

BUILDING A BETTER FUTURE

Sustainability Appraisal
of the Regulation 19 Draft Local Plan

July 2026



Havant
BOROUGH COUNCIL

Regulation 19 Draft 'Building a Better Future' Local Plan – Sustainability Appraisal Report (2026)

Non-Technical Summary	3
1. Introduction	4
2. Testing the Local Plan Objectives (SA Stage B1)	6
3. Developing the Local Plan Options: Alternative Development Strategies (SA Stage B2)	11
4. Evaluating the likely effects of the Local Plan and alternatives (SA Stage B3) and considering ways of mitigating adverse effects and maximising beneficial effects (Stage B4)	29
Findings of the sustainability appraisal of the topic policies	29
Findings of the sustainability appraisal of the site allocations	42
5. Consultation (SA Stage D) and Next Steps	52
6. Monitoring the Sustainability Effects of the Plan	53
Appendix A: Local Plan Sustainability Appraisal Framework	56
Appendix B: Sites included in each strategy option	64
Appendix C: Full sustainability appraisal of topic policies	65
Appendix D: Full sustainability appraisal of sites	66
Appendix E: Summary of negative effects identified at allocation sites and proposed mitigation	67
Appendix F: Legal Compliance	68

Non-Technical Summary

This report accompanies the 2026 consultation on the Publication Draft 'Building a Better Future' Local Plan for Havant Borough. It is a procedural requirement to assess the economic, social and environmental effects of the emerging plan through a 'Sustainability Appraisal' (SA). A framework for doing so was established in 2022. Legal compliance is demonstrated through Appendix F.

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

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

Comments are invited on the Publication Draft Local Plan by 9 September 2026. This Sustainability Appraisal report is published alongside that draft of the Local Plan, and comments on this report are also invited (see section 5).

1. Introduction

- 1.1 The purpose of the planning system is to contribute to the achievement of sustainable development. This involves balancing economic, social and environmental objectives.
- 1.2 When preparing a Local Plan, section 19(5) Planning and Compulsory Purchase Act 2004 (PCPA) requires local planning authorities to (a) carry out an appraisal of the sustainability of the proposals in each development plan document; and (b) prepare a report of the findings of the appraisal.
- 1.3 This document is the Sustainability Appraisal (SA) Report accompanying the 2026 Regulation 19 consultation on the Building a Better Future Plan, the new Local Plan for Havant Borough. The new Local Plan establishes a spatial strategy for development for the period to 2043, identifies sites for housing, employment and infrastructure which deliver that strategy and establishes the policies against which planning applications will be determined.
- 1.4 It is a requirement that Sustainability Appraisal is undertaken in line with the [Environmental Assessment of Plans and Programmes Regulations 2004](#). Compliance of this report with the requirements of the 'Environmental Report' is confirmed through Appendix F.
- 1.5 SA is a mechanism for considering and communicating the likely effects of a draft plan, and alternatives to that plan, with a view to avoiding or mitigating adverse effects and maximising positive ones. It is a multi-stage process, most of which is undertaken in separate appraisals of each version of the plan as it evolves. [Government guidance on strategic environmental assessment and sustainability appraisal](#) sets out the process for local plans in a number of stages, as follows:

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

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

STAGE B: Developing and refining alternatives and assessing effects

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

STAGE C: Prepare the SA Report

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

STAGE E: Post adoption reporting and monitoring

E1- Prepare and publish post-adoption statement

E2- Monitor significant effects of implementing the Local Plan

E3- Respond to adverse effects

- 1.6 This report represents stages B and C of this process, leading to Stage D in the summer of 2026. Stage A was undertaken 2022, and [the SA Scoping Report](#) is available alongside this report. The framework established through the scoping stage is repeated for ease at Appendix A.

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

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

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

A Borough...

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Corporate Strategy Theme and Local Plan Objective 3: Growth

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

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

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

2.5 The Local Plan objectives were tested against the Sustainability Appraisal Framework, which had been established through the earlier scoping report (see paragraph 1.6 and Appendix A). The framework will be used at each stage of plan preparation to assess the impact of the proposed strategy and policies, as well as alternatives to them. The established SA themes and objectives are repeated below for ease of reference¹.

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

¹ The full framework includes further information on assessment criteria. See Appendix A.

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

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

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

Key  fully aligned  compatible  no direct relationship  possible conflicts

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

- 3.1 [An earlier Regulation 18 Local Plan consultation](#) presented an intended approach for the Local Plan, with a sustainability appraisal of the approach to each policy theme and alternatives to it accompanying the consultation. Together with further research and evidence studies, the consultation on those proposed approaches was fundamental in forming the 2025 Regulation 18 full draft plan and the revised Regulation 19 Draft Plan, in particular the overall development strategy which guides the plan.
- 3.2 While in less constrained Local Authority areas, options might typically be based around decisions on whether to add urban extensions or create new self-contained settlements away from existing urban centres. In Havant Borough, the existing pattern of development and the severely restricted amount of land remaining for development (see [the Havant Borough Constraints Study](#)) makes this approach to options impossible.
- 3.3 Instead, options were developed and considered on a more qualitative basis focussed on where the emphasis in addressing competition for the use of land lies, and what outcomes are more desirable locally. Alternatives along a spectrum of different emphases were considered, ranging from an option seeking to maximise environment protection, to a development delivery market driven option with limited expectations for development quality or environmental considerations.

Simple Overview of the Development Strategy Alternatives Considered



- 3.4 Four clearly distinguishable alternatives along the spectrum were developed and tested. Each strategy option considered brings together a coherent overall approach to:
- a. the characteristics of sites themselves (i.e. the type of land that would be affected by development eg brownfield or greenfield; any nature conservation, heritage or other protective designations etc);
 - b. locational matters (i.e. where development should take place in relation to other facilities, infrastructure needs etc) and
 - c. qualitative requirements (eg density and quality requirements for housing).
- 3.5 Please note, a fifth option is discussed below in the context of the results of the sustainability effects of the 4 options considered.
- 3.6 Finally, it should be noted that the strategy options considered in early phases of plan making were not based on selection or rejection of particular sites. In assessing and selecting the proposed development strategy, no detailed decisions were made about what sites to take forward for allocation. The SA of the alternatives considered the options based on high level qualitative principles. However, at the Regulation 18 consultation consultees commented that it was difficult to understand what sites would have been included or excluded in which strategy option. This information, in the form of Appendix B to this report was subsequently added to aid understanding of the effects of the options on the distribution of development and inclusion or exclusion of individual sites.

Development Strategy - Option 1

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

- Acknowledging environmental and infrastructure limits, and planning for local development needs within those limits
- Development only where it has no unacceptable impacts on international, national or local environmental designations, or national landscape designations
- Restricting development to established urban and developed areas and brownfield sites across the borough (i.e. no greenfield development)
- Promoting development where good accessibility between homes, jobs and services by a wide choice of modes exists or can be achieved High development densities to make the most efficient use of land and promote sustainable transport accessibility
- A particular focus on development which will help to sustain and enhance the borough's town centres
- Development which promotes better self-containment and reduces the need to travel for communities, such as appropriately scaled commercial, retail and service uses
- Protecting and enhancing our unique coastline and harbours for wildlife; managing the coast with a focus on nature;
- Sustaining existing communities and protecting them from coastal erosion and sea level rise but responding to the effects of climate change by not adding to the level of risk through a presumption against new housing in areas that are at risk of flooding, now or in the future (due to the risk to the single access road on and off the island, this includes greenfield sites on Hayling Island, which may not themselves be at risk)
- Safeguarding existing open spaces and expecting new developments to enhance them and/or provide new open spaces
- High standards of housing quality to provide good quality, healthy and affordable homes for all
- High standards of sustainable construction to minimise the environmental impact of development and maximise its resilience to the effects of climate change

For the implications on what sites would be included under this option please see Appendix B

Development Strategy - Option 2

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

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

For the implications on what sites would be included under this option please see Appendix B

Strategy Option 3

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

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

For the implications on what sites would be included under this option please see Appendix B

Strategy Option 4

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

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

NB under this option, sites that were discounted in the SHELAA are reconsidered for inclusion in the plan.

For the implications on what sites would be included under this option please see Appendix B

- 3.7 The table below shows the expected development supply under each of the strategy options. A table showing which sites are assumed to be included under each option is found at Appendix B. The supply figures in the table are derived from work on the Strategic Housing and Employment Land Availability Assessment (SHELAA), a study which considers what sites in the borough are suitable and available for development, and whether development is deliverable on that site. Where these three criteria are met, a site is considered to be 'developable'.

