



**Havant**  
BOROUGH COUNCIL

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# Local Plan Self Assessment: Soundness

September 2021

Havant Borough Local Plan



# Legal Compliance Checklist

Purpose of this paper	To show that the Havant Borough Local Plan (HBLP) is sound in accordance with the National Planning Policy Framework before is submitted for Examination by an independent Inspector.
Why?	Local plans are examined to assess whether they are 'sound' according to the tests set out in Paragraph 35 of the NPPF.
Objectives	To demonstrate that the Local Plan is sound

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# 1. Introduction

- 1.1 The matters which are tested at examination are whether a Local Plan is legally compliant and 'sound'. The Planning Inspectorate strongly urges councils to conduct a self-assessment before submitting a plan for examination.
- 1.2 This document provides the evidence to support Havant Borough Council's assertion that the plan should be found 'sound'. A separate self-assessment demonstrates legal compliance.

## The Checklist

- 1.3 Following publication of the National Planning Policy Framework in 2012, the Planning Advisory Service (PAS) prepared a toolkit to help councils check local plans for legal compliance and soundness. That toolkit has not been updated for the 2021 NPPF<sup>1</sup>. The checklist in this document has therefore been prepared by Havant Borough Council.
- 1.4 While it is acknowledged that the planning system is one of development management, where policy making and decisions on planning applications are on continuous, fully integrated process, this self-assessment focuses on those parts of the NPPF which specifically deal with plan making. Where a section or paragraph refers specifically to decision making, it has not been assessed as part of this particular assessment.
- 1.5 The tables in section 2 of this report lists the paragraph of the NPPF and the overview of the requirement in that paragraph. The full NPPF text is not reproduced in all cases, but is limited to the headline requirement. For the full guidance, readers may wish to consult the NPPF alongside this document.
- 1.6 The table sets out the council's assessment of how each requirement has been met in the production of the Havant Borough Local Plan. Policy and paragraph numbers refer to the Pre-Submission Plan (January 2019). Where evidence of meeting an NPPF requirement is provided in another document it is signposted. Overall, the table provides the evidence to show that the local plan is sound.

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<sup>1</sup> National Planning Policy Framework: [www.gov.uk/government/publications/national-planning-policy-framework--2](https://www.gov.uk/government/publications/national-planning-policy-framework--2)

## 2. Soundness Checklist: Plan-Making

NPPF Paragraphs 15-19: The Plan-making framework		
NPPF Paragraph	Requirement	Evidence
15	Plans should provide a positive vision for the future of each area	Section 2 of the plan sets out a clear and positive vision of what Havant will be like at the end of the plan period, together with a delivery strategy on how this will be achieved
15	Plans should provide a framework for addressing housing needs and other economic, social and environmental priorities;	The whole plan provides the framework for addressing housing needs and other economic, social and environmental priorities. The overview of the strategy is established through strategic policy DR1 'Delivery of Sustainable Development'.
15	Plans should provide a platform for local people to shape their surroundings.	Local people have been involved in the stages of plan preparation (see <a href="#">Consultation Statement</a> ).
16a	Plans should be prepared with the objective of contributing to the achievement of sustainable development	The preparation of the plan has been guided by the desire to achieve sustainable development. Policy DR1 'Delivery of Sustainable Development' sets the overarching direction. <a href="#">Sustainability Appraisal</a> has informed the content of the plan. The development management in the policies cover the spectrum of economic, social and environmental needs.
16b	Plans should be prepared positively, in a way that is aspirational but deliverable;	Policy DR1 'Delivery of Sustainable Development' is based on this principle. Only sites which are considered to be deliverable have been included in the plan. Policies with developer requirements have been tested through the <a href="#">Local Plan and CIL Viability Assessment</a> .
16c	Plans should be shaped by early, proportionate and effective engagement between plan makers and communities, local organisations, businesses,	Engagement with communities, local organisations, businesses, infrastructure providers and operators and statutory consultees is documented in: <a href="#">The Consultation Statement</a> <a href="#">The Duty to Cooperate Statement</a>

	infrastructure providers and operators and statutory consultees.	<b>Statements of Common Ground</b> <b>The Infrastructure Delivery Plan</b>
16d	Plans should contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;	Multiple stages of review, including by officers not involved in drafting, council members and external partners such as statutory consultees allowed for detailed questioning and examination of draft policies to ensure they are clear and unambiguous.
16e	Plans should be accessible through the use of digital tools to assist public involvement and policy presentation	The draft plan and full evidence base are available on the council's website <a href="http://www.havant.gov.uk/localplan">www.havant.gov.uk/localplan</a> , and were made available here during consultation periods. The Policies map will also be available as an interactive tool once the plan is adopted.
16f	Plans should serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in the NPPF, where relevant).	The HBLP will replace all adopted planning policies for the local area. As required by test of soundness d (see below) the plan takes cues from the policies in the NPPF and applies them to the local circumstances, rather than duplicating them.
17	The development plan must include strategic policies to address each local planning authority's priorities for the development and use of land in its area	The plan includes strategic policies to address Havant's priorities for the development and use of land in its area (see table on Strategic Policies below).
18	Policies to address non-strategic matters should be included in local plans that contain both strategic and non-strategic policies, and/or in local or neighbourhood plans that contain just non-strategic policies.	The plan includes non-strategic policies (see table on non-strategic policies below). The <b>Emsworth Neighbourhood Plan</b> also contains non-strategic policies.
19	The development plan for an area comprises the combination of strategic and nonstrategic policies which are in force at a particular time.	The Plan will replace the <b>Havant Core Strategy (2011)</b> and the <b>Site Allocation Plan (2014)</b> . Together with the <b>Hampshire Minerals and Waste Plan (2013)</b> and any <b>Neighbourhood Plans</b> , the Plan will form the development plan for the area, once adopted.

## NPPF Paragraphs 20-27: Strategic Policies & Maintaining Effective Cooperation

NPPF Paragraph	Requirement	Evidence
20	Strategic policies should set out an overall strategy for the pattern, scale and design quality of places.	The overall strategy for the pattern and scale of development is established through strategic policies DR1 'Delivery of Sustainable Development' and DR2 'Regeneration', supplemented by a suite of policies to guide the quality of development.
20a	Strategic policies should make sufficient provision for housing (including affordable housing), employment, retail, leisure and other commercial development	Policy DR1 'Delivery of Sustainable Development' sets out how the plan will meet the borough's needs for housing and employment / commercial development. Policies are also included for each town centre (incl retail, leisure, commercial and residential uses), tourism (policy C2) and the regeneration of Hayling Island (policy KP3), and for sports and recreation (policy E11).
20b	Strategic policies should make sufficient provision for infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);	Policy IN1 'Effective Provision of Infrastructure' and IN2 'Improving Transport Infrastructure' cover infrastructure provision. A specific policies safeguards land for the Havant Thicket Reservoir and Pipeline – a key project to secure water supply for the sub-region (KP9). These policies are backed up by the <a href="#">Infrastructure Delivery Plan</a> and the local <a href="#">Community Infrastructure Levy</a> .
20c	Strategic policies should make sufficient provision for community facilities (such as health, education and cultural infrastructure)	Policy IN1 'Effective Provision of Infrastructure' covers infrastructure provision. This is backed up by the <a href="#">Infrastructure Delivery Plan</a> and the local <a href="#">Community Infrastructure Levy</a> . In addition, development requirements for individual sites, in particular key sites such as Southleigh (KP5) and Leigh Park (KP4) set out the need for on-site provision of community facilities.
20d	Strategic policies should make sufficient provision for conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.	The 'Environment' policies in the plan (prefixed with 'E') make provision for conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation. These policies have been developed in partnership with the relevant statutory bodies, such as Historic England, Natural England and the Environment Agency (see <a href="#">Statements of Common Ground</a> ).

