scientific Interest (SSSI)	✓	✓	✓	✓	✓
SSSI Impact Risk Zones	✓	✓	✓	✓	✓
Ancient Woodland	✓	x	✓	✓	✓
National Nature Reserves (NNR)	x	x	✓	✓	✓
Local Nature Reserves (LNR)	✓	✓	✓	✓	✓
Sites of Importance for Nature Conservation (SINC)*	✓	✓	✓	✓	✓
Solent Waders and Brent Goose Strategy Sites	✓	✓	x	x	✓
Land within a 5.6km buffer from the Solent SPAs	✓	✓	✓	✓	✓
Land within a 13.8km buffer from the New Forest Sites	x	x	✓	x	x
Land within the Solent catchment (nutrients)	✓	✓	✓	✓	✓
Land within the Itchen catchment (nutrients)	x	x	✓	✓	x

\*SINC data provided for this study limited to HBC boundary and immediate surroundings. It is anticipated that all Authorities will have SINCs to consider within their boundary based on previous experience.

## Summary of Level 1 Results

- 6.29 Of the areas we are considering, Havant and Portsmouth are both notably more constrained than Chichester, with a significant proportion of Havant designated as part of the Chichester and Langstone Harbours SPA and Ramsar and Solent Maritime SAC, and a significant proportion of Portsmouth designated as Portsmouth Harbour SPA and Ramsar.
- 6.30 Those areas without a coastline - Winchester and East Hampshire Hampshire - are generally less constrained. Whilst also containing SAC, SPA, Ramsar sites, and SSSIs, these boroughs, on account of their size are not so heavily constrained relative to the proportion of land under designation.
- 6.31 Further to this, they do not contain areas of land identified within the Solent Waders and Brent Goose Strategy and are therefore not constrained by the requirement to provide mitigation land for impacts to terrestrial habitat used by SPA/Ramsar bird species.
- 6.32 Overall, the network of ecology constraints in this area, including birds, directs the search for strategic land into the far edges of our study area beyond the coastal related ecology constraints.
- 6.33 Paragraph 180 of the NPPF does not support development that would result in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees), unless there are wholly exceptional circumstances such as nationally significant infrastructure projects where the benefit outweighs the loss of these habitats. Development would have to mitigate for loss of habitat through suitable compensatory land with, for example, development in close proximity to ancient woodland requiring a buffer to avoid impacts to the woodland.
- 6.34 All boroughs support land designated as Local Nature Reserves, most of which at least partially overlap the SSSI designated areas. All boroughs also support SINC's (noting only SINC data for Havant and its immediate surrounds have been provided for consideration in this study).
- 6.35 The fact that neither Havant nor Portsmouth have a significant quantum of undeveloped land creates a different type of constraint - if or where land is developed close to the coast, and requires mitigation land to be provided, there is very limited land available. It is the case that mitigation land can 'stack' (service multiple purposes) but in these two boroughs the pool of possible mitigation land is very small. Without a supply of mitigation land in these areas, the potential quantum of what (otherwise unconstrained) land could be developed is limited. If development was accommodated here, then land outside the administrative areas would likely to be needed for mitigation<sup>16</sup>.

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<sup>16</sup> Note there is the theoretic potential to enhance existing SWBGS Supporting Sites, rather than have to procure completely new mitigation sites. But in our experience this is very challenging.

6.36 In summary – as can be seen from the constraint mapping – this area has a significant number of ecology constraints. But, in general the further away from the coast the fewer the constraints. In this area the presence of SPA/Ramsar supporting habitat for wintering birds – and the land needed to mitigate for these – is a major constraint across the coastal plain and for Havant in particular.

## Overwintering Birds

- 6.37 On our maps we have shown Solent Waders & Brent Goose Strategy (SWBGS) sites as a constraint.
- 6.38 Brent Geese, waders, and certain other migratory wildfowl are species of international importance generally protected under European legislation, and specially protected within designated sites: Special Protection Areas (SPAs) and Ramsar sites. Birds are mobile species, they are also dependent on land outside formal designations and rely on the availability of a network of non-designated feeding and roosting resources over the winter period. In this area, the Solent Waders and Brent Goose Strategy (2020) has identified a network of connected sites which provide supporting habitat to bird species and are important to the functioning of the SPA itself. These sites are afforded legal protection under the Habitats Regulations.
- 6.39 Inclusion of land in the Solent Waders and Brent Goose Strategy is not automatically a block to development. The strategy recognises that given the pressures for development there may be cases where loss or damage to a SWBGS site cannot be avoided and mitigation is required.
- 6.40 In such situations, the competent authority<sup>17</sup> must carry out an Appropriate Assessment in accordance with the Habitats Regulations and determine whether a proposed development would lead to an effect on the SPA/Ramsar and, where mitigation is proposed, whether that mitigation would maintain the overall integrity of the SPA/Ramsar.
- 6.41 It is also the case that further assessment can be undertaken to support development on SWBGS sites. All sites are given a status based on the number of birds present and the frequency of use, and the site status determines the level of mitigation required. Additional survey effort can be used to confirm or amend the status of a SWBGS site. For this study we consider SWBGS sites as a significant constraint due to the high number and density of SWBGS sites within Havant Borough, particularly on Hayling Island. A particular challenge is securing land for mitigation/compensation by either providing an uplift on existing SWBGS sites or securing and managing new habitat.

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<sup>17</sup> The “competent authority” for planning decisions,. See: [Habitats regulations assessments: protecting a European site - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site)

## Summary

### Wider Area

- 6.42 Across the wider area it is generally the case that the further from the coast, the fewer the significant ecological constraints. Coastal ecological receptors are a significant constraint, with the need to mitigate (provide replacement habitat) for wintering bird species being a most obvious example, particularly within the neighbouring areas of Portsmouth and Chichester. Coastal ecological constraints are particularly difficult to mitigate because of a need for alternative land of a similar characteristic.
- 6.43 This means Havant is relatively more constrained with regards to potential development areas than some of its neighbouring authorities located further in land.
- 6.44 Comparatively, Portsmouth, located to the west of Havant, is subject to many of the same or similar constraints, with a high relative proportion of land under designation or otherwise affected by the requirement for strategic mitigation, along with an already high proportion of existing development, such that open space within which to accommodate new development, or mitigation, is limited.
- 6.45 The remaining boroughs (Chichester, Winchester and East Hampshire) support designated areas for nature conservation and other ecological features, but are substantially larger, with a greater availability of undeveloped land apparent. This land may be more readily suitable for the provision of new development or mitigation, although it is also acknowledged that these boroughs may be subject to other constraints outside the ecological considerations (most obviously the National Park which may limit development potential).

### Havant

- 6.46 Havant is highly constrained from an ecological perspective due to the relatively small size of the borough, the presence of internationally and nationally designated areas for nature conservation (especially coastal areas) and the presence of substantial areas of terrestrial SPA/Ramsar supporting habitat. Development directly impacting international and national designated sites is essentially neither possible nor desirable, and impacts to supporting habitat often requires alternative land for mitigation.
- 6.47 Locally designated areas for nature conservation are also present within Havant, as well as parcels of ancient woodland, priority habitat and areas within 3km of Bechstein's Bat roosts (for which further mitigation considerations to enable development are required).
- 6.48 Furthermore, given the mandatory requirement for Biodiversity Net Gain (BNG), areas of land beyond those set aside for development will also need to be identified. This will provide off-site biodiversity compensation/enhancement where unachievable within a development footprint.
- 6.49 The Local Nature Recovery Strategy (LNRS) for Hampshire will, when published, provide a framework for the delivery of BNG and other aspects of nature recovery. It may therefore place further constraints on available land. Consideration of the

suitability of stacking various mitigation requirements will also be relevant to the delivery of BNG for future development.

- 6.50 It is clear from the mapping and the description of the ecological constraints that the nature and extent of the ecological features considered within this report provides a significant and demonstrably limiting factor to future development within Havant Borough.
- 6.51 It is acknowledged that since the commencement of this study, the requirement for development to deliver Mandatory Biodiversity Net Gain came into effect (on Feb 12th 2024) through Regulations of the Environment Act. This is not specifically covered in this report, as not covered by the NPPF Footnote. The LNRS is relevant to consideration of delivery of BNG through development but BNG will be a consideration likely to apply to most development within Havant. Furthermore, the LNRS does not yet exist (see:[Local Nature Recovery Strategy for Hampshire | Hampshire County Council \(hants.gov.uk\)](https://www.hants.gov.uk/local-nature-recovery-strategy-for-hampshire))



## 7 Flood Risk

“The policies referred to are those in this Framework (NPPF) (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 181) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 68); and **areas at risk of flooding or coastal change**. (Footnote 7 of para 11 of NPPF)

### Introduction

- 7.1 This chapter of the report describes the flood risk and coastal change-related datasets and the sources of information used in the assessment of flood risk as a constraint to future development within Havant and its neighbouring authorities.
- 7.2 Both nationally derived, and locally derived datasets have been used in this assessment. The locally derived datasets have been obtained from each Local Authorities Strategic Flood Risk Assessment (SFRA) summarised in Table 4.

**Table 4 – Strategic Flood Risk Assessment Summary**

Local Planning Authority	SFRA Name	SFRA Date
Havant Borough Council	DRAFT Partnership for South Hampshire Strategic Flood Risk Assessment*	May 2022
Portsmouth City Council		
Winchester City Council		
East Hampshire District Council	Level 1 Strategic Flood Risk Assessment	May 2022
Chichester District Council	Level 1 Interim Strategic Flood Risk Assessment	December 2022

\* Note the Partnership for South Hampshire covers ten planning authorities, but only those assessed as part of this study have been listed.

- 7.3 Nationally derived datasets do not map or account for the impacts of climate change. Climate change impacts are described within each of the SFRA reports and are summarised in the latter part of this chapter.

### National Datasets

#### Flood Map for Planning Rivers and Seas

- 7.4 The Flood Map for Planning shows the areas of land at risk of flooding from rivers and seas when the presence of flood defences is ignored. The dataset is provided by the Environment Agency and is largely based on modelled data. It is therefore indicative of, rather than specific to, areas at risk of flooding.
- 7.5 The Flood Map is comprised of several Flood Zones as defined within the Planning Practice Guidance (PPG):

- **Flood Zone 1 ‘Low Probability’** – Land having less than a 1 in 1000 (0.1%) Annual Probability of flooding from rivers or the sea.
- **Flood Zone 2 ‘Medium Probability’** – Land having between a 1 in 1000 and 1 in 100 (0.1% - 1%) Annual Probability of flooding from rivers and between a 1 in 1000 and 1 in 200 (0.1% - 0.5%) Annual Probability of flooding from the sea.
- **Flood Zone 3a ‘High Probability’** – Land having a greater than a 1 in 100 (1%) Annual Probability of river flooding or greater than a 1 in 200 (0.5%) Annual Probability of flooding from the sea.
- **Flood Zone 3b ‘Functional Floodplain’** – Land where water has to flow or be stored in times of flood, or land purposely designed to be flooded in an extreme flood event.

7.6 Note that the Environment Agency Flood Map for Planning (Rivers and Sea) does not separately distinguish Flood Zone 3b from Flood Zone 3a. Local Planning Authorities identify in their Strategic Flood Risk Assessments (SFRA) areas of functional floodplain and its boundaries accordingly, in agreement with the Environment Agency. The availability of information defining Flood Zone 3b is discussed in a latter section of this report.

### Coastal Change Management Areas

- 7.7 Coastal Change Management Areas (CCMAs) are areas identified as likely to be affected by physical changes to the coast. Such changes include erosion, coastal landslip, permanent inundation, or accretion. They are typically defined where a shoreline management plan policy is anything other than hold or advance the line at any time during its plan period.
- 7.8 CCMAs are designated through Local Plans. The Planning Practice Guidance states that permanent new residential development (including through change of use) will not be appropriate within a CCMA.
- 7.9 Within Havant Borough, CCMAs are currently located along Hayling Island’s southern and western coastlines and discussed later in this chapter of the report. Reflecting the increasing effects of climate change and rising sea levels in particular, it is proposed through the emerging local plan to increase the extent of CCMAs which would have a particularly notable impact on the southern coast of Hayling Island.