Housing Land Supply 2022-2043 (number of dwellings likely to be delivered under each development strategy option)				
Sources of housing supply	Option 1	Option 2	Option 3	Option 4
Base position across all options				
Completions 2022-2025	1,179	1,179	1,179	1,179
Planning Permissions includes sites started but not yet completed, and sites not started and therefore reviewed through SHELAA & SA	984	984	984	984
Windfall	1,275	1,275	1,275	1,275
Total base supply common to all options	3,438	3,438	3,438	3,438
Option variations				
Sites considered appropriate for allocation under the strategy option	723	3,926	5,326	5,351
Small sites within the settlement boundary (no specific allocation)	21	30	30	30
Discounted SHELAA sites	0	0	0	2203
Additional supply from Strategy Options	744	3,956	5,356	7,584
Summed Supply				
Total housing supply	4,182	7,394	8,794	11,022
Supply against standard method plan requirement of 18 x 879 = 15,822	-11,640	-8,428	-7,028	-4,800

Employment Land Supply 2022-2043 (employment floorspace likely to be delivered under each development strategy option)				
Sources of employment supply*	Option 1	Option 2	Option 3	Option 4
Base position across all options				
Completions 2022-25	32,216	32,216	32,216	32,216
Planning Permissions includes sites started but not yet completed, and sites not started and therefore reviewed through SHELAA & SA	70,969	70,969	70,969	70,969
Total base supply common to all options	103,185	103,185	103,185	103,185
Option variations				
Sites considered appropriate for allocation under the strategy option	15,760	45,745	45,745	45,745
Discounted SHELAA sites	0	0	0	13,791
Additional supply from Strategy Options	15,760	45,745	45,745	59,536
Summed Supply				
Total employment supply	118,945	148,930	148,930	162,721
Supply against established need of 146,213	-27,268	2,717	2,717	16,508
* Please note all the figures presented in this table are industrial supply. The Council's Employment Land Review concluded that although there is a theoretical need of 36,000sqm of office, in reality there is no office market in the Havant area. This need should therefore be directed to the Portsmouth economic market area.				

NB The tables presented here and at Appendix B are not found in the SHELAA. That is because the SHELAA itself is not designed to test options. Rather it serves to gather information on and assess a very high level whether sites are developable. The table presented here then makes further assumptions on what sites would be considered to be appropriate for development under each development strategy option, based on the parameters of each option.

- 3.8 Naturally, as the focus on housing delivery increases through the options, with fewer other balancing considerations taken into account as one moves from Option 1 through to Option 4, the amount of housing expected to be delivered through the Local Plan increases. However, crucially, it should also be noted that under none of the options, even when all sites previously discounted through the SHELAA process are put back into the supply, is it possible to achieve delivery of the total need for housing, as set out in the standard method.
- 3.9 In terms of employment supply the same parameters applied to the location and quality of development result a less marked difference between the options than for the housing supply, with options 2, 3 and 4 all including the same potential site allocations. Need is met in all options except Option 1.
- 3.10 A 5th option – to fully meet housing and employment need - was considered but was not formally explored through the SA. Comments at the 2025 Regulation 18 consultation suggested that this is a failing of the SA. However, the Council maintains that this is not a realistic option to explore. That is because Option 4 already includes all the possible development sites that the council is aware of and that were therefore considered through the SHELAA, applying the principle of 'leaving no stone unturned'. Options 3 and 4 include all those considered to be developable, and Option 4 adds back in those that the Council has discounted for a variety of reasons, (with the exception of those discounted as they are unavailable). While it is not considered realistic to bring forward sites judged as undevelopable, including this option serves to demonstrate that even with all the discounted sites included, housing need is not met. Any option beyond option 4 and looking to meet the full housing need would be a hypothetical option based solely on numbers, which would have to rely on fictional sites for those numbers to be reached. Such a strategy would inevitably not comply with several of the NPPF's tests of soundness, in particular, it would be neither 'justified' nor 'effective'. Employment need is met in all options except option 1, so a full need option is already covered.
- 3.11 Development land supply is just one of many factors in assessing the suitability of a development strategy, particularly in the context of sustainability appraisal, whose purpose is to balance all the factors that make sustainable development. The same is true of the planning system as a whole. Paragraphs 7 and 8 of the NPPF (2024) clearly state that 'the purpose of the planning system is to contribute to the achievement of sustainable development' and that 'achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives)': an economic objective, a social objective and an environmental objective. Therefore, all objectives must be pursued and balanced in order to achieve sustainable development.
- 3.12 The wider sustainability effects of the alternatives considered are set out in the tables below.

Sustainability Appraisal of Development Strategy – Option 1

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

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

Development standards should however help ensure high quality development and positive results across the majority of the SA themes. Since a number of the decision-making criteria under theme 4 (healthy communities) relate to access to open spaces and natural areas, as well as the management of flood risk, very positive effects are also expected against this theme under this strategy option. Similarly, some criteria in theme 7 (natural resources) relate to avoiding pollution and preserving natural resources, as well as energy efficient construction, with positive sustainability gains expected from this strategy. Further gains are expected under this option in theme 5 (economy) and 6 (transport), based on this strategy's focus for development in already built-up areas, in particular in town centres and areas of good accessibility. However, it must be noted that the focus on higher densities in already developed areas to protect undeveloped areas also could have potential negative effects on local character within theme 8 (landscape & heritage).

However, Option 1 does not perform well against those criteria that measure development supply (objectives 3 and 5). This option significantly limits the availability of land considered suitable for development, with greenfield development not considered to be acceptable.

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

	four alternatives are balanced to a degree through pre-existing requirements on what Local Plans or the planning system can or should achieve.
	Overall, Development Strategy Option 1 is expected to produce many positive sustainability effects against most of the SA themes. However, it does not perform well against those criteria that measure development supply (objectives 3 and 5). This negative effect is noted against all 4 options and it is not considered to be possible to address it in any of the options, given the particular circumstances of Havant Borough in terms of land constraints and availability. However, Option 1 constrains supply to such a significant degree that it is not considered to be the most suitable option overall, even when taking into account the significant sustainability gains across all the themes.

Sustainability Appraisal of Development Strategy Option 2

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

Strategy Option 2 seeks to balance the need for land to meet development needs with a desire for strong environmental protection and climate change adaptation and mitigation.

The sustainability appraisal shows a wide range of sustainability gains. Development standards should however help ensure high quality development and positive results across the majority of the SA themes. Since a number of the decision-making criteria under theme 5 (healthy communities) relate to access to open spaces and natural areas, as well as the management of flood risk, very positive effects are also expected against this theme under this strategy option. Similarly, some criteria in theme 7 (natural resources) relate to avoiding pollution and preserving natural resources, as well as energy efficient construction, with positive sustainability gains expected from this strategy. Further gains are expected under this option in theme 5 (economy) and 6 (transport), based on this strategy's focus for development in already built-up areas, in particular in town centres and areas of good accessibility. However, it must be noted that the focus on higher densities in already developed areas also could have potential negative effects on local character (8d).

The option does not perform well against those criteria that measure housing supply (objectives 3a-c), though it does provide sufficient land for employment (objectives 5 a-c).

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

Overall, Development Strategy Option 2 is expected to produce many positive sustainability effects against most of the SA themes. However, it does not perform well against those criteria that measure housing supply. This negative effect is noted against all 4 options and it is not considered to be possible to address it in any of the options, given the particular circumstances of Havant Borough in terms of land constraints and availability. Compared to the other options, Option 2 delivers more housing supply than option 1, while retaining significant positive outcomes against the wider set of objectives, which begin to erode in Option 3 and 4.

Sustainability Appraisal of Development Strategy Option 3

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

Strategy Option 3 takes into account the need for environmental protection, and expects quality standards, in particular for housing developments, but is primarily driven by seeking to meet the development needs of the borough.

Under this strategy, it is expected that a greater number of homes will be able to be delivered when compared to strategy options 1 and 2, while employment supply remains the same as in option 2. However, it remains the case that housing need cannot be met under this option, resulting in negative effects being noted against housing supply (criteria 3a-c).

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

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

	Overall, Strategy Option 3 is found to produce only limited sustainability gains. While it performs better against housing delivery than options 1 and 2, , national policy is clear that these must be balanced against other policy objectives, most of which are not given sufficient importance and therefore attract negative effects in this option.

Sustainability Appraisal of Development Strategy Option 4

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

Similarly to Strategy 3, Strategy Option 4 is driven by a focus on meeting development needs, in particular for housing. This strategy seeks to enable the market to deliver homes and other development, restricted only by legally required environmental restrictions. In this strategy, the Local Plan will be minimal in requiring development to meet particular quality, environmental, social or locational standards, in order to provide maximum flexibility to the market.

Under this strategy, it is expected that the greatest number of homes will be able to be delivered when compared to all the other strategy options, though it remains the case that housing need cannot be met under this option, resulting in negative effects being noted against housing supply (criteria 3a-c). (this is despite sites being discounted through the SHELAA being re-considered in this option). This option delivers positive outcomes and flexibility in employment supply, and it is acknowledged that it may be possible to transfer some of this into delivering homes, which would address the still noted negative effects against objective 3.

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

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

	Consistent through all 4 strategy alternatives, a number of assessment criteria are not expected to see any notable effects arising from this strategy option. That is because the alternatives presented are high level strategic options, which do not address in detail all matters covered by the SA. None of the strategy options are expected to have strong negative effects on any of the criteria. That is because all four alternatives are balanced to a degree through pre-existing requirements on what Local Plans or the planning system can or should achieve.
	Overall, Strategy Option 4 is found to produce only limited sustainability gains. While it performs better against development delivery than all the other options, national policy is clear that these must be balanced against other policy objectives. This option shows an even greater number of expected negative effects than Strategy 3.