21	<p>Plans should make explicit which policies are strategic policies*.</p> <p>These should be limited to those necessary to address the strategic priorities of the area (and any relevant cross-boundary issues), to provide a clear starting point for any nonstrategic policies that are needed. Strategic policies should not extend to detailed matters that are more appropriately dealt with through neighbourhood plans or other non-strategic policies</p> <p>*Where a single local plan is prepared the non-strategic policies should be clearly distinguished from the strategic policies.</p>	<p>Appendix 2 of the HBLP sets out the list of Strategic Policies</p>
22	<p>Strategic policies should look ahead over a minimum 15 year period from adoption to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure.</p>	<p>The plan period is to 2037. The Plan should be adopted in 2021.</p>
22	<p>Where larger scale developments such as new settlements and significant extension to existing villages or town form part of the strategy for the area policies should be set within a vision that looks further ahead (at least 30 years) to take into account the likely timescales for delivery.</p>	<p>Southleigh (KP5) forms a significant urban extension to existing settlements in the Borough. The Council considers that, whilst the Local Plan, its evidence and this allocation was prepared prior to this national policy being adopted, it already complies. The Plan allocates Southleigh for the full capacity of the site, fully acknowledging that its implementation will stretch beyond the plan period. The impact in terms of infrastructure in particular is assessed on the full quantum of development proposed.</p> <p>Nonetheless, Paragraph 221, within Annex 1, sets out that paragraph 22 of the new NPPF only applies to plans which have not reached the Regulation 19 stage at the date of publication (20 July 2021). As such, the Havant Borough Local Plan qualifies for the transitional arrangements.</p>
23	<p>Broad locations for development should be indicated on a key diagram, and land use designations and allocations identified on a policies map.</p>	<p>A Key Diagram is included in the plan as Figure 3. The council has also produced a policies map identifying land use designations and allocations, which sits alongside the plan.</p>
23	<p>Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This</p>	<p>The overall strategy for bringing forward land for development is established through strategic policies DR1 'Delivery of Sustainable Development' and DR2 'Regeneration'. A Delivery Strategy is also set out (Chapter 2 of the plan). These are supported by an extensive evidence base on deliverability including: Strategic Housing Land Availability Assessment (SHLAA), Five year supply update, Housing</p>

	should include planning for and allocating sufficient sites to deliver the strategic priorities of the area.	constraints and supply analysis, Residential density evidence paper, summary of allocation methodology, windfall/unidentified housing development paper, Employment Land Review; <a href="#">Opportunity Havant: A regeneration Strategy for Havant Borough</a> ; Southleigh Masterplan; Local Plan and CIL Viability Study.
24-27	Maintaining effective cooperation	Please see the Council's 'Duty to Cooperate Statement'



NPPF Paragraphs 28-30 and 34: Non-Strategic Policies and Development Contributions		
NPPF Paragraph	Requirement	Evidence
28	<p>Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development.</p> <p>This can include allocating sites, the provision of infrastructure and community facilities at a local level, establishing design principles, conserving and enhancing the natural and historic environment and setting out other development management policies.</p>	<p>The plan contains an extensive suite of development allocations, and policies guiding the quality of housing and commercial development, and mitigating the effects of all types of development.</p>
29-30	[Relate to Neighbourhood Plans]	<p>It is the decision of local communities whether they wish to prepare neighbourhood plans. HBC will provide support to groups who wish to prepare a plan. The Emsworth Neighbourhood Plan is the only neighbourhood plan in the Havant area, and was submitted to the Council in April 2019. Once made, it will form part of the development plan.</p>
34	<p>Plans should set out the contributions expected from development.</p> <p>This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan.</p>	<p>Policy H2 sets the expected level of affordable housing; Policies IN1 – IN5, as well as individual development allocations, set out expectations in relation to infrastructure provision, supported by the <a href="#">Infrastructure Delivery Plan</a> and the Council's <a href="#">Community Infrastructure Levy</a>. The <a href="#">CIL Charging Schedule</a> and <a href="#">Developer Contributions Guide</a> have been updated alongside the Local Plan. Some environmental policies further set out expected contributions to specific items, to mitigate the impacts of development (eg E16 Solent Special Protection Areas; E19 Managing Flood Risk in New Development; EX1 Water Quality Impact on the Solent European Sites and EX2 Warblington Farm). Policies with developer requirements have been tested through the <a href="#">Local Plan and CIL Viability Assessment</a>.</p>

## NPPF Paragraphs 31-33: Preparing and Reviewing Plans

NPPF Paragraph	Requirement	Evidence
31	<p>The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.</p>	<p>An extensive suite of evidence has been prepared and is available at <a href="http://www.havant.gov.uk/localplan/evidence-base">www.havant.gov.uk/localplan/evidence-base</a></p>
32	<p>Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered).</p>	<p>Sustainability Appraisal has accompanied and informed each stage of plan preparation. The SA for each stage of the plan is available at <a href="https://www.havant.gov.uk/localplan/regulatory-requirements">https://www.havant.gov.uk/localplan/regulatory-requirements</a>. The <b>summary of allocation methodology</b> also shows how SA has been used to guide decisions on allocations of land for development.</p>
33	<p>Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy. Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future.</p>	<p>The plan includes a section setting out the requirements for Monitoring and Review (see Chapter 1 of the plan). This commits to a review of the plan within 5 years, or a partial review if appropriate. The Annual Monitoring Report will be used to assess on an annual basis whether the Local Plan remains up to date or whether a review is necessary. This will take into account the performance of the Havant Borough Local Plan. It will also consider any changes to national planning policy, regulatory changes and new strategies from key partners.</p>

## NPPF Paragraphs 35-37: Examining Plans: The Tests of Soundness

NPPF Paragraph	Requirement	Evidence
35	Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:	See 35 a-d below
35a	<p>Positively prepared: providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs*; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development</p> <p>*Where this relates to housing, such needs should be assessed using a clear and justified method, as set out in paragraph 60 of this Framework.</p>	<p>The overall strategy for bringing forward land for development is established through strategic policies DR1 'Delivery of Sustainable Development' and DR2 'Regeneration'. A Delivery Strategy is also set out (Chapter 2 of the plan). These are supported by an extensive evidence base on deliverability and show the council's commitment, and planned actions, to meet Havant's objectively assessed needs. Meeting the needs of other areas has also been considered during the plan preparation. See <a href="#">Duty to Cooperate Statement</a> and <a href="#">Statements of Common Ground with neighbouring authorities and PfSH</a></p>
35b	<p>Justified: an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence</p>	<p>The council considers the plan put forward to be the most appropriate to meet the development needs of the borough and achieve sustainable development. This is supported by extensive evidence <a href="http://www.havant.gov.uk/localplan/evidence-base">www.havant.gov.uk/localplan/evidence-base</a>. Alternatives were tested through sustainability appraisal <a href="http://www.havant.gov.uk/localplan/regulatory-requirements">www.havant.gov.uk/localplan/regulatory-requirements</a>.</p>
35c	<p>Effective: deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground</p>	<p>See <a href="#">Duty to Cooperate Statement</a> and <a href="#">Statements of Common Ground with neighbouring authorities and PfSH</a></p>
35d	<p>Consistent with national policy: enabling the delivery of sustainable development in accordance with the policies in this Framework.</p>	See following tables

## NPPF Paragraphs 59-79 Delivering a sufficient supply of homes

NPPF Paragraph	Requirement	Evidence
61	<p>To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance.</p> <p>unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. 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.</p>	<p>Table 2 in the Plan takes as its starting point the objectively assessed housing need from 2016 to 2037, using the standard methodology (9,260 dwellings). It shows that there are sufficient sites to provide 10,597 net new homes across Havant Borough from 2016 up to 2037. This will address the objectively assessed need for housing and provides a buffer of 154 homes. <a href="#">See also Duty to Cooperate Statement and Statements of Common Ground with PUSH and neighbouring authorities.</a></p>
62	<p>The size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies</p> <p>(including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).</p>	<p>A number of assessments assessing the need for different sizes, types and tenures have informed the plan:</p> <p><a href="#">PUSH Objectively Assessed Housing Needs Update</a>  <a href="#">Gypsy, Traveller and Travelling Showpeople Accommodation Assessment</a>  <a href="#">Havant Borough Specialist Housing Analysis</a>  <a href="#">Residential Density Evidence Paper</a></p> <p>These have informed, in particular, policies: H1 High quality new homes; H2 Affordable Housing; H3 Housing Density; H4 Housing mix; H5 Retirement and Specialist Housing; H6 Residential Annexes; H7 Gypsies, Travellers and Travelling Showpeople.</p>
	<p>Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required,</p> <p>and expect it to be met on-site unless: a) off-site provision or an appropriate financial contribution in lieu can be robustly justified; and b) the agreed approach contributes to the objective of creating mixed and balanced communities.</p>	<p>Policy H2 sets out what is expected of developers in terms of the provision of affordable housing. It specifies that 10% of the total number of new homes (gross) are for shared ownership (as part of the affordable housing). The balance of the affordable requirement should be rented; It further makes clear that the affordable housing provision is provided on site, although on off-site contributions will be considered in exceptional circumstances. It also requires the development contributes towards mixed and balanced communities with a range, type and</p>

