



Habitats Regulations Assessment

July 2026



Contents

Executive Summary	3
Findings	3
<i>Outcome of HRA Stage 1 - Screening</i>	<i>4</i>
<i>Outcome of HRA Stage 2 - Appropriate Assessment and the Integrity Test</i>	<i>5</i>
1. Introduction	6
Background.....	6
The requirement for HRA	6
Purpose and Structure of this document.....	7
Previous HRAs in the Borough	7
Background to the Building A Better Future Plan	8
<i>Structure of the Building A Better Future Plan</i>	<i>8</i>
2. Methodology	9
Introduction	9
Methodology	10
Limitations and uncertainty.....	12
<i>Scientific.....</i>	<i>12</i>
<i>Regulatory</i>	<i>12</i>
<i>Planning Hierarchy</i>	<i>12</i>
<i>Implementation</i>	<i>13</i>
<i>Precautionary nature of the 'likely significant effects' test</i>	<i>13</i>
In-combination Effects	14
Avoidance, Mitigation and Compensatory Measures	15
<i>Other relevant case law.....</i>	<i>15</i>
The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019	16
3. European sites.....	17
Scope of the study	17
Qualifying features.....	18
Conservation Objectives	18
Conservation Status	19
Site Integrity.....	21
The Qualifying Features of European sites.....	21
4. Impact Pathways	26
Background.....	26
Site-specific Impact pathways	26
Habitat Loss	26
<i>Construction Noise</i>	<i>27</i>

Building a Better Future Plan	
Habitats Regulations Assessment	
<i>Construction Activity</i>	27
<i>Construction-phase Pollution</i>	28
<i>Obstruction of Flight- and Sightlines</i>	28
<i>Operational Activity</i>	28
Larger-scale Impact pathways	29
Recreational Disturbance	29
Coastal Squeeze	29
Air Quality	30
Water Resources	31
Nutrient Neutrality	32
5. Screening of the Building A Better Future Plan	34
Background.....	34
Consideration of effects.....	34
6. Commentary on Effects	65
Habitat Loss	65
<i>Direct loss</i>	65
<i>Functional loss</i>	65
Recreational Disturbance	67
Air quality	67
Coastal squeeze	69
Water Resources	69
Nutrient Neutrality	71
Conclusions of Screening.....	74
7. Appropriate Assessment & Integrity Test	76
Habitat Loss	78
Impacts to SPA/Ramsar Supporting Habitat	78
The Solent Waders & Brent Goose Strategy (SWBGS)	78
Mitigation Measures for Impacts to Supporting Habitat	79
Recreational Disturbance	81
The Solent Recreation Mitigation Strategy (SRMS)	81
Air Quality	82
Coastal Squeeze	83
Water Resources/Nutrient Neutrality	83
8. Summary and Record of the HRA	87
9. References	88
 APPENDIX 1 – LOCATION OF EUROPEAN SITES WITHIN 10KM OF HAVANT BOROUGH	
APPENDIX 2 - AIR QUALITY HABITATS REGULATIONS ASSESSMENT	
APPENDIX 3 – NUTRIENT BUDGET	

Executive Summary

Havant Borough Council has produced the Building a Better Future Plan – the Borough’s new Local Plan. The Building a Better Future Local Plan provides a strategy for how the borough will develop and grow into the middle of the 21st Century, responding to the opportunities and challenges this presents and providing innovative solutions. The plan provides an overarching framework and a long-term spatial strategy which responds to climate change, provides for new development, promotes regeneration and the re-use of brownfield sites, protects our cherished environment, delivers the infrastructure to support growth and enables our communities to be healthy and vibrant.

This document comprises a Habitats Regulations Assessment (HRA) of the Building A Better Future Plan in accordance with the Conservation of Habitats and Species Regulations 2017 (the ‘Habitats Regulations’). This HRA provides an analysis of the policies and allocations within the Plan and seeks to establish whether or not these will result in any ‘likely significant effect’¹ on internationally designated European sites in and around Havant Borough.

Each of the 60 policies and 30 allocations (23 housing allocations and 7 employment allocations) in the Plan have been assessed to determine whether there could be a likely significant effect on a European site if it went ahead. It is recognised that none of the policies or allocations within the Plan is necessary for the management of any of the European sites. This HRA considers the potential for likely significant effect on the following eighteen European sites:

Table 1: European sites included within the HRA screening assessment		
Special Area of Conservation (SAC)	Special Protection Area (SPA)	Ramsar site
Solent Maritime	Chichester & Langstone Harbours	Chichester & Langstone Harbours
Solent & Isle of Wight Lagoons	Portsmouth Harbour	Portsmouth Harbour
South Wight Maritime	Pagham Harbour	Pagham Harbour
Butser Hill	The New Forest	The New Forest
Kingley Vale	Solent & Southampton Water	Solent & Southampton Water
The New Forest	Solent & Dorset Coast	
Singleton & Cocking Tunnels		

Findings

In accordance with the screening requirements of the HRA process, and therefore in the absence of appropriate mitigation measures, it is concluded that eleven policies and 30 allocations within the Plan could lead to likely significant effects alone and/or in combination with other plans or projects on European sites, due to the effects of habitat loss, recreational

¹ Any effect that may reasonably be predicted as a consequence of the plan or project that may affect the conservation objectives of the features for which a site was designated

disturbance, coastal squeeze, air quality, and nutrients. These potential impact sources will need to be taken forward to the next stage of HRA and be subject to appropriate assessment to determine whether, once mitigation measures are put in place, there is a residual impact on European site integrity.

Outcome of HRA Stage 1 - Screening

- **Eleven policies** and **30 allocations** within the Plan are considered to have the potential to result in a likely significant effect on a European site either alone or in-combination.
- **Nine policies** and **16 allocations** are considered to have potential to result in either direct habitat loss impacts or functional habitat loss impacts to Solent Maritime SAC, Singleton & Coking Tunnels SAC, Chichester & Langstone Harbours SPA/Ramsar, Portsmouth Harbour SPA/Ramsar and/or Solent & Dorset Coasts SPA.
- **Eleven policies** and **23 allocations** are considered to have potential for recreational disturbance impacts to Chichester & Langstone Harbours SPA/Ramsar, Portsmouth Harbour SPA/Ramsar and/or Solent & Southampton Water SPA/Ramsar.
- **Nine policies** are considered to have potential for increasing the potential impacts of coastal squeeze on Solent Maritime SAC and Chichester & Langstone Harbours SPA/Ramsar.
- **Nine policies** and **30 allocations** are considered to have the potential for in-combination impacts related to increases in atmospheric pollution on and/or Butser Hill SAC, Kingley Vale SAC, Solent Maritime SAC, Chichester & Langstone Harbours SPA/Ramsar, Pagham Harbour SPA/Ramsar, Portsmouth Harbour SPA/Ramsar, and Solent and Dorset Coast SPA.
- **Ten policies** and **23 allocations** are considered to have potential to result in in-combination impacts relating to nutrient neutrality on Solent Maritime SAC, Solent & Isle of Wight Lagoons SAC, Chichester & Langstone Harbours SPA/Ramsar, Portsmouth Harbour SPA/Ramsar, Solent & Dorset Coasts SPA or Solent & Southampton Water SPA/Ramsar.

Table 2: Summary of Policies/Allocations with potential to result in Likely Significant Effect

European Site	Policy/Allocation with potential to result in Likely Significant Effect
Solent Maritime SAC	Policies 1-4, 6-8, 29, 41, 43, 45 Allocations 1-30
Butser Hill SAC	Policies 1-4, 6-8, 29 Allocations 1-30
Kingley Vale SAC	Policies 1-4, 6-8, 29 Allocations 1-30
Singleton & Coking Tunnels SAC	Policies 1, 2, 6-8, 45, 47 Allocations 1, 2, 4, 5, 13-15, 18, 23, 25

Table 2: Summary of Policies/Allocations with potential to result in Likely Significant Effect	
European Site	Policy/Allocation with potential to result in Likely Significant Effect
Chichester & Langstone Harbours SPA	Policies 1-4, 6-8, 29, 41, 43, 45 Allocations 1-30
Chichester & Langstone Harbours Ramsar	Policies 1-4, 6-8, 29, 41, 43, 45 Allocations 1-30
Pagham Harbour SPA	Policies 1-4, 6-8, 41, 43-45 Allocations 1-30
Pagham Harbour Ramsar	Policies 1-4, 6-8, 41, 43-45 Allocations 1-30
Portsmouth Harbour SPA	Policies 1-4, 6-8, 41, 43-45 Allocations 1-30
Portsmouth Harbour Ramsar	Policies 1-4, 6-8, 41, 43-45 Allocations 1-30
Solent and Dorset Coast SPA	Policies 1-4, 6-8, 29, 41, 43-45 Allocations 1-30
Solent & Southampton Water SPA	Policies 1-4, 6-8, 41, 43-45 Allocations 1-23
Solent & Southampton Water Ramsar	Policies 1-4, 6-8, 41, 43-45 Allocations 1-23

Outcome of HRA Stage 2 - Appropriate Assessment and the Integrity Test

Following the screening exercise, and after the inclusion of mitigation measures embedded within the Local Plan policies, it is concluded that through a combination of strategic mitigation and proposal-specific mitigation, adverse effects on European site integrity can be avoided in all instances.

1. Introduction

Background

- 1.1 This document has been prepared by Havant Borough Council (HBC) as competent authority under the Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations) and forms a Habitats Regulations Assessment (HRA) of the Building A Better Future Plan. The document forms one of the statutory assessments for the Local Plan ('the Plan').
- 1.2 The purpose of this document is to set out the methodology, baseline evidence, and screening used to assess the Building A Better Future Plan. The objective of the HRA is to identify any aspects of the Plan that would have the potential to result in a likely significant effect on European sites either alone or in combination with other plans and projects, thereby potentially adversely affecting the ecological integrity of those sites.