### Reduction in Risk of Flooding from Rivers and Sea due to Defences

- 7.10 The Flood Zone classification ignores the presence of defences. The EA ‘Reduction in Risk of Flooding from Rivers and Sea due to Defences’ dataset indicates where areas have reduced flood risk from rivers and sea, due to the presence of flood defences. Proposed development in these areas, or located behind defences, should consider the potential safety of the development, through measures such as raised floor levels and the potential for safe access and egress in the event of rapid inundation of water due to a defence breach with little warning. Risk would need to be managed over the lifetime of the development.

7.11 Further discussion on the location of defences within the study area and the impact on flood risk is discussed later in this chapter.

### Risk of Flooding from Surface Water

7.12 The Risk of Flooding from Surface Water map is a nationally derived dataset produced by the Environment Agency. The dataset has been generated from hydraulic modelling, assessing areas at risk of surface water flooding during three annual probability events. These results are categorised into four risk categories as produced below:

- **'High' Risk:** 1 in 30 (3.3%) or greater AP rainfall event;
- **'Medium' Risk:** Between a 1 in 100 (1%) and 1 in 30 (3.3%) AP rainfall event;
- **'Low' Risk:** Between 1 in 1000 (0.1%) and 1 in 100 (1%) AP rainfall event;
- **'Very Low' Risk:** Lower than 1 in 1000 (0.1%) AP rainfall event.

### Risk of Flooding from Groundwater

7.13 The 'Areas Susceptible to Groundwater Flooding' is a national dataset produced by the Environment Agency which shows the proportion of 1km squares where geological and hydrogeological conditions show that groundwater might emerge. It does not show the likelihood of groundwater flooding occurring. Rather, it shows the locations at which groundwater may emerge. The dataset should be considered as a hazard rather than a risk-based dataset.

7.14 Hazard is represented by one of four area categories, showing the proportion of each 1km square that is susceptible to groundwater flood emergence:

- < 25% chance of GW emergence
- $\geq 25\%$  and  $< 50\%$  chance of GW emergence
- $\geq 50\%$  and  $< 75\%$  chance of GW emergence
- $\geq 75\%$  chance of GW emergence

Absence of a value means there is no risk anticipated to be present.

7.15 The dataset should not be used in isolation to make planning decisions at any scale. The dataset is intended to be used as a guide to highlight areas where further consideration may be required depending on local factors (i.e. locations of potential groundwater emergence). Residential development may be permitted within areas at risk of groundwater emergence, although both resistance and resilience measures may need to be incorporated into building design.

### Risk of Flooding from Reservoirs

7.16 The Environment Agency's 'Flood Risk from Reservoirs' mapping presents the potential extent of a reservoir breach. The inundation mapping provides outputs for a 'dry day' scenario (when river levels are normal), and for a 'wet day' scenario (when there is also coincident flooding from rivers - a 1 in 1,000 year annual probability event). The dam breach assessments are based on precautionary principles to be used to support off-site emergency planning, and represent a near instantaneous failure of the dams. A defined methodology is used for all EA reservoir breach maps

based on broad high-level assumptions about the failure mechanisms for different types of embankment.

- 7.17 The data represents a prediction of a credible worst case scenario, however it is unlikely that any actual flood would be this large. An instantaneous failure of the embankment structure around the reservoir (the breach scenario modelled and presented on the EA flood maps) is an extremely unlikely event, and considered a 'residual' risk. This residual risk is managed through the statutory duties imposed on reservoir owners under the Reservoirs Act 1975. The data gives no indication of likelihood or probability of reservoir flooding.
- 7.18 Flood extents are not included for smaller reservoirs, or for reservoirs commissioned after the reservoir modelling programme began in October 2016. The maps would not for example, show the predicted risk of flooding from the forthcoming Havant Thicket Reservoir.
- 7.19 Allocation of land for development in areas at risk of reservoir flooding should consult with local resilience forums for advice on emergency planning, and with relevant reservoir owners to understand any potential impact of the development on their reservoirs.

## Local Datasets

### Flood Zone 3b

- 7.20 This section of the report summarises the definition of Flood Zone 3b as described within the SFRA's outlined in Table 4. Flood Zone 3b encompasses an active floodplain, representing the most vulnerable area for flooding due to river or sea overflow.
- 7.21 The PPG was updated in August 2022 which defined Flood Zone 3b as the 1 in 30 (3.3%) or greater annual probability, replacing the previous 1 in 20 (5%) requirement. With this change more land is likely to be defined as a 'functional floodplain', within which very few development types are permitted. As we note below the Councils are updating their evidence .
- 7.22 Chichester District Council has defined Flood Zone 3b within their administrative area as part of their SFRA update completed in December 2022. At the time of publishing the Interim SFRA, not all hydraulic models had been simulated for the 3.3% AEP event. Therefore the 4% and 5% AEP events have been used to define Flood Zone 3b in some areas. Where detailed modelling was not available, then Flood Zone 3a has been used as a precautionary approach.
- 7.23 At the time of undertaking the present study, Havant, along with other Local Planning Authorities (Portsmouth, and the parts of Winchester and East Hampshire that lie within the Partnership for South Hampshire, are in the process of updating their SFRA and defining Flood Zone 3b. It should be noted that as part of this process, it was identified that the hydraulic models for the Hermitage Stream and Lavant Stream within Havant Borough were found to lack the information needed to map the functional floodplain, and that flood zone 3a should be used as a proxy.

- 7.24 East Hampshire District Council updated their SFRA in May 2022, and the basis of the definition of Flood Zone 3b has been based on modelled extents of the 5% Annual Exceedance Probability (AEP) event. This predates the change in PPG (August 2022) which refers to defining Flood Zone 3b based on the 3.33% AEP event.
- 7.25 For the purposes of this Constraints Exercise, Flood Zone 3 (encompassing both Flood Zone 3a and 3b) has been mapped on the GIS Portal.

### Risk of Flooding from Sewers

- 7.26 The updated SFRAs for Havant, the wider PfSH area, and Chichester have used historic records of flooding to indicate areas susceptible to flooding from sewers. This information is typically provided by the water utilities company and processed based on postcode area for data protection reasons.
- 7.27 Within the context of strategic planning, identification of these locations of previous flooding can inform local planning authorities about areas where further development may have a significant impact on the existing sewer system. It also indicates where water companies may be required to invest in measures to improve capacity to support the proposed development. These datasets, however, should be used with caution as they can contain incidents that have already been addressed through ongoing asset management programmes.
- 7.28 The assessment of flood risk from sewers has been based on the information displayed and mapped within the SFRAs. The underlying datasets were not made available in a GIS format for this study and therefore not mapped within the GIS Portal.

### Flood Risk Vulnerability Classifications

- 7.29 The flood risk vulnerability classification table is a system which shows the compatibility of a proposed development in relation to the Flood Zones. The table taken from Planning Policy Guidance is reproduced as Table 1.

**Table 5 – Flood Risk Vulnerability and Flood Zone ‘Incompatibility’<sup>18</sup>**

		Flood Risk Vulnerability Classification				
		Essential infrastructure	Highly vulnerable	More vulnerable	Less vulnerable	Water compatible
Flood Zones	Zone 1	✓	✓	✓	✓	✓
	Zone 2	✓	Exception Test Required	✓	✓	✓
	Zone 3a	Exception Test Required	X	Exception Test Required	✓	✓
	Zone 3b	Exception Test Required	X	x	x	✓

<sup>18</sup> Reproduced from the Planning Policy Guidance: Flood risk and coastal change (25 August 2022)

Key

✓	Exception Test is not required
X	Development should not be permitted

- 7.30 The application of the Sequential Test should be applied in the first instance to steer new development to the lowest flood risk areas, taking all sources of flood risk and climate change into account. In addition, the NPPF states that “inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk” whether this relates to an existing risk or future risk when the impacts of climate change are taken into account. In addition, “all plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change”.
- 7.31 Residential developments have a ‘More Vulnerable’ classification. ‘More Vulnerable’ developments are shown to be suitable in Flood Zone 1 and 2. Locations within Flood Zone 3a are subject to the Exception Test, and not permitted within Flood Zone 3b.
- 7.32 Even if a development type is compatible with a Flood Zone, it does not necessarily follow that development will be permitted. Paragraph 023 PPG is clear in stating that a sequential approach should be adopted meaning “avoiding, so far as possible, development in current and future medium and high flood risk areas considering all sources of flooding including areas at risk of surface water flooding”.

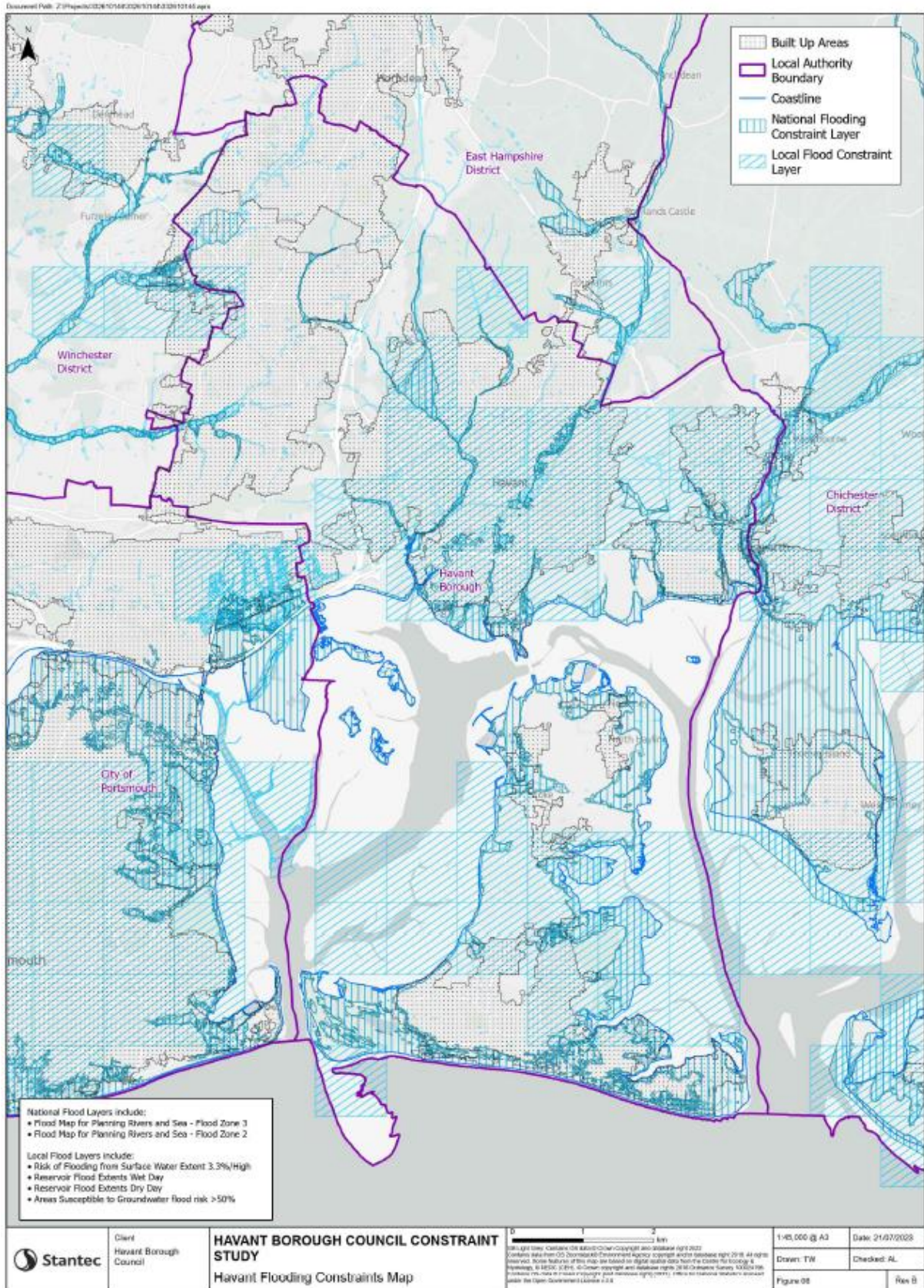
## Havant

### Fluvial/Tidal Flood Risk

- 7.33 Most of the land located inland in Havant Borough is shown to be located within Flood Zone 1, particularly across Purbrook, Cowplain and Bedhampton. Flood risk from fluvial sources is predominant within the mainland around the Hermitage Stream, River Lavant, River Ems, and other smaller watercourse channels flowing through the central and eastern sectors of Havant. Although flood defences are present across the Havant district, few areas at fluvial flood risk have been identified as having a reduced risk of flooding due to the presence of flood defences.
- 7.34 Flood Zone 2 and 3 are present along all river corridors and extend notably into the floodplain near to the western parts of Bedhampton and Leigh Park, across Middle Park Way, in Havant Town Centre and in Emsworth. The land within these fluvial Flood Zones, mostly consists of existing developments. There are pockets of land in the western area of Emsworth, that remain undeveloped and are located away from the fluvial floodplain of the River Ems (the primary fluvial flood source that affects Emsworth).
- 7.35 Flood Zone 2 and 3 extend along the majority of the Havant mainland coastline, and the entirety of the Hayling Island coastline. Tidal flooding is the principal source of flood risk in these locations. Some areas of Langstone are shown to have a reduced risk of flooding in comparison.