		size of affordable housing which reflects the latest evidence of locally identified needs. Affordable housing should be evenly spread across the site and integrated with, and indistinguishable from the rest of the development
64	Provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer). To support the re-use of brownfield land, where vacant buildings are being reused or redeveloped, any affordable housing contribution due should be reduced by a proportionate amount.	Policy H2 seeks affordable housing provision on residential developments resulting in a net gain of 10 or more dwellings.
65	Where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the homes total number of homes to be available for affordable home ownership unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups. Exemptions to this 10% requirement should also be made where the site or proposed development: a) provides solely for Build to Rent homes; b) provides specialist accommodation for a group of people with specific needs (such as purpose-built accommodation for the elderly or students); c) is proposed to be developed by people who wish to build or commission their own homes; or d) is exclusively for affordable housing, an entry-level exception site or a rural exception site.	Policy H2 sets out what is expected of developers in terms of the provision of affordable housing. It specifies that 10% of the total number of new homes (gross) are for shared ownership (as part of the affordable housing). The policy does not set out the specific exceptions listed in a) to d) of Paragraph 64 of the NPPF. These exceptions are clear provisions in the NPPF, which do not need to be duplicated in the plan, in line with paragraph 16f of the NPPF.
66-67	Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations.	Table 2 in the Plan takes as its starting point the objectively assessed housing need from 2016 to 2037, using the standard methodology: 10,443 dwellings. It shows that there are sufficient sites to provide 10,597 net new homes across Havant Borough from 2016 up to 2037. This will address the objectively assessed need for housing and provides a buffer of 154 homes. Requirements have not been set for sub-areas, as the only designated neighbourhood area in existence during the drafting of the Local Plan did not wish to make their own development allocations, preferring to leave this to the Borough Council. The SHLAA does, however, clearly show available sites for sub-areas of the Borough.

68	<p>Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment.</p> <p>From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:</p> <ul style="list-style-type: none"> <li>a) specific, deliverable sites for years one to five of the plan period; and</li> <li>b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.</li> </ul>	<p>Havant's <a href="#">Strategic Housing Land Availability Assessment (SHLAA)</a> is updated regularly and the most up to date version has informed the plan at each stage. The <a href="#">Summary of allocation methodology</a> sets out how the SHLAA has informed site allocations taken forward into the plan.</p>
69	<p>Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should:</p> <ul style="list-style-type: none"> <li>a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved</li> <li>b) use tools such as area-wide design assessments and Local Development Orders to help bring small and medium sized sites forward</li> <li>c) support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes; and</li> <li>d) work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.</li> </ul>	<p>The plan contains allocations for a good range of site sizes, from small (under 1 ha) to strategic size. In addition, there are a number of small site small sites within larger regeneration area, such as the town centres and the seafront. <a href="#">A brownfield register</a> has been published together with the <a href="#">Strategic Housing Land Availability Assessment</a> and a <a href="#">Windfall paper</a>, which analyses the past supply of small windfall sites. In addition, policy DR1, supported by national policy, is clear that the Council overtly supports the development and intensification of brownfield sites to provide as much of the Borough's development needs as possible; This includes both allocated and non-allocated sites.</p>
71	<p>Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.</p>	<p>Table 2, and paragraph 2.48 in the Plan set out what allowance the Council has made for windfall development. This is supported by a paper on <a href="#">Windfall/Unidentified Housing Development</a>, which has had regard to historic windfall delivery rates and expected future trends.</p>

72	Local planning authorities should support the development of entry-level exception sites, suitable for first time buyers (or those looking to rent their first home), unless the need for such homes is already being met within the authority's area. These sites should be on land which is not already allocated for housing and should: a) comprise of entry-level homes that offer one or more types of affordable housing as defined in Annex 2 of this Framework; and b) be adjacent to existing settlements, proportionate in size to them, not compromise the protection given to areas or assets of particular importance in this Framework, and comply with any local design policies and standards.	This is a matter for the decision-making stage. How the council will consider applications in relation to this matter is set out in paragraph 5.34. Entry-level exception sites will be judged against the plan as a whole and the provisions of the NPPF.
73	The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes). Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way. In doing so, they should:	The plan allocated the strategic site at Southleigh under Policy KP5. This has the potential to deliver about 2,100 homes, together with infrastructure to support it. The allocation has been informed by a <a href="#">Masterplan</a> , which in turn was created with intensive community input ( <a href="#">see Southleigh Masterplan Consultation Summary</a> )
73a	a) consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains;	The Council has considered planned infrastructure investments through the IDP, as well as the development needs of the area, and has used this information to develop the <a href="#">Southleigh Masterplan</a> and the development elements and requirements set out in policy KP5.
73b	b) ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;	Masterplanning has sought to ensure that the new development at Southleigh will be a community in its own right, with access to local facilities. However, with just 2,100 dwellings, it is not possible to plan it to be self-sufficient, and therefore links to the adjoining settlements of Havant (Denvilles), and Emsworth and beyond are key elements of the masterplan. (see details in Policy KP5 and the <a href="#">Southleigh Masterplan</a> )
73c	c) set clear expectations for the quality of the places to be created and how this can be maintained (such as by	<a href="#">The Southleigh Masterplan</a> and policy KP5 set out clearly the council's expectation.



	following Garden City principles), and ensure that appropriate tools such as masterplans and design guides or codes are used to secure a variety of well-designed and beautiful homes to meet the needs of different groups in the community;	
73d	d) make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations)	Although the site is capable of delivering around 2,100 homes, around half of those are expected to be delivered outside of the plan period, so are not relied upon in demonstrating how the objectively assessed need will be met (see Table 2 in the plan).
73e	e) consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size.	The community masterplanning workshops (see <a href="#">Southleigh Masterplan Consultation Summary</a> ) made it clear that existing residents desired separation of the new community from existing areas, and substantial areas of open space have therefore been included in the masterplan. However, formal Green Belt designation would not be appropriate for the size and nature of the site.
74	Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old. The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period)	A trajectory has not been included in the plan, as the information will be out of date very quickly. However, the trajectory is published <a href="#">Annual Monitoring Report</a> . The Council will also update its 5 year supply position at least once a year.
74-77	Relate to 'Maintaining supply and delivery' through decision making	n/a
78-80	Relate to 'Rural Housing'	The Council does not consider any part of the Borough to be 'rural'



## NPPF Paragraphs 80-84: Building a strong, competitive economy

NPPF Paragraph	Requirement	Evidence
81	Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.	Policy DR1 Delivery of Sustainable Development sets out how employment floorspaces needs are being planned for through the Local Plan, and confirms the Council's commitment to an 'open for business' approach. The Council also acknowledges that Havant sits in the prosperous South East but that many areas of the borough have not seen investment in renewal for some years. Policy DR2 sets out the council's regeneration ambitions, including the need to boost skills levels. This is backed up by ambitious policies for the renewal of town centres (Policies KP1, KP2, KP4), key employment sites (Policies KP6 Langstone Technology Park and KP7 Dunsbury Park), as well as the protection of existing employment sites (Policy C1)
82a	Planning policies should set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;	The vision set out in Chapter 2 of the plan includes the ambition for Havant that by the end of the plan period people will have access to high quality new employment, education and training opportunities to boost economic growth and address the skills gap; and that new and refurbished business development will consolidate and reinforce the Borough's reputation as a centre for high technology and advanced manufacturing and as an excellent place to start a new business. (see in particular paragraphs 2.14-2.16; and 2.20-2.22).
82b	Planning policies should set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;	Policy DR1 Delivery of Sustainable Development sets out how employment floorspaces needs are being planned for through the Local Plan. As well as ambitious policies for the renewal of town centres (Policies KP1, KP2, KP4), the plan sets out plans for the borough's key employment sites with investment opportunities (Policies KP6 Langstone Technology Park and KP7 Dunsbury Park), as well as the protection of existing employment sites (Policy C1).
82c	Planning policies should seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and	The Council acknowledges that Havant many areas of the borough have not seen investment in renewal for some years. Policy DR2 sets out the council's strategy for regeneration. Policy IN1 sets out the planned approach to infrastructure provision,

		and a suite of environmental and housing policies seek to lift the quality of development.
82d	Planning policies should be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.	Policies supporting economic activity have been drafted to be flexible to be able to deal with changing circumstances. For example, policies seeking to retain particular uses allow for the consideration of market signals at the time of an application. The approach to town centres, and the mix of appropriate uses, is also much more flexible than in previous plans, acknowledging the changes that are likely to need to take place as the retail element of town centres reduces. The words 'flexible' / 'flexibility' and 'market signals' occur around 30 times in the plan.
83	Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.	A particular sector recognised by the Solent LEP as important to the local economy is that marine sector. This is recognised and taken account of specifically in a number of policies in the plan (E4 Development on the Coast; C1 Protection of existing employment sites; KP3 Hayling Island); Havant has also historically been a hub for digital technology firms, in particular at Langstone Technology Park, where this strength can be built on in the future (KP6 Langstone Technology Park)
84-85	'Supporting a prosperous rural economy'	The Council does not consider any part of the Borough to be 'rural'