The requirement for HRA

- 1.3 The application of HRA to land use plans is a requirement of Regulation 105 of the Habitats Regulations, the UK's transposition of European Union Directive 92/43/EEC on the '*Conservation of natural habitats and of wild fauna and flora*' (the Habitats Directive). HRA must be applied to all local planning policy documents in England and Wales and aims to assess the potential effects of a land use plan or policy against the conservation objectives of any European sites designated for their nature conservation importance under the Habitats Directive and Birds Directive (Directive 2009/147/EC on the '*conservation of wild birds*'). Such sites are known collectively as the National Sites Network (formerly the Natura 2000 network).
- 1.4 The National Sites Network collectively provides ecological infrastructure for the protection of rare, endangered or vulnerable natural habitats and species of exceptional importance within the UK. These sites consist of Special Areas of Conservation (SACs, designated under the Habitats Directive) and Special Protection Areas (SPAs, classified under the Birds Directive). Additionally, UK Government policy (section 194 of The National Planning Policy Framework (Ministry of Housing, Communities and Local Government, 2023) and Circular 06/05 (ODPM, 2005)) recommends that Ramsar sites listed under the Convention on Wetlands of International Importance (UNESCO, 1971), are treated as if they are fully designated European sites for the purposes of considering development proposals that may affect them.
- 1.5 Under Regulation 105 of the Habitats Regulations, any HRA must determine whether or not a plan will undermine the published conservation objectives of the European site(s) concerned and as a result adversely affect the ecological integrity of the site(s). Where negative effects are identified, the process should consider alternatives to the proposed actions and explore mitigation opportunities, whilst adhering to the precautionary principle.
- 1.6 The European Commission (2000) describes the precautionary principle as follows: "If a preliminary scientific evaluation shows that there are reasonable grounds for concern that a particular activity might lead to damaging effects on the environment, or on human, animal or plant health, which would be inconsistent with the protection normally afforded to these within the European Community, the Precautionary Principle is triggered".
- 1.7 Decision-makers then have to determine what action to take. They should take account of the potential consequences of taking no action, the uncertainties inherent in the scientific evaluation, and they should consult Natural England and may consult other interested parties on the possible ways of managing the risk. Measures should be proportionate to the level of

risk and to the desired level of protection. They may be provisional in nature pending the availability of more reliable scientific data.

- 1.8 Action is then undertaken to obtain further information enabling a more objective assessment of the risk. The measures taken to manage the risk should be maintained so long as the scientific information remains inconclusive and the risk unacceptable. The hierarchy of intervention is important: where effects on ecological integrity are identified, plan makers must first consider alternative ways of achieving the plan's objectives that avoids significant effects entirely. Where it is not possible to meet objectives through other means, mitigation measures that allow the plan to proceed by removing or reducing significant effects may be considered. If it is impossible to avoid or mitigate the adverse effect, the plan-makers must demonstrate, under the conditions of Regulation 107 of the Regulations, that there are Imperative Reasons of Overriding Public Interest (IROPI) to continue with the proposal and that compensatory measures are necessary. This is widely perceived as an undesirable position and should be avoided if at all possible.

Purpose and Structure of this document

- 1.9 This document sets out the initial evidence gathering process and provides a screening of all policies within the Local Plan to determine whether they would have a 'likely significant effect' on the European site(s) concerned. It then provides an 'appropriate assessment' to determine whether the plan would have an effect on the integrity of those European site(s).
- 1.10 The document is structured as follows:
- Chapter One: Introduction
 - Chapter Two: HRA methodology
 - Chapter Three: European sites
 - Chapter Four: Impact Pathways
 - Chapter Five: Screening of the Building A Better Future Local Plan
 - Chapter Six: Commentary on Effects
 - Chapter Seven: Appropriate Assessment & the Integrity Test
 - Chapter Eight: Summary and Record of the HRA.

Previous HRAs in the Borough

- 1.11 HRA screening was carried out in relation to the Havant Borough Local Plan Core Strategy (HBC, 2007; HBC, 2009) subsequent to which an Appropriate Assessment of the Core Strategy was carried out in 2010 (HBC, 2010).
- 1.12 A full Appropriate Assessment was also carried out for the Havant Borough Local Plan (Allocations) (HBC, 2013).
- 1.13 More recently, HRA screening was also undertaken for the Havant Borough Housing Statement 2016 (HBC, 2016) and the previous Havant Borough Local Plan (HBC, 2021).
- 1.14 The Building a Better Future Local Plan consultation paper was also subject to HRA screening in 2022 (HBC, 2022).
- 1.15 Both the Core Strategy and Local Plan (Allocations) are still relevant in relation to their HRA screening and Appropriate Assessment and remain valid up until the time when the Building A Better Future Local Plan is adopted and the policies in the Core Strategy and Allocations Plan are replaced.

Background to the Building A Better Future Plan

- 1.16 The existing Adopted Local Plan is made up of the Havant Borough Local Plan (Core Strategy) and the Havant Borough Local Plan (Allocations). These were adopted by the Council in 2011 and 2014 respectively. Together with the Hampshire Minerals and Waste Plan and the Emsworth Neighbourhood Plan these form the development plan for the Borough. This means that they are the starting point in determining planning applications as s38(6) of the Planning and Compulsory Purchase Act 2004 sets out that “*determination must be made in accordance with the plan unless material considerations indicate otherwise*”.
- 1.17 It is proposed to produce a single Local Plan that will replace the Core Strategy and Allocations plans. This will be the Building A Better Future Plan. Once this is adopted, the development plan for the Borough will consist of:
- The Building A Better Future Plan
 - The Hampshire Minerals and Waste Plan (2013)
 - The Emsworth Neighbourhood Plan (2021)

Structure of the Building A Better Future Plan

- 1.18 The consultation presents a series of 60 policies and 30 allocations. The allocations comprise 23 housing allocations and seven employment allocations.

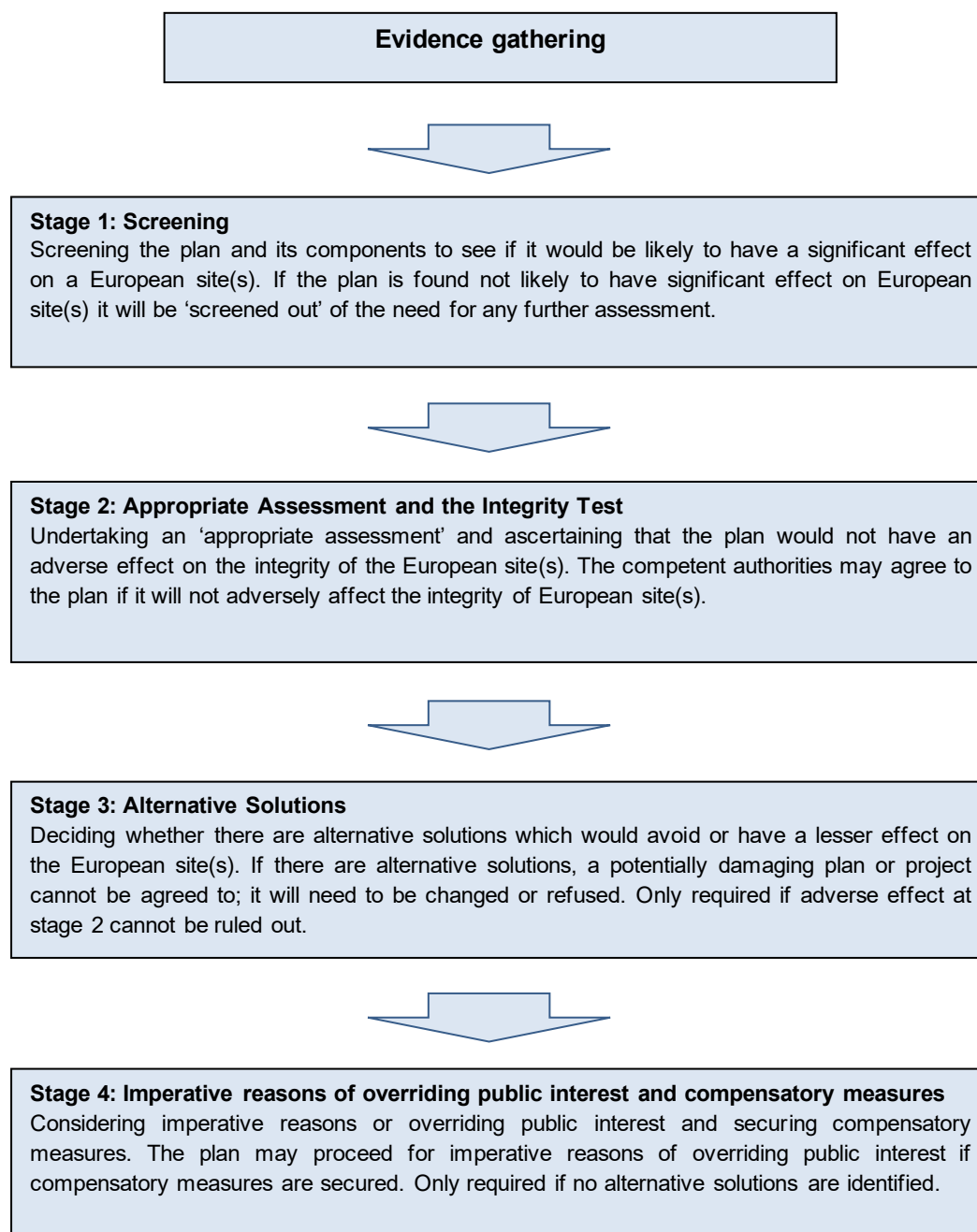
2. Methodology

Introduction

- 2.1 Guidance on HRA is published online²² by the UK Government (HM Government, 2025). Detailed technical advice on applied HRA is available in The Habitats Regulations Assessment Handbook by David Tyldesley and Associates (DTA Publications, 2025), and this methodology has been applied to this assessment.
- 2.2 The guidance recognises that there is no single statutory method for undertaking HRA but rather that the adopted method must be ‘appropriate’ to its purpose under the Habitats Regulations; this concept is one of the reasons why HRA is often referred to as appropriate assessment. The methodology applied here recognises four stages to HRA.
- | | |
|----------------|--|
| Stage 1 | Screening |
| Stage 2 | Appropriate Assessment and the Integrity Test |
| Stage 3 | Alternative Solutions |
| Stage 4 | Imperative reasons of overriding public interest and compensatory measures |
- 2.3 The four stages collectively make up the ‘appropriate assessment’. If the evidence gathered at Stage 1 points to a need for further assessment, it proceeds to Stage 2. If potential adverse effects cannot be ruled out, the assessment must consider alternative solutions to remove or further reduce adverse effects at Stage 3, and where the removal of effects cannot be achieved, there is a need to proceed to Stage 4 and explore imperative reasons of overriding public interest (IROPI). It is generally expected that through this iterative HRA process, the potential for likely significant effects on European sites can be avoided or reduced to levels where impacts to site integrity are avoided or become insignificant.
- 2.4 This document fulfils the requirements of Stage 1 and Stage 2 in providing a screening statement for the Building a Better Future Plan and, where effects cannot be screened out, proceeding to appropriate assessment and the integrity test. Figure 1 provides a visual representation of the HRA process used in the document.