- 3.13 The tables above demonstrate why Strategy Option 2 was selected and taken forward as the strategy for the local plan².
- 3.14 The spatial distribution of development planned for through the chosen option focusses on the existing built-up areas across the borough, with the addition of less constrained and long-term sustainable greenfield land. Accessibility and choice of transport modes is a key consideration. Habitats and species protection and national landscape designations limit which areas are considered suitable for development or where strict mitigation measures will be required. Flood risk provides a further key constraint given the borough's coastal location and evidence of climate change and sea level rise. Existing open space for use by local communities is also protected.
- 3.15 It is acknowledged that under this strategy option, standard method housing need is not met, though employment land need is. Being conscious of the high need in particular for housing in the area, the Council takes its responsibilities in relation to meeting development requirements extremely seriously. However, to deliver truly sustainable development this must be balanced with other needs and drivers. The SA demonstrates that more limited sustainability gains arise from those options that prioritise development delivery over all other matters, and that the environmentally focussed option would reduce too far the already constrained supply of development land. The chosen strategy seeks to positively address the reality of climate change and the precarious state of the natural environment while still making available all possible developable land that can be brought forward within these parameters. It should be noted again here that none of the reasonable alternatives, including the heavily development delivery driven ones, are capable of delivering a plan that meets housing need.
- 3.16 The pattern of development that results in the chosen option is focussed on long-term sustainable brownfield and greenfield sites on the mainland of the borough only, including very significant greenfield sites delivering thousands of homes and employment floorspace. Sites are not automatically excluded where biodiversity and other environmental constraints exist, but successful mitigation is expected. Greenfield land on Hayling Island is not being put forward for development, primarily on the basis of flood risk, which will increase significantly with climate change. Due to the risk to the single access road on and off the island, greenfield sites on the island, even where they may not themselves be at risk, are considered unsustainable in the long term. This pattern of development also aligns with the strategic aim to ensure good accessibility and modal choice.
- 3.17 The development strategy proposed is considered to be the most appropriate strategy for the Building a Better Future Plan. It combines and balances in the most effective way key national and local objectives and overall represents the most sustainable strategy, when considered against the alternatives.

² NB The Development Strategy is described in Section 2 of the Regulation 19 Local Plan, in particular Policy 1. The exact wording describing the strategy has evolved from the initial description of Option 2 in this SA. However, the overall meaning and intention, as well as the spatial distribution and sites allocation implications remain the same.

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

- 4.1 Sustainability Appraisal Stages B3 and B4 were undertaken as a single step.
- 4.2 Following the decision to pursue Strategy Alternative 2, a draft Local Plan was drawn up, providing detailed topic policies and identifying sites for development, known as 'site allocations', in line with the chosen strategy.
- 4.3 In parallel with the drafting of these policies and allocations, each of them was subject to testing against the sustainability appraisal framework. Each emerging policy was tested against the assessment criteria for each of the established sustainability objectives. Testing for the topic policies included commentary not only on the expected effects of the draft policy but also compared this with a 'no policy' alternative, as well as other alternative variations on the policy that were considered. Testing for the site allocations assessed the likely effects that development of the site for its proposed use would have on the sustainability objectives.
- 4.4 The assessment was undertaken on spreadsheets, with separate tabs for each sustainability objective. The full assessment spreadsheets are published as appendices to this report: Appendix C for the topic policies and Appendix D for the site allocations.
- 4.5 This process was repeated for the Regulation 19 version of the plan to ascertain whether the earlier assessment remained valid following updates to the plan between Regulation 18 and 19. The review also considered comments made by consultees on the SA at the earlier stage. Overall, the sustainability findings remain broadly the same, with some improvements noted as the plan has been improved. In individual instances, relevant updated commentary is included in the SA tables and summary discussion.

Findings of the sustainability appraisal of the topic policies

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

Objective 1: The Natural Environment & Biodiversity

- 4.7 The policies in the plan all either actively support the objective of protecting and enhancing the natural environment and supporting biodiversity, or where they do not, are considered neutral against this objective. Notably, the plan contains a swathe of policies to protect the natural environment in general, as well as notable and protected habitats and species from harm from development. These will apply to all relevant developments. Overall, the plan is considered to be strong in relation to this objective.

- 4.8 Nevertheless, improvements to outcomes against this objective were sought. It was found that in most instances introducing additional criteria to policies to strengthen them in relation to biodiversity outcomes would be unhelpful, as such additions would confuse the main focus of these policies and lead to less clarity, although clarifying and strengthening wording changes were introduced as the plan evolved. On this basis, it is acceptable for a large number of policies to be neutral against this objective.
- 4.9 A notable discussion within the assessment relates to Policy 5 – Amount of Housing and Policy 6 – Amount of Employment Land. Momentarily setting aside the evidence base on deliverability and focussing on sustainability outcomes, the policy could set out a higher or lower housing and/or employment land requirement in the plan. Although less development might be considered positive for biodiversity, it is not anticipated that a policy reflecting a lower number per se would make a difference to biodiversity outcomes. That is because national policy drivers would in any case require delivery of development, in particular of housing. Policies setting higher development requirements would likely lead to poorer outcomes for biodiversity, with more greenfield sites, potentially of great biodiversity value being required to meet those needs. It was concluded that the development target policies as proposed, taken together with the biodiversity specific policies in the plan successfully balance a range of considerations to present development figures which is considered realistic, and that they should remain unchanged.
- 4.10 Improvements were made to the following policies after the initial assessment found that they could provide better outcomes in relation to biodiversity if amended:
- 4.11 Further changes were made to the plan between the Regulation 18 and 19 stages, in response to consultee comments and the evolving evidence base. These were all found to strengthen the plan in relation to the Biodiversity sustainability objective:
- Policy 4 – Infrastructure and Environmental Mitigation to support development: Through the assessment it was noted that the list of infrastructure items did not specifically highlight environmental mitigation land and schemes. The policy and associated mapping was subsequently amended to highlight sites safeguarded for environmental mitigation. This will help prevent their loss to other forms of development and achieve better outcomes against the biodiversity objective.
 - Policy 8 - Five Year Housing Land Supply: The review of the policy through the SA highlighted that the Solent European Marine sites are directly mentioned, rather than a broader mentioned of habitats sites and sites needed to compensate for impacts on such sites. The wording was amended to refer to internationally designated habitats sites more generally. This will ensure adequate protection of these sites and avoid any real or perceived contradiction with national policy.
 - Policy 13- High-Quality Design: The policy serves to pull together a number of matters that need to be considered in the design of a site, which have their own dedicated policy elsewhere in the plan. It was noted during the assessment that biodiversity themes were completely absent. Subsequently, a criterion was added to the policy requiring the effective integration of environmental mitigation

and biodiversity features into the design of the buildings and landscaping. This will ensure this policy makes a positive contribution to the biodiversity objective.

- Policy 21 – International and National Nature Conservation Sites: During the assessment it was noted that the policy wording focussed on individual protect sites. The assessment under SA criterion 1c flagged that these were not obviously being considered as a network as well as individually. Amendments were made to the policy wording to acknowledge the ecological network, with expected improvement in outcomes against this criterion.

4.12 Further changes were made to the plan between the Regulation 18 and 19 stages, in response to consultee comments and the evolving evidence base. These were all found to strengthen the plan in relation to the Biodiversity sustainability objective:

- Policy 5 – Green and Blue Infrastructure: This new policy was introduced into a later draft of the plan in response to consultee comments, providing additional support for the protection of existing and creating of new habitats
- Policy 17 – Preventing Overheating: Policy wording was added to expect proposals to maximise blue and green infrastructure and prioritise nature based solutions.
- Policy 22 – The Local Ecological Network: Wording was added to the policy and the supporting text to clarify that the Local Ecological Network does not respect administrative boundaries, strengthening this policy in relation to potential cross-boundary effects. Wording was also added to include the need for buffer zones where relevant, again strengthening the outcomes of this policy against the biodiversity objective.
- Policy 24 - Water Quality Effects on International Sites: an important addition was made to clarify that mitigation measures must be provided in perpetuity, ensuring that envisaged neutral / positive effects are long-lasting and not time-limited.
- Policy 25 - Protected and Notable Species: similar to Policy 22, cross boundary effects were added to the policy as a consideration, expanding the spatial reach of the positive effects of the policy.
- Policy 26 - Solent Wader and Brent Goose Strategy Sites: Wording was added to clarify the impact pathways which assessments of potential impacts to SWBGS sites should take account to aid implementation and therefore improve outcomes.

Objective 2: Climate Change

- 4.13 The vast majority of the policies in the plan are neutral against the objective to minimise the borough's contribution to climate change and ensure resilience to the effects of climate change. Positive contributions are unsurprisingly largely concentrated in those policies that are specifically designed to deal with climate change, such as a strategic policy on climate change and detailed policies on sustainable construction methods, or those relating to trees and landscaping. Most other policies are considered to be neutral. Even the transport and flood risk policies in the plan, although inherently linked to climate change are judged as neutral, since their effects are measured under the assessment criteria of other SA objectives.
- 4.14 Improvements were made to the following policies after the initial assessment found that they could provide better outcomes in relation to climate change if amended:
- Policy 27 - Flood risk: The policy is concerned with the way developers assess, avoid and manage flood risk in their developments. Future flood risk is explicitly covered. However, climate change was only explicitly mentioned in the supporting text. Through this assessment it was suggested that alternative policy wording should be considered which more clearly mentions climate change in the policy text.
 - Policy 28 – Drainage: The policy is concerned with the way developers address the drainage needs in their developments. The policy is clear that the drainage needs for the lifetime of the development must be considered and addressed. The supporting text clarifies that this includes consideration of the climate change scenario. Through this assessment it was suggested that alternative policy wording should be considered which more clearly mentions climate change in the policy text.
 - Policy 58 - Renewable Energy Infrastructure: While the policy is designed to encourage renewable energy installations, this assessment showed that it did not actually state this explicitly and instead listed what might appear to be hindering criteria. The review arrived at alternative policy wording which states explicitly that 'The installation of renewable energy infrastructure is supported in principle.' While this was always the intention of the policy, this alternative wording is considered likely to achieve better outcomes in relation to this objective.
- 4.15 Potential negative effects were found against the suite of heritage policies in the plan, on the basis that there is potential for conflict between the requirement to safeguard historic buildings from harm and introducing energy efficiency and climate change adaptations. Amendments were not made to these policies to address this negative effect. The policy is based on national law and policy objectives for historic assets, and it is considered that to be effective in achieving the policy objective to protect those assets, some effects on the climate change objective are inevitable. In recognition of the potential conflicts, an additional policy was added dealing specifically with Improvements in Energy Performance of Historic Assets (see below).