7.36 Along the coastline of Hayling Island, parts of Stoke and South Hayling are shown to have areas with reduced flood risk in comparison to the other parts of the Island. Notably, the single access road onto Hayling Island from Langstone is at risk of flooding both now and in the future, presenting challenges to the ability to sustainably provide access to any new development sites.

### Map 10 – Havant Borough Flood Constraints





7.37 Two CCMA's have been designated through the Adopted Local Plan along Hayling Island's southern and western coastlines, at West Hayling and Hayling Beachfront. CCMA's help reduce the risk of flooding from coastal change, by avoiding inappropriate development in vulnerable areas. In accordance with the principles set out in the NPPF, new residential developments are not suitable in these locations. The number and extent of CCMA's would need to be revisited as part of the preparation of the Council's emerging Local Plan. Reflecting the increasing effects of climate change and rising sea levels in particular, it is proposed through the that plan to increase the extent of CCMA's which would have a particularly notable impact on the southern coast of Hayling Island.

### Surface Water Flood Risk

7.38 The surface water flood risk on Hayling Island is predominately very low, with a few medium and higher risk areas around existing developed land. However, the mainland within Havant Borough is very densely populated and the risk from surface water flooding is notably greater. The mapping shows wide-reaching 'Low' to 'High' risk areas across Havant. The highest risk areas include Waterlooville, Havant town, and around the Hermitage Stream, the River Lavant and the Ems.

7.39 The sequential approach advises steering development to areas at lowest risk of flooding. Paragraph 023 of Planning Practice Guidance states "*The approach is designed to ensure that areas at little or no risk of flooding from any source are developed in preference to areas at higher risk. This means avoiding, so far as possible, development in current and future medium and high flood risk areas considering all sources of flooding including areas at risk of surface water flooding.*"

7.40 Areas identified in Havant with the lowest risk of surface water flooding should be prioritised for development. Any development in areas of higher surface water flood risk, would be expected to manage this risk on site. This may include measures such as incorporating an appropriate level of resilience and integrating flow routes within the development layout.

### Groundwater Flood Risk

7.41 The 'Areas Susceptible to Groundwater Flooding' (AStGWF) Environment Agency dataset and the 'Susceptibility to Groundwater Flooding' British Geological Survey (BGS) dataset have been used to assess the potential for groundwater flooding within the Havant administrative area. Neither dataset is an indication of the hazard or risk of groundwater flooding, and only indicate at a high level where groundwater has the potential to emerge.

7.42 The AStGWF dataset indicates the west of Havant mainland has the lowest (<25%) potential for groundwater flooding to occur. There are also smaller areas with low (25-50%) susceptibility to groundwater flooding scattered around the mainland and Hayling Island (to the north and south). The majority of land within Hayling Island, particularly towards the centre, and a significant proportion of the mainland, particularly towards the east, is indicated to have a higher (over 50% susceptibility) to groundwater flooding.

- 7.43 The datasets should be used in conjunction with other relevant, local information (such as past incidences of groundwater flooding, land drainage information, etc) to establish the relative risk of groundwater flooding to the area and to inform planning decisions.
- 7.44 The broadscale nature of these datasets means they should not be used in isolation to make planning decisions at any scale as they do not indicate risk of groundwater flooding; only an indication of the potential for it to occur. They should therefore not be seen as a key constraint to development for the purposes of this exercise.

### Sewer Flood Risk

- 7.45 The review of flood risk from sewers has been carried out based on information in the emerging Havant Borough Council SFRA. Sewer flooding records show internal and external flooding has occurred across the Budds Farm Wastewater Treatment Works, located along the southwestern coastline of the Havant mainland. Further sewer flooding has taken place to the south of Hayling Island and more extensive sewer flooding events recorded on the mainland. Most of these mainland events are centred around Havant town and Emsworth, with another cluster to the northwest.
- 7.46 Locations of previous flooding can inform local planning authorities of areas where further development may have a significant impact on the existing sewer system. Prior to allocation of sites within these areas, it is recommended the local planning authority liaise with Southern Water to understand the asset management works programme to determine whether improvements to the sewer capacity have been made or are planned for the future.

### Reservoir Flood Risk

- 7.47 The reservoir flood maps identify an area at risk of flooding in the west of Havant Borough and in the upper reaches of the Potwell Tributary catchment between Aldermoor Road and Ladybridge Road. The flood extent is located downstream of a small water body to the south of Purbrook Junior and Infant School. Further downstream along this watercourse is the Southwick Park Lake. The flood extent shown on the mapping may also be attributed to a breach or failure of the Southwick Park Lake.
- 7.48 Located along the Havant Borough's western boundary edge in Farlington, a small area of land is identified as being within a reservoir flood extent. This flood extent reaches into the Borough across an open field, located between the A27 Havant Bypass in the south and the East Lodge Recreation Ground in the north.
- 7.49 A reservoir flood extent is located just outside of the Borough's western and southwestern boundary, within the neighbouring City of Portsmouth. The likely source of reservoir flood risk within this area, would be a breach or failure of the lakes within the Farlington Marshes.
- 7.50 There are no other areas identified to be at risks of flooding from reservoirs, across Havant Borough. Note that the maps do not show the flood extent resulting from a breach for reservoirs commissioned after the reservoir modelling programme began in

October 2016. Specifically for this study area, the predicted risk of flooding from Havant Thicket Reservoir is not shown.

7.51 The risk of flooding from reservoir breach is considered a 'residual risk'. Reservoir owners are obliged to undertaking a range of management measures to keep the reservoir safe including a routine surveillance regime under the Reservoirs Act 1975 and maintaining an on-site response plan in the event of a safety incident.

### Wider Area

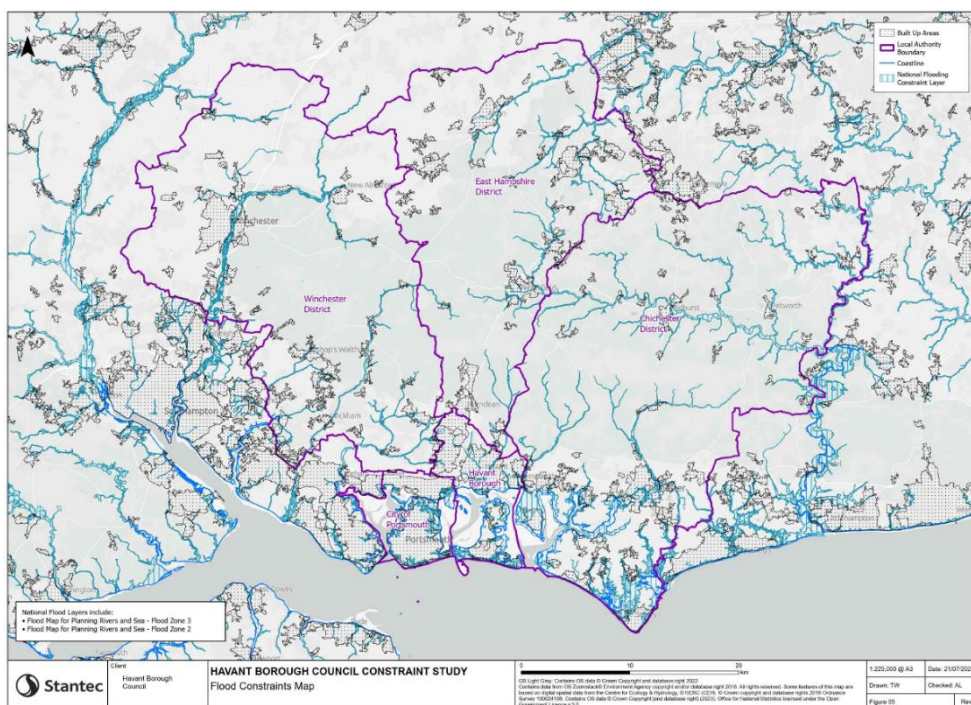
7.52 We start by looking at the authorities in our wider study area. As seen in the analysis of previous chapters, the further from the coast the less constrained the land is likely to be (here due to coastal flood risk). Away from the coast the land rises, though parts may be subject to flood risk from rivers (something to be expected in any area).

7.53 One feature to note is that parts of the study area have been identified as susceptible to groundwater emergence. The data to inform this analysis is broadscale and does not show the likelihood of groundwater flooding occurring, rather, it shows the locations at which groundwater may emerge.

7.54 For this work we would not consider such a factor to be a constraint that prevents development, but a consideration at a site specific level for further assessment and mitigation where required.

7.55 The mapping below gives an overview of the wider area.

**Map 11 – Neighbouring Authorities Flood Constraints**



## Chichester

- 7.56 Most of the district is located in Flood Zone 1 and is suitable for all types of development.
- 7.57 There are areas across the district located within Flood Zones 2 and 3. Tidal flooding is the primary flood source along the southern coastline, with much of the inland harbour bays and land surrounding the banks of the estuaries categorised as located in Flood Zone 3b (functional flood plain). Only water compatible uses and essential infrastructure (that has passed the Exception Test) can be considered in Flood Zone 3b.
- 7.58 There are areas within the district located within Flood Zone 2 and 3 that have a reduced risk of flooding due to the presence of existing flood defences. These include Ham, Selsey, Pagham and Thorney.
- 7.59 Further inland, the district is shown to be at risk of fluvial flooding, in particular from the River Kird in the north, the River Arun that runs along the district's eastern boundary, the River Rother in the centre of the National Park, and the River Lavant that flows through the centre of Chichester. Flood Zone 2 and 3 are generally limited to the river corridor.
- 7.60 The district is shown to predominantly have a 'Very Low' to 'Low' risk of flooding from surface water. Areas at 'Medium' to 'High' risk tend to follow topographical flow paths of existing watercourses or dry valleys, with some isolated ponding located in low lying areas. Any development in areas at risk of surface water flooding may need to demonstrate flow routes are unimpeded, and a suitable freeboard is provided to mitigate from the impacts of flooding.

## Portsmouth

- 7.61 Land across the mainland and the centre of Portsea Island is shown to be located within Flood Zone 1. Tidal flooding is the primary source of flood risk across the city. Significant areas of land are shown to be in Flood Zones 2 and 3, in the north-eastern and southern ends of Portsea Island, most noticeably in the Hilsea, Baffins and Southsea areas. Some of these areas within Flood Zone 2 and 3 are shown to have reduced risk of flooding due to existing defences.
- 7.62 Surface water flooding is prevalent across the city, particularly in developed areas adjacent to the coastline along the mainland. However, the surface water flood risk across the district is predominantly 'Low' risk, with much of the district at a 'Very Low' risk.