²² <https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site>

Figure 1: The four-stage approach to HRA

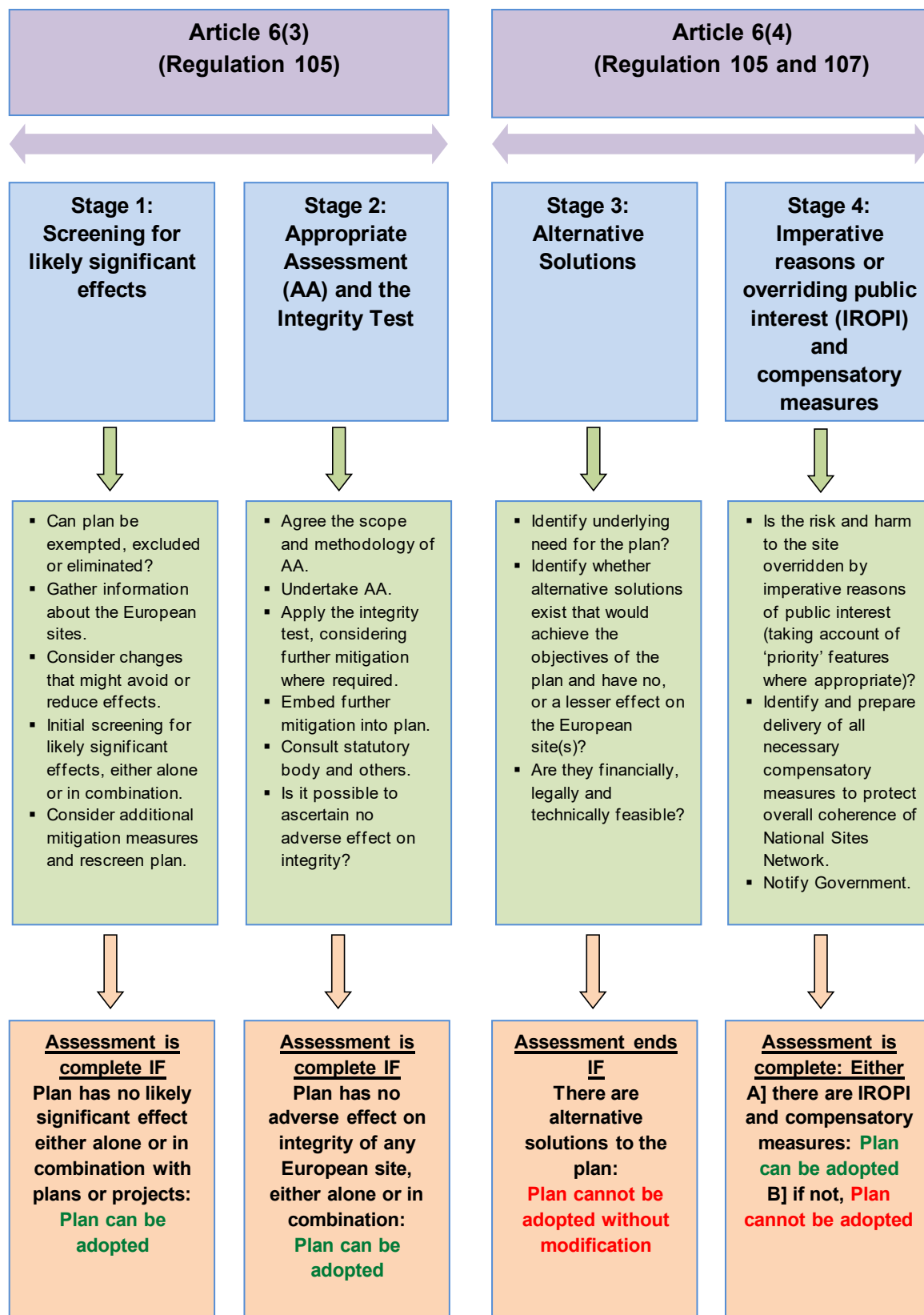


- 2.5 It is recognised that HRA may be undertaken at the same time as other assessment processes associated with the preparation of development documents (i.e. Sustainability Appraisal and Strategic Environmental Assessment (SA/SEA)) but should be recorded as a distinct procedure with its own legislative requirements.

Methodology

- 2.6 This assessment follows the methodology for Stages 1 and 2 prepared by David Tyldesley and Associates (2025), as described in Figure 2.

Figure 2: Outline of the four-stage approach to the assessment of Plans under the Habitats Regulations



Limitations and uncertainty

- 2.7 It is important to note the role of uncertainty in the HRA process. There are many factors which either alone or in combination may place caveats on the level of certainty that is able to be applied to the assessment and the degree to which conclusive statements on likely significant effect can be made. This is particularly the case when dealing with populations of wild organisms or other aspects of dynamic ecological systems.

Scientific

- 2.8 Scientific uncertainty arises owing to uncertainty about the predicted effects of one or more aspect of a plan on the interest features of a European site. Examples may be a lack of scientific knowledge of, or inadequate data concerning, a particular ecological feature e.g. bird numbers or distribution, habitat distribution or condition, or broad-scale environmental variables e.g. climate change. It may also occur where the assessor is unable to satisfactorily predict and estimate the nature, timing, scale or spatial extent of changes proposed by the plan. This last point is particularly relevant to higher-level plans where site-specific details are generally lacking.
- 2.9 In accordance with the Habitats Regulations, wherever scientific uncertainty is encountered a precautionary approach should be adopted. If in doubt, further assessment should be undertaken, and the worst outcome assumed based on the best available evidence.

Regulatory

- 2.10 Some local planning documents will include references to proposals that are planned and implemented through other planning and regulatory regimes e.g. previous Local Plans, housing allocations. These will be included because they have important implications for spatial planning, but they are not proposals specific to the plan in question. Their potential effects will be/have been assessed through other procedures.
- 2.11 The competent authority may not be able to assess the effects of these proposals, and it may be inappropriate for them to do so, resulting in unnecessary duplication. That said, the possible effects of such proposals, in combination with the plan in question, may be relevant and where necessary should be considered.

Planning Hierarchy

- 2.12 Higher level strategic documents will contain general and strategic provisions and therefore their effects are by definition more uncertain than for lower tier, site-specific proposals. The protective regime of the Habitats Regulations is intended to operate at differing levels and in some circumstances assessment at a lower tier in the planning hierarchy (e.g. site-specific HRA) will be more effective in assessing the potential effects of a proposal on a particular site and protecting its integrity: at the strategic level consideration of potential effects is understandably generic but can set broad parameters to guide lower tier assessments, ensuring that future detailed plans are captured through the HRA process.
- 2.13 It is only appropriate to consider deferring detailed assessment to the site/project level where the HRA of a higher tier cannot reasonably assess the effects on a European site in a meaningful way. A lower tier plan/project can identify more precisely the nature, scale, timing or location of development, and thus its potential effects. Therefore, HRA of policies or proposals at a lower level (e.g. a specific site proposal) will be able to change the proposal if an adverse effect on site integrity cannot be ruled out, because the lower tier plan is free to change the nature, scale, timing or location of the proposal in order to avoid adverse effects on the integrity

of any European site. Additionally, the HRA of the plan or project at the lower tier is required as a matter of law and policy.

- 2.14 It is however seen as relevant and important for the HRA of higher tier plans to indicate what further assessment may be necessary in a lower tier plan and how the requirements may be adjusted, in the event that the HRA of the lower tier plan shows that adverse effects on a European site could not be ruled out.
- 2.15 Because, for the reasons detailed above, higher tier plans may be limited by uncertainties about the true effects on European sites resulting from site-specific proposals, it is important to adopt a precautionary approach. If adverse effects on European sites could occur as a result of the amount, type or location of development to be provided for within the higher tier plan, it is necessary to make every effort – given acknowledged limitations and constraints where fully justified - to adapt the higher tier plan to avoid such effects in any case. This may include changes to higher tier plan policy wording to ensure that restrictions are placed on certain policies i.e. ensuring that implementation of a certain policy would occur only after appropriate avoidance/mitigating measures are in place.

Implementation

- 2.16 As detailed above, in many situations the effects arising from a plan depend on how that plan is implemented. To ensure compliance with the Regulations, it may be appropriate to impose a caveat in relevant policies, or introduce a free-standing policy, which states that any development project that could have an adverse effect on the integrity of a European site will not be in accordance with the plan.
- 2.17 This would help to enable stakeholders to reasonably conclude, on the basis of objective information, that even where there are different ways of implementing a plan, and even applying the precautionary principle, no element of the plan that could adversely affect the integrity of a European site could be seen as being supported by the plan.
- 2.18 It is however not sufficient for the HRA to conclude no significant effects, merely because the plan contains a policy protecting European sites. Any policy introduced to remove uncertainty must be targeted specifically to deal with the issue that is causing the uncertainty. In assessing the effects on European sites, the HRA should assess (where known) the overall scale, location, timing and nature of new development. It should assess whether delivery of that development in the timescale of the plan, and the implementation of all its policies and proposals, would be likely to have a significant effect on a European site, alone or in combination with other plans or projects.
- 2.19 For some widescale potential impacts such as those resulting from air quality or water resource management issues, effects are not confined within the boundaries of a single local planning authority, and the effects may be caused in part, or mostly, by impacts within another competent authority's area. The effects of such cumulative impacts can only reasonably be addressed across authority boundaries. Due to the differing timescales for local plan implementation between authorities, it is necessary for authorities to commit to joint working to address such widescale potential issues.

Precautionary nature of the 'likely significant effects' test

- 2.20 The decision-making process under the Habitats Regulations is underpinned by the precautionary principle, whereby the competent authority acts to avoid potential harm in the face of scientific uncertainty. If it is not possible in a 'likely significant effect' test to rule out a

significant effect on a European site on the basis of available evidence, then it should be assumed the significant effect identified is likely to occur as a result of the plan and needs to be dealt with at the next stage of HRA. Where faced with uncertainty, this precautionary approach should be taken at all stages of the assessment.

In-combination Effects

- 2.21 It is a requirement of the Regulations that the potential in-combination effects of the subject plan and any other relevant plans or projects on European sites are assessed: this is referred to as the 'in-combination effect' and each proposal or policy within the plan should be screened for its potential to result in 'likely significant effect' on each European site either alone or in-combination with other plans or projects.
- 2.22 For the purposes of this assessment the following plans and projects have been considered when assessing the potential for in-combination effects.