- 4.16 Further changes were made to the plan between the Regulation 18 and 19 stages, in response to consultee comments and the evolving evidence base. These were all found to strengthen the plan in relation to the Climate Change sustainability objective:
- Policy 4 - Infrastructure and Environmental Mitigation to Support Development: specific support for 'the delivery of infrastructure for the generation, storage and use of renewable energy' was added to this policy, improving the assessment of criterion 2d from neutral to positive.
 - Policy 5 – Green and Blue Infrastructure: This new policy was introduced into a later draft of the plan in response to consultee comments, bringing further climate change mitigation benefits such as natural flood risk managements and natural cooling.
 - Policies 11 – Climate Change and 12: Health were combined in earlier iterations of the plan. Although there are numerous links between these issues, it is considered that the splitting out of the policies has the benefit of a clearer focus on each.
 - Policy 31 - Trees, Hedgerows and Woodland: Clarifications were added between the Regulation 18 and 19 Plans in relation to planting choices in the light of climate change
 - Policy 37 - Improvements in Energy Performance of Historic Assets: The introduction of this policy is designed to address concerns that the objective of minimising the borough's contribution to climate change and ensure resilience to the effects of climate change is incompatible with the objective of protecting historic assets. It thereby functions as an encouraging policy to make suitable adaptations to historic assets to improve their energy performance.

Objective 3: Homes for All

- 4.17 The assessment against this objective shows a mixed picture. Naturally policies concerned with housing targets and housing delivery are judged to be positive against the objective to provide good quality homes for all. Many of the proposed local plan policies are judged as neutral, most on the basis that either requirements are set nationally and therefore the local plan will have no additional effect on the objective, or because policy requirements are drafted to be sufficiently flexible so as not to create negative effects on housing delivery.
- 4.18 Nevertheless, a number of policies are expected – and accepted – to have potentially negative effects on housing supply. Policy 2 – Defined Settlement Boundary; Policy 27 – Flood risk; Policy 29 – Development on the coast; Policy 30 – Nationally Protected Landscapes; Policy 44 – Protecting employment uses; Policy 48 – Protecting existing community facilities; Policy 55 – Protecting Open Space; Policy 56 – Provision of public open space in new development, are all judged to have the potential to restrict housing delivery. Variations to improve outcomes in relation to the Homes for All objective, for example by reducing requirements or adding exception

criteria, where considered. While these would likely improve outcomes in relation to housing delivery in pure numerical terms, they were not taken forward as these alternatives would reduce the effectiveness of these policies in relation to what they setting out to achieve i.e. the protection of particular types of land or uses from development. It is the purpose of the Local Plan to meet needs for all forms of development and infrastructure and provide protection to valued natural areas and community assets to create a vibrant mix of uses which makes places liveable and sustainable, so the potential negative effects on housing delivery of these policies are considered acceptable.

- 4.19 In this context, Policy 7 - Amount of Employment was judged to be neutral against the housing objective (and vice versa – see objective 5). It is acknowledged that competition exists between different uses for the availability of land, particularly in a constrained area such as Havant. Targets for housing and employment (as well as protective policies) therefore interact, and the final use allocated or permitted on any piece of land has an effect on the supply of other types. The Local Plan in policies 6 and 7 demonstrates that housing needs as defined by the standard method cannot be met, while employment land needs can. Alternatives to both policies could amend targets and/or supply for each type, shifting the balance from one to the other.
- 4.20 Policy 14 – Housing density is expected to have potentially negative effects on SA criterion 3d, which assesses the provision of healthy homes. This is because higher densities could work against the desire to create healthy homes with sufficient living, storage and amenity, good natural light etc. This potential negative is mitigated by inclusion of a policy on space standards. Alternative density levels were considered for inclusion in the policy. However, these were dismissed, as the chosen density levels are based on a study of a range of residential developments across different suburban and urban contexts in and around the borough and take into consideration of the national planning and design guidance. The option to omit the policy from the plan was not considered as a reasonable alternative, as higher densities are considered essential in aiming to meet housing needs, and to achieve sustainable transport aims.
- 4.21 Improvements were made to the following policies after the initial assessment found that they could provide better outcomes in relation to climate change if amended:
- Policy 9 - New homes for sustainable communities: The policy was unsurprisingly considered to make a positive contribution to all the criteria in the Homes for All objective. As such alternative approaches were not considered. However, in response to this assessment, amendments to the policy wording were made to explicitly include specialist housing needs (SA criterion 3b).
 - Policy 40 - Retirement and specialist housing: The policy is intended to be supportive of specialist and retirement provision, yet the policy when assessed read as a restrictive one. Alternative policy wording was considered which actively supports retirement and specialist housing provisions, for which there is a high need in the borough, so as to maximise the benefits under SA criterion 3c. This alternative, stating that 'proposals for retirement housing and specialist accommodation within settlement boundaries will be

supported in principle' was taken forward in the local plan to allow the anticipated uncertain / unknown effect to be upgraded to an anticipated positive effect.

- Policy 38 – Affordable Housing: Changes were made to the policy between the Regulation 18 and 19 Plans, to reflect the outcomes of the viability study. These changes in the thresholds for affordable housing requirements in different parts of the borough and types of development are judged to improve the deliverability of the policy and thus outcomes in relation to the supply of affordable housing.

Objective 4: Healthy and Safe Communities

- 4.22 The majority of the policies in the plan make a positive contribution to one or more criteria used to assess this objective. This is perhaps unsurprising, because two of the Local Plan's stated objectives are to 'secure highquality development design and layouts that support the wellbeing of all residents, encourage active lifestyles and foster a sense of place and community' and to 'provide safe, easy access to recreation and leisure facilities, children's play areas and outdoor spaces to support physical and mental health and boost wellbeing'.
- 4.23 A possible negative effect was noted against this objective from Policy 31: Trees, hedgerows and woodland. Criterion 4f seeks to design out crime – this generally favours clear sightlines, which trees and planting could obstruct. The policy was not amended as a result, so as not to undermine the purpose of the policy. However, it is considered that it will be possible to overcome or manage this conflict in the design of individual schemes. Policy 5: Green and Blue Infrastructure is judged the same against criterion 4f for the same reasons.
- 4.24 Improvements were made to the following policies after the initial assessment found that they could provide better outcomes in relation to promoting healthy, inclusive and safe places if amended:
- Policy 4 – Infrastructure and Environmental Mitigation to support development: The policy already achieved multiple strong positive outcomes against the Healthy and Safe Communities objective. Nevertheless, through this assessment, it was noted that a positive outcome was not expected from the policy in relation to SA criterion 4d ('to promote inclusivity of provision and design of facilities and services'). This is perhaps surprising for an infrastructure policy. Alternative wording was therefore considered, and subsequently taken forward into the plan, to make the policy more explicit in relation to promoting inclusivity of provision and design of facilities and services, 'ensuring provision is inclusive and benefits the whole community'.
 - Policy 9 - New homes for sustainable communities: Alternative wording to strengthen the policy in relation to access to green space and avoidance of flood risk specifically, and the creation of healthy and safe communities more generally was considered. It was concluded that very specific changes relating to green spaces and flood risk were too detailed for this strategic policy and would reduce the clarity of the policy. However, in response to this assessment, the policy as taken forward into the plan following this

assessment now explicitly expects 'that all new homes are of a high quality, support residents' health, a good quality of life and are affordable, safe and comfortable for their occupants to live in'.

- Policy 12 – Health: The specific mention of active lifestyles was added to the policy as a result of finding it lacking through this assessment.

Policy 43 - Gypsies, travellers and travelling showpeople: The policy sets out criteria which would make an application for a gypsy and traveller site acceptable. These include that the site has reasonable access to education, health, welfare and employment opportunities, facilities and infrastructure (SA criterion 4e) and that the site is not located in an area at high risk of flooding (SA criterion 4g). As a result of this assessment, an alternative was considered which required sites not to be at 'risk of flooding', rather than at 'higher risk of flooding'. This alternative was taken forward into the plan both because it achieves better outcomes in relation to SA criterion 4g, and because it brings this policy in line with the general flood risk policy which will apply to general housing.

4.25 Further changes were made to the plan between the Regulation 18 and 19 stages, in response to consultee comments and the evolving evidence base. These were all found to strengthen the plan in relation to the Healthy & Safe Communities sustainability objective:

- Policy 3 – Regeneration: Strengthening wording relating to accessibility and transport choice as well as avoiding the displacement of vulnerable communities through regeneration was added.
- Policy 4 – Infrastructure: Wording was to specifically mention public service infrastructure, in response to consultee comments.
- Policy 5 – Green and Blue Infrastructure: This additional policy strongly promotes green and blue infrastructure, which is proven to have multifunctional benefits, including for providing better access to high quality open space and encouraging outdoor activity, as well as natural flood management. As noted above, a possible negative effect is noted against designing out crime - while green and blue infrastructure is certainly not incompatible with this objective, the design of blue and green infrastructure will be key to whether crime is designed out
- Policy 11 – Climate Change: The policy supports providing sustainable forms of vehicular and personal transport and reducing car use and providing for green/blue infrastructure and open spaces, and in doing so encouraging healthy lifestyles. It also sets a climate change focused strategic direction for flood risk management.
- Policy 13: High Quality Design: While strong positives were already noted from the policy, specific reference was added to passive surveillance between the Regulation 18 and 19 Plans, improving the policy in relation to criterion 4f.