## Winchester

- 7.63 Much of the land across the Winchester district is shown to be located within Flood Zone 1. The predominant source of flooding in the district is fluvial with key watercourses in the area being the River Itchen, River Meon and the River Hamble. Flood defences are located along the River Itchen as it passes through Winchester City. The main areas of land identified as being within Flood Zone 2 and 3 are located along the river banks and floodplains of the lower River Itchen watercourse, which

flows through the city of Winchester and towards Shawford. There are limited areas within the Winchester district within Flood Zone 2 and 3 that are identified as having a reduced risk of flooding due to the presence of flood defences.

- 7.64 The majority of land across the district is shown to have a 'Very Low' or 'Low' surface water flood risk. 'Low' to 'High' Surface water flooding is most prevalent in the southern areas of the district, across Bishops Waltham and Wickham. However, these surface water flows mainly follow topographical flow paths of existing watercourses or dry valleys, with some isolated ponding located in low lying areas.

### East Hampshire

- 7.65 East Hampshire district is located inland, and flood risk from rivers is the primary source of flooding. Most of the available land within the district is shown to be located within Flood Zone 1.
- 7.66 Parts of the river corridor and adjacent floodplain is located in Flood Zone 2 and 3. Fluvial flooding is most prevalent across the northern and eastern parts of the district, on land within the floodplain of the River Wey and its surrounding tributaries. The existing developed areas most at risk of fluvial flood risk include the towns of Alton, Whitehill & Bordon, and the surrounding villages (Standford, Kingsley, Sleaford) while the floodplain of the Lavant Stream is the primary flood source that affects the villages of Rowlands Castle and Petersfield in the south of the district.
- 7.67 There are no areas within the district shown to have a reduced risk of flooding due to existing defences.
- 7.68 'Low' to 'High' Surface water flooding is shown to be prevalent across the districts existing developed areas. However, these surface water flows mainly follow topographical flow paths of existing watercourses or dry valleys, with some isolated ponding located in low lying areas. The majority of undeveloped land within the district is shown to have a 'Very Low' or 'Low' surface water flood risk.

### Future Flood Risk

- 7.69 Climate change is expected to increase the frequency, extent, and impact of flooding, reflected in peak river flows. Wetter winters and more intense rainfall may increase fluvial flooding and surface water runoff and there may be increased storm intensity in summer. Rising river and sea levels may also increase flood risk.
- 7.70 The application of the Sequential Approach aims to avoid development in areas of current and future medium and high flood risk areas considering all sources of flooding. The SFRAs listed within Table 4 provides commentary on the impacts of climate change to each administrative area. This section of the report summarises the findings.
- 7.71 Coastal modelling scenarios for Havant BC were undertaken to show predicted future changes in flood extent within the study area. The mapping shows major predicted depth and hazard increases by the year 2122 all along the coast of Havant Borough mainland and around Hayling Island. This predicted increase in flooding will put properties and roads at risk that were previously unaffected.

- 7.72 No fluvial hydraulic models within Havant BC exist that could be re-run to simulate the impacts of climate change. A GIS based floodplain analysis was undertaken to indicate which floodplains were sensitive to increases in water level. The assessment found almost all of the watercourses in Havant could be sensitive, with the most sensitive areas around Waterlooville, northern Leigh Park, Bedhampton, Langstone, east of Havant town centre and west of Emsworth. The SFRA recommends that should development be proposed in these areas, it is recommended that hydraulic modelling is carried out to map the future risk of flooding more accurately.
- 7.73 The remaining Local Authorities covered within the PfSH area follow a similar approach to Havant BC. Modelled simulations to assess the impact of sea level rise using UKCP18 climate change projections have been undertaken and mapped.
- 7.74 GIS analysis of the extent of Flood Zones 2 and 3 was undertaken in cases where hydraulic models were not able to be re-simulated. This mapping does not show the expected impacts of climate change, rather it highlights areas which could be sensitive to flooding if water levels were higher, for example in the future as a result of the impacts of climate change. It also identifies areas of floodplain which comprise a more well defined valley and are therefore less sensitive to changes in flood level. The Chichester Interim SFRA has re-simulated several fluvial hydraulic models to assess the impacts of climate change. Where no models exist, the SFRA recommends the use of Flood Zone 2 to provide an indication of the impacts of climate change. The use of this dataset as a proxy is suitable for the broadscale nature of this constraints exercise, however detailed modelling would be required at a site-specific level.
- 7.75 The Arun to East Head and Chichester Harbour coastal modelling studies were also updated with the latest climate change allowances as part of the Chichester Interim SFRA. Both defended and undefended scenarios were assessed.
- 7.76 The Risk of Flooding from Surface Water map does not include specific scenarios to determine the impact of climate change on the risk of surface water flooding. The maps present a range of three annual probability events have been modelled, 3.3%, 1% and 0.1%, and therefore it is possible to use with caution the 0.1% outline as a substitute dataset to provide an indication of the implications of climate change on surface water flood risk in the future.
- 7.77 Climate change is anticipated to increase the potential risk from sewer flooding as summer storms become more intense and winter storms more prolonged. This is likely to place more pressure on the existing efficiency of the sewer system thereby reducing its design standard leading to an increase in flooding incidents.
- 7.78 Water Companies continue to monitor the risk of sewer flooding and put plans in place to manage the risk. The LPAs can work with the Water Company to identify flooding hotspots and locations of known sewer capacity issues where risk could be exacerbated.
- 7.79 With climate change bringing wetter winters, an increased risk of groundwater flooding may be seen. However the complex relationship between rainfall, recharge, groundwater storage and flow make the response to climate change uncertain.

## Summary

### Havant

- 7.80 Most of the land located inland is shown to be located within Flood Zone 1 and suitable for all development, particularly across Purbrook, Cowplain and Bedhampton. In coastal areas, there is land located within Flood Zone 2 and 3a. These areas should only be considered if the areas within Flood Zone 1 are found to be insufficient or unsuitable. Two CCMA's are designated in the Adopted Local Plan along Hayling Island's southern and western coastlines, at West Hayling and Hayling Beachfront. Due to the effects of climate change, these are proposed to increase in scale through the emerging Local Plan. CCMA's preclude any residential development.
- 7.81 Surface water flood risk is low in undeveloped areas, with built up areas having higher flood risk. The majority of land within Hayling Island and a significant proportion of the mainland, particularly towards the east, is indicated as susceptible to groundwater emergence.

### Wider Area

- 7.82 A general rule of thumb is that the further from the coast, the less constrained the area. There are areas located within Flood Zone 1 that also have a low risk of surface water flooding that should be prioritised for development.
- 7.83 Away from the coast there are areas at risk of fluvial and other flooding, but some areas within Flood Zone 1 that are suitable for all types of development. In accordance with the principles of the Sequential Approach, these areas should be considered first before consideration of development in Flood Zones 2 and 3.
- 7.84 Surface water flood risk likewise is more prevalent along the coast and increasingly less inland. This is the case for Chichester and Portsmouth.
- 7.85 Inland within Winchester and East Hampshire, the predominant source of flood risk is fluvial. There are limited areas in Chichester identified as having a reduced risk of flooding due to the presence of flood defences. The majority of undeveloped land across the inland districts is shown to have a 'Very Low' or 'Low' surface water flood risk with 'Low' to 'High' Surface water flooding being most prevalent in southern areas closer to the coast and river catchment areas.

## 8 Identifying areas of least constraint

### Introduction

- 8.1 With so many constraints and so many competing thematic geographies, the resultant overall constraints position is complex. This section synthesises the analysis to identify areas of less or least constraint.
- 8.2 The analysis focuses on those areas that our thematic analysis above suggests are generally free of constraints. This work has taken the form of a desktop study, and we cannot conclude any land is free of constraints at this time.
- 8.3 This is particularly the case where the extent of the constraint requires professional judgement to assess its extent, the setting of a heritage asset for example. There may also be local constraints that, on balance, make land not suitable for development or that development cannot be sustainably accommodated at scale. Development in some of the areas of least constraint is likely to require significant new infrastructure and is likely to represent a major change to an area's current spatial strategy and incursion into the countryside.
- 8.4 We also cannot consider constraints that cannot be mapped (such as nutrient neutrality considerations or the setting of some assets). The thematic chapters discuss how the setting may influence development but land is not excluded because it may be within the setting of a National Park, National Landscape or a registered asset.

### Parcels on Havant Mainland

- 8.5 There are two parcels of land on Havant's mainland. These are close to Havant town and are both very small.
- 8.6 Land North of the A27 is adjacent to an adopted local plan allocation at Brockhampton West. Access will be challenging given the site would need to be served by the A27, with the railway presenting a barrier to the north. Indeed, the site promoter has indicated that achievement of access to the site would likely not be viable, with a preference for the site to be used for environmental purposes. But neither access constraints are within the scope of this study and the land is identified as being less constrained accordingly. Most of Havant is covered by environmental constraints associated with the land's physical proximity to the sea but the land here is not designated under the Solent Waders and Brent Goose Strategy. Our maps suggest surface flooding may be an issue here but, as discussed above, flood data is basic and further work would be needed to confirm this.
- 8.7 Our analysis has also identified limited scope at Land West of the A3(M) and south of Campdown which has been previously identified for development. The parcel is bound by the potential development site, the road network, and heritage assets (related to Fort Purbrook) to the west which results in a very small area of land. The land is designated in the Solent Wader and Brent Goose Strategy but only as low use land. It is, however, adjacent to a Primary Support area and may be needed to assist with mitigation of the land which is already proposed for development.



## Parcels on Hayling Island

- 8.8 In our assessment there are parcels of land on Hayling Island that are free of major landscape constraints (although noting the setting of the Chichester Harbour National Landscape) and the sites themselves would be unconstrained by flooding.
- 8.9 There are scattered heritage assets especially in the northern parcel on the Island but the largest of these is of local constraint. Detailed setting work is needed to refine the extent of the heritage constraints but, from the data available, it is not considered that these constraints are showstopping.
- 8.10 There may be additional capacity on the Island – along West Lane – but we have excluded because of ground flooding evidence. But as discussed above data relating to this is at a desktop level and further work may dismiss this as a constraint.
- 8.11 Even if more land on the Island was available and the dense network of ecology constraints could be overcome, the need to service additional land parcels using the single access road which would need to be considered in terms of compliance with the NPPF given the accessibility and flood risk constraints this presents. This is a matter for other elements of the emerging Local Plan's evidence base to consider and outside of the scope of this study.