## NPPF Paragraphs 85-90: Ensuring the vitality of town centres

NPPF Paragraph	Requirement	Evidence
86	Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation.	Town Centres form a key strand of the council's development and regeneration strategy in the local plan. See further detail below.
86a	Planning policies should define a network and hierarchy of town centres and promote their long-term vitality and viability – by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters	Through the Local Plan, the council has defined a network of town centres (see Table 1 in the plan), together with policies for each to guide their future development and change (see Policies KP1 Havant Town Centre, KP2 Waterlooville Town Centre, KP4 Leigh Park District Centre, C3 Cowplain District Centre; C4 Emsworth District Centre; C5 Mengham District Centre, C6 Local Centres, local shops and services)
86b	Planning policies should define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations, as part of a positive strategy for the future of each centre	Policies KP1 Havant Town Centre, KP2 Waterlooville Town Centre, KP4 Leigh Park District Centre, C3 Cowplain District Centre; C4 Emsworth District Centre; C5 Mengham District Centre, C6 Local Centres, local shops and services and the Policies map define the extent of the town centres, as well as the primary shopping area for each, together with the uses which the council considers acceptable in each.
86c	Planning policies should retain and enhance existing markets and, where appropriate, re-introduce or create new ones	Havant Town Centre, Waterlooville Town Centre, Emsworth District Centre are the centres in the borough capable of supporting markets. Policies KP1, KP2 and C4 for these centres express support for the retention, support and enhancement of the successful operation of street markets and other public realm events.
86d	Planning policies should allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead. Meeting anticipated needs for retail, leisure, office and other main town centre uses over this period should not be compromised by limited site availability, so	The <a href="#">Havant and Waterlooville Town Centres Study</a> includes a review of trends in retailing and town centres, a health check and a boundary review for the borough's two main town centres. Policies KP1 and KP2 of the Plan, together with the council's <a href="#">Regeneration Strategy</a> , set out a flexible framework for these centres, which includes identifying sites and areas for the different uses needed for them to thrive into the future.

	town centre boundaries should be kept under review where necessary.	
86e	Planning policies should, where suitable and viable town centre sites are not available for main town centre uses, allocate appropriate edge of centre sites that are well connected to the town centre. If sufficient edge of centre sites cannot be identified, policies should explain how identified needs can be met in other accessible locations that are well connected to the town centre;	Not applicable
86f	Planning policies should recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.	The town centre policies in the plan clearly recognise that residential development can make a valuable contribution to their vitality. Residential uses are encouraged at upper floors in all the borough's town centres, while for the larger centres (KP1 Havant Town Centre, KP2 Waterlooville Town Centre), where the council is leading on an ambitious regeneration strategy, more extensive residential development is promoted (750 and 600 units respectively). <a href="#">See Opportunity Havant: A regeneration Strategy for Havant Borough</a>
87-91	Relate to the Sequential Test in planning applications	n/a, although Policy C6 includes a provision requiring the sequential test for applications for town centre uses outside of designated town centres.

## NPPF Paragraphs 91-101: Promoting healthy and safe communities

NPPF Paragraph	Requirement	Evidence
92	<p>Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:</p> <p>a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;</p> <p>b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of attractive, well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and</p> <p>c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.</p>	<p>The plan includes an overarching Health and Wellbeing policy (E2), and one of the criteria in the <a href="#">Sustainability Appraisal</a> is 'To safeguard and improve community health, safety and wellbeing'. Other policies, which actively seek to promote healthy, inclusive and safe places are:</p> <ul style="list-style-type: none"> <li>• IN3 Transport and Parking in New Development promoting safe and convenient pedestrian and cycle provision</li> <li>• E1 High Quality Design, including a requirement to design out crime and create safe and inclusive communities</li> <li>• E8 and E9 Protecting existing open spaces and requiring new ones respectively</li> <li>• E11 Sports and Recreation promoting healthy lifestyles and physical activity through good quality sports, leisure and recreation facilities</li> <li>• H1 High Quality Homes, promoting minimum size standards for internal and outdoor space</li> <li>• C8 Food, drink and entertainment uses, including restrictions on A5 takeaways</li> </ul>
93	<p>To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:</p> <p>a) plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;</p> <p>b) take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;</p>	<p>The town centre regeneration policies as well as that for Southleigh (KP1-KP5) recognise the importance of shared spaces and local facilities.</p> <p>Policies E8, E11, and C7 include protective measures to guard against the loss of valued community facilities and spaces, while allowing flexibility, for example for uses which have become unviable.</p> <p><a href="#">The Sustainability Appraisal</a> considered the location of potential allocation sites in relation to their access to shops and services.</p>

	<p>c) guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs;</p> <p>d) ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community; and</p> <p>e) ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.</p>	
94	<p>Planning policies and decisions should consider the social, economic and environmental benefits of estate regeneration. Local planning authorities should use their planning powers to help deliver estate regeneration to a high standard.</p>	<p>The major estates in Havant Brough are owned and managed by Portsmouth City Council. It is for that authority to consider its estate regeneration needs, but in preparing the HBLP, the Council worked with PCC to consider how the plan could support regeneration efforts. Allocation H39 Strouden Court reflects the desire to renew an outdated local centre in the Warren Park estate. In Leigh Park, the council is working to regenerate the District Centre. This is reflected in Policy KP4 and the <a href="#">Regeneration Strategy for Havant Borough</a>.</p>
95	<p>It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:</p> <p>a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and</p> <p>b) work with schools promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.</p>	<p>The council has worked closely with Hampshire County Council as Local Education Authority to understand the education needs arising from the proposed quantum and location of development. This is reflected in the <a href="#">Infrastructure Delivery Plan</a> and IN1 Effective Provision of Infrastructure. Effective planning for education is also reflected in relevant development allocations, such as H14 Forty Acres and KP5 Southleigh.</p>
96	<p>To ensure faster delivery of other public service infrastructure such as further education colleges, hospitals and criminal justice accommodation, local planning authorities should also work proactively and positively with promoters, delivery partners and statutory bodies to plan for required facilities and resolve key planning issues before applications are submitted.</p>	<p>Policy IN1 sets out how the Council will work with various infrastructure providers to bring about the strategic infrastructure which the Borough needs. Council planning officers are members of a number of working groups with infrastructure providers and work very closely with key infrastructure providers, such as Hampshire County Council (transport, education and others) and Coastal Partners (coastal defences).</p>

97	<p>Planning policies and decisions should promote public safety and take into account wider security and defence requirements by:</p> <p>a) anticipating and addressing possible malicious threats and natural hazards, especially in locations where large numbers of people are expected to congregate. Policies for relevant areas (such as town centre and regeneration frameworks), and the layout and design of developments, should be informed by the most up-to-date information available from the police and other agencies about the nature of potential threats and their implications. This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security; and</p> <p>b) recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.</p>	<p>The design policy includes a criterion supporting development which ‘Reduces opportunities for crime and anti-social behaviour and contributes to the creation of safe and inclusive communities (E1.c.vii).</p> <p>Policy IN1 safeguards land for a combined Emergency Services Hub (IN1D).</p>
98	<p>Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.</p>	<p>Policies E2 Health and Wellbeing, and E8 Protection of Open Spaces, E11 Sports and Recreation are supported by the:</p> <ul style="list-style-type: none"> <li>• Indoor Built Sport Facilities Strategy</li> <li>• Playing Pitch Strategy</li> <li>• Open Space Strategy</li> <li>• Local Green Spaces and Destination Open Space Review</li> <li>• Biodiversity Strategy</li> </ul>
99	<p>Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:</p> <p>a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or</p>	<p>After completion of the</p> <ul style="list-style-type: none"> <li>• Indoor Built Sport Facilities Strategy</li> <li>• Playing Pitch Strategy</li> <li>• Open Space Strategy</li> <li>• Local Green Spaces and Destination Open Space Review</li> </ul> <p>policies E8 protects existing open spaces, and policy E11 protects sport and recreation facilities.</p>