Objective 5: Economy & Employment

- 4.26 The assessment against this objective shows a mixed picture. Naturally policies concerned with employment floorspace targets and employment land, regeneration and the borough's town centres are judged to be positive against the objective to support and enhance the local economy now and into the future. Policies protecting the natural and the historic environment are also recognised for the potential benefits these bring to the local economy.
- 4.27 Many of the proposed local plan policies are judged as neutral, most on the basis that they largely apply to housing proposals and therefore will not affect employment outcomes.
- 4.28 Policy 6 - Amount of Housing was judged to be largely neutral against the economy objective (and vice versa – see objective 3). It is acknowledged that competition exists between different uses for the availability of land, particularly in a constrained area such as Havant. Targets for housing and employment (as well as protective policies) therefore interact, and the final use allocated or permitted on any piece of land has an effect on the supply of other types. The Local Plan in policies 6 and 7 demonstrates that housing needs as defined by the standard method cannot be met, while employment land needs can. Alternatives to both policies could amend targets and/or supply for each type, shifting the balance from one to the other.
- 4.29 A number of policies in the Local Plan are expected to have negative effects on this objective:
- Policy 2 – Defined Settlement Boundary: The policy restricts the location of development, which reduces flexibility and adaptability, and might also mean some types of businesses choose not to locate in the borough. Various versions of this policy were considered, with varying degrees of restrictions on specific uses, and application to different areas. It was considered whether to be more flexible in terms of the location of employment uses, in order to mitigate potential negative impacts on the local economy of the restrictive policy. In relation to the Employment and Economy objective this would provide improved outcomes. However, overall, it is considered that any development outside of existing settlements should be properly planned through allocations in a Local Plan, and the policy helps to prevent unplanned expansions of built-up areas. Some flexibility is already built into the policy wording for uses which explicitly require a location outside of the urban area. No change needed.
 - Policy 27 – Flood Risk: The policy requires flood risk to be fully considered and addressed before development can take place. This will limit the supply of developable land including development on sites in employment areas and town centres. However, this negative effect is accepted; it would be inappropriate to make any additional amendments to the policy to achieve greater flexibility for development on employment sites and town centres delivery, as this would undermine the policy objectives. It should be noted that it is not thought that limitation on development on Hayling Island arising from the policy would hamper efforts to support the tourism and visitor economy on the island, as the restriction only applies to residential development.

- Policy 47 – Food, drink and entertainment uses: By limiting certain food and drink uses, the policy might have a minor negative effect on local employment opportunities (SA criterion 5c). However, the policy would not be effective in achieving health objectives without this restriction, so on balance, this negative effect is considered acceptable.

4.30 Further changes were made to the plan between the Regulation 18 and 19 stages, in response to consultee comments and the evolving evidence base. These were all found to strengthen the plan in relation to the Employment & Economy objective:

- Policy 5 – Green and Blue Infrastructure: This new policy was introduced to reflect wide ranging multifunctional benefits, including for the local economy.
- Policy 43 - Gypsies, Travellers and Travelling Showpeople: Earlier versions of the Policy did not limit commercial activities taking place on gypsy & traveller sites. That earlier version of the policy was considered to have better outcomes for the employment prospects of this particular community than the final policy. While an uncertain employment effect is noted for that community, this is considered acceptable, as the introduction of this criterion does not prevent this community working, and does not affect the economy & employment objectives more globally.

Objective 6: Effective Transport and Communications

- 4.31 A significant number of policies in the Local Plan are judged to be neutral against this objective. These are those policies that deal with topics unrelated to transport or the location of development.
- 4.32 The suite of policies also achieves a number of positive outcomes. In particular those policies concerned with climate change, the location of development, good design, health and wellbeing, encouraging active travel for both climate change and health reasons and of course those relating to transport and infrastructure directly all achieve positive effects.
- 4.33 The assessment flagged that Policy 13 – High-Quality Design could be improved in relation to transport outcomes by setting out that cycle storage should be conveniently located and well-integrated into the design. It was also considered whether greater transport sustainability gains may be achieved if the policy specifically spelled out a need for good accessibility by all modes, or if it emphasised sustainable modes. The policy put forward refers to all modes, with the transport policy referring more directly to sustainable modes being prioritised. It is considered that this strikes the right balance overall.
- 4.34 Several uncertainties / unknowns were flagged in the Regulation 18 Plan iteration of this assessment. This is because at that stage of the Local Plan, the Strategic Transport Assessment (STA) had not yet been completed, and it was therefore not possible to judge what effects the policies relating to the quantum and distribution of development would have on SA criteria 6d, 6e and 6f, which are concerned with the effects of development on highways safety, the demand on transport infrastructure and the impacts of development on the

transport network. At the Regulation 19 Publication Plan, a neutral effect was confirmed, since the STA has now demonstrated that the transport impacts of the plan are capable of being successfully mitigated.

- 4.35 Further changes were made to the plan between the Regulation 18 and 19 stages, in response to consultee comments and the evolving evidence base. These were found to strengthen the plan in relation to the Transport objective:
- Policy 2 – Regeneration: Strengthening wording relating to accessibility and transport choice was added in response to consultee comments. Wording was also clarified in relation to the Hayling Island Regeneration area to make clear that this does not imply large scale development in this area, due to limited access options.
 - Policy 5 – Green and Blue Infrastructure: This new policy was introduced to reflect wide ranging multifunctional benefits, including for making active travel more attractive to residents.
 - Policy 13 – High-Quality Design: The SA of earlier versions of the policy noted that greater transport sustainability gains may be achieved if the policy specifically spelled out a need for good accessibility either by all modes, or if it emphasised sustainable modes; In addition, it should be considered whether the policy should spell out that cycle storage should be conveniently located, as well as well integrated into the design. Both of these matters were integrated into the final version of the policy, in order to achieve better outcomes against the transport objective.
 - Policy 14 – Housing Density: A specific reference was added to accessibility by active travel, as well as public transport, at the request of the Local Highway Authority.
 - Policy 40 - Retirement and Specialist Housing: The Plan was strengthened in regard to accessibility requirements, to align more directly with the NPPF on this matter.
 - Policy 53 – Accessibility, Transport and Parking: This is the key policy in relation to the transport objective. Strong and accurate policy provisions are therefore key to successful transport outcomes. Additional and amended wording was added at the Regulation 19 stage to strengthen and clarify the policy, in particular relating to inclusivity of access, the prioritisation of active and sustainable modes, and the integration of new and existing communities through good connectivity.

Objective 7: Natural Resources

- 4.36 The majority of the policies are judged as being either neutral or positive against this objective.
- 4.37 However, the suite of heritage Historic Environment policies is noted as being potentially negative against SA criterion 7f. The consideration of heritage matters could potentially make the use of sustainable materials and methods more difficult. This is however,

mitigated in the supporting text in Policy 33 – Conservation Areas, which explicitly recognises the appropriateness of new and modern development in the historic environment. An additional policy (Policy 37 - Energy Performance of Historic Assets) was added specifically to address concerns that protecting historic assets may be incompatible with seeking to promote the use of sustainable materials and construction methods (criterion 7f). It thereby functions as an encouraging policy to make suitable adaptations to historic assets to improve their energy performance.

- 4.38 The assessment flagged that Policy 13 - High-Quality Design could be improved in relation to natural resources, and in particular waste management (SA criterion 7e) if the policy specifically required the convenient location of waste and recycling bins in new development.
- 4.39 It was also noted that in Policy 41 – Residential Annexes amenity is only mentioned in the context of amenity space for the residents of the site. Through this assessment it was suggested that alternative policy wording should be considered to specifically note and consider the amenity impacts on neighbours of the intensified use of land to improve outcomes in relation to SA criterion 7c (pollution).

Objective 8: Sense of Place (Landscape, Townscape and Heritage)

- 4.40 A significant number of policies in the Local Plan are judged to be neutral against this objective. These are those policies that are unlikely to influence the build form of development.
- 4.41 Those policies that seek good design and high build quality in their various forms are, perhaps unsurprisingly, judged to have positive effects on this objective, together with the suite of policies relating to the historic environment and locally important features such as the Nationally Designated Landscapes of the South Downs National Park and Chichester Harbour AONB
- 4.42 A number of uncertainties are noted. These relate to matters where the detail cannot be assessed until a detailed scheme is being considered, such as the exact design of regeneration schemes or low carbon measures.
- 4.43 Improvements were made to the following policies after the initial assessment found that they could provide better outcomes in relation to landscape, townscape and biodiversity if amended:
- Policy 3 – Regeneration: The assessment found that the policy was lacking in relation to density and design in the town centre regeneration areas. Strengthening these provisions would also afford an opportunity to make clearer references to sense of place (SA criterion 8f), which is identified as uncertain.
 - Policy 12 – High-Quality Design: Through this assessment it was noted that heritage considerations were only reflected in the supporting text, rather than the policy requirements itself. This makes the policy weaker than it could be in this regard. Additional wording was added to the policy text to strengthen it in relation to SA criterion 8b.

- Policy 16 - Preventing Overheating: Other similar policies in the plan directly reference heritage consideration in the supporting text. In order to prevent adverse heritage outcomes, this was replicated as a change to this policy also.