- Chichester Local Plan 2021-2039
- Chichester Local Plan Habitats Regulations Assessment Jan 2023
- East Hampshire District Local Plan: Joint Core Strategy (adopted 2014)
- East Hampshire District Local Plan (Part 2): Housing and Employment Allocations
- East Hampshire District Council Draft Local Plan 2021-2040 Regulation 18
- Habitats Regulations Assessment of East Hampshire's Regulation 18 Local Plan January 2024
- Eastleigh Borough Local Plan 2016-2036
- Eastleigh Borough Local Plan 2016-2036 Habitats Regulations Assessment 2018
- Eastleigh Borough Local Plan 2016-2036 Habitats Regulations Assessment Addendum 2022
- Fareham Local Development Strategy – Core Strategy 2011
- Fareham Local Plan part 2: Development Sites and Policies
- Fareham Local Plan part 3: the Welborne Plan (adopted 2015)
- Fareham Local Plan 2037 Revised
- HRA for the Fareham Local Plan 2036: Screening and Appropriate Assessment Report for the Revised Publication Local Plan May 2021
- Habitats Regulations Assessment for the Fareham Borough Local Plan 2037 Screening and Appropriate Assessment Report for the Main Modifications Local Plan Sep 2022
- Gosport Borough Local Plan 2042
- Habitats Regulations Assessment for the
- Gosport Borough Local Plan 2042 February 2026 Hampshire Local Transport Plan 4 February 2024
- Joint Hampshire Minerals and Waste Plan (adopted 2013) (includes Portsmouth, Southampton, New Forest National Park and South Downs National Park).
- Hampshire Minerals & Waste Plan Assessment Under the Habitats Regulations July 2013
- North Solent Shoreline Management Plan (2010)
- Hayling Island Coastal Management Strategy (2024)
- South Hayling Island Beach Management Plan 2024-2029
- Pre-Submission Portsmouth Local Plan July 2024

- Habitat Regulations Assessment of the Portsmouth Local Plan Regulation 19 April 2024
- Pre-Submission Portsmouth Local Plan Addendum November 2025
- Habitat Regulations Assessment of the Portsmouth Local Plan Update for Local Plan Addendum September 2025
- Portsmouth Water Draft Water Resources Management Plan 2024
- South Downs Local Plan (2014-2033)
- South Downs Local Plan: Proposed Submission May 2026
- South Downs National Park Local Plan Habitats Regulation Assessment Regulation 19 May 2026
- Sub Regional Transport Model for South Hampshire (2010)
- Winchester District Local Plan 2020 – 2040 March 2026
- Winchester Local Plan (Regulation 19) Habitats Regulations Assessment Report July 2024
- Winchester Local Plan Habitats Regulations Assessment of Main Modifications November 2025

Avoidance, Mitigation and Compensatory Measures

- 2.23 An intrinsic factor in the assessment of ecological impacts is the inclusion of mitigation measures, or measures to avoid or reduce an identified impact and the HRA process should of course be guided by this principle. The ‘mitigation hierarchy’ of ‘avoid-mitigate-compensate’ is a common thread running through good ecological practice.
- 2.24 A clear distinction must be made between mitigation measures and compensatory measures. The former are designed to cancel or lessen identified impacts, whereas the latter are designed to offset residual negative impacts.
- 2.25 A Local Plan will contain policies whose purpose is explicitly to ensure that ecological impacts are avoided, mitigated, or compensated as appropriate. Some measures operate at a strategic level (e.g. mitigating recreational disturbance) whereas others will be most effective at the site level (e.g. requirement for full ecological assessment and mitigation strategy at planning application stage).
- 2.26 Whereas previously it was correct to take into account mitigating measures at the screening stage and often conclude that such measures effectively removed the potential for likely significant effect such that the potential effects could be ‘screened out’ from further assessment, the *Court of Justice of the European Union (CJEU) ruling People Over Wind and Sweetman v Coillte Teoranta (Case C-323/17)* reversed this. Mitigating measures should not now be considered in screening and therefore HRA should, in nearly all cases where mitigating measures are proposed, proceed automatically to the second stage; appropriate assessment and the integrity test. This has been confirmed by the Chief Planning Officer of Her Majesty’s Government (MHCL, January 2019).

Other relevant case law

- 2.27 The 2018 *Holohan v An Bord Pleanála* case related to the interpretation of Article 6(3) of the EU Habitats Directive. This judgement concluded that: “*Article 6(3) of the Habitats Directive must be interpreted as meaning that an ‘Appropriate Assessment’ must, on the one hand, catalogue the entirety of habitat types and species for which a site is protected, and, on the other, identify and examine both the implications of the proposed project for the species present on that site, and*

for which that site has not been listed, and the implications for habitat types and species to be found outside the boundaries of that site, provided that those implications are liable to affect the Network Objectives of the site."

2.28 This means that any Appropriate Assessment must consider the implications of a plan or project not only on the habitat types and species that the site is designated for, but also on:

- Species listed on Annex II of the Habitats Directive as well as birds listed on Annex I of the Birds Directive that are present on the site but not listed as qualifying species.
- Habitat types and species listed on Annex I and II of the Habitats Directive and Annex I of the Birds Directive that occur outside the boundaries of the designated site, if there are implications for these that affect the Network Objectives for the site.

The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019

2.29 Following the UK's exit from the European Union, it was deemed necessary to amend the Habitats Regulations to ensure that the habitat and species protection derived from EU law – specifically those measures enshrined in the Habitats and Birds Directives - would continue to apply.

3. European sites

Scope of the study

- 3.1 Each European site has its own intrinsic qualities (geological, hydrological and ecological) that enable the site to support its component flora and fauna. An important aspect of this is that the ecological integrity of each site can be vulnerable to change from natural and human induced activities in the surrounding environment. For example, sites can be affected by land use plans in a number of different ways, including the direct land-take of new development, the type of use the land will be put to (for example, a noise emitting use), the pollution a development generates and the resources it uses (during both construction and operation).
- 3.2 One intrinsic quality of any European site is its ecological functionality at the landscape level; in other words, how the site (and the flora and fauna which depend upon it) interacts with the zone of influence of its immediate surroundings, as well as the wider area e.g. an estuary would be influenced by activities occurring within the wider river catchment. Best practice guidance on HRA suggests that all European sites within the area of coverage of a plan, together with all those within a 10km buffer zone should be considered in the first instance as potential receptors for negative effects. In addition to these, other European sites further than 10km from the area of coverage of a plan may also be affected due to their specific environmental sensitivities and the activities proposed within the plan. This is particularly the case where there is potential for developments resulting from the plan to generate water-borne pollutants, where there are particularly high demands for water resources, where a specific recreational resource has a catchment area of greater than 10km, or where a plan would result in increased airborne pollutants affecting areas beyond the plan's boundary.
- 3.3 Table 3 lists eighteen European sites considered within the scope of this assessment. Appendix 1 shows the locations of Havant Borough and the European sites located within a 10km buffer zone.

Table 3: European sites within the scope of assessment		
Name	Location	Type
Solent & Isle of Wight Lagoons	Within 10km buffer zone	SAC
Solent Maritime	Within 10km buffer zone	SAC
South Wight Maritime	Within 10km buffer zone	SAC
The New Forest	c. 20km to the west (straight line)	SAC
Butser Hill	Within 10km buffer zone	SAC
Kingley Vale	Within 10km buffer zone	SAC
Singleton & Cocking Tunnels	c.13km to the north-east	SAC
Chichester & Langstone Harbours	Within 10km buffer zone	SPA
Portsmouth Harbour	Within 10km buffer zone	SPA
Solent & Southampton Water	Within 10km buffer zone	SPA
The New Forest	c. 20km to the west (straight line)	SPA

Table 3: European sites within the scope of assessment		
Solent and Dorset Coast	Within 10km buffer zone	SPA
Pagham Harbour	c. 15km to the east (straight line)	SPA
Chichester & Langstone Harbours	Within 10km buffer zone	Ramsar
Portsmouth Harbour	Within 10km buffer zone	Ramsar
Solent & Southampton Water	Within 10km buffer zone	Ramsar
The New Forest	c. 20km to the west (straight line)	Ramsar
Pagham Harbour	c. 15km to the east (straight line)	Ramsar

Qualifying features

- 3.4 The qualifying features of each European site (that is, the reasons for which the site is designated) are listed in Table 4. These comprise the species and habitats whose conservation is highly dependent on the designation and protection of the European sites.

Conservation Objectives

- 3.5 Natural England, as the statutory nature conservation body for England, formulates detailed conservation objectives for all SACs and SPAs³. Progress towards these objectives can be taken as an indicator of 'favourable conservation status' at a site (i.e. the cited qualifying features (species and habitats) are in a suitable conservation status at the national, biogeographical or European level).
- 3.6 Ramsar sites do not have agreed conservation objectives, but in most instances overlap with SPA site boundaries and for the purposes of this assessment the conservation objectives for SPAs are applied to Ramsar sites. However, it should be noted that Ramsar qualifying features often include a range of habitats and non-bird species common to SAC designations, as well as bird species and assemblages and their supporting habitats, which are common to SPAs.
- 3.7 The conservation objectives for European sites are broadly similar for SPAs and SACs and their purpose is to:
- 3.8 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds/Habitats Directive, by maintaining or restoring;
- The extent and distribution of qualifying natural habitats and habitats of qualifying species
 - The structure and function of the habitats of the qualifying features
 - The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely

³ Improvement programme for England's Natura 2000 sites (IPENS)

- The population of each of the qualifying features, and,
- The distribution of the qualifying features within the site.

- 3.9 In addition to these broad conservation objectives, Natural England has published Supplementary Advice on Conservation Objectives (SACO) for European sites, providing a list of attributes for each qualifying feature which '*if safeguarded will enable achievement of the Conservation Objectives*'. The SACO information also contains target thresholds for 'maintaining' or 'restoring' each attribute. It is important to note that '*the targets given for each attribute do not represent thresholds to assess the significance of any given impact in Habitats Regulation Assessments*'. It follows that it is not necessary for the HRA of a plan to ensure that these attribute targets are exceeded e.g. it would be unreasonable to require a particular plan to ensure that a certain population level of a species was maintained or restored, when the range of factors acting on that population may include some outside the possible influence of a land-use plan.
- 3.10 The attributes listed within the SACO information are broadly similar for each of the qualifying features e.g. they relate to maintaining current population levels/extent and distribution of habitat, reducing disturbance, maintaining concentrations of air pollutants below current thresholds etc.
- 3.11 In addition to SACO, Natural England also publishes Advice on Operations (AOO). This advice 'identifies pressures associated with the most commonly occurring marine activities and provides a detailed assessment of the feature/sub feature or supporting habitat sensitivity to these pressures'. Whilst AOO is focussed on marine activities, this includes activities which may be influenced or facilitated by a local plan e.g. coastal development and flood and erosion risk management schemes, or recreation.
- 3.12 Natural England has also published a series of Site Improvement Plans (SIPs) for European sites. Each plan provides a 'high level overview of the issues (both current and predicted) affecting the condition of the qualifying features on the site(s) and outlines the priority measures required to improve the condition of the features'.
- 3.13 Some SIPs include an aggregate of several sites. For example, the Solent SIP covers Chichester & Langstone Harbours SPA, Portsmouth Harbour SPA, Solent & Southampton Water SPA and Solent Maritime SAC. SIPs have also been produced for Butser Hill SAC, Kingley Vale SAC, The New Forest SPA and SAC and Pagham Harbour SPA.
- 3.14 Together, the conservation objectives and their supplementary advice provide a baseline for assessing the potential effects of the policies within the Local Plan.

Conservation Status

- 3.15 For the purposes of HRA, the assessment must investigate the current conservation status of the individual qualifying features of any given European site, with 'favourable conservation status' being the ultimate benchmark against which the plan is assessed. In other words, favourable conservation status of a qualifying feature is maintained (i.e. is not demonstrably reduced, irrespective of its baseline condition) if its conservation objectives are not undermined by the plan. If favourable conservation status is maintained, then it follows that a site's overall integrity would not be impacted.