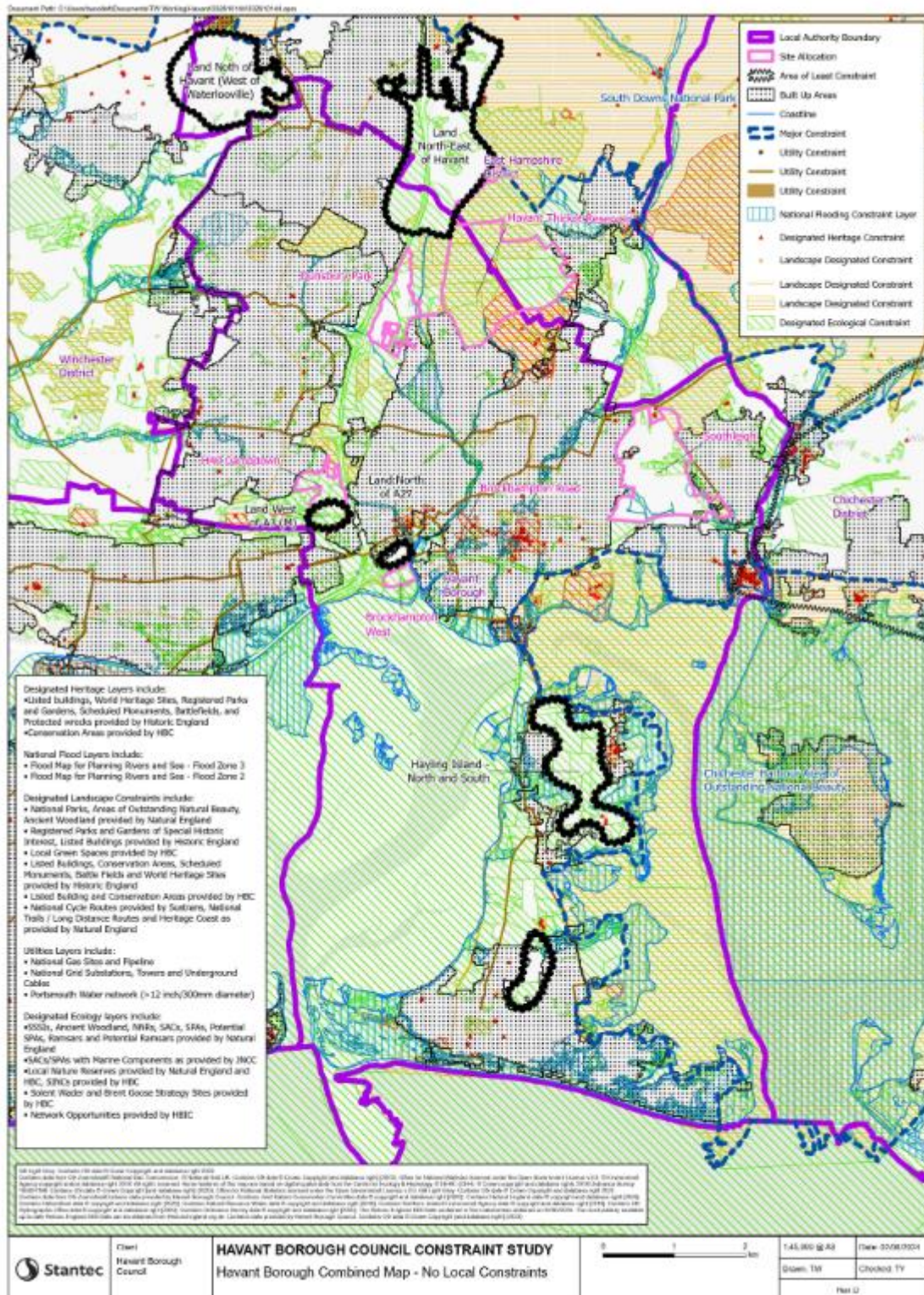
## Land Around and Within Havant Borough

- 8.12 We have identified six parcels of land in and around Havant Borough that are considered to be less constrained.
- 8.13 These are shown on the maps below along with the extent of the land previously proposed for allocation in the withdrawn local plan – most noticeably the Southleigh potential residential allocation and Dunsbury Park economic allocation. Both withdrawn allocations would be highlighted as less constrained areas and so our analysis would suggest that the sites are appropriately located and provided evidence to support our conclusion that land in proximity to the Park (and Harbour) may be within the setting but this does not preclude appropriate development.
- 8.14 The map also shows the extent of the Havant Thicket reservoir and the Brockhampton West site that are proposed for utility infrastructure and so not considered available for residential or commercial development.
- 8.15 The map below shows how these areas related to the national constraints discussed in previous sections.
- 8.16 For clarity we have not shown the detailed ecology land parcels that we discussed in Section 6. Land on Hayling Island is particularly complex because of the fragmented nature of the land parcels and the fact that some ecology impacts can be mitigated on, or off site. We cannot undertake a detailed assessment of how ecology constraints may be mitigated but our conclusion, as set out in the chapter above is that the density of the Solent Wader and Brent Goose network here may not preclude any development but would limit the ability of those parcels (on the Island) to accommodate strategic development. We have shown a more detailed inset of Havant's technical constraints

below to show the impact of ecology constraints on land otherwise identified as less constrained: it covers almost every undeveloped land parcel.

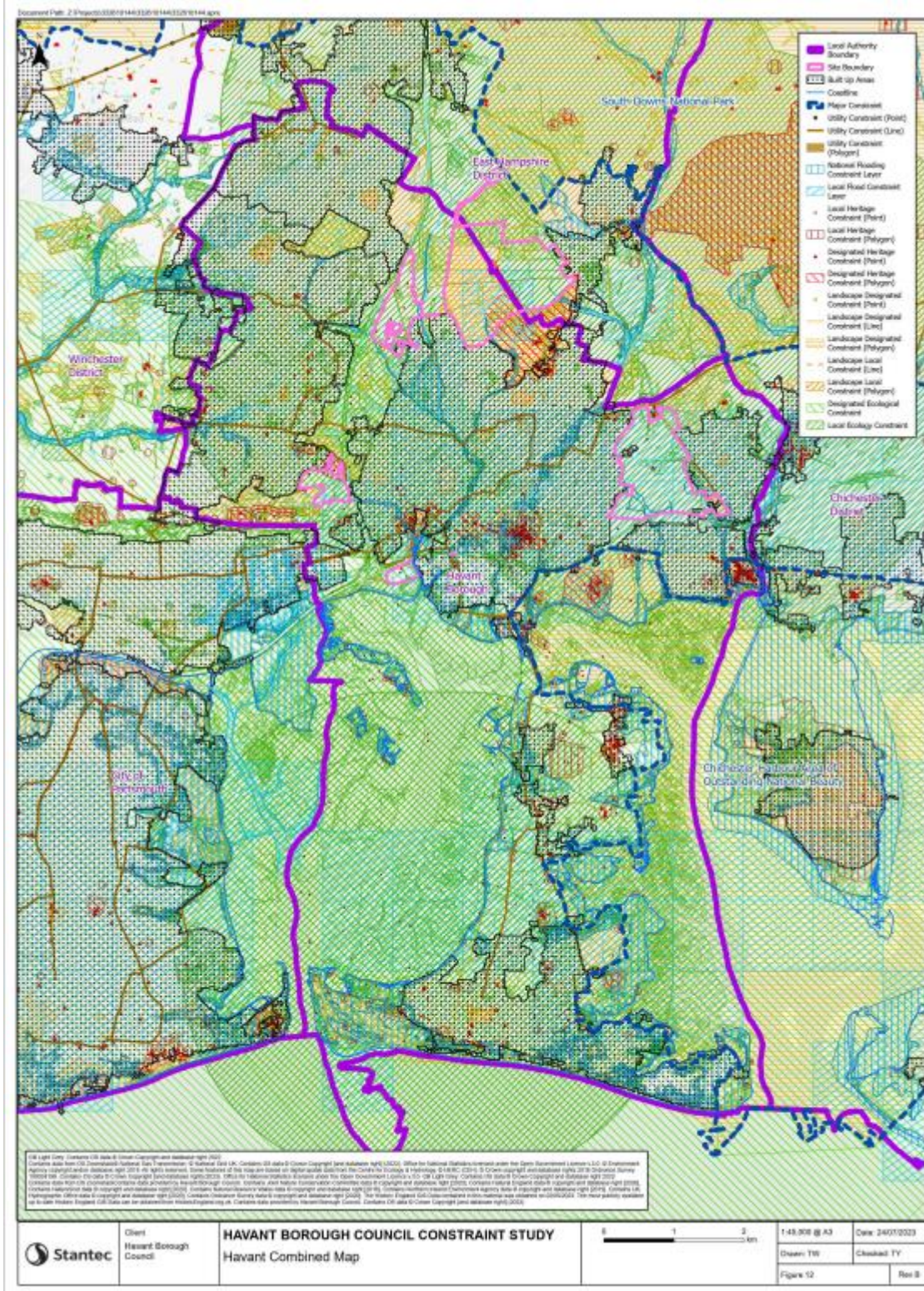
- 8.17 Surface flooding has also been excluded because, as discussed, we don't consider it a significant constraint. If included, it would serve to constrain the remaining least constrained land on Hayling Island: this land (east/west of West Lane) has been identified as susceptible to surface flooding.
- 8.18 Further investigation of surface flooding constraints is needed, but even if it transpired that surface flooding did not affect these areas, they would still be constrained by ecology. Particularly those land parcels which are functionally linked and related to the Solent Wader and Brent Goose Strategy.
- 8.19 While more data / detail, including further setting work for the National Landscape, could always be added it would not appear to add significantly to our analysis because the setting does not preclude development.

Map 12 – Havant Borough Constraints Map (No Local Constraints)



8.20 The map below adds the local Havant constraints in addition but the sheer number and density of these only confirms why National Policy does not look to apply all constraints equally and has developed an effective two stage process of national and local constraints – with local flexing according the need.

Map 13 – Havant Borough Constraints Map (All Constraints)



8.21 Pragmatically our analysis highlights areas already proposed (in the withdrawn local plan) for development along with Hayling Island – with or without land at West Lane being included.

8.22 On the mainland we have identified some peripheral land that, coupled with land in neighbouring areas would be worthy of further investigation.

### **East Hampshire Parcels within or adjoining Havant Borough**

8.23 In that regard, two parcels - Land North of Havant Borough (west of Waterlooville) along with Land North East of Havant Borough are located partly in East Hampshire District.

8.24 The North East of Havant Borough Parcel – east of Horndean is already allocated for development in the Adopted Local Plan, with a proposed extension considered through the emerging local plan<sup>19</sup>. EHDC’s own evidence base work (Site Assessment Background Paper – 2019) would appear to support our more strategic analysis, and concluded that land here ‘passed’ their constraint and opportunity assessment<sup>20</sup>. Land south of East Hampshire, across the boundary and into Havant, was not proposed for development by EHDC. Our analysis suggests there is some limited scope south of East Hampshire, because the land over the boundary in Havant Borough is generally free of constraints.

8.25 Our analysis would also suggest there is less constrained land west of Horndean (North of Havant Borough, West of Waterlooville, within East Hampshire District) that is not allocated in the adopted local plan. Some of this land was assessed as parcels in the East Hampshire Land Availability Assessments (2023) and that work appears to conclude that some of the land is developable here. The full extent of the area we have suggested is less constrained was not assessed in the LAA work (which was limited to parcels along the built up boundary) but the fact adjacent parcels were considered deliverable would support our assessment.

8.26 While in East Hampshire we consider this parcel here because it is immediately adjacent to Havant and, if allocated by the East Hampshire, it would appear as an extension to the built up area of Havant. From our analysis this land does not appear to extend into Havant’s administrative area (unlike NE Havant) but may extend into Winchester District.

8.27 It maybe that this land has not been promoted to East Hampshire rather than the Council concluding that the land is not developable.

8.28 If East Hampshire was to allocate either area of least constraint, it would likely be needed to address East Hampshire’s development needs. Only the small extent of additional land of the North East parcel within Havant may be available to Havant Borough. This would be subject to more detailed work to demonstrate that the area of free of other constraints, and there are no major ‘setting’ issues that would limit development.

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<sup>19</sup> <https://www.easthants.gov.uk/media/5567/download?inline>

<sup>20</sup> <https://www.easthants.gov.uk/media/5636/download?inline>

8.29 Further work is needed with East Hampshire (and Winchester) to confirm whether it is practical or feasible to extend the built up area of Havant across the administrative boundary – our analysis would not suggest that there is an overarching national constraint that would prevent a joined up approach to land on the boundary.

## Havant Summary

8.30 Our analysis has highlighted a small number of less constrained land parcels that could be explored in more detail to determine their capacity and appropriateness for development.

8.31 But our analysis also demonstrates that in terms of additional capacity Havant's options are limited.

8.32 Aside from land at Dunsbury, Southleigh and area which formerly formed the H40 (Campdown) housing allocation that are already well understood by Havant, scope is limited to:

- Undeveloped land at Hayling Island – noting that these are poorly accessible and this may limit their sustainable capacity and that we do not consider transport constraints in this study. These two parcels, Land north and south at Hayling Island total to 160ha.
- On the mainland – land in Havant is largely developed in the south with only very small parcels being identified –17 ha at Land West of the A3(M) and 10 ha North of the A27. Even if other constraints can be overcome (inc. transport/access) they would struggle to make a meaningful contribution to the plan.