4.44 Further changes were made to the plan between the Regulation 18 and 19 stages, in response to consultee comments and the evolving evidence base. These were all found to strengthen the plan in relation to the Sense of Place objective:

- Policy 5 - Green and Blue Infrastructure was introduced at a late stage in the plan making process. It is demonstrated to have multifunctional benefits, including for a sense of place and pride in place (criterion 8f), although it might be considered that the policy could result in lower densities, thereby counteracting criterion 8d.
- Policy 30 – Nationally Designated Landscapes: Changes were made to detailed wording in consultation with the relevant national landscape bodies, to improve the clarity of the policy application within the national landscapes, thereby confirming the expected strong positive outcomes against criterion 8f.
- Policies 33 – 37 were introduced to deal with specific aspects of the historic environment, providing greater clarity for their implementation, and therefore for positive outcomes in relation to criterion 8b.

Findings of the sustainability appraisal of the site allocations

- 4.45 The assessment of sites forms an important step between the identification of a site as 'developable' in the [Strategic Housing and Economic Land Availability Assessment \(SHELAA\)](#) and its proposed 'allocation' in the plan, denoted by a policy in the plan identifying the site as suggested for development for a particular use.
- 4.46 The SHELAA serves to assess, at a high level, what land in the borough is 'suitable', 'available' and 'deliverable', together taken to mean that it is potentially 'developable'. The next step is then to consider in much more detail whether each of these sites is in line with the development strategy (discussed in the Local Plan itself and in chapter 3 above), and whether the possible effects of developing the site are acceptable, both at a site level and taken as a collective.
- 4.47 All the sites considered developable in the SHLAA were therefore put through the sustainability appraisal process. Planning officers, as well as expert advisors in such matters as ecology, heritage, landscape, transport and environmental health fed into this process to screen sites and identify potential effects.
- 4.48 This section provides an overview of the findings. Rather than site by site, they are presented here by SA objective, so as to paint an overall picture of the sustainability effects of the plan. Appendix D to this report shows the full assessment spreadsheet for the developable sites.
- 4.49 Sites with expected negative effects are highlighted specifically in Appendix E. That table also indicates the measures proposed to mitigate these effects, or in a limited number of cases suggest that the site should not be taken forward. These were also guided by expert input in the relevant topic.
- 4.50 As with the topic policies, the sustainability appraisal of sites was repeated between the Regulation 18 and 19 of the Plan, to take into account changes to the list of sites being included in the plan. Some sites were removed at this stage due to updated evidence. Others were added. The review also considered comments made by consultees on the SA at the earlier stage. The tables and discussions on this report demonstrate how the Council arrived at the final selection of allocations in the Regulation 19 Plan.

Objective 1: The Natural Environment

- 4.51 The Council's ecologist reviewed and assessed all the proposed sites, noting any designations on or near the site, and the likely or known presence of protected species.
- 4.52 It is acknowledged that development on the vast majority of sites is likely to have an effect of some kind on biodiversity and the natural environment. However, it would be overly cautious to consider that in all cases, a negative effect should be assumed.

- 4.53 In assessing sites, a distinction was made between those sites where protected species are likely to be present, and those sites that have a specific site designation and/or protected species are known to be present. The Council's ecologist also considered the prospect of successful mitigation.
- 4.54 Broadly speaking, where a site is not protected in its own right and species are not confirmed to be present, the site was noted as uncertain against the objectives of protecting designated species and protected sites from development related harm and protecting and enhancing ecological networks (SA objectives 1a-c). That is because the exact form of development as well as the proposed mitigation is not known at the allocation stage and therefore remains uncertain. It is considered likely that once appropriate mitigation is agreed, these sites could be assessed as neutral.
- 4.55 By contrast, sites that are subject to a site level protective designation, or where protected species have been confirmed to be present on site were noted as having a negative impact against protecting designated species and protected sites from development related harm and protecting and enhancing ecological networks (SA objectives 1a-c), as these sites are considered to be particularly sensitive.
- 4.56 That said, no site is marked as 'strongly negative', or the issue as insurmountable. On this basis, the sites have still been put forward for allocation. The relevant policy will provide guidance as to the nature of the mitigation required to make the site acceptable. Only if this mitigation is delivered as part of the planning proposal will these sites considered to be acceptable for development.
- 4.57 The SA of the Regulation 18 Plan was not able to take into account the outputs of the Local Nature Recovery Strategy (LNRS), since it was still under preparation at the time. The LNRS identifies land that is of value to the local ecological network and opportunities for enhancement. This updated SA has reviewed the sites against the LNRS, noting those where opportunities are identified for enhancement as positive against criterion 1c. As a result, these opportunities have also been flagged in any relevant site allocations.
- 4.58 In relation to supporting biodiversity net gain (SA objective 1d), all sites were judged to be neutral on the basis that this can only be readily assessed at the detailed development stage. It is a requirement in law to achieve at least 10% biodiversity net gain on all sites.
- 4.59 Development must also be nutrient neutral as a result of case law. On this basis, all sites could be considered neutral against SA objective 1e. However, since agricultural use is inherently nutrient intensive, those greenfield sites currently in agricultural use score positively when development is considered, while brownfield sites and other non-agricultural uses score as neutral. Even those with positive effects will need to demonstrate at the application stage that they are nutrient neutral.

Objective 2: Climate Change

- 4.60 The outcomes against this objective are largely influenced by the chosen design and construction of any particular development, and therefore remain uncertain until the planning application stage. Topic policies in the plan set out the requirements all development must

meet to achieve positive and avoid negative effects. While the location and nature of the site will have some bearing on this, it is not considered significant enough to distinguish between sites at the site assessment or allocation stage.

Objective 3: Homes for All

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

Objective 4: Healthy and Safe Communities

- 4.66 This SA objective covers a wide range of indicators designed to assess whether policies and sites help to promote healthy, inclusive and safe places. A number of these are deemed not possible to assess at the allocation stage, so attract an uncertain or unknown rating at this stage (criteria 4c, d and f, relating to promoting healthy lifestyles, inclusivity of provision and design of services and designing out crime).
- 4.67 One of the measures is 'protecting access to natural spaces, green spaces, parks, leisure open spaces and recreational facilities' (criterion 4a). Where development would result in the loss of public open space or sports and leisure facilities, these sites are noted as having a negative effect on this objective. The same applies where Public Rights of Way could be affected. It should be noted that a large number of the sites are undeveloped land, and some of these are used informally by local residents. These sites have not attracted a negative assessment in this SA. Although it is acknowledged that loss of such access would have a detrimental effect on residents' access to such spaces, landowners could enforce this through control measures at any time, not necessarily linked to development of the site. It is also not possible to be consistent about assessing access, where access is not formally permitted. Finally, it is also acknowledged that the presence of open and undeveloped spaces can have health benefits, whether they are accessible or not by providing green outlooks and 'breathing space' from built up areas. However, Criterion 4a, specifically measures 'access to' such spaces. The loss of open spaces, countryside etc in the visual sense is measured under SA Objective 8.
- 4.68 A similar criterion (4b), which relates to improving resident's access to open and recreational spaces is judged as neutral for all possible allocation sites, because topic policies in the plan set out requirements for the provision of open space on and/or off-site. It is therefore not a distinguishing feature between sites at the allocation stage. That is with the exception of the Southleigh site, where significant open space provision is expected which will make a positive contribution to the wider area, so this site is noted as positive against criterion 4b.
- 4.69 Criterion 4e considered whether a site supports equal and safe access to facilities and services, particularly by walking and cycling. The SA of potential site allocations used accessibility mapping to determine the SA score for each site, taking into account the proximity of town centres, bus routes and train stations. Sites considered to be poorly accessible are noted as negative against this objective, those with moderate accessibility neutral, and very well-connected sites positive. Naturally, town centre locations and those that are on main bus routes and/or close to railway stations score well here, while more remote sites score badly. The same system was used, and the same scores applied to criterion 6a (see Transport & Communications below).
- 4.70 Criterion 4g is designed to assess flood risk to sites. Flood risk can arise from a multiplicity of sources, including most commonly the sea (tidal), rivers (fluvial), surface water from rainfall (pluvial) and groundwater, as well as interaction between these sources.

- 4.71 The assessment of the full range of flood risks has been set out at the strategic level through a Strategic Flood Risk Assessment of the possible allocation sites, which allows the complexity of this topic to be considered in a more nuanced and detailed way. That work provided a summary of the risk at each site for use in this SA. The SA reflects the risk to a site in terms of tidal, fluvial or surface water risk now or in the future with climate change taken into account. It has also been considered whether the site is currently greenfield or brownfield (with greenfield development noted to be likely to change surface water run-off more dramatically than brownfield development), and whether the site lies in an area where drainage is more likely to be an issue (drainage priority areas as identified in the LLFA Catchment Management Plan).
- 4.72 It is notable, compared to other SA criteria, that none of the sites has been judged as positive. This is because every site assessed is affected by flood risk of one form or another. Naturally this varies in severity, for example some sites are affected directly by risk of flooding from the sea or a river, while others might not be at risk themselves, but have the potential to increase risk elsewhere. Sites across the board have therefore attracted negative or uncertain SA scores.
- 4.73 A number of strong negative effects are noted, namely against the sites on Hayling Island. The review of sites through the Strategic Flood Risk Assessment of Local Plan sites highlighted the significant flood risk to the access road to the island. It found that this would make voluntary movement of people on or off the island as well as emergency access by road at the time of a flood event impossible. It was not considered that this risk could be satisfactorily addressed by the development, or that the risk is outweighed by any notable sustainability benefits to the community, even when taking into account the contribution the sites could make to meeting housing need. The SFRA Sites Review considered it unlikely that these sites could pass the exception test, which is reflected in the strong negative effects in the SA against criterion 4g.