	b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.	
100	Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.	Policy IN3 Transport and parking in new development includes a provision to require new development to be designed so that any existing public rights of way are safeguarded and where appropriate improved, and new routes provided where appropriate; This is reiterated in individual site allocations. Detailed advice from Hampshire County Council's Rights of Way team allowed specific rights of way to be identified for protection, enhancement or the creation of links.
101	The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period.	The Evidence Paper ' <a href="#">Local Green Spaces and Destination Open Spaces in Havant Borough</a> ' sets out the reasoning and methodology for selecting Local Green Spaces.
102	The Local Green Space designation should only be used where the green space is: a) in reasonably close proximity to the community it serves; b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and c) local in character and is not an extensive tract of land.	The Evidence Paper ' <a href="#">Local Green Spaces and Destination Open Spaces in Havant Borough</a> ' sets out how each of the proposed Local Green Spaces to be protected through Policy E8 meets the criteria in paragraph 100 of the NPPF.
103	Policies for managing development within a Local Green Space should be consistent with those for Green Belts.	There is no Green Belt in Havant Borough



## NPPF Paragraphs 102-111: Promoting Sustainable Transport

NPPF Paragraph	Requirement	Evidence
104	<p>Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:</p> <ul style="list-style-type: none"> <li>a) the potential impacts of development on transport networks can be addressed;</li> <li>b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;</li> <li>c) opportunities to promote walking, cycling and public transport use are identified and pursued;</li> <li>d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and</li> <li>e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places</li> </ul>	<p>A Sustainability Appraisal accompanied each stage of plan preparation. This included a criterion to ‘Improve the efficiency of transport networks by increasing the proportion of travel by sustainable modes, by promoting policies which reduce the need to travel and provide opportunities for walking and cycling’.</p> <p>Early work on the potential strategic sites considered infrastructure needs at a high level, including the potential need for a junction onto the A27; transport and movement were considered in detail during the masterplanning for Southleigh. Proposed development allocations highlight key transport and highways consideration, in consultation with Hampshire County Council. Policies IN2 to IN4 set out the council’s own approach to transport and its expectations of developers. The whole plan is underpinned by a Transport Assessment for the Mainland and a separate, more detailed one for Hayling Island.</p>
105	<p>The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.</p>	<p>The plan relies as heavily as possible on the development of brownfield sites in urban areas, with a focus on the regeneration of, and substantial residential development in, town centres (Policies DR2, KP1, KP2), although it is acknowledged that it would not be possible to meet the area’s development needs on such sites alone. Higher densities are proposed through the plan, with gradations linked to access to services (Policy H3). Access to services has been tested for all proposed allocation sites through Sustainability Appraisal criteria ‘Ensure easy and equitable access to services, facilities and opportunities’ and ‘Improve the efficiency of transport networks by increasing the proportion of travel by sustainable modes, by promoting policies which reduce the need to travel and provide opportunities for walking and cycling’</p>

106a	Planning policies should support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities;	The plan supports a mix of uses across the area. This is true, in particular of town centre policies (KP1, KP2, KP4, C3, C4 and C5). In addition, KP5 Southleigh, sets out the expected delivery of facilities and services to serve the homes on the strategic site. The plan also makes connections between sites, considering, for example, the links between the employment hub at Langstone Technology Park (KP6) and Havant Town Centre.
106b	Planning policies should be prepared with the active involvement of local highways authorities, other transport infrastructure providers and operators and neighbouring councils, so that strategies and investments for supporting sustainable transport and development patterns are aligned;	See <a href="#">Duty to Cooperate Statement</a> and <a href="#">Statements of Common Ground with Hampshire County Council, Highways England, West Sussex County Council</a> , as well as the <a href="#">Infrastructure Delivery Plan</a> .
106c	Planning policies should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development;	The Local Plan safeguards land for a junction onto the A27 to serve the strategic site (policies KP5 and IN2). IN2 also sets out the council's commitment to work with partners to deliver a range of transport improvements.
106d	Planning policies should provide for attractive and well-designed walking and cycling networks with supporting facilities such as secure cycle parking (drawing on Local Cycling and Walking Infrastructure Plans)	Policy IN2 and IN3 set out a number of criteria in relation to this objective – both in terms of future actions by the council and expectations of new development. This is also reflected in E2 'Health & Wellbeing'. In addition, site allocations set out specific requirements for connections through and beyond sites, to connect to existing and future networks.
106e	Planning policies should provide for any large scale transport facilities that need to be located in the area, and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy. In doing so they should take into account whether such development is likely to be a nationally significant infrastructure project and any relevant national policy statements;	The Local Plan safeguards land for a junction onto the A27 to serve the strategic site (policies KP5 and IN2). IN2 also sets out the council's commitment to work with partners to deliver a range of transport improvements.
106f	Relates to general aviation airfields	There are no aviation airfields in Havant Borough
107	If setting local parking standards for residential and non-residential development, policies should take into account: a) the accessibility of the development; b) the type, mix and use of development; c) the availability of and opportunities for public transport; d) local car ownership levels; and e) the need to ensure an	The Local Plan does not set parking standards, other than to require development to make provision for the parking of cars, motor cycles and cycles.

	adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.	
108	Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport (in accordance with chapter 11 of this Framework). In town centres, local authorities should seek to improve the quality of parking so that it is convenient, safe and secure, alongside measures to promote accessibility for pedestrians and cyclists.	The Local Plan does not set parking standards, other than to require development to make provision for the parking of cars, motor cycles and cycles.
109	Planning policies and decisions should recognise the importance of providing adequate overnight lorry parking facilities, taking into account any local shortages, to reduce the risk of parking in locations that lack proper facilities or could cause a nuisance. Proposals for new or expanded distribution centres should make provision for sufficient lorry parking to cater for their anticipated use	Parking standards have been set for different uses, including B8 storage and distribution. These are expected to be met through policy IN4.
110-113	Paragraphs concern transport matters in development applications	n/a

## NPPF Paragraphs 112 - 116: Supporting high quality communications

NPPF Paragraph	Requirement	Evidence
114	Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections. Policies should set out how high quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time; and should prioritise full fibre connections to existing and new developments (as these connections will, in almost all cases, provide the optimum solution).	Policy IN1 supports the delivery of advanced telecommunications (see criteria h and x).
116	Local planning authorities should not impose a ban on new electronic communications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of electronic communications development, or insist on minimum distances between new electronic communications development and existing development. They should ensure that: a) they have evidence to demonstrate that electronic communications infrastructure is not expected to cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest; and b) they have considered the possibility of the construction of new buildings or other structures interfering with broadcast and electronic communications services.	The plan imposes no such ban
115; 117-118	Relate to planning decision making	n/a

## NPPF Paragraphs 117 - 123: Making effective use of land

NPPF Paragraph	Requirement	Evidence
119	Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.	The Plan promotes the effective use of land in meeting the area's development needs, with a strong focus on town centre regeneration, the use of brownfield land and higher densities. See Policies DR2, KP1, KP2, H3.
120a	Planning policies and decisions should encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside	Policies in the plan, in particular development requirements in site allocations policies, require multiple benefits to be delivered alongside development, including creating and/or linking to a network of foot and cycle ways; biodiversity net gain (Policy E14); reduction in flood risk (E19/E20); The word 'enhance' appears in the plan almost 200 times..
120b	Planning policies should recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production	The council has assessed potential development sites, and rejected those which perform valuable other functions, such as for wildlife or recreation; Even within allocated developments sites, some areas are designated not to be developed, for example areas needed for flood storage, ecological mitigation or buffers. A suite of environmental policies sets out criteria for the protection of land valuable for functions other than developments.
120c	Planning policies should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support	The plan relies as heavily as possible on the development of brownfield sites in urban areas, with a focus on the regeneration of, and substantial residential development in, town centres (Policies DR2, KP1, KP2), although it is acknowledged that it would

	appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land	not be possible to meet the area's development needs on such sites alone. Higher densities are proposed to minimise the use of greenfield land (policy H3). Policy E24 sets out the council's approach to contaminated land.
120d	Planning policies should promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure)	The plan supports the re-use or intensification of sites in principle. In particular, it supports the intensification of existing industrial estates and the use of upper floors in town centres for residential and office use (Policies DR1; DR2; KP1, KP2, KP4, C3, C4 and C5). However, it does also set limitations related to design; highways safety and environmental impacts.
120e	Planning policies should support opportunities to use the airspace above existing residential and commercial premises for new homes. In particular, they should allow upward extensions where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene, is well designed (including complying with any local design policies and standards), and can maintain safe access and egress for occupiers	The plan is silent on the use of airspace above existing residential and commercial premises for new homes. However, the policies contained within the plan would allow for such development. In particular, all the town centre policies promote residential use/development on upper floors, including the use of taller landmark buildings in suitable locations (KP1, KP2); The design policy E1 requires development to make optimal use of land, supported my minimum density requirements in policy H3.
121	Local planning authorities, and other plan-making bodies, should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs, including suitable sites on brownfield registers or held in public ownership, using the full range of powers available to them. This should include identifying opportunities to facilitate land assembly, supported where necessary by compulsory purchase powers, where this can help to bring more land forward for meeting development needs and/or secure better development outcomes.	The Local Plan makes clear that the Council will be actively involved in bringing sites forward and where necessary will use compulsory purchase powers (Policies DR1 and DR2). This is particularly pertinent for town centre regeneration projects (Policies KP1 and KP2), which the Council's regeneration team is actively driving (see <a href="#">Regeneration Strategy</a> )
122	Planning policies and decisions need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability. Where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in a plan: a) it should, as part of plan updates, reallocate the land for a more deliverable use that can help to address identified needs (or, if appropriate, deallocate a site which is	The Local Plan contains a commitment to monitoring and review.

	undeveloped); and b) in the interim, prior to updating the plan, applications for alternative uses on the land should be supported, where the proposed use would contribute to meeting an unmet need for development in the area.	
123	Relates to applications for changes of use of land which is currently developed but not allocated for a specific purpose in plans	n/a
124	<p>Planning policies and decisions should support development that makes efficient use of land, taking into account:</p> <ul style="list-style-type: none"> <li>a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;</li> <li>b) local market conditions and viability;</li> <li>c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;</li> <li>d) the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and</li> <li>e) the importance of securing well-designed, attractive and healthy places.</li> </ul>	The design policy E1 requires development to make optimal use of land, supported my minimum density requirements in policy H3. The design of these and other policies, such as on high quality new homes (H1) and housing mix (H4), have taken into account and balanced the matters listed in this paragraph of the NPPF.
125	<p>Area-based character assessments, design guides and codes and masterplans can be used to help ensure that land is used efficiently while also creating beautiful and sustainable places. Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site. In these circumstances:</p> <ul style="list-style-type: none"> <li>a) plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination, and should include the use of minimum density standards for city and town centres and other locations that are well served by public transport. These standards should seek a significant uplift in the average density of residential</li> </ul>	<p>The design policy E1 requires development to make optimal use of land, supported my minimum density requirements in policy H3.</p> <p>Policy E1 also requires development to be well designed. The introductory text has been amended through the Schedule of Proposed Changes (CD27D) to reflect the new NPPF wording.</p>

<p>development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate;</p> <p>b) the use of minimum density standards should also be considered for other parts of the plan area. It may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range; and</p> <p>c) local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).</p>	
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## NPPF Paragraphs 124 - 132: Achieving Well-Designed Places

NPPF Paragraph	Requirement	Evidence
126	The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.	The Local Plan contains a design policy (E1), and an additional policy governing the design of new homes (H1). Supporting text explains the council's expectations of developers at the pre-application stage and the use of Development Consultation Forums and the Design Review Panel.
127	Plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. Design policies should be developed with local communities so they reflect local aspirations, and are grounded in an understanding and evaluation of each area's defining characteristics. Neighbourhood planning groups can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development, both through their own plans and by engaging in the production of the design policy, guidance and codes by local planning authorities and developers.	The Local Plan contains a design policy (E1), and an additional policy governing the design of new homes (H1). In addition, where appropriate, design considerations are set out for each allocation site, and key project area or site. The design considerations for the Southleigh strategic site (KP5) where developed through masterplanning workshops involving the local community.
128	To provide maximum clarity about design expectations at an early stage, all local planning authorities should prepare design guides or codes consistent with the principles set out in the National Design Guide and National Model Design Code, and which reflect local character and design preferences. Design guides and codes	The design considerations for the Southleigh strategic site (KP5) where developed through masterplanning workshops involving the local community. The policy requires any future developer to take that masterplan as a starting point and develop it up into a more detailed masterplan and design guide / code to be developed with the local community and agreed by the council.

	provide a local framework for creating beautiful and distinctive places with a consistent and high quality standard of design. Their geographic coverage, level of detail and degree of prescription should be tailored to the circumstances and scale of change in each place, and should allow a suitable degree of variety.	Please also see commentary regarding paragraph 129 below.
129	Design guides and codes can be prepared at an area-wide, neighbourhood or site specific scale, and to carry weight in decision-making should be produced either as part of a plan or as supplementary planning documents. Landowners and developers may contribute to these exercises but may also choose to prepare design codes in support of a planning application for sites they wish to develop. Whoever prepares them, all guides and codes should be based on effective community engagement and reflect local aspirations for the development of their area, taking into account the guidance contained in the National Design Guide and the National Model Design Code. These national documents should be used to guide decisions on applications in the absence of locally produced design guides or design codes.	<p>The Council considers that design guides and codes are being prepared as Supplementary Planning Documents so that they can contain more detailed information and are able to be updated easily.</p> <p>The Council already has a number of Supplementary Planning Documents (<a href="http://www.havant.gov.uk/planning-policy/supplementary-planning-documents">www.havant.gov.uk/planning-policy/supplementary-planning-documents</a>). With changes to planning policies that the new plan would bring about, updating the Borough Design Guide SPD and others would have been necessary anyway. These are more appropriate to be prepared as a design guide or design code.</p>
130	<p>Planning policies and decisions should ensure that developments:</p> <ul style="list-style-type: none"> <li>a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;</li> <li>b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;</li> <li>c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);</li> <li>d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and</li> </ul>	<p>As well as the design parameters contained within individual allocations, the plan contains a suite of policies to achieve these aims, in particular:</p> <ul style="list-style-type: none"> <li>E1 High Quality Design</li> <li>E2 Health and Wellbeing</li> <li>E3 Landscape and Settlement Boundaries</li> <li>E4 Development on the Coast</li> <li>E5 Chichester Harbour AONB</li> <li>E8 Protection of Open Space</li> <li>E9 Provision of Open Space in New Development</li> <li>E12 Low Carbon Design</li> <li>E13 Historic Environment and Heritage Assets</li> <li>E18 Trees, Hedgerows and Woodland</li> <li>H1 High Quality New Homes</li> <li>H3 Housing Density</li> </ul>

	<p>materials to create attractive, welcoming and distinctive places to live, work and visit;</p> <p>e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and</p> <p>f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.</p>	<p>H4 Housing Mix</p> <p>IN1 Effective Provision of Infrastructure</p> <p>IN5 Future Management and Management Plans</p>
131	<p>Trees make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly planted trees, and that existing trees are retained wherever possible. Applicants and local planning authorities should work with highways officers and tree officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users.</p>	<p>Policy E18 provides protection for existing trees and the expectation that new trees are provided as part of development schemes. This includes a requirement for successful implementation and management of landscape and tree planting schemes.</p> <p>An additional provision has been made to Policy E18, through the Schedule of Proposed Changes (CD27D) to incorporate a requirement for streets in new developments to be tree-lined.</p>
132	<p>Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should work closely with those affected by their proposals to evolve designs that take account of the</p>	<p>The Local Plan contains a design policy (E1), and an additional policy governing the design of new homes (H1). Supporting text explains the council's expectations of developers at the pre-application stage and the use of Development Consultation Forums and the Design Review Panel. In addition, where appropriate, design considerations are set out for each allocation site, and key project area or site. The</p>

	views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.	design considerations for the Southleigh strategic site (KP5) where developed through <b>masterplanning workshops</b> involving the local community.
133	Local planning authorities should ensure that they have access to, and make appropriate use of, tools and processes for assessing and improving the design of development. These include workshops to engage the local community, design advice and review arrangements, and assessment frameworks such as Building for a Healthy Life. These are of most benefit if used as early as possible in the evolution of schemes, and are particularly important for significant projects such as large scale housing and mixed use developments. In assessing applications, local planning authorities should have regard to the outcome from these processes, including any recommendations made by design review panels.	The Local Plan contains a design policy (E1), and an additional policy governing the design of new homes (H1). Supporting text explains the council's expectations of developers at the pre-application stage and the use of Development Consultation Forums and the Design Review Panel. In addition, where appropriate, design considerations are set out for each allocation site, and key project area or site. The design considerations for the Southleigh strategic site (KP5) where developed through <b>masterplanning workshops</b> involving the local community
134-135	Relate to design in the determination of planning applications	n/a
136	The quality and character of places can suffer when advertisements are poorly sited and designed. A separate consent process within the planning system controls the display of advertisements, which should be operated in a way which is simple, efficient and effective. Advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts.	Policies KP1, KP2 and KP4 (policies on town centre regeneration) contain a requirement for high quality signage, and the general design policy E1 also applies to signage.