- 3.16 Conservation status is defined as ‘the sum of the influences acting on a natural habitat and its typical species that may affect its long-term natural distribution, structure and functions as well as the long-term survival of its typical species’.
- 3.17 The conservation status of a habitat is considered favourable when ‘its natural range and areas it covers within that range are stable or increasing; the specific structure and functions which are necessary for its long-term maintenance exist and are likely to continue to exist for the foreseeable future; and the conservation status of its typical species is favourable’.
- 3.18 The conservation status of a species is considered favourable when ‘population dynamics data on the species concerned indicate that it is maintaining itself on a long-term basis as a viable component of its natural habitats, and; the natural range of the species is neither being reduced nor is likely to be reduced for the foreseeable future, and; there is, and will probably continue to be, a sufficiently large habitat to maintain its population on a long-term basis’ (JNCC, 2018).
- 3.19 In the UK, assessing favourable conservation status is carried out in broad accordance with European Union guidance and is based upon a system of ‘Common Standards Monitoring’ which combines site-level monitoring of Sites of Special Scientific Interest (SSSI) and European sites.
- 3.20 Natural England is currently undertaking condition assessments of marine features within Marine Protected Areas (MPAs). To date, condition assessments have been carried out only for marine habitat features of a number of SACs: in other words, only selected habitats within some SACs have been assessed. A programme of condition assessments for SPAs is also underway, with Chichester & Langstone Harbours having recently been published (Natural England, 2024).
- 3.21 For the qualifying species of SPAs, assessments of status must therefore be based upon the latest data on populations where available. Natural England’s own site information for SPAs recognises that there are gaps in the data for some qualifying species.
- 3.22 The most recent reporting on the condition of UK habitats (terrestrial and marine) listed under Regulation 9a of the Conservation of Habitats and Species Regulations 2017 (as amended) was published in January 2026. The report details the results of monitoring for the period 2019 to 2024 and details the condition of each habitat in terms of its range, area, structure and function whilst for each species details of range, population, habitat and its future prospects are provided.
- 3.23 European sites are often underlain by one or more SSSIs and it is therefore logical to undertake condition assessments of habitats and species concurrently, as the condition of individual SSSI compartments allows an assessment of the current conservation status of the overlying European site. The Common Standards Monitoring is therefore an essential component of the HRA process.
- 3.24 It follows that the HRA process can be assisted by using SSSI compartment condition assessments to help determine the overall conservation status of a European site or part thereof. SSSI compartments in England are assessed on a rolling programme by Natural England: depending on the date of the most-recent surveys these condition assessments provide the most up-to-date information on site condition.
- 3.25 In some instances, site-specific surveys are carried out by statutory nature conservation bodies, by the local planning authority, by a non-governmental organisation or by a commercial consultant. Where available, these surveys can provide valuable evidence to inform the HRA

process, providing detailed information on the distribution and condition of habitats or species relevant to the European site which can be used to determine condition status.

- 3.26 In addition, data held by local Biological Records Centres can be invaluable in determining the presence and distribution of European site qualifying features. Map-based data showing the location of Priority Habitats is readily available and these are often analogous to e.g. SAC qualifying habitats. It should be noted that for most European sites there is not a comprehensive, highly detailed map of vegetation communities and therefore a degree of uncertainty may remain when assessing the presence, extent or distribution of a particular qualifying habitat in the context of a specific site proposal within a plan.

Site Integrity

- 3.27 Site integrity is defined as 'the coherence of its ecological structure and function, across its whole area, which enables it to sustain the habitat, complex of habitats and/or the levels of populations of the species for which it was classified' (JNCC, 2002). It therefore follows that for site integrity to be unaffected, there should be no impacts to a site's qualifying features resulting in harm to the ecological structure and functioning of the site, its supporting processes and/or adversely affecting the site's ability to meet conservation objectives.

The Qualifying Features of European sites

- 3.28 Table 4 below details the primary and secondary qualifying features (Annex I habitats and Annex II species) of each of the European sites included in this assessment.

Table 4: Qualifying Features of European sites		
Site Name	Type	Qualifying Features
Solent and Isle of Wight lagoons	SAC	1150 Coastal lagoons
Solent Maritime	SAC	1110 Sandbanks which are slightly covered by sea water all the time 1130 Estuaries 1140 Mudflats and sandflats not covered by seawater at low tide; Intertidal mudflats and sandflats 1150 Coastal lagoons 1210 Annual vegetation of drift lines 1220 Perennial vegetation of stony banks; Coastal shingle vegetation outside the reach of waves 1310 <i>Salicornia</i> and other annuals colonising mud and sand; Glasswort and other annuals colonising mud and sand 1320 <i>Spartina</i> swards (<i>Spartinion maritimae</i>); Cord-grass swards 1330 Atlantic salt meadows (<i>Glaucopuccinellietalia maritimae</i>) 2120 Shifting dunes along the shoreline with <i>Ammophila arenaria</i> ("white dunes"); Shifting dunes with marram 1016 Desmoulin's Whorl Snail <i>Vertigo moulinsiana</i>
South Wight Maritime	SAC	1170 Reefs 1230 Vegetated sea cliffs of the Atlantic and Baltic coasts 8330 Submerged or partially submerged sea cliffs
The New Forest	SAC	3110 Oligotrophic waters containing very few minerals of sandy plains (<i>Littorelletalia uniflorae</i>); Nutrient-poor shallow waters with aquatic vegetation on sandy plains 3130 Oligotrophic to mesotrophic standing waters with vegetation of the <i>Littorelletalia uniflorae</i> and/or of the <i>Isoëto-Nanojuncetea</i> ; Clear-water lakes or lochs with aquatic vegetation and poor to moderate nutrient levels 4010 Northern Atlantic wet heaths with <i>Erica tetralix</i> ; Wet heathland with cross-leaved heath 4030 European dry heaths 6410 <i>Molinia</i> meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinion caeruleae</i>); Purple moor-grass meadows 7140 Transition mires and quaking bogs; Very wet mires often identified by an unstable 'quaking' surface 7150 Depressions on peat substrates of the <i>Rhynchosporion</i>

Table 4: Qualifying Features of European sites		
Site Name	Type	Qualifying Features
		7230 Alkaline fens; Calcium-rich spring water-fed fens 9120 Atlantic acidophilous beech forests with <i>Ilex</i> and sometimes also <i>Taxus</i> in the shrub layer (<i>Quercion robori-petraeae</i> or <i>Ilici-Fagenion</i>); Beech forests on acid soils 9130 <i>Asperulo-Fagetum</i> beech forests; Beech forests on neutral to rich soils 9190 Old acidophilous oak woods with <i>Quercus robur</i> on sandy plains 91D0 Bog woodland 91E0 Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (<i>Alno-Padion</i>, <i>Alnion incanae</i>, <i>Salicion</i> Alder woodland on floodplains 1044 Southern Damselfly <i>Coenagrion mercuriale</i> 1083 Stag Beetle <i>Lucanus cervus</i> 1166 Great Crested Newt <i>Triturus cristatus</i>
Butser Hill	SAC	6210 Semi-natural dry grasslands and scrubland facies: on calcareous substrates (<i>Festuco-Brometalia</i>) (*important orchid sites) 91J0 <i>Taxus baccata</i> woods of the British Isles; Yew-dominated woodland
Kingley Vale	SAC	6210 Semi-natural dry grasslands and scrubland facies: on calcareous substrates (<i>Festuco-Brometalia</i>) (*important orchid sites) 91J0 <i>Taxus baccata</i> woods of the British Isles; Yew-dominated woodland
Singleton & Cocking Tunnels	SAC	S1308 Barbastelle Bat <i>Barbastella barbastellus</i> S1323 Bechstein's Bat <i>Myotis bechsteinii</i>
Chichester and Langstone Harbours	SPA	A046a Dark-bellied Brent Goose <i>Branta bernicla bernicla</i> A048 Common Shelduck <i>Tadorna tadorna</i> (Non-breeding) A050 Eurasian Wigeon <i>Mareca penelope</i> (Non-breeding) A052 Eurasian Teal <i>Anas crecca</i> (Non-breeding) A054 Northern Pintail <i>Anas acuta</i> (Non-breeding) A056 Northern Shoveler <i>Anas clypeata</i> (Non-breeding) A069 Red-breasted Merganser <i>Mergus serrator</i> (Non-breeding) A137 Ringed Plover <i>Charadrius hiaticula</i> (Non-breeding) A141 Grey Plover <i>Pluvialis squatarola</i> (Non-breeding) A144 Sanderling <i>Calidris alba</i> (Non-breeding)

Table 4: Qualifying Features of European sites		
Site Name	Type	Qualifying Features
		A149 Dunlin <i>Calidris alpina alpina</i> (Non-breeding) A157 Bar-tailed Godwit <i>Limosa lapponica</i> (Non-breeding) A160 Eurasian Curlew <i>Numenius arquata</i> (Non-breeding) A162 Common Redshank <i>Tringa totanus</i> (Non-breeding) A169 Ruddy Turnstone <i>Arenaria interpres</i> (Non-breeding) A191 Sandwich Tern <i>Thalasseus sandvicensis</i> (Breeding) A193 Common Tern <i>Sterna hirundo</i> (Breeding) A195 Little Tern <i>Sternula albifrons</i> (Breeding) Waterbird Assemblage
Portsmouth Harbour	SPA	A046a Dark-bellied Brent Goose A069 Red-breasted Merganser A149 Dunlin A156 Black-tailed Godwit <i>Limosa limosa islandica</i>
Solent and Southampton Water	SPA	A046a Dark-bellied Brent Goose A069 Red-breasted Merganser A149 Dunlin A156 Black-tailed Godwit A176 Mediterranean Gull <i>Ichthyophaga melanocephalus</i> (Breeding) A191 Sandwich Tern A192 Roseate Tern <i>Sterna dougalli</i> (Breeding) A193 Common Tern A195 Little Tern
The New Forest	SPA	A072 European Honey-buzzard <i>Pernis apivorus</i> (Breeding) A082 Hen Harrier <i>Circus cyaneus</i> (Non-breeding) A099 Eurasian Hobby <i>Falco subbuteo</i> (Breeding) A224 European Nightjar <i>Caprimulgus europaeus</i> (Breeding) A246 Woodlark <i>Lullula arborea</i> (Breeding) A302 Dartford Warbler <i>Curruca undata</i> (Breeding) Wood Warbler <i>Phylloscopus sibilatrix</i> (Breeding)