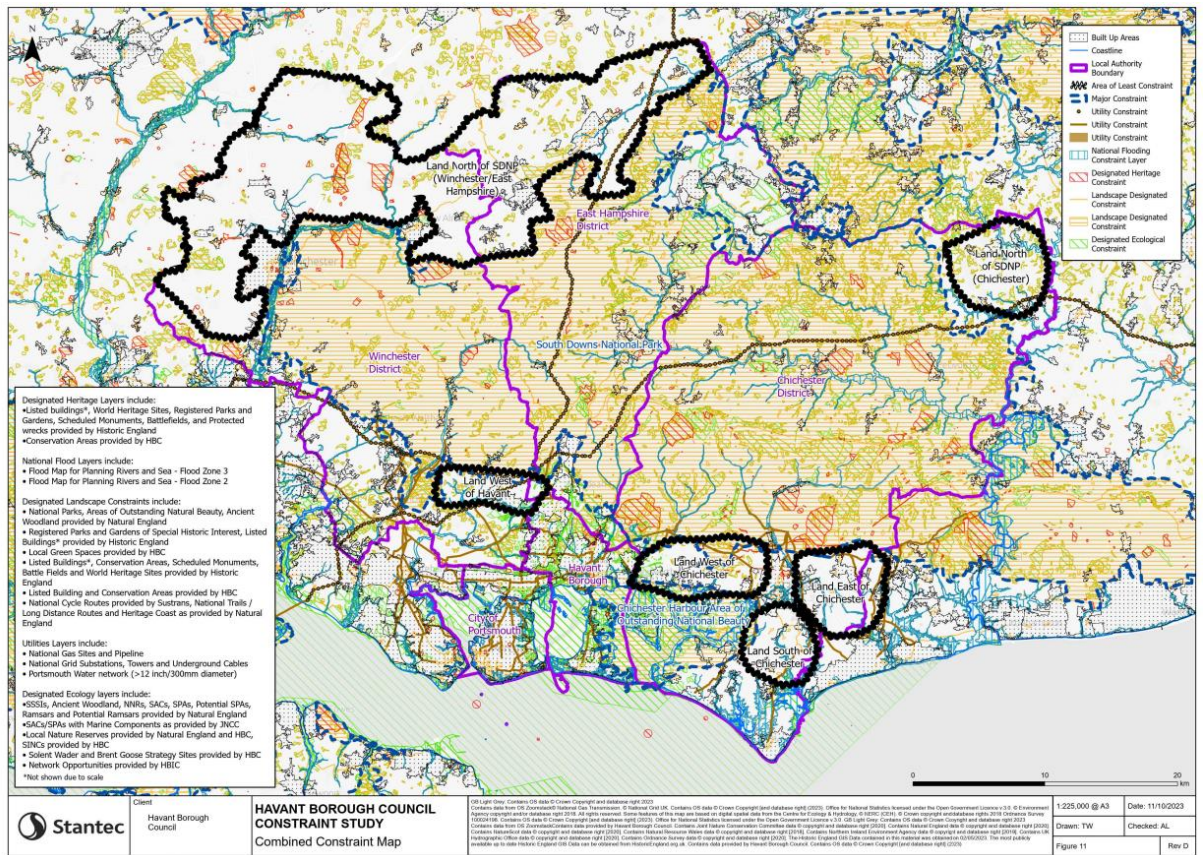
8.33 Two parcels in the north have been highlighted but these are effectively cross boundary parcels running into East Hampshire. Land North East of Havant (250ha) is part proposed for allocation by East Hampshire but the less constrained parcel appears to extent southwards into Havant Borough. The 156ha we describe as North of Havant (West of Waterlooville) is not proposed for allocation by East Hampshire. We have illustrated this area as being limited to East Hampshire so not to run towards Denmead and the National Park boundary but further work could extend this parcel subject to more detailed constrain analysis and especially around the setting of this land.

8.34 Finally, to put this land in context, we have identified only 590 ha of land in or around Havant Borough and even then, around 400ha of this is outside of the Havant administrative boundary and crosses into East Hampshire and Winchester district.

## Land in the Wider Area

8.35 We have also looked to identify larger, strategic areas,, which are less constrained. Whilst there may be smaller, irregular parcels of land between Havant and its neighbouring authorities, these are often covered by a network of constraints which would limit these areas' ability to accommodate strategic cross boundary development needs. For example, land around Rowlands Castle is not covered by national constraints but does not have a coherent area of land that may be free of constraints that would represent a logical extension to existing built form.

**Map 13 – Neighbouring Authorities Areas of Least Constraint**



8.36 The map shows these larger strategic areas of ‘least constraint’ plotted against our overarching constraint map and highlights the presence of ‘least constrained’ land in each of these areas. But it also shows that, while these may be areas of less constraint, they still include some constraints. The main reason these areas are identified is because they are free of the National Park and National Landscape (AONB) policy constraints, and are removed from coastal constraints.

### Land to the north of the National Park

8.37 Our analysis has identified two broad parcels north of the South Downs National Park that appear less constrained. Firstly one very large parcel north of the Park and spanning Winchester and East Hampshire district. There is also a second area, in the very north of Chichester District.

8.38 Both areas are remote from Havant Borough and, if considering Havant’s development needs, would struggle to function as part of Havant’s economy. But this does not preclude them from being considered – there is nothing in national planning policy that says unmet housing (or economic) needs can only be addressed in a functional market area.

8.39 Our thematic assessments did not conclude that the area is totally free of constraints. As illustrated above, the area still accommodates several heritage assets, some

flooding and ecology constraints, but across all thematic topics there remains less constrained land that could be considered in more detail.

- 8.40 We would note however that these parcels accommodate a dense network of ecology constraints related to woodland. From our analysis we would expect more detailed work, especially ecology, could potentially shrink these parcels even to the point that no meaningful strategic parcel remains. Detailed consideration of the setting of the National Park is also likely to further limit capacity. When considering the smaller North of Havant (West of Waterlooville parcel) we did not draw a boundary adjacent to the park and it is the case that we could also illustrate this area slightly stepped back for consistency. We observe that land north the Winchester land does not appear to have the dense network of ecology constraints that appear present in East Hampshire but further work would be needed to demonstrate whether this land can be formed into practical development parcels.
- 8.41 Our maps suggest that there may be less constrained land around Bordon but the network of constraints is dense in this area. Consideration of the landscape settings could close the gap between the designated landscape assets and the existing settlements. So we have not highlighted this area on our maps. But this could be reviewed if additional landscape evidence confirmed that development can work around any setting issues.

### **Land to the South of the National Park**

- 8.42 Our analysis has identified four parcels of land south of the National Park that appear less constrained. Two of these are in Chichester but carry the caveat that they may be heavily influenced by the setting of the National Park and Chichester Harbour National Landscape (AONB). A further Chichester parcel is south of the city – towards Selsey – which is further from the National Park but still adjacent the National Landscape.
- 8.43 Our ecology analysis does not consider these areas as constrained but, in this coastal area, further work could identify further ecology constraints.
- 8.44 All four parcels serve as ‘gaps’ and significant development in any of these parcels would most likely result in erosion of the remaining gaps between settlements. As noted, local policy gaps need to be kept under review and can be revised. Within Havant Borough, this has led to the identification of potential land between Denvilles and Emsworth at Southleigh, to the west of ‘Land West of Chichester’.
- 8.45 Land west of Havant (West of Waterlooville) could erode any gap between urban Havant and Denmead (Winchester district) and the remaining land is largely wooded (e.g. Creech Wood to the South of Denmead). These constraints can be seen from the more detailed Havant ecology mapping where, for context, we show national and local constraints within Havant and show its immediate adjacent areas.



## Summary and conclusions

- 8.46 The purpose of the Constraints Study is to support the work undertaken by the Council in responding to the significant challenge of meeting its development needs within its own boundary.
- 8.47 As with any Council in England, there is a pressing need for new homes and land to accommodate these homes. There is also a need to identify new land for industry, especially logistics, as consumer behaviour has shifted away from the traditional high street in recent years.
- 8.48 This study does not look to allocate land for development or inform the development strategy but it does paint a picture of how constrained the Borough is, and therefore the challenge facing the Council when looking for new suitable land for development.
- 8.49 Within Havant's administrative boundary land is limited to the Island and small infill parcels in the south of the Borough.
- Hayling Island North and South – 158ha
  - Land West of the A3 (M) – 17ha
  - Land North of the A27 – 9.7ha
- 8.50 On paper, there is 158 ha of land on the Island which, if delivered could make a meaningful contribution to housing needs and this is the largest possible opportunity open to Havant working alone to meet its housing needs within its own boundary. However the location of this land, on the Island, is likely to mean that this is always an area that would struggle to accommodate strategic scale growth – even if the network of ecology and heritage constraints can be addressed. We do not consider these 'showstopping' but will always limit development.
- 8.51 The other Havant only sites, Land West of the A3(M) and land North of the A27 sum to less than 30ha even if developed in full.
- 8.52 Unlocking capacity in the North of Havant borough (Land North of Havant (West of Waterlooville 156ha) and Land North East of Havant (250ha) is likely to open up very little land within the administrative area of Havant – these parcels extend across into neighbouring authorities. But these parcels are some of the very limited areas where homes can be provided that, if developed, would function as part of Havant. So even if these areas are developed it is not certain that the homes would meet the identified needs of Havant unless highlighted otherwise through those respective local plans.
- 8.53 It is reasonably clear that homes may need to be exported outside of Havant and into neighbours and especially in scenarios where future housing need may be higher than the current, 2014 based, Standard Method.
- 8.54 Our analysis highlights land north of the Park – in both Winchester and East Hampshire districts. However this is land close to the Park and, especially in East Hampshire, a dense network of ecology constraints, may significantly limit capacity.
- 8.55 Our analysis does not rule out land around Chichester town. Unlike Havant, which is largely built to its administrative boundaries, Chichester town would appear to have

developable land. We cannot conclude that this, subject to further work, would remain less constrained – nor that land is sustainable but we would suggest more detailed work is needed here to develop an shared understanding of the impact of meeting cross boundary housing needs here.

- 8.56 There is land nearby; extending into East Hampshire and Winchester in the north of Havant district but even if scoped into Havant borough extensions they would formally be in a separate district and so explicit reference would need to be made in the East Hampshire Local Plan.
- 8.57 Land further away may, using our analysis, not be significantly constrained by obvious NPPF footnote constraints. But, even were this land developed, it would mean houses being provided at a considerable distance to Havant and would essentially be exported in full – the recipient district would need to plan for their full social and physical infrastructure and provide, for example, employment and retail opportunities alongside homes.
- 8.58 In conclusion – the simple fact is that Havant is largely developed to its administrative boundary. The obvious land parcels at Southleigh and Dunsbury are not new opportunities and, aside from the Island, there is little (if any) strategic scale land available for development.

## APPENDIX A – FURTHER ECOLOGY

### Havant Borough Constraints Study

#### Ecology and Biodiversity

##### Introduction

##### *Approach to Study*

1. To inform consideration of constraints and supply analysis, an ecological desk study has been undertaken, drawing on the following resources:
  - Freely available ecological data from Multi-Agency Geographic Information for the Countryside (MAGIC) website, Natural England website and Joint Nature Conservation Committee (JNCC) website;
  - Ecological data obtained from Havant Borough Council (HBC), including ecological data from Hampshire Biodiversity Information Centre (HBIC), provided by HBC; and
  - OS mapping (1:25,000) and aerial photography.
2. Data considered during the ecological desk study in relation to both HBC and the surrounding Authorities is set out in Tables 1A and 1B. The data set out in Table 1A relates to designated sites protected by National legislation or planning policy and which are referenced in the NPPF, along with associated buffer zones defining potential impact risk zones to these designated sites. The data set out in Table 1B relates to designated sites which are not specifically mentioned in the NPPF but which nonetheless are a consideration at the Local Plan level and are considered for both HBC and the surrounding authorities.
3. The results of this analysis has been mapped in the Ecology section of this report and also presented, at A3, in appendix B.
4. Data considered during this study in relation to HBC alone covers the information set out in Tables 1A and 1b, in addition to the data set out in Table 2. The data set out in Table 2 further informs the constraints and supply analysis specific to Havant Borough Council. The data described in Table 2 have been provided by HBC / HBIC for the HBC area only and are a consideration for the Local Plan to enable HBC to demonstrate consideration of their Biodiversity Duty and to enable delivery of Biodiversity Net Gain and protected species mitigation considerations.