## NPPF Paragraphs 148 - 169: Meeting the challenge of climate change, flooding and coastal change

NPPF Paragraph	Requirement	Evidence
152	Introductory paragraph	see lines below for details
153	Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure	The Local Plan contains policies to ensure that development will make a positive contribution to tackling climate change through enhanced levels of energy efficiency (Policy E12 Low Carbon Design), the protection of existing open space and provision of new ones (Policies E8 and E9), and the protection of existing trees and planting of new ones (Policy E18 Trees, hedgerows and woodland). New homes will be located to minimise flood risk and adopt a sustainable approach to drainage to ensure that flood risk is not increased elsewhere, particularly taking account of the effects of climate change (see <a href="#">Strategic Flood Risk Assessment</a> ; Policies E19 Managing Flood Risk in New Development and E20 Drainage Infrastructure in New Development; E4 Development on the Coast). The plan also recognises the need for and supports the provision of a water storage reservoir at Havant Thicket (KP9), and sea defences (E4 and IN1).
154	New development should be planned for in ways that: a) avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure; and b) can help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards.	The Local Plan contains policies to ensure that development will make a positive contribution to tackling climate change through enhanced levels of energy efficiency (Policy E12 Low Carbon Design), the protection of existing open space and provision of new ones (Policies E8 and E9), and the protection of existing trees and planting of new ones (Policy E18 Trees, hedgerows and woodland). New homes will be located to minimise flood risk and adopt a sustainable approach to drainage to ensure that flood risk is not increased elsewhere, particularly taking account of the effects of climate change (see <a href="#">Strategic Flood Risk Assessment</a> ; Policies E19 Managing Flood Risk in New Development and E20 Drainage Infrastructure in New Development). The plan also recognises the need for and supports the provision of a water storage reservoir at Havant Thicket (KP9), and sea defences (E4 and IN1).

155	<p>To help increase the use and supply of renewable and low carbon energy and heat, plans should:</p> <p>a) provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts);</p> <p>b) consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development; and</p> <p>c) identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co locating potential heat customers and suppliers.</p>	<p>Part of the Vision to be delivered through the Plan is that development will make a positive contribution to tackling climate change through enhanced levels of energy efficiency.</p> <p>Policy E12 Low Carbon Design expects new development to address climate change through low carbon design. Development proposals which are intended to improve the energy efficiency of existing buildings or provide low or zero carbon energy will be supported in principle. This policy (paragraph 5.118) also confirms that the Council is exploring how district heat can be used in the proposed council led re-development at the Civic Campus (KP1), and supports development which uses district heat or combined heat and power.</p>
156	Local planning authorities should support community-led initiatives for renewable and low carbon energy, including developments outside areas identified in local plans or other strategic policies that are being taken forward through neighbourhood planning.	Relates to decision making
157, 158	Relate to the determination of planning applications in relation to renewable energy and low carbon development	n/a
159	Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.	<b>The Strategic Flood Risk Assessment (Local Plan Allocations)</b> and Policy E19 Managing Flood Risk in New Development directly reflect this approach.
160	Strategic policies should be informed by a strategic flood risk assessment, and should manage flood risk from all sources. They should consider cumulative impacts in, or affecting, local areas susceptible to flooding, and take account of advice from the Environment Agency and other relevant flood risk management authorities, such as lead local flood authorities and internal drainage boards.	Site Allocations have been informed by <b>the Strategic Flood Risk Assessment (Local Plan Allocations)</b> . This, as well as policies E19 and E20, dealing with flood risk and drainage, were created in consultation with the Environment Agency, and with input from the council's drainage engineers. See also <b>Statement of Common Ground with the Environment Agency</b> .

161	<p>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 so as to avoid, where possible, flood risk to people and property. They should do this, and manage any residual risk, by:</p> <ul style="list-style-type: none"> <li>a) applying the sequential test and then, if necessary, the exception test as set out below;</li> <li>b) safeguarding land from development that is required, or likely to be required, for current or future flood management;</li> <li>c) using opportunities provided by new development and improvements in green and other infrastructure to reduce the causes and impacts of flooding, (making as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management); and</li> <li>d) where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to relocate development, including housing, to more sustainable locations.</li> </ul>	<p><a href="#">The Strategic Flood Risk Assessment (Local Plan Allocations)</a> and Policies E19 Managing Flood Risk in New Development E20 Drainage Infrastructure in New Development reflect this approach. E4 Development on the Coast IN1 Effective Delivery of Infrastructure reflect this approach.</p> <p>The Environment Agency is supportive of the council's approach to flood risk (<a href="#">see Statement of Common Ground with the Environment Agency</a>).</p>
161	<p>The aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test. The sequential approach should be used in areas known to be at risk now or in the future from any form of flooding.</p>	<p><a href="#">The Strategic Flood Risk Assessment (Local Plan Allocations)</a> and Policy E19 Managing Flood Risk in New Development reflect this approach. The sequential and exception tests are specifically referenced in the policy.</p>



162	If it is not possible for development to be located in areas with a lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied. The need for the exception test will depend on the potential vulnerability of the site and of the development proposed, in line with the Flood Risk Vulnerability Classification set out in Annex 3.	<a href="#">The Strategic Flood Risk Assessment (Local Plan Allocations)</a> and Policy E19 Managing Flood Risk in New Development reflect this approach. The sequential and exception tests are specifically referenced in the policy.
163	The application of the exception test should be informed by a strategic or site specific flood risk assessment, depending on whether it is being applied during plan production or at the application stage. To pass the exception test it should be demonstrated that: a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.	<a href="#">The Strategic Flood Risk Assessment (Local Plan Allocations)</a> has applied the exception test as described. Policy E19 Managing Flood Risk in New Development sets out that the circumstances under which the exception test will need to be applied, and what is expected of applicants.
164	Both elements of the exception test should be satisfied for development to be allocated or permitted.	See above
165-167	Relate to the sequential and exception tests, and the need for site specific flood risk assessments in planning applications	n/a, though principles are confirmed in the supporting text to Policy E19.
168	Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The systems used should: a) take account of advice from the lead local flood authority; b) have appropriate proposed minimum operational standards; c) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development; and d) where possible, provide multifunctional benefits.	There is a clear expectation reflecting this paragraph in Policy E20 Drainage Infrastructure in New Development
169	In coastal areas, planning policies and decisions should take account of the UK Marine Policy Statement and marine plans. Integrated Coastal Zone Management should be pursued across local authority and land/sea boundaries, to ensure	This principle is reflected in Policy E4 Development on the Coast



	effective alignment of the terrestrial and marine planning regimes	
170	Plans should reduce risk from coastal change by avoiding inappropriate development in vulnerable areas and not exacerbating the impacts of physical changes to the coast. They should identify as a Coastal Change Management Area any area likely to be affected by physical changes to the coast, and: a) be clear as to what development will be appropriate in such areas and in what circumstances; and b) make provision for development and infrastructure that needs to be relocated away from Coastal Change Management Areas.	This principle is reflected in Policy E4 Development on the Coast
171	Development in a Coastal Change Management Area will be appropriate only where it is demonstrated that: a) it will be safe over its planned lifetime and not have an unacceptable impact on coastal change; b) the character of the coast including designations is not compromised; c) the development provides wider sustainability benefits; and d) the development does not hinder the creation and maintenance of a continuous signed and managed route around the coast	This principle is reflected in Policy E4 Development on the Coast
172	Local planning authorities should limit the planned lifetime of development in a Coastal Change Management Area through temporary permission and restoration conditions, where this is necessary to reduce a potentially unacceptable level of future risk to people and the development.	This principle is reflected in Policy E4 Development on the Coast