Table 4: Qualifying Features of European sites		
Site Name	Type	Qualifying Features
Solent and Dorset Coast	SPA	A191 Sandwich Tern (breeding) A193 Common Tern (breeding) A195 Little Tern (breeding)
Pagham Harbour	SPA	A046a Dark-bellied Brent Goose (non-breeding) A151 Ruff <i>Philomachus pugnax</i> (non-breeding) A193 Common Tern (breeding) A195 Little Tern (breeding)
Chichester and Langstone Harbours	Ramsar	Ringed Plover Black-tailed Godwit Common Redshank Dark-bellied Brent Goose Common Shelduck Grey Plover Dunlin Little Tern
Portsmouth Harbour	Ramsar	Dark-bellied Brent Goose
Solent and Southampton Water	Ramsar	Dark-bellied Brent Goose Eurasian Teal Ringed Plover Black-tailed Godwit
The New Forest	Ramsar	Valley mires Rare wetland plants and animals, especially invertebrates
Pagham Harbour	Ramsar	Dark-bellied Brent Goose Black-tailed Godwit

4. Impact Pathways

Background

- 4.1 This section summarises the range of potential pathways which may lead to impacts on European sites and/or their supporting habitat as a result of the policies and allocations within the Plan. Impacts in this context can be defined as mechanisms or factors resulting in identifiable changes affecting the qualifying features of a designated site such that its conservation objectives are undermined.
- 4.2 The identified pathways may result in various impacts to the qualifying features of a site. These impacts may be physical, biological, chemical, hydrological or anthropological. In addition, they can exhibit variation in their timing, duration, frequency or permanence and the effect on the site in question will be related to the characteristics of that site e.g. its sensitivity, vulnerability.
- 4.3 Impact pathways may operate over considerable geographical distances, especially in relation to air quality and the water environment and where qualifying features are highly mobile (e.g. birds, fish) or are susceptible to effects operating over large geographic areas. The proximity of an impact source to the site in question will clearly influence the likelihood of impacts (e.g. construction noise is unlikely to operate beyond the immediate vicinity), although there are some potential impacts for which proximity to the site is not a primary factor.
- 4.4 These pathways have been used to assess the potential consequences of the policies and allocations within the Plan on the European sites taken forward for assessment. Further detailed comment on selected key pathways is provided in Chapter 6 below.
- 4.5 The range of potential impacts can be subdivided into those operating at a site-specific scale and those operating over a larger scale. Some pathways operate at both levels.
- 4.6 Construction-related impacts are used here to describe any activities during construction, remediation or decommissioning at a site. These are distinct from the operational phase impacts which are a result of the specified post-construction land-use at a particular site.

Site-specific Impact pathways

Habitat Loss

- 4.7 This refers to the direct physical or functional loss of habitat either within a European site or habitat outside a European site but supporting its qualifying features (e.g. habitat supporting key bird species). Loss in this context refers both to direct physical loss (land take) and functional loss resulting from e.g. construction-phase or operational-phase activities such as noise and visual disturbance.
- 4.8 Direct land take can occur within designated sites and result in direct impacts to SAC qualifying habitat features or land within a SPA/Ramsar. For example, works to repair or enhance coastal defences, to redevelop/encourage marine recreation or commercial facilities, or to increase recreational visitors may result in habitat loss or damage e.g. through trampling or construction as an indirect but predictable result of a policy or proposal.
- 4.9 For local plans to facilitate land take within designated sites is exceptional and therefore large-scale impacts to site integrity resulting from this are extremely rare. Where minor (in extent or duration) losses are likely as a result of a policy or proposal then that loss will need to be

viewed within the context of whole-site integrity. There may be circumstances where a seemingly trivial loss may have more profound impacts e.g. the loss of an important bird roosting/nesting site or a particularly notable vegetation community, or where small impacts to a larger dynamic system may have unintended consequences. Conversely, a small loss may not reasonably result in impacts to whole-site integrity.

- 4.10 Functional loss can occur without direct physical impacts (e.g. through the effects of the proximity of adjacent built development rendering a site unattractive to bird species) but the effect is analogous. This impact pathway is most relevant to non-designated habitat supporting SPA/Ramsar bird species which utilise this habitat for roosting, resting or feeding: the land is functionally linked to the European site. This impact could also be relevant to wide-ranging bat species, where development outside a designated site could result in the loss of valuable foraging, commuting or roosting habitat. The impact will result in total or partial loss of habitat and/or the permanent displacement of species. Functional loss can result from the following pathways:

Construction Noise

- 4.11 Noise generated during construction activities can result in changes in the presence and/or distribution of key qualifying features such as birds, with permanent or temporary displacement of birds from a site or area. This displacement can result in birds expending additional time and energy in finding undisturbed habitat and can ultimately affect their ability to survive and reproduce.
- 4.12 Common construction activities likely to result in novel disturbance events include excessive vehicle revving, reversing alarms, certain power tools and loud, percussive noises (e.g. via concrete breaking, piling). Research (e.g. Cutts *et al.* (2008); Wright *et al.* (2010)) has shown that noise levels approaching 70 decibels (dB) result in the most profound responses from bird species (i.e. site abandonment), whereas general background construction noise below c.55dB is unlikely to result in disturbance. It appears that irregular yet frequent loud noise exceeding 70dB is the most likely to result in effects, and that impacts can be observed for distances up to 300m in some species.
- 4.13 Birds' reactions to novel noise disturbance can vary from site abandonment to temporary displacement and are likely to be species-specific, with some species more or less tolerant than others. Similarly, there are likely to be differences in tolerance at different geographic locations.
- 4.14 Construction noise may be exacerbated by the density and/or quantum of built development and its location: noise disturbance from a high-density large housing development would be more likely to be disruptive than a low-density small-scale development, and development in a rural location may be more disruptive than in an urban one.

Construction Activity

- 4.15 In addition to noise, various construction activities can have impacts on mobile qualifying features such as birds within designated sites and their supporting habitat. Novel incidents such as increased human presence, vehicles, or plant such as cranes could result in the displacement of bird species from a site with the same potential effects as for construction noise.
- 4.16 Research into the potential disturbance from construction activities specifically is sparse, although Cutts *et al.* (2009) and evidence collected for the Solent Disturbance Mitigation Project

(SDMP) (Stillman *et al.* (2012) does provide evidence that human-induced disturbance (although not construction-related) can occur from 0-300m depending on species. It can be assumed that any potential impacts from construction-phase activities will be more profound with increasing proximity to the source of disturbance.

- 4.17 As with construction noise, the location, amount and density of planned development may exacerbate issues of disturbance.

Construction-phase Pollution

- 4.18 Construction activities can result in the mobilisation of airborne and waterborne contaminants, either through novel introductions (e.g. a spillage, fumes/smoke, litter) or through the disturbance of existing contaminant sources.
- 4.19 Contamination events can have profound impacts on designated sites and/or their supporting habitat e.g. pollution of aquatic habitats, damage to terrestrial vegetation, harm to wildlife) and can operate at the site-scale and over broader geographic areas.

Obstruction of Flight- and Sightlines

- 4.20 The presence of novel construction-related artefacts such as buildings, fencing, hoarding or vegetation screening can result in incidental impacts to both designated sites and their supporting habitat. Many bird species favour open habitats in which to rest and feed and therefore the presence of novel obstructions could result in the displacement of bird species, with similar effects as for construction noise and activity.
- 4.21 Again, research is sparse although research carried out in relation to the Solent Waders & Brent Goose Strategy (Whitfield, D., 2020) highlights that the most-favoured sites used by Dark-bellied Brent Geese are generally several hundred metres from obvious obstructions such as buildings.
- 4.22 Within the Solent coastal plain there are a large number of supporting habitat sites used by high numbers of SPA/Ramsar bird species which are situated within densely developed urban areas (e.g. Havant, Gosport, Portsmouth). These birds appear to be accustomed to foraging and resting within very close proximity to buildings and human activity and therefore the potential impacts of flight- and sight-line obstructions should be viewed in a local context.

Operational Activity

- 4.23 Once a development site is operational there may be a range of novel activities which could result in impacts to designated sites and their supporting habitat. These impacts may include additional recreational pressure resulting in damage to SAC habitat, or the displacement of bird species as a result of increased human presence or activity.
- 4.24 Housing developments inevitably result in increased human presence in an area and its surrounds. Depending on the accessibility of the wider area (e.g. presence of public rights of way, car parking) an increase in human presence in previously undisturbed areas could result in displacement of bird species and/or damage to sensitive vegetation/soils (through trampling, dog fouling). This effect could be felt at considerable distance from the development site depending on the permeability of the landscape and the presence/location/type of suitable public greenspace. The effect would also be influenced by the location, density and quantum of development.

- 4.25 Increased human presence is often accompanied by an increase in dogs. Research carried out by Stillman *et al* (2012) showed the impacts of dog walking to birds in the Solent was likely to be reduced where dog walking was eliminated entirely and reduced somewhat where off-lead dog walking was replaced by on-lead dog walking. Again, the effects of increased dog walking will be to a large part dependent upon landscape permeability and the presence/location/type of suitable public greenspace.

Larger-scale Impact pathways

Recreational Disturbance

- 4.26 Development can increase the recreational use of the coast and associated habitats, which in turn has the potential to cause detrimental impacts on important bird assemblages as well as damage and disturbance to habitats. The impacts of increased recreational disturbance can be felt across a wide geographical area, particularly within a key coastal area such as the wider Solent which is such an attractive destination for visitors. These effects can impact both designated sites and their supporting habitat. Impacts on birds from recreational disturbance can occur year-round, affecting both overwintering species and those breeding in coastal and coast-adjacent habitats
- 4.27 The impacts of recreational disturbance are analogous to impacts from direct habitat loss as recreation can cause important habitat to be unavailable for use (the habitat is functionally lost, either permanently or for a period). Birds can be displaced by human recreational activities (terrestrial and water-based) and use valuable resources in finding suitable areas in which to rest and feed undisturbed.
- 4.28 It is important to note that recreational impacts can be felt both as a result of individual development sites and/or as a cumulative consequence of multiple developments in combination, even over a large geographical area. Within the wider Solent the issue of recreational disturbance is addressed in a strategic manner in recognition of the fact that any net increase in residential dwellings within an agreed catchment contributes towards a cumulative impact.
- 4.29 The Solent planning authorities have developed the Bird Aware Solent Partnership and adopted a definitive strategy in December 2017. This was updated in November 2024. The potential impacts from recreational disturbance must be viewed in combination with other pressures.

Coastal Squeeze

- 4.30 Coastal squeeze is a term used to describe the inability for coastal habitats such as mudflats or saltmarsh to respond to sea level rises by naturally 'migrating' inland due to the presence of artificial barriers such as sea defences; over time these liminal habitats are lost. This effect is relevant to many areas across the wider Solent, where the viability of much residential and commercial development and infrastructure is dependent on the protection afforded by coastal defences.
- 4.31 Predictions for future sea level rises require a strategic-level approach to managing coastal defences, with various options considered ranging from 'hold the line' to 'managed realignment'.
- 4.32 New residential and commercial development can exacerbate problems associated with coastal squeeze by providing impetus to maintain or enhance hard sea defences., This removes the

possibility of ameliorating coastal squeeze through managed realignment and has the potential to directly impact designated sites and their supporting habitat.

- 4.33 The loss of natural intertidal habitats through the process of coastal squeeze may result in increased frequency of bird species using non-designated land, with further potential for conflicts between nature conservation and other land use objectives.