**Table 1A**

<b>Ecological Features</b>	<b>Summary Description</b>
<i>Ecological features for which consideration is made within the National Planning Policy Framework (NPPF), footnote 7, and / or paragraphs to which footnote 7 refers.</i>	
Special Protection Areas (SPA) / Potential SPA / Marine SPA	Area originally classified under the Wild Birds Directive and now form part of the National Site Network which conserves and protects our rarest and most threatened bird species.
Special Areas of Conservation (SAC) / Possible SAC / Marine SAC	Areas originally designated under the Habitats Directive and now form part of the National Site Network which conserves and protects our rarest and most threatened species and habitat types.

<b>Ecological Features</b>	<b>Summary Description</b>
Ramsar Sites / Proposed Ramsar Sites	Wetlands of international importance designated under the Convention on Wetlands of International Importance, especially as waterfowl habitat.
A 5.6km buffer from the Solent SPAs (Chichester and Langstone Harbours SPA, Portsmouth Harbour SPA and Solent & Southampton Water SPA)	Area within which the Solent Recreation Mitigation Strategy applies.
A 13.8km buffer from the New Forest SAC, SPA and Ramsar site.	Area within which mitigation for recreational impacts on the New Forest SAC, SPA and Ramsar Site applies.
Catchment mapping showing the areas within which nutrient mitigation considerations apply	Areas within the catchment of the Solent and / or the River Itchen National Site Network within which nutrient mitigation considerations for nitrates and / or phosphates (being nutrients of concern) associated with residential development apply.
Sites of Special Scientific Interest (SSSI) / SSSI Impact Risk Zones	Areas selected and notified of being of importance for wildlife, geology or landform of special interest on a national scale and their associated potential Impact Risk Zones which define potential Zones of Influence and impact risks.
Solent Wader and Brent Goose Strategy Sites	Sites that provide a supporting role to the internationally important brent goose and wading bird populations associated with National Site Network within and surrounding the Solent coast. These sites are functionally important for the integrity of the internationally important areas. They are graded regarding their likely level of importance as 'Functionally Linked Land'.
Ancient Woodland	Areas of ancient and semi-natural woodland (an 'irreplaceable habitat') and / or ancient replanted woodland.

**Table 1B**

<b>Ecological Features</b>	<b>Summary</b>
<i>Ecological features not mentioned in the NPPF, which are nonetheless a consideration at the Local Plan level (Considered for all Local Authorities discussed in this Technical Note, where data is available).</i>	
National Nature Reserves (NNR)	Areas designated as key places for wildlife and natural features in England.
Local Nature Reserves (LNR)	Areas of importance for wildlife, geology, education or public enjoyment within the local area.
Sites of Importance for Nature Conservation (SINC)*	Areas recognised as being of importance to wildlife and biodiversity within the local area.

\* SINC data provided for this study limited to HBC boundary and immediate surroundings. It is anticipated that all Authorities will have SINC's to consider within their boundary based on previous experience.

**Table 2**

Supplementary Ecological Data	Summary
<i>Ecological features not mentioned in the NPPF, which are nonetheless a consideration at the Local Plan level and/or relevant to plan-led allocation or project development (Considered for Havant Borough Council only and discussed in this Technical Note):</i>	
Priority Habitats	Priority Habitats or Habitats of Principal Importance (HPI) are habitats that are identified to be the most threatened, requiring conservation.
Ecological Network Mapping	This is a biodiversity opportunity map, led by Hampshire Biodiversity Information Centre. This data set is likely to evolve into Nature Recovery Network / Biodiversity Opportunity Area mapping, and identifies areas which may be used to focus future ecological mitigation and enhancement.
Bechstein's Bat Consultation Zones	Areas within 3km of a known Bechstein's <i>Myotis bechsteinii</i> bat roost (rare bat with distribution restricted to southern counties of England), within which, further consideration for this species (e.g., bespoke survey and mitigation) may be required to inform allocation and/or development.

5. Following the compilation of data, a two-level approach to the analysis of the data has been undertaken, as follows:

**Level 1:**

6. Ecological data described in Tables 1A and 1B has been subject to a high-level review to determine which of the identified ecological features, or buffers within which strategic mitigation is required, are located within the following boroughs surrounding HBC, as well as within HBC itself:

- Havant
- Portsmouth
- Winchester
- East Hampshire
- Chichester

7. The results of this high-level review are presented within Table 3 within the results section below..

**Level 2:**

8. A detailed review of ecological data described in Tables 1A, 1B and 2, has been undertaken for land within Havant Borough alone. This identifies land within Havant Borough which is constrained by any of the identified ecological features either directly

(i.e., land itself is subject to designation), or indirectly (i.e., land is identified within the Solent Wader and Brent Goose Strategy or is located within a buffer within which strategic mitigation is required).

9. The results of this detailed review are provided in the commentary provided within the results section below.
10. Taking account of the Level 1 and Level 2 analysis, conclusions are then derived which seek to determine:
  - Whether the constraints identified are significant and / or limiting with regard the development of the Havant local plan and
  - Whether Havant is more or less constrained that surrounding boroughs.

## Results

### Level 1 Results

11. Table 3 below present the findings of the high-level review, identifying which of the ecological features, as identified in Tables 1A and 1B are present within each of the Local Authority areas considered in this study. Only Internationally designated areas for nature conservation are identified by name, given that they are the most substantial constraint on account of their high level of legal and planning policy protection , with full details pertaining to the features for which they are designated provided within. A summary of the comparative constraints across the boroughs is provided below Table 3.

**Table 3: Results of Ecological Analysis for HBC and Neighbouring Boroughs**

Ecological Features	Havant	Portsmouth	Winchester	East Hampshire	Chichester
Special Protection Areas (SPA)					
<i>Chichester and Langstone Harbours</i>	✓	✓	x	x	✓
<i>Portsmouth Harbour</i>	x	✓	x	x	x
<i>Solent &amp; Southampton Water</i>	x	x	✓	x	x
<i>Wealden Heaths Phase II</i>	x	x	x	✓	✓
<i>Pagham Harbour</i>	x	x	x	x	✓
Potential SPA	x	x	x	x	x
Marine SPA					
<i>Solent and Dorset Coast</i>	✓	✓	x	x	✓
<i>Chichester and Langstone Harbours</i>	✓	✓	x	x	✓
<i>Portsmouth Harbour</i>	x	✓	x	x	x
<i>Solent and Southampton Water</i>	x	x	✓	x	x
<i>Pagham Harbour</i>	x	x	x	x	✓
Special Areas of Conservation (SAC)					
<i>Solent Maritime</i>	✓	✓	✓	x	✓
<i>Solent &amp; Isle of Wight Lagoons</i>	x	✓	x	x	x
<i>River Itchen</i>	x	x	✓	x	x

Ecological Features	Havant	Portsmouth	Winchester	East Hampshire	Chichester
<i>Woolmer Forest</i>	x	x	x	✓	x
<i>East Hampshire Hangers</i>	x	x	x	✓	x
<i>Buster Hill</i>	x	x	x	✓	x
<i>Shirtheath Common</i>	x	x	x	✓	x
<i>Rook Clift</i>	x	x	x	x	✓
<i>The Mens</i>	x	x	x	x	✓
<i>Ebernoe Common</i>	x	x	x	x	✓
<i>Kingley Vale</i>	x	x	x	x	✓
<i>Duncton to Bignor Escarpment</i>	x	x	x	x	✓
<i>Singleton and Cocking Tunnels</i>	x	x	x	x	✓
Possible SAC	x	x	x	x	x
Marine SAC					
<i>Solent Maritime</i>	✓	✓	✓	x	✓
<i>Solent &amp; Isle of Wight Lagoons</i>	x	✓	x	x	x
Ramsar Sites					
<i>Chichester and Langstone Harbours</i>	✓	✓	x	x	✓
<i>Portsmouth Harbour</i>	x	✓	x	x	x
<i>Solent &amp; Southampton Water</i>	x	x	✓	x	x
<i>Pagham Harbour</i>	x	x	x	x	✓
Proposed Ramsar Sites	x	x	x	x	x
Sites of Special Scientific Interest (SSSI)	✓	✓	✓	✓	✓
SSSI Impact Risk Zones	✓	✓	✓	✓	✓
Ancient Woodland	✓	x	✓	✓	✓
National Nature Reserves (NNR)	x	x	✓	✓	✓
Local Nature Reserves (LNR)	✓	✓	✓	✓	✓
Sites of Importance for Nature Conservation (SINC)*	✓	✓	✓	✓	✓
Solent Wader and Brent Goose Strategy Sites	✓	✓	x	x	✓
Land within a 5.6km buffer from the Solent SPAs	✓	✓	✓	✓	✓
Land within a 13.8km buffer from the New Forest Sites	x	x	✓	x	x
Land within the Solent catchment (nutrients)	✓	✓	✓	✓	✓
Land within the Itchen catchment (nutrients)	x	x	✓	✓	x

\*SINC data provided for this study limited to HBC boundary and immediate surroundings. It is anticipated that all Authorities will have SINC's to consider within their boundary based on previous experience.

Summary of Level 1 Results:

12. All of the boroughs considered within this study contain designated areas for nature conservation.
13. Those located along the south coast, bounded to the south by the Solent (Portsmouth, Havant and Chichester), all contain SPAs, SACs and Ramsar sites, and their constituent

SSSIs (which broadly follow the same boundaries) associated with the coast and are located wholly or almost wholly within the Solent catchment and the 5.6km buffer attributed to the Solent SPAs. Further to this, those boroughs along the south coast also all contain areas of land identified within the Solent Wader and Brent Goose Strategy as being important to maintaining the integrity of the Solent SPAs.

14. Of these boroughs however, Havant and Portsmouth are both more notably constrained than Chichester, on account of the proportion of each subject to designation (with a significant proportion of Havant designated as Chichester and Langstone Harbours SPA and Ramsar / Solent Maritime SAC, and a significant proportion of Portsmouth designated as Portsmouth Harbour SPA and Ramsar), with the remainder of both boroughs located wholly or almost wholly within the Solent catchment and the 5.6km buffer attributed to the Solent SPAs. Chichester, which is more substantial in size and as such has a relatively smaller proportion of land under designation, even taking account of SSSIs not associated with the Solent which lie further inland within the Brough, is not so heavily constrained.
15. Comparatively, those sites without a coastline (Winchester and East Hampshire), whilst also containing SAC, SPA and Ramsar sites, as well as SSSIs, are not so heavily constrained on account of their size, the relative proportion of land under designation, and that the majority of each of these two boroughs is located wholly or almost wholly outside the Solent catchment and the 5.6km buffer attributed to the Solent SPAs. Further to this, they do not contain areas of land identified within the Solent Wader and Brent Goose Strategy as being important to maintaining the integrity of the Solent SPAs.
16. Both Winchester and East Hampshire do however contain land located within the Itchen catchment (a significant proportion for Winchester, and a lesser extent for East Hampshire), with a limited extent of Winchester also falls within the 13.8km buffer for the New Forest Sites. Furthermore, Chichester, East Hampshire and Winchester support more Ancient Woodland sites than Havant or Portsmouth and are the only boroughs to support National Nature Reserves. All boroughs support land designated as Local Nature Reserves, most of which at least partially overlap the SSSI designated areas. All boroughs will also support SINC's (noting only SINC data for Havant and its immediate surrounds have been provided for consideration in this study).
17. Finally, from aerial mapping, it is clear that of the land not subject to designation or inclusion within the Solent Wader and Brent Goose Strategy Sites, both Havant and Portsmouth contain a very high proportion of existing development, with Portsmouth in particular, significantly limited in the availability of land within which to accommodate new development, or mitigation. The remaining boroughs (Chichester, Winchester and East Hampshire) are substantially larger, with a greater availability of open land apparent, which may be more readily available for development or mitigation, although it is also acknowledged that these boroughs may be subject to other constraints outside the ecological considerations considered in this note (e.g. National Park).

### **Level 2 Results**

18. The results of the detailed review for Havant Borough Council is described in the section below. Commentary on this detailed review is provided below.



