



Havant Borough Local Plan Examination: Scope of Sustainability Appraisal Addendum (2021)

11 November 2021

The Council proposes to produce a further addendum to the Sustainability Appraisal (SA) report on the Pre-Submission Plan SA (CD10), which will focus on bringing together the assessment of alternatives to the policies and proposals in the plan.

Different sections of the plan and its policies require a different approach to the assessment of alternatives. Below is set out how the Council proposes to address the requirement for each sub-section of the plan:

1. Spatial Strategy

This section will cover the overall development distribution, largely presented in policies DR1 & DR2 of the plan. It will include:

- Confirmation of the earlier assessment in CD10 of alternatives to housing provision
- Assessment of alternatives to employment land provision, following a similar approach to that for housing documented in CD10. (NB If alternatives to individual site allocations for employment are to be considered, these would be presented in the site allocations section)

2. Thematic Policies

This Section will cover the thematic policies under the headings Infrastructure, Environment, Housing and Commercial development, which are set out in chapters 4 to 7 of the plan.

- As a minimum a 'no policy' option will be assessed, and in many cases, where appropriate, alternative content options to the policies will also be discussed (such as setting standards higher or lower, or excluding certain elements of the policy).
- The Council considers that the assessment of alternatives will be more effective if it focusses clearly on the differences between the proposed policy and the alternatives to

it. Therefore, the Council proposes that this element of the addendum shall take the form of a commentary on the differences and their sustainability effects, such as higher or lower standards or thresholds, rather than a fully scored appraisal of full alternative policies, in which many elements of the policy would be the same in each alternative, and differences in effects might therefore get lost.

An example of the proposed approach is shown below:

Policy	Policy Name	Alternatives Considered	Sustainability Appraisal Commentary
IN3	Transport & Parking	No Policy	<p>The NPPF ascribes a role to local planning policies in promoting sustainable travel modes and low emission vehicles, as well as ensuring well designed streets and parking provision. Policy IN3 provides the local detail and sets out what is expected of developers with regard to transport and parking. Not having this policy would reduce the positive impacts the plan has on objectives 4 and 11.</p> <p>Conclusion: Including the policy would have greater positive sustainability effects than omitting it from the plan.</p>
IN3	Transport & Parking	Lower or Higher Level of EV charging requirements	<p>Policy IN3 includes a specific requirement for Electric Vehicle Charging points to be included in development. An alternative would be to include a lower requirement, such as to require only a certain percentage of homes with private parking spaces to have EV charging points or to ask applicants to justify the level of provision. The Council is seeking to maximise the sustainability benefits in relation to objective 4, and a lower threshold would reduce these benefits. The other alternative would be a higher requirement, such as a charging point for a higher specified number of non-allocated parking spaces. While this would have a greater positive impact on objective 4, this approach had the potential to have minor negative effects on objectives 1 and 2, bearing in mind the cost and design implications of this approach.</p> <p>Conclusion: A lower or higher policy threshold would reduce the sustainability benefits of the policy.</p>
IN4	Access onto Classified Roads	No Policy	<p>Policy IN4 restricts the nature of new accesses onto classified road. Not including the policy would reduce safety and affect the efficient running of the road network, thereby having a negative effect on objectives 3 and 11, and to a lesser extent 12.</p> <p>Conclusion: Including the policy would have greater positive sustainability effects than omitting it from the plan.</p>
IN4	Access onto Classified Roads	No specific requirements in relation to A3023 (reliance on general part of policy)	<p>Policy IN4 would still function if the second part, which makes particular reference and provisions for accesses onto the A3023. Nevertheless, this part is included in particular acknowledgement of the known friction issues on that road and excluding it would have a negative effect on safety and the efficient running of the road network (objectives 3 and 11, and to a lesser extent 12).</p> <p>Conclusion: Including this part of the policy would have greater positive sustainability effects than omitting it from the plan.</p>

3. Key Projects & Site Allocations

This section is proposed to constitute a review of site allocations for housing and commercial uses and allocations under the 'Key Projects' heading, and a full assessment of alternative sites. Through the examination, concern was raised that some sites had been discounted by the Council prematurely. To address this, the addendum will include:

- A review of all sites either noted in CD10 as discounted through the SHLAA or noted in the sites Topic Paper TP02 as omission sites.
- An assessment of which sites previously discounted remain available and/or actively promoted
- Full Appraisal tables for all reasonable alternative sites, including alternative uses being promoted on any sites. An initial review suggests that assessment tables would be included for the following sites (NB this may be subject to change as the full review is undertake):

Site Reference (SHLAA/ELR)	Site Name
EM41	South of Havant Road <i>(NB also referred to as Horses Field)</i>
HB3 (ext)	Land at Palk Road (extension)
HB6b	Little Park Wood
HB15	Southmere Field
HB63	Kingscroft Farm
HY5 & HY11	Land North of Tournurbury Lane & Hayling College Playing Fields
HY46	Land north of Selsmore Road
LP127 (central)	Land east of A3(M) <i>(NB also referred to as Hulbert Rd)</i>
WV70	Hazleton Wood
BD38	Interbridges West
various	alterative employment sites <i>(tbc following review of approach to employment land need)</i>

Finally, the Council is conscious that in the course of addressing other issues with the plan, it may be necessary to make additional updates to the assessments presented in CD10 to CD12.

Overall, the Council considers that the above approach would serve to address the concerns raised by the inspectors in paragraphs 41-44 of the Interim Findings Report (CR18).