## NPPF Paragraphs 170 - 183: Conserving and enhancing the natural environment

NPPF Paragraph	Requirement	Evidence
174	<p>Planning policies and decisions should contribute to and enhance the natural and local environment by:</p> <ul style="list-style-type: none"> <li>a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);</li> <li>b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;</li> <li>c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;</li> <li>d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;</li> <li>e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability.</li> </ul> <p>Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and</p>	<p>The Local Plan contains policies seeking to protect the natural and local environment and the specific matters mentioned in this paragraph, in particular:</p> <ul style="list-style-type: none"> <li>E3 Landscape and Settlement Boundaries</li> <li>E4 Development on the Coast</li> <li>E5 Chichester Harbour AONB</li> <li>E6 Best and Most Versatile Agricultural Land</li> <li>E7 Hermitage Stream</li> <li>E14 The Local Ecological Network</li> <li>E18 Trees, hedgerows and woodland</li> <li>E21 Aquifer Source Protection Zones</li> <li>E22 Amenity and Pollution</li> <li>E23 Air Quality</li> <li>E24 Contamination</li> <li>EX1 Water Quality Impact on the Solent European Sites</li> <li>EX2 Warblington Farm</li> </ul>

	f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.	
175	Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.	Designated sites formed one of the key constraints in considering land for future development (see Housing constraints and supply analysis; Summary of allocation methodology, Summary of site screening work); Policies are included in the plan to protect designated sites and species (Policies E15 to E17, E25, EX1,EX2), and promote the Local Ecological Network (Policy E14).
176	Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks. Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.	<p>The plan contains a specific policy governing proposals in the Chichester Harbour AONB (Policy E5). It is acknowledged that the plan also includes an allocation for development at Northney Marina (Policy KP3). While this is a major development within the AONB, it is on a previously developed site, and it is considered that the proposal has the potential to improve the visual appearance of the site. The necessary design considerations and safeguards are included within the policy.</p> <p>Policy E5 is not specific to development within the AONB and as such, includes development within the setting of the AONB.</p> <p>The Havant Borough area is not within, but immediately adjoins the South Downs National Park. The value of this landscape is recognised throughout the plan, and highlighted as a site constraint in relevant site allocation policies (KP5 Southleigh, KP9 Havant Thicket Reservoir, H8 Land North of Long Copse Lane) which could be within the setting of the national park.</p>
177	When considering applications for development within National Parks, the Broads and Areas of Outstanding Natural Beauty permission should be refused for major development other than in exceptional circumstances, and	Please see commentary in respect of Paragraph 176.

	<p>where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:</p> <ul style="list-style-type: none"> <li>a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;</li> <li>b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and</li> <li>c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.</li> </ul>	
178	<p>Within areas defined as Heritage Coast (and that do not already fall within one of the designated areas mentioned in paragraph 175), planning policies and decisions should be consistent with the special character of the area and the importance of its conservation. Major development within a Heritage Coast is unlikely to be appropriate, unless it is compatible with its special character.</p>	<p>There is no defined Heritage Coast in the Havant area</p>
179	<p>To protect and enhance biodiversity and geodiversity, plans should:</p> <ul style="list-style-type: none"> <li>a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and</li> <li>b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.</li> </ul>	<p>Designated sites formed one of the key constraints in considering land for future development (<a href="#">see Housing constraints and supply analysis; Summary of allocation methodology, Summary of site screening work</a>);</p> <p>Policies are included in the plan to protect designated sites and species (Policies E15 to E17, and E25, EX1, EX2), and promote the Local Ecological Network (Policy E14).</p>

180	Relates to ecology considerations in the determination of planning applications	n/a, but the policies in the plan as set out above, support these principles in decision making
181	<p>The following should be given the same protection as habitats sites:</p> <p>a) potential Special Protection Areas and possible Special Areas of Conservation;</p> <p>b) listed or proposed Ramsar sites; and</p> <p>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.</p>	<p>The Plan includes policies protecting the sites listed:</p> <p>E14 The Local Ecological Network</p> <p>E15 Protected Species</p> <p>E16 Solent Special Protection Areas</p> <p>E17 Solent Wader and Brent Goose Feeding and Roosting sites</p> <p>In addition, sites are identified for Brent Goose and Wader Refuges under policies E25</p>
182	The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.	This principle is enshrined in policy E14 and explained further in supporting text paragraph 5.176
183	<p>Planning policies and decisions should ensure that:</p> <p>a) a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. This includes risks arising from natural hazards or former activities such as mining, and any proposals for mitigation including land remediation (as well as potential impacts on the natural environment arising from that remediation);</p> <p>b) after remediation, as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990; and</p> <p>c) adequate site investigation information, prepared by a competent person, is available to inform these assessments</p>	Policy E24 sets out the requirements in relation to Contaminated Land. This policy was drawn up using the expertise of the council's environmental health contaminated land experts

184	Where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner.	This is confirmed in the supporting text to Policy E24 (paragraph 5.304)
185	Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should: a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life; b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.	Policy E22 seeks to minimise negative effects from noise, odour or vibration, as well as light, water or air pollution. There is an additional separate policy on Air quality in the plan (E23). Given the largely urbanised character of the borough, no areas have been designated specifically for their tranquillity. In addition to general policy E22, following the regulation 19 consultation, specific wording is proposed to be added to safeguard the dark skies policy of the nearby South Downs National Park.
186	Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.	Policy E22 seeks to minimise negative effects from noise, odour or vibration, as well as light, water or air pollution. There is an additional separate policy on air quality in the plan (E23). The plan is underpinned by a rigorous study into the likely effects of the planned growth on air quality (PUSH Air Quality Impact Assessment)
187	Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing	Policy E22 Amenity and Pollution recognises that adverse effects can arise from the inappropriate location of new development close to sources of pollution or other amenity impact, and that the policy applies to this situation as well as new potentially polluting development.

	businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed.	
188	The focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively. Equally, where a planning decision has been made on a particular development, the planning issues should not be revisited through the permitting regimes operated by pollution control authorities.	The potential for pollution was considered in detail during the <a href="#">site screening</a> process.

## NPPF Paragraphs 184 - 202: Conserving and enhancing the historic environment

NPPF Paragraph	Requirement	Evidence
189	Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.	Policy E13 Historic environment and Heritage Assets recognises the value and importance of these features, and sets out how these will be considered in development applications. The council worked extensively with Historic England to devise this policy (see also <a href="#">Statement of Common Ground with Historic England</a> ) Heritage was also considered as a key constraint to development in selecting sites for allocation (see <a href="#">Housing constraints and supply analysis; Summary of allocation methodology, Summary of site screening work</a> )
190	Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account: a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation; b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring; c) the desirability of new development making a positive contribution to local character and distinctiveness; and d) opportunities to draw on the contribution made by the historic environment to the character of a place.	Policy E13 Historic environment and Heritage Assets recognises the value and importance of these features, and sets out how these will be considered in development applications, as well as the council's wider strategy for its built heritage (see policy and supporting text)
191	When considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest.	CA designations made through process separate from Local Plan
192	Local planning authorities should maintain or have access to a historic environment record. This should contain up-	Havant <a href="#">Historic Environment Record is hosted by Hampshire County Council</a> . The site screening work supporting the selection of allocation sites and subsequent policy



	<p>to-date evidence about the historic environment in their area and be used to:</p> <p>a) assess the significance of heritage assets and the contribution they make to their environment; and</p> <p>b) predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future.</p>	development considered the location heritage assets, both known and currently unidentified.
193	Local planning authorities should make information about the historic environment, gathered as part of policy-making or development management, publicly accessible.	All conservation area and character appraisals, as well as the historic environment details of the housing constraints and supply analysis and summary of site screening work are published on the council's website
194	<p>In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.</p>	This principles is enshrined in policy E13 and explained in the supporting text (paragraph 5.137)
195	Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.	Constraints mapping and site screening informed site allocations in the plan. Site opportunities and constraints highlighted in allocations policies include heritage assets. Conservation and archaeology officers are consulted on planning applications.
196-208	Relate to decision making in the context of heritage assets	n/a, although the concepts in these paragraphs, in particular the consideration of whether substantial harm would result, is reflected in policy E13

## NPPF Paragraphs 203 - 211: Facilitating the sustainable use of minerals

NPPF Paragraph	Requirement	Evidence
209-217	Relate to Minerals and Waste Planning	This function is undertaken by Hampshire County Council. The Local Plan, has taken into account minerals and waste safeguarding in making site allocations and setting out site opportunities and constraints