### Summary of Level 2 Results:

Present within the borough of Havant are the following statutory designated areas for nature conservation:

- Internationally designated areas for nature conservation:
  - o Chichester and Langstone Harbours SPA (including Marine) and Ramsar
  - o Solent Maritime SAC (including Marine)
  - o Solent and Dorset Coast SPA (including Marine)
- Nationally designated areas for nature conservation:
  - o Langstone Harbour SSSI
  - o Warblington Meadow SSSI
  - o Sinah Common SSSI
  - o Chichester Harbour SSSI
- Locally designated areas for nature conservation:
  - o Farlington Marshes LNR
  - o The Kench, Hayling Island LNR
  - o Hayling Billy LNR
  - o West Hayling LNR
  - o Gunter Point LNR
  - o Sandy Point LNR
  - o Brook Meadow (Emsworth) LNR

19. With the exception of Brook Meadow (Emsworth) LNR, the LNRs are wholly associated with Langstone and Chichester Harbours, which surround Hayling Island, to the south of the town of Havant. As such, these designations are largely overlaid, together dominating the southern half of the borough. Where not already subject to designation, the vast majority of Hayling Island and open land to the south-east of the town of Havant is identified within the Solent Wader and Brent Goose Strategy as providing a support role to and important to maintain the integrity of the Solent SPAs.

20. Whilst land in the northern extent of Havant Borough<sup>21</sup> is potentially less directly constrained (i.e., not subject to statutory designation or inclusion within the Solent Wader and Brent Goose Strategy), the vast majority is nonetheless located within both the Solent catchment (wholly) and the 5.6km buffer attributed to the Solent SPAs (the vast majority), and therefore subject to indirect impact and mitigation consideration within those buffers. Furthermore, the northern extent of Havant Borough supports more SINC<sup>2</sup>s and pockets of ancient woodland than the southern extent and the Bechstein's Bat 3km Consultation Zone is also focussed around the northern part of the borough, which is not unsurprising given this bat species is most often associated with woodland habitats. Priority Habitat Mapping mainly echoes the designated site areas, with Priority Habitats being identified across HBC. Similarly, Ecological Network Mapping, identifying areas for potential biodiversity enhancement, is identified across HBC with more opportunities identified in the northern extent.

### Implications for Local Plan Development:

#### *Internationally Designated Areas for Nature Conservation:*

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<sup>21</sup> Including a swathe of land to the east and west of the A3(M), land to the north of the Leigh Park area of Havant, and land between Emsworth (to the east) and the town of Havant, to the north of the A27.

21. All development should seek to avoid direct and indirect effects on internationally designated areas for nature conservation. Given the information described above and mapped in the main chapter of this report, they are a significant constraint and are likely to limit development within the borough of Havant.
22. If plans or projects (not directly related to management of the internationally designated area) are proposed that could have an effect on the interest features of an internationally designated area (a 'European Site'), the relevant public authority (in consultation with Natural England) has a duty to consider, through a Habitat Regulations Assessment, whether the European Site could be affected either alone or in combination with other plans or projects. This enables avoidance or mitigation to be developed and / or implemented to ensure potential adverse effects are no longer significant. If negative effects cannot be avoided, or if uncertainty remains, consent for works will only be granted if there are no alternative solutions, there are imperative reasons of over-riding public interest for the works and compensatory measures have been secured (though this stage is highly unlikely to ever be used for a housing or commercial development and is typically utilised for infrastructure or national security developments). These step-wise tests can be significant to overcome and necessarily would need to be considered across the relevant affected Boroughs.
23. A number of mitigation schemes have been devised for the Solent to enable adverse effects that may otherwise arise as a result of nearby development, to be dealt with in a strategic manner. These comprise:
  - The Solent Recreation Mitigation Strategy (Bird Aware Solent, 2017<sup>22</sup>);
  - The Solent Waders and Brent Goose Strategy (Solent Waders and Brent Goose Steering Group, 2020<sup>23</sup>) and associated Solent Waders and Brent Goose Strategy – Guidance on Mitigation and Off-Setting Requirements (SWBGS Steering Group, 2018<sup>24</sup>); and
  - The latest tools and guidance issued by Natural England to enable nutrient neutrality for development within the Solent catchment, as contained within Nutrient Budget Calculator Guidance Document (Ricardo Energy and Environment, 2022<sup>25</sup>) and associated tools and documents.

Together, and where relevant, these mitigation schemes require:

- The provision of financial contributions towards strategic access and visitor management and monitoring and / or the provision of on or off-site alternative recreational greenspace; and
- The provision of measures to mitigate for increased nutrient burdens within the Solent catchment (including, for example, offsetting against the existing land use on-site, extant permissions or other land controlled by the applicant, bespoke measures, such as Sustainable Urban Drainable Systems (SUDS), interception or wetland creation, and / or financial contributions to strategic nutrient neutrality measures); and, where relevant

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<sup>22</sup> Bird Aware Solent (2017): Solent Recreation Mitigation Strategy. Accessed: [https://birdaware.org/solent/wp-content/uploads/sites/2/2021/10/Solent\\_Recreation\\_Mitigation\\_Strategy.pdf](https://birdaware.org/solent/wp-content/uploads/sites/2/2021/10/Solent_Recreation_Mitigation_Strategy.pdf)

<sup>23</sup> Solent Waders and Brent Goose Steering Group (2020): Solent Waders and Brent Goose Strategy. Accessed: <https://solentwbgs.files.wordpress.com/2021/03/solent-waders-brent-goose-strategy-2020.pdf>

<sup>24</sup> SWBGS Steering Group (2018): Solent Waders and Brent Goose Strategy – Guidance on Mitigation and Off-Setting Requirements. Accessed: <https://solentwbgs.files.wordpress.com/2021/03/swbgs-mitigation-guidance-oct-2018.pdf>

<sup>25</sup> Ricardo Energy and Environment (2022), on behalf of Natural England: Nutrient Budget Calculator Guidance Document – Guidance for Completion of a Nutrient Budget using the Nutrient Budget Calculator Tool. Accessed: [https://www.newforest.gov.uk/article/2714/Nutrient-neutral-development#Achieving\\_nutrient\\_Neutrality](https://www.newforest.gov.uk/article/2714/Nutrient-neutral-development#Achieving_nutrient_Neutrality)

- The provision of alternative, managed 'Functionally Linked Land' and / or the provision of financial contributions towards management and enhancement of the wider wader and brent goose ecological network.

Nationally and Locally Designated Areas for Nature Conservation:

24. All development should seek to avoid direct and indirect effects on nationally and locally designated areas for nature conservation. As such, they are a significant constraint that are likely to limit development within the borough of Havant.
25. Given that the majority of these designations largely overlap the international designations within Havant, it is considered likely that measures required to suitably mitigate for adverse effects on the internationally designated areas for nature conservation may also be used to mitigate against adverse effects on nationally and locally designated sites.
26. However, where nationally and locally designated areas for nature conservation are located outside the footprint of the internationally designated areas, and/or where the nationally and locally designated area supports features outside of the international designation criteria, there will be a requirement to demonstrate the implementation of the mitigation hierarchy through the local plan process and/or through consideration in the planning process (i.e., avoidance of impacts, minimisation of impacts where unavoidable, compensation of impacts where unavoidable and enhancement).

Non-Statutory Designated Areas for Nature Conservation, Ancient Woodland and Priority Habitats:

27. All development should seek to avoid direct and indirect effects on non-statutory designated areas for nature conservation, ancient woodland and priority habitats with such habitats usually protected by National and Local Plan Policy and the "Biodiversity Duty" of Local Authorities. As such, they are a constraint that may limit development within the borough of Havant.
28. Where these overlap the international designations, it is considered likely that measures required to suitably mitigate for adverse effects on the internationally designated areas for nature conservation may also be used to mitigate against adverse effects on non-statutory designated areas for nature conservation, ancient woodland and priority habitats. However, where non-statutory designated areas for nature conservation, ancient woodland and priority habitats are located outside the footprint of the internationally designated areas and/or where these support features outside of the international designation criteria, there will be a requirement to demonstrate the implementation of the mitigation hierarchy through the local plan process and/or through consideration in the planning process (i.e., avoidance of impacts, minimisation of impacts where unavoidable, compensation of impacts where unavoidable and enhancement).

Biodiversity Net Gain:

29. The Environment Act 2021 received Royal Assent on 9th November 2021 and includes a regulation to make provision for 'biodiversity net gain' a condition of planning permission in England. The Environment Act 2021 and the requirement for mandatory biodiversity net gain will become a legal requirement when the Secretary of State appoints a

Regulation to do so, likely following a two year 'transition period' after the Environment Act 2021 came into force, i.e., from November 2023.

30. In addition, the requirement to have regard for the conservation of biodiversity and deliver net gain in biodiversity is outlined within Section 40 of the Natural Environment and Rural Communities (NERC) Act, 2006 and the NPPF, 2021.
31. Consideration will therefore need to be made as to where and how within the borough of Havant land may be set aside for the delivery of biodiversity net gain through off-setting ("Biodiversity Gain Sites"), where this cannot be achieved within the footprint of a development. The Ecological Network Mapping provided by HBIC/HBC is understood to likely form the basis for subsequent identification of a Nature Recovery Network / Biodiversity Opportunity Areas which should be used to target the delivery of biodiversity net gain off-setting within a cohesive and well-managed network across the borough. There should also be consideration of the potential for delivery of Biodiversity Net Gain within urban areas, in addition to delivery of such measures outside the existing urban/suburban areas. A review of the opportunities for Biodiversity Gain Sites within HBC landholdings has the potential to contribute to the Nature Recovery Network, with funding for these secured through development within HBC. It should be noted that government have released initial guidance on the acceptability (or otherwise) of the stacking of BNG with other ecological mitigation requirements<sup>26</sup>; that is, the delivery of multiple mitigation within the same parcel of land. It appears that stacking of some mitigation is considered acceptable; however, it is anticipated that further guidance and clarification on the stacking point will be issued between now and the anticipated commencement of mandatory BNG. Any limitations on stacking has the potential to reduce the potential value of land as a Biodiversity Gain Site.

Bechstein's Consultation Zone.

32. Whilst the presence of the Bechstein Consultation Zone (3km buffer from known roosts) does not preclude development, it is indicative of where consideration should be given to greater baseline survey effort to determine if the Site provides a supporting role to the Bechstein population which may shape the nature and form of development. The area most affected by the Bechstein's Consultation Zone is associated with woodland areas to the north of the Borough.

## Conclusions

33. In conclusion, Havant is highly constrained from an ecological perspective due to the relatively small size of the borough and the presence of internationally and nationally designated areas for nature conservation associated with the Solent and its harbours; land identified within the Solent Wader and Brent Goose Strategy as being important to maintaining the integrity of the Solent designated areas, and buffer zones associated with these areas, within which ecological mitigation is required to enable development. Locally designated areas for nature conservation are also present within Havant, as well as

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<sup>26</sup> <https://www.gov.uk/guidance/what-you-can-count-towards-a-developments-biodiversity-net-gain-bng>

parcels of ancient woodland, priority habitat and areas within 3km of Bechstein's bat roosts, for which further mitigation considerations to enable development are required. Furthermore, given the forthcoming requirement for mandatory biodiversity net gain, areas of land beyond those set aside for development will also need to be identified, within which the delivery of off-site biodiversity compensation and enhancement may be delivered, where this cannot be achieved within the footprint of a development.

Consideration of the suitability of stacking of the various mitigation requirements will also be relevant to the delivery of Biodiversity Net Gain for future development. It is clear from the mapping and the description of the ecological constraints that the nature and extent of the ecological features considered within this note provides a significant and limiting factor to future development within Havant Borough.

34. Comparatively, Portsmouth, located to the west of Havant, is subject to many of the same or similar constraints as Havant, with a high relative proportion of land under designation or otherwise affected by the requirement for strategic mitigation, along with the already high proportion of existing development, such that open space within which to accommodate new development, or mitigation, is limited.
35. The remaining boroughs (Chichester, Winchester and East Hampshire), whilst also supporting designated areas for nature conservation and other ecological features, are substantially larger, with a greater availability of open space apparent, which may be more readily available for the provision of new development or mitigation, although it is also acknowledged that these boroughs may be subject to other constraints outside the ecological considerations considered in this note.