Objective 5: Economy & Employment

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

as strongly positive in relation to enhancing the quality and vitality of town centres (SA criterion 5f). Employment floorspace near town centres is judged as uncertain against SA criterion 5e – they could be positive, for example because workers may use the town centre at lunchtime or after work; however, depending on the uses, they might also compete with the town centre.

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

Objective 6: Effective Transport and Communications

- 4.78 All sites are judged as neutral against decarbonising the transport system e.g. through electrification etc (SA criterion 6c) and supporting and facilitating communications technology (SA criterion 6g). It is not considered that anything distinguishes one site from another in this regard.
- 4.79 Criterion 6a is designed to assess how accessible a site is, by considering whether shops, jobs, services and facilities are within easy reach of homes. The SA of potential site allocations used accessibility mapping to determine the SA score for each site, taking into account the proximity of town centres, bus routes and train stations. Sites considered to be poorly accessible are noted as negative against this objective, those with moderate accessibility neutral, and very well-connected sites positive.
- 4.80 In addition to this map-based review the Local Highway Authority reviewed each of the sites, providing commentary based on knowledge of particular issues at sites, as well as consideration of the principles enshrined in Local Transport Plan (LTP) 4. This allowed a few detailed concerns to be noted on individual sites and groups of sites. Overall, the assessment highlighted that a few sites were considered to be poorly accessible or offering poor modal choice, being in need of significant infrastructure improvements for development to be acceptable here. This review fed into the assessment for criterion 6b (making the use of sustainable modes of transport attractive), 6d (avoiding or mitigating adverse effects of development on highways safety), 6e (addressing the effects of increased demand on transport infrastructure) and f (avoiding severe residual cumulative impacts of development on the transport network). Likely negative impacts are noted against criteria 6b,e and f for sites on Hayling Island. This is on the basis that the Local Highway Authority has indicated that development on the island would not accord with the principles of Local Transport Plan 4, as it would create car dependent development. Hayling Island has very limited modal choice, so does not encourage sustainable travel choices. Development on these sites would rely on the highway network resilience of one road on and off the island, and the HA considers it likely that there will be cumulative impact on the resilience of the highway network especially at the A27/Langstone junction

from significant development on the Island. It is questionable whether choice and connectivity can be significantly improved in this location given the constraints of the locality and the network. It is therefore unlikely that it will be possible to address the predicted individual or cumulative effects on residents' travel choices or on the transport network, resulting in unmitigated negative effects into the future.

In relation to SA criteria 6d, 6e and 6f, it is also noted that the Strategic Transport Assessment for the Local Plan as a whole has shown that development impacts may be mitigated. However, pending detailed transport assessments for each site, which will be required to accompany any planning application, these criteria are all considered to remain uncertain.

Objective 7: Natural Resources

- 4.81 This objective considered the likely impact of development on proposed sites on a range of natural resources – land, air and water.
- 4.82 Sustainable construction and waste management are also considered here, though these latter two are noted as uncertain against all sites, as the detail of approaches to these matters will not be known until a planning application is made. One site was noted as a potential negative, as it encroached on the buffer zone of a waste management site safeguarded through the Hampshire Minerals and Waste Plan.
- 4.83 The Council's Environmental Health team screened the sites for the presence of sources of contamination and sensitive receptors.
- 4.84 In relation to SA criterion 7a (protecting water bodies and systems as a valuable resource), it was found that every site has at least one, and often multiple, of the following receptors present on site or nearby:
- Main river adjacent
 - Main river on site
 - Ordinary water course on site
 - Coastal water within 25m
 - Secondary aquifer on site
 - Principal aquifer on site
 - SPZ (Excl. 1C) on site
 - SPZ1C on site

- 4.85 Policies in the plan as well as other control regimes require assessment of the impact of any proposed development on these natural resources. However, the effects cannot be fully assessed until the application stage, when the detail of proposals is known. As such, while the presence of these features is noted, the effect of development remains uncertain on all sites.
- 4.86 A number of sites are noted as uncertain against the criterion of protecting and improving air quality (SA criterion 7b). This applies to sites where air quality is likely to be a particular consideration, but again, the effects cannot be fully assessed until the planning application stage, when the detail of proposals is known. . Where air quality is considered unlikely to be a concern based on currently available evidence, the site was assessed as positive.
- 4.87 Since water and air are considered specifically under SA criteria 7a and 7b, the assessment of SA criterion 7d ('avoiding all sources of pollution'), focussed on contaminated land and radon exposure. The Environmental Health review noted potential contamination (either suspected or recorded, on site or adjacent to the site) or the need for radon protection. As with water and air quality detailed assessments will be required at the application stage, leaving the effects at the plan level as uncertain. However, the limited number of site where these matters are considered unlikely to be a key issue are noted as positive. NB – in terms of other pollution, noise matters were also considered as part of the screening but were found to be a likely consideration on the vast majority of the sites, making it not a useful measure to distinguish sites by. Matters such as construction noise will be dealt with at the planning application stage through other control regimes in any case.
- 4.88 SA criterion 7c, designed to assess the desire to avoid the irreversible loss of access to or overuse of natural resources (minerals, waste, soil, water), was approached in a similar manner. Assessors considered whether the site was in the Minerals Safeguarding Area under Hampshire County Council's Minerals and Waste Plan and noted any likely presence of minerals under the site. Since this is not considered a constraint on development, these sites were not noted as having negative impacts. However, an uncertain effect against the loss of minerals was noted, and a development requirement will be highlighted in any site allocations that the extraction of minerals prior to development should be considered, to avoid the permanent sterilisation of the site.
- 4.89 Under this same criterion, the site screening noted whether a site was brownfield or greenfield, i.e. whether greenfield was being lost to development. This did not however attract a negative score, as the loss of greenfield land does not *per se* constitute a reason not to develop; rather, these were considered to be neutral. (NB the loss of open space, which is in many cases synonymous with greenfield land is considered both under SA objective 4 'healthy & Safe Communities', as well as SA objective 8 'Landscape 7 Townscape, and negative effects noted in relation to its loss).
- 4.90 It should be acknowledged that ideally, the assessment of this criterion would also have included a review of whether land was Best and Most Versatile Agricultural Land. However, due to the age of the publicly available data and subsequent change in agricultural classifications, this was not considered to be a useful tool by which to differentiate sites.

Objective 8: Landscape, Townscape and Heritage

- 4.91 The final SA objective considered whether development will protect and enhance the landscape and townscape character of the borough and protect and enhance heritage assets.
- 4.92 Naturally, a full assessment of impacts against this objective cannot be made until proposed designs and layouts emerge at the application stage. For this reason, SA criteria 8c, d and e, relating to making best use of land; ensuring appropriate density and scale of development, within the local context and striving for excellent design and the use of high-quality materials respectively are not considered suitable for differentiating sites at the allocations stage. All sites are noted as uncertain against these criteria.
- 4.93 The assessment of sites focusses then on SA criteria relating to impact on landscape, heritage assets and sensitivity to the local environment and sense of place.
- 4.94 Against SA criterion 8a ('protect and enhance valued landscape') and criterion 8f ('sensitive to the local environment and promote a sense of place') have been considered together. The former focussed on impacts to formal landscape designations (the South Downs National Park and the Chichester Harbour AONB National Landscape). The latter took a more local view, a considered the change in character that development of a site would bring about, as well as possible impacts on particular features such as Public Rights of Way. Only a small number of sites was judged to have possible negative impacts on formally 'values landscapes', while naturally, a number of greenfield sites were considered to have likely negative effects on local character and sense of place. While it is acknowledged that if development is accepted, the loss of the feeling of openness in an area is unavoidable. However, mitigation in the form of sensitive layouts, separation distances, protection of existing planting and boundary screening can address some of the visual effects of a change from an undeveloped to a developed site.
- 4.95 Criterion 8b considered heritage assets and archaeological potential. While some possible effects are identified, and some sites are noted as more sensitive than others, mitigation of harm is considered possible on all proposed sites.

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

- 4.96 The table at Appendix E summarises all the potential allocation sites where negative effects were noted through the SA and how these can be mitigated to make allocation for development acceptable. These mitigation measures should be reflected in any allocations drawn up for the Local Plan to ensure that negative effects are avoided or mitigated.
- 4.97 In this context, it should be noted that securing mitigation does not rely solely on the allocation policies, but that the topic policies in the plan also address these issues and require them to be satisfactorily addressed before development may be considered acceptable and sustainable.

- 4.98 For the vast majority of identified negative effects the review has demonstrated that mitigation measures, expressed through site requirements in any allocation policies and/or topic policies in the plan, are likely to be able to address negative effects of developing these sites.
- 4.99 However, certain negative effects are not considered mitigatable either at an individual site level or more broadly and cumulatively. For those sites the sites review suggested that the site should not be allocated for development through the Local Plan. These sites are
- greenfield development sites on Hayling Island, where the significant flood risk to the whole island and lack of accessibility and modal choice are considered unlikely to be addressable by the individual sites or cumulatively by groups of sites / the strategy as a whole; and
 - a site in Waterloo where satisfactory access is likely to be unachievable.
- 4.100 The Council carefully considered the recommendations of this review, taking into account not only the site by site findings, but also the wider sustainability implications of allocating or not allocating sites, in particular in light of high housing need. The Council decided to allocate all sites where mitigation of negative effects is likely to be achievable. It did not proceed with allocating those sites where significant doubt exists over the possibility of mitigating negative effects. For these sites, the Council is not satisfied that the negative effects are outweighed by any notable sustainability benefits, even when taking into account the contribution these sites could make to meeting local development needs.