Air Quality

- 4.34 The impacts of increased atmospheric pollution can be profound and operate across broad geographical areas. Within the Local Plan area, impacts can arise/be exacerbated through increases/changes in the distribution of vehicular movements (to and from residential and commercial development) and/or the location of significant point-source emissions (e.g. new industrial or commercial development).
- 4.35 The most significant consequences of increased atmospheric pollution are eutrophication and acidification through the contact of nitrogen oxides (NO_x) with vegetation, soils and water. These anthropogenic sources operate at a much faster level than the normally slow cycling of 'natural' nitrogen in the environment. Nitrogen oxides can react with airborne water to form nitric acids which then result in impacts to vegetation through contact. Atmospheric pollution can also result in the deposition of NO_x in soils and water, affecting vegetation therein.
- 4.36 The presence of airborne pollutants is often described in terms of critical levels and critical loads. Levels refer to the concentration of atmospheric pollutants above which harmful effects are considered likely. Load refers to the deposition rate of nutrients below which effects are considered unlikely to occur.
- 4.37 Increased NO_x deposition can affect vegetation in several ways. Some vegetation types (e.g. bryophytes, ericaceous shrubs) can be directly impacted through contact, affecting photosynthesis, water transportation and growth.
- 4.38 Deposition of NO_x can also influence vegetation composition, with increased soil and water nitrogen levels causing eutrophication and favouring coarser plant species over more sensitive species of conservation concern.
- 4.39 The effects of atmospheric pollution are most often felt within SACs designated for their sensitive vegetation communities.
- 4.40 Within most assessments of air quality impacts, it has been assumed that distance is a key factor, with impacts most evident within c.200m of the source of pollution (i.e. a road). Clearly, any effects will be dependent not only on the proximity to the source of pollution, but also on the characteristics of the habitats present and the overall background levels and loads.
- 4.41 The cumulative impacts of air quality will need to be viewed in light of the court judgement *Wealden District Council v. Secretary of State for Communities and Local Government*, *Lewes District Council and South Downs National Park Authority* [2017] which has clarified the need for all strategic planning documents to account for the in-combination impacts of air quality on internationally designated sites and not just those within 200m of potential pollution sources.
- 4.42 Vehicle emissions are estimated to have produced around two-thirds of all UK NO_x emissions in 2015 (National Atmospheric Emissions Inventory, 2017). The general trend over recent decades has been for atmospheric NO_x emission to decline due to a stricter regulatory system and emission-reduction technologies and projections are that UK atmospheric NO_x levels will

continue to fall in this and subsequent decades (Wagner *et al.*, 2009; Misra *et al.* 2012). However, there are a number of factors which present uncertainties within any projection of future NO_x levels.

- 4.43 There is now evidence (IAQM, 2016) that NO_x emissions from road transport have not declined as expected since about 2011, in spite of regulatory frameworks and technological developments. Diesel vehicles, the primary source of NO_x, remain popular and sales have increased. In addition, it is now known that some emission-reduction products result in increases in the proportion of nitrogen dioxide (NO₂) within NO_x exhaust emissions (IAQM, 2016).
- 4.44 Havant Borough Council, in association with other Partnership for South Hampshire (PFSH, formerly PUSH) authorities, commissioned a full assessment of air quality issues across the PUSH area as a result of proposed development.
- 4.45 The PUSH Air Quality study (Ricardo, 2018) assesses baseline and future traffic-related pollution within the context of the proposed levels of growth on European sites within and beyond the study area. This takes into account strategic development locations and associated transport infrastructure which may have implications for air quality and apportions impacts to each local authority accordingly.
- 4.46 The study also considers potential mitigation measures or interventions required to mitigate the effects on air quality and evaluate their effectiveness in avoiding or reducing significant effects. This could be on an area-wide basis as a result of e.g. forecasts in modal shift; a rise in the use of electric and ultra-low emission cars; improving standards for cars/lorries/buses; and phasing out of older vehicles. In addition, there is an assessment of opportunities to avoid or reduce impacts through site-specific measures as part of development such as building design or landscaping and/or planning obligations to provide improved habitats within European sites.
- 4.47 Further to this, more detailed analysis was undertaken at the local level to assess the potential impact of the specific proposals in the withdrawn Havant Borough Local Plan (Ricardo, 2019). For the Building a Better Future Plan, a repeat study has been undertaken (WSP, 2026).

Water Resources

- 4.48 The issue of water resources covers water quality in its broadest sense, encompassing water abstraction and supply as well as waste-water treatment and conveyancing and the effect of these on the wider water environment.
- 4.49 Impacts associated with water resources can include increased abstraction, pollution and changes in the composition and distribution of terrestrial and aquatic (freshwater and marine) ecological communities.
- 4.50 The potential impacts arising from water resources necessarily operate over broad geographic areas (catchments) and are best addressed in a strategic manner. Any strategic-level assessments should investigate the carrying capacity of the water environment and water resource infrastructure and their ability to accommodate the level and distribution of growth identified.
- 4.51 In 2018 PUSH commissioned an Integrated Water Management Strategy (IWMS) to provide an update to the previous 2008 version: an update to this study was published in 2020. These documents investigate how water resources, water quality and the environment can be

protected and improved across the PUSH area within the context of projected development up to 2036. The IWMS takes a strategic approach to assess the constraints and requirements that will arise from the potential growth within the PUSH area on the water environment. This includes a focus on ensuring that potential solutions can be identified to facilitate the envisaged level and broad distribution of growth, without adverse effects on the water environment and, where possible, enhancing it.

- 4.52 The study establishes a baseline level of information relating to the water environment and specifically address: the availability of water resources; existing wastewater infrastructure and infrastructure capacity; the environmental capacity (chemical and biological limits) of receiving waters (including watercourses and transitional and coastal water bodies); water quality; and ground water (including ground water quality).

Nutrient Neutrality

- 4.53 In March 2018 an Integrated Water Management Study (IWMS) was completed for the Partnership for South Hampshire (PfSH). Amongst other issues, the IWMS highlighted concerns relating to high levels of nitrogen and phosphorous being present within Solent waters. These nutrients are liable to cause dense mats of macroalgae and phytoplankton to grow (called eutrophication), which can have an adverse impact upon the integrity of the protected Solent Special Protection Areas (as shown in Figure 2), as well as harming rare and protected species, such as waders.

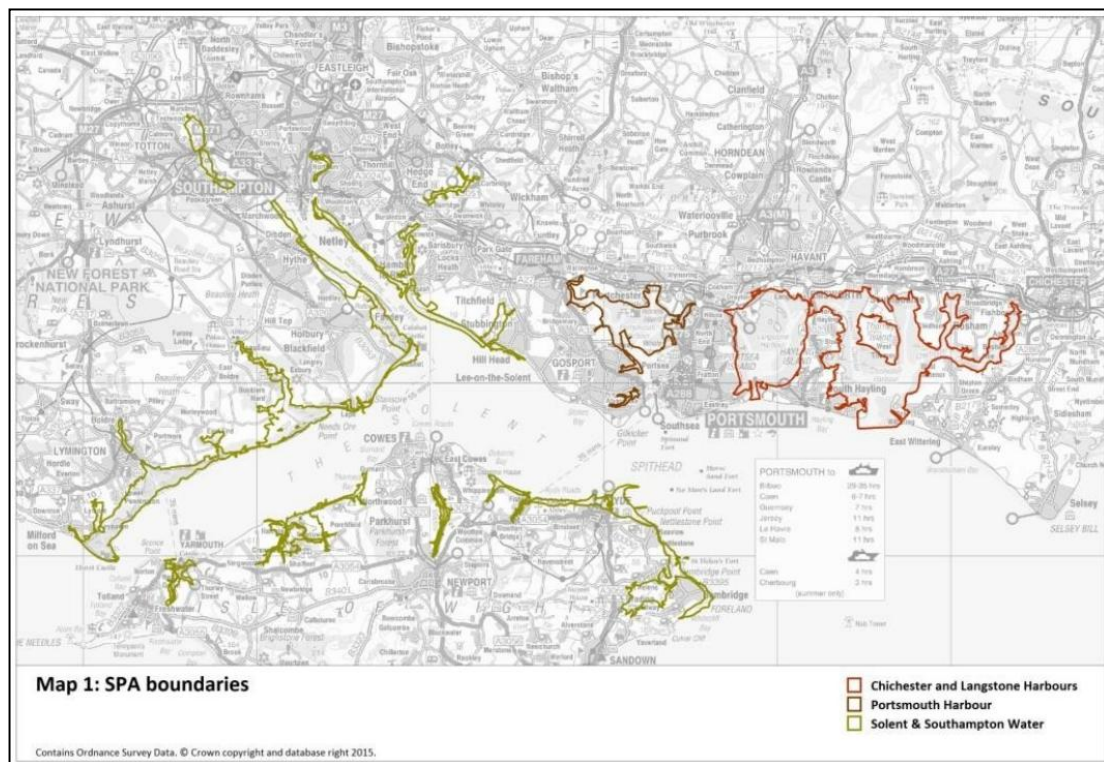


Figure 2 - The Solent SPAs (Source: SRMP Strategy)

- 4.54 In line with the Habitat Regulations and recent CJEU case law which require plans and projects to prevent further deterioration of the water environment, since January 2019 Natural England has required all developments in the Solent area to be 'nutrient neutral'. This includes all

residential proposals, tourist accommodation and visitor attractions which would draw additional people into the catchment. Certain commercial and industrial activities which use large volumes of water may also be required to be nutrient neutral.

- 4.55 New development sites produce a source of nitrogen and phosphorous input to the Solent marine environment via wastewater and surface run-off. The majority of waters within Havant Borough are conveyed to the Wastewater Treatment Works (WwTW) at Budd's Farm near Langstone where, during normal dry weather periods and after treatment, they are discharged into the Solent via the Eastney Long Sea Outfall (LSO). During periods of wet weather combined wastewater and rainfall run-off can be discharged, without robust treatment, directly into the Solent via Combined Sewer Overflows (CSO) in order to prevent flooding. The Emsworth area of the Borough discharges to Thornham WwTW just to the east of the Borough. Thornham WwTW discharges directly into Chichester Harbour.
- 4.56 Natural England have issued advice to Local Planning Authorities in the Solent region on the issue of nutrient enrichment affecting important marine habitats. Havant Borough Council has issued guidance⁴ to developers based on this advice. NE advice is that there is a direct causal link between the presence of nitrogen⁵ in surface and ground waters entering the Solent and human activities such as agriculture and development. Nutrient-enriched waters entering the Solent are causing blooms of marine algae which smother intertidal habitats, displace marine vegetation and reduce dissolved oxygen. These factors result in impacts to the European sites and their qualifying habitats and species.
- 4.57 As a result, it can only be concluded that new development within the Borough could increase nitrogen inputs to the Solent above consented levels. The resulting nutrient enrichment would result in a likely significant effect on the Solent European sites.