5. Consultation (SA Stage D) and Next Steps

Consultation

- 5.1 Havant Borough Council is undertaking a 'Regulation 19' consultation on its Publication Local Plan from 20th July to 9th September 2026.
- 5.2 This SA report is available as part of that consultation, in fulfilment of required SA stage D (see paragraph 1.5). The contents of this report can be used as a tool to help consultees understand why a particular course of action is being proposed.
- 5.3 Consultees are invited to comment on the plan, the SA report or both. Details of the consultation, and how to respond can be found at <https://www.havant.gov.uk/local-plan>.
- 5.4 If you have any questions about the consultation, or the content of this document in particular, please email the Planning Policy Team at policy.design@havant.gov.uk.

Next Steps

- 5.5 A final full SA report will be submitted to the Planning Inspectorate alongside the Submission Local Plan, to form the final evidence of the fulfilment of the legal requirements for SA in plan making.

6. Monitoring the Sustainability Effects of the Plan

- 6.1 Since the purpose of the Local Plan is to deliver sustainable development, the Council considers it appropriate to use the same monitoring framework for the SA and the Plan. [Guidance on SA for Local Plans](#) confirms that details of monitoring arrangements may be included in the sustainability appraisal report, the post-adoption statement or in the local plan itself. The monitoring results should be reported in the local planning authority's Monitoring Report.
- 6.2 The monitoring framework is set out at Appendix 2 of the Regulation 19 Plan, and is repeated for ease below.

Topic	Local Plan Policies	How it will be monitored
Development Strategy	Policy 1: Development Strategy	Number of sites included on the brownfield register Updates to Flood Risk Information Progress of FCERM schemes Major planning permissions granted on appeal
	Policy 2: Defined Settlement Boundary	Number of permissions granted for development outside the settlement boundary
	Policy 3: Regeneration	Number and nature of permissions granted for development within the broad locations
	Policy 4: Infrastructure and Environmental Mitigation to Support Development	Number and nature of permissions granted for infrastructure schemes or which include strategic infrastructure enhancements
Housing Need and Supply	Policy 6: Amount of Housing	Housing completions Planning permission granted for site allocations within the Local Plan Number of planning permissions granted on PDL
	Policy 8: Five Year Housing Land Supply	Delivery timescales as submitted through site proformas requested from developers
	Policy 38: Affordable Housing	Total completions of affordable housing units Completions of affordable housing units by tenure
	Policy 40: Retirement and Specialist Housing	Number and nature of permissions granted for specialist accommodation for older people
	Policy 42: Self and Custom Build Housing	Number of permissions granted for self and custom build housing Number of people entered on the Custom Self Build Register

Topic	Local Plan Policies	How it will be monitored
	Policy 43: Gypsies, Travellers and Travelling Showpeople	Number of permissions granted for gypsy, traveller and travelling showpeople accommodation
Employment	Policy 7: Amount of Employment	Total floorspace gains and losses
	Policy 44: Protecting Employment Uses	Total floorspace gains and losses
	Policy 16: Low Carbon Development	Number of permissions granted for renewable and low carbon energy schemes.
Natural Environment	Policy 20: Biodiversity Net Gain	The Annual Biodiversity Monitoring Report including details of BNG provision through planning permissions
	Policy 23: Recreation Disturbance on International Sites	Bird Aware Annual Report including number of payments towards Bird Aware Solent for recreational disturbance mitigation
	Policy 24: Water Quality Effects on International Sites	Solent Mitigation Partnership annual nutrient mitigation supply and demand report detailing supply and likely demand for nutrient mitigation by catchment
	Policy 26: Solent Wader and Brent Goose Strategy Sites	Number of permissions granted which impact Solent Wader and Brent Goose sites Any update or review of the Solent Wader and Brent Goose Strategy and associated mapping
Flood Risk and the Coast	Policy 27: Flood Risk	Progress of FCERM schemes Updates to Flood Risk Information Number of planning permissions granted in areas at risk of flooding
	Policy 29: Development on the Coast	Number and type of permissions granted within Coastal Change Management Areas
Heritage and Landscape	Policy 30: Nationally Protected Landscapes	Number of permissions granted for new housing or commercial floorspace within the Chichester Harbour National Landscape
	Policy 36: Locally Listed Buildings and Non-Designated Heritage Assets	Changes to the local list of non-designated heritage assets
Retail and Leisure	Policy 45: Town, District and Local Centres	All losses of class E uses within the boundaries of the town, district and local centres through planning permissions being granted.
Infrastructure	Policy 4: Infrastructure and Environmental Mitigation to Support Development	Planning permissions granted which include infrastructure as set out in Policy 4
	Policy 55: Protecting Open Space	All losses of open space approved through planning permission being granted

Topic	Local Plan Policies	How it will be monitored
	Policy 57: Sport and Recreation Facilities	Number of planning permissions providing sport and recreation facilities All losses of sport and recreation facilities through planning permission being granted
	Policy 58: Renewable Energy Infrastructure	Number of planning permissions granted for commercial scale renewable electricity generation
	Policy 59: Employment and Skills Plans	The output and outcomes of employment and skills plans submitted to the Council following granting of planning permission

- 6.3 The Council will publish Annual Monitoring Reports (AMRs), which will report on the effectiveness of the policies in the plan in delivering sustainable development. The table below proposes the monitoring indicators that the Council will use to monitor the plan, though this will be kept under review if additional or different sources of information and data become available.

Appendix A: Local Plan Sustainability Appraisal Framework

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

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

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

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

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

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

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

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

Appraisal symbol	Assigned where...
++	Strong Positive - notable sustainability gains are expected to arise from the policy or development of the site; and/or - the policy strongly supports the sustainability objective; and/or
+	Positive - some sustainability gains are expected to arise from the policy or development of the site; and/or - the policy supports the sustainability objective; and/or
+/-	Neutral - no or minimal effects against the sustainability objective are anticipated from the policy or development of the site; and/or - the policy neither works against nor supports the sustainability objective; and/or - if negative effects could arise from the policy, the policy also requires mitigation; and/or - the policy might have both minor positive or negative effects, but on balance is neutral
?	Uncertain or Unknown effects are uncertain or unknown (at the time of the assessment)
-	Negative - some sustainability losses are expected to arise from the policy or development of the site; and/or - the policy works against this sustainability objective
--	Strong Negative - notable sustainability losses are expected to arise from the policy or development of the site; and/or - the policy works strongly against the sustainability objective

Appendix B: Sites included in each strategy option

See spreadsheet published as separate file

Appendix C: Full sustainability appraisal of topic policies

See Excel spreadsheet published as separate file

Appendix D: Full sustainability appraisal of sites

See Excel spreadsheet published as separate file

Appendix E: Summary of negative effects identified at allocation sites and proposed mitigation

See spreadsheet published as separate file

Appendix F: Legal Compliance

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

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

Schedule 2 requirement for the Environmental Report	Where has this requirement been addressed
1. An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes	The SA Scoping Report (2022) linked at paragraph 1.6 of this report and section 2 of this report. It is accepted that scoping took place a number of years ago. A review has been undertaken, which confirmed that the contents and main objectives of the plan, and its relationship with other relevant plans has remained consistent with those identified in the scoping report.
2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme	The current state of the environment and trends without the Local plan taken into account are outlined in the SA Scoping Report (2022) , linked at paragraph 1.6 of this report. It is accepted that scoping took place a number of years ago. A review has been undertaken, which confirmed that the current state of the environment and evolution thereof without the plan has remained consistent with those identified in the scoping report.
3. The environmental characteristics of areas likely to be significantly affected	The SA Scoping Report (2022) linked at paragraph 1.6 considered the environmental characteristics of the area. These remain consistent in 2026. The full assessments of the proposed thematic policies and development allocations is set out in Appendices C and D of this report, summarised in section 4.

Schedule 2 requirement for the Environmental Report	Where has this requirement been addressed
4. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as a European site (within the meaning of regulation 8 of the Conservation of Habitats and Species Regulations 2017)	The SA Scoping Report (2022) considered existing environmental problems relevant to the plan. These remain relevant in 2026.
5. The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.	The SA Scoping Report (2022) established the relevant environmental considerations and included them in a framework for assessing the Local Plan. The framework is summarised at paragraph 2.5 and set out at Appendix A of this report. Assessment of the compatibility of the plan objectives with the SA objectives in section 2 of this report.
6. The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects, on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above	Assessment of the effects of the alternative development strategies in section 3 of this report. The full assessments of the proposed thematic policies and development allocations in Appendices C and D of this report, summarised in section 4.
7. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	The full assessments of the proposed thematic policies and development allocations in Appendices C and D of this report, summarised in section 4. Appendix E focusses on negative effects and mitigation requirements.
8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	Sections 2,3 and 4 of this report

Schedule 2 requirement for the Environmental Report	Where has this requirement been addressed
9. A description of the measures envisaged concerning monitoring in accordance with regulation 17.	Section 6 confirms that the Council intends to use the same monitoring framework for the SA and the Plan. The proposed monitoring framework is set out at Appendix 2 of the Regulation 19 Plan, and is repeated for ease in sectionn6 of this report.
10. A non-technical summary of the information provided under paragraphs 1 to 9	The whole report is written in a non-technical style. A summary is provided at the beginning of this report.