⁴<https://www.havant.gov.uk/planning-services/planning-policy/supplementary-planning-documents/nutrient-neutrality>

⁵ Please note that the relevant guidance regarding Nutrient Neutrality sets out that phosphorus levels are not an HRA impact pathway for development in Havant Borough.

5. Screening of the Building A Better Future Plan

Background

- 5.1 This section considers the policies and allocations presented within the Building a Better Future Plan and, acknowledging that the Plan is not necessary to European site management, states whether or not they are likely to have a significant effect on a European site, either alone or in combination with other plans or projects. The screening exercise identifies those policies and allocations which may result in a 'likely significant effect' on a European site, and which should be taken forward for further assessment. Any policy or allocation considered not to have an effect is 'screened out' of any further assessment.

Consideration of effects

- 5.2 All relevant policies and allocations presented within the Plan have been screened for likely significant effects on the European sites in question. The potential impact pathways considered are those described in Chapter 4 above. In accordance with the *People over Wind* ruling, mitigating measures are not taken into account at this stage.
- 5.3 As with any strategic planning document there are a number of very broad policies or objectives which may either negatively or positively impact European sites in a generic manner or have no conceivable effect, as well as policies for which impacts are more readily predictable.
- 5.4 The policies and allocations within the Plan can be sorted into one of twelve screening categories, which are listed below in Table 5. These categories help to screen which, if any, elements of the Plan would be likely to have an effect on any qualifying feature of a European site, alone or in combination with other plans or projects, directly or indirectly.
- 5.5 Any policies or allocations falling within categories A - H are deemed not to have an effect on a European site and can be screened out from further assessment. Those falling within categories I and L will certainly require further assessment as significant effects are likely either alone or in-combination. For policies or proposals falling into category J there may still be potential for in-combination effects whereas for category K there is no potential for impacts alone or in combination.
- 5.6 Table 6 illustrates the results of the HRA screening process (the Screening Matrix) for the policies and allocations in the Plan, where the letter in each of the coloured cells corresponds to a screening category listed in Table 5. For each policy and allocation its potential for likely significant effect on each of the seventeen designated sites is displayed as having no adverse effect (green shading) or the potential for an effect alone and/or in-combination (orange shading).

Table 5: HRA Screening categories (from The HRA Handbook, DTA Publications, 2025)

- A. General statements of policy/general aspirations
- B. Policies listing general criteria for testing the acceptability/sustainability of proposals
- C. Proposal referred to but not proposed by the plan
- D. Environmental protection/site safeguarding policies
- E. Policies or proposals that steer change in such a way as to protect European sites from adverse effects
- F. Policies or proposals that cannot lead to development or other change
- G. Policies or proposals that could not have any conceivable adverse effect on a site
- H. Policies or proposals the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects)
- I. Policies or proposals with a likely significant effect on a site alone
- J. Policies or proposals not likely to have a significant effect alone
- K. Policies or proposals not likely to have a significant effect either alone or in combination
- L. Policies or proposals likely to have a significant effect in combination

	Will have no adverse effect on a European site.
	Could have a potential adverse effect on a European site, either alone or in combination with other plans or projects.

- 5.7 Seventeen European sites have been included in the screening matrix: South Wight Maritime SAC has been excluded as it is situated at a considerable distance from Havant Borough and it is considered that there is no reasonable likelihood of any effect, alone or cumulatively.
- 5.8 Of the seventeen European sites taken forward for screening, for eleven - Solent Maritime SAC, Butser Hill SAC, Solent & Isle of Wight Lagoons SAC, Singleton & Cocking Tunnels SAC, Chichester & Langstone Harbours SPA/Ramsar, Portsmouth Harbour SPA/Ramsar, Solent & Southampton Water SPA/Ramsar and Solent & Dorset Coasts SPA - there is considered to be a widespread potential for likely significant effect alone and/or in combination.
- 5.9 The potential for likely significant effects stems primarily from these sites' proximity to possible future built development and the potential for impacts from habitat loss (direct or functional), nutrient enrichment (via airborne or waterborne pathways) and/or recreational disturbance.
- 5.10 Parts of the Solent Maritime SAC lie in close proximity to the M27/A27 corridor and therefore potentially within zones of increased atmospheric pollution arising from any increases or changes in vehicle movements. Any policy resulting in an increase or shift in vehicular movements would potentially contribute alone and in combination.

- 5.11 The Solent & Dorset Coast SPA is in proximity to some allocations, and due to its coastal locations is perhaps vulnerable to the effects of general increases in population and specifically to coastal recreation. As this is essentially a marine designation for the protection of bird feeding areas, policies which have a realistic prospect of resulting in impacts offshore (e.g. through the promotion of water sports, leading to disturbance or via changes to water quality, leading to impacts to foraging resources) that have been highlighted.
- 5.12 For the remaining six European sites – New Forest SAC, Kingley Vale SAC, New Forest SPA and Ramsar and Pagham Harbour SPA and Ramsar – likely significant effects are considered to be unlikely due primarily to the distance between them and any potential impact pathways arising from the policies and allocations in the Plan. The initial screening exercise therefore assumes no impacts arising alone or in combination.
- 5.13 Tables 7 and 8 provide an initial high-level screening of each policy and allocation: European sites are denoted by site codes as shown in Table 6. For those policies or allocations with a potential likely significant effect, Tables 9 and 10 summarise the potential impact pathways and the European sites considered to be at risk of likely significant effect.
- 5.14 Following this, Chapter 6 discusses the range of potential impact pathways in greater detail, examining the mechanisms through which impacts may occur as a result on the Plan policies and allocations.

Table 6: European site codes used in screening		
Site Code	Name	Type
SM	Solent Maritime	SAC
NF	The New Forest	SAC
BH	Butser Hill	SAC
KV	Kingley Vale	SAC
SCT	Singleton & Cocking Tunnels	SAC
SIOWL	Solent & Isle of Wight lagoons	SAC
CLH	Chichester & Langstone Harbours	SPA
PORH	Portsmouth Harbour	SPA
SSW	Solent & Southampton Water	SPA
NF	The New Forest	SPA
SDC	Solent and Dorset Coast	SPA
PAGH	Pagham Harbour	SPA
CLH	Chichester & Langstone Harbours	Ramsar
PORH	Portsmouth Harbour	Ramsar
SSW	Solent & Southampton Water	Ramsar
NF	The New Forest	Ramsar
PAGH	Pagham Harbour	Ramsar

Table 7: Building A Better Future Local Plan - HRA Screening Matrix - Policies																	
Policy	European Site																
	SM SAC	NF SAC	BH SAC	KV SAC	SCT SAC	SIOWL SAC	CLH SPA	PORH SPA	SSW SPA	NF SPA	SDC SPA	PAGH SPA	CLH Ram	PORH Ram	SSW Ram	NF Ram	PAGH Ram
1. Spatial Strategy	I/L	G	L	L	I/L	K	I/L	I/L	I/L	G	I/L	L	I/L	I/L	I/L	G	L
2. Defined Settlement Boundary	I/L	G	L	L	I/L	K	I/L	I/L	I/L	G	I/L	L	I/L	I/L	I/L	G	L
3. Regeneration	I/L	G	L	L	G	K	I/L	I/L	I/L	G	I/L	L	I/L	I/L	I/L	G	L
4. Infrastructure and Environmental Mitigation to Support Development	I/L	G	L	L	G	K	I/L	I/L	I/L	G	I/L	L	I/L	I/L	I/L	G	L
5. Green and Blue Infrastructure	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B
6. Amount of housing	I/L	G	L	L	I/L	K	I/L	I/L	I/L	G	I/L	L	I/L	I/L	I/L	G	L
7. Amount of Employment	I/L	G	L	L	I/L	K	I/L	I/L	I/L	G	I/L	L	I/L	I/L	I/L	G	L
8. Five-year housing land supply	I/L	G	L	L	I/L	K	I/L	I/L	I/L	G	I/L	L	I/L	I/L	I/L	G	L
9. New homes for sustainable communities	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B

Building A Better Future Local Plan
Habitats Regulations Assessment

Policy	European site																
	SM SAC	NF SAC	BH SAC	KV SAC	SCT SAC	SIOWL SAC	CLH SPA	PORH SPA	SSW SPA	NF SPA	SDC SPA	PAGH SPA	CLH Ram	PORH Ram	SSW Ram	NF Ram	PAGH Ram
10. Supporting a strong and prosperous economy	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B
11. Climate Change	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B
12. Health	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B
13. High Quality Design	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B
14. Housing Density	K	K	K	K	K	K	K	K	K	K	K	K	K	K	K	K	K
15. High quality new homes	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B
16. Low Carbon Development	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B
17. Preventing Overheating	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B
18. Sustainable Construction Methods, Materials and Waste	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B
19. Water Efficiency	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B
20. Biodiversity Net Gain	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E

Building A Better Future Local Plan
Habitats Regulations Assessment

Policy	European site																
	SM SAC	NF SAC	BH SAC	KV SAC	SCT SAC	SIOWL SAC	CLH SPA	PORH SPA	SSW SPA	NF SPA	SDC SPA	PAGH SPA	CLH Ram	PORH Ram	SSW Ram	NF Ram	PAGH Ram
21. International and national nature conservation sites	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E
22. The Local Ecological Network	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E
23. Recreation disturbance on European sites	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E
24. Water quality effects on European sites	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E
25. Protected and Notable Species	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E
26. Solent Wader and Brent Goose feeding and roosting sites	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E	D/E
27. Flood Risk	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B
28. Drainage	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B
29. Development on the Coast	I/L	G	L	L	B	B	I/L	L	B	G	I/L	L	I/L	L	B	B	L
30. Nationally Protected Landscapes	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B

Building A Better Future Local Plan
Habitats Regulations Assessment

Policy	European site																
	SM SAC	NF SAC	BH SAC	KV SAC	SCT SAC	SIOWL SAC	CLH SPA	PORH SPA	SSW SPA	NF SPA	SDC SPA	PAGH SPA	CLH Ram	PORH Ram	SSW Ram	NF Ram	PAGH Ram
31. Trees, hedgerows and woodland	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B
32. The historic environment	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B
33. Conservation areas	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B
34. Listed buildings	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B
35. Archaeology	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B
36. Locally Listed Buildings and non-designated heritage assets	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B
37. Improvements in Energy Performance of Historic Assets	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B
38. Affordable Housing	K	K	K	K	K	K	K	K	K	K	K	K	K	K	K	K	K
39. Housing Mix	K	K	K	K	K	K	K	K	K	K	K	K	K	K	K	K	K
40. Retirement and Specialist Housing	G	G	G	G	G	G	G	G	G	G	G	G	G	G	G	G	G
41. Residential Annexes	I/L	G	K	G	K	K	I/L	I/L	I/L	G	I/L	G	I/L	I/L	I/L	G	G

Building A Better Future Local Plan
Habitats Regulations Assessment

Policy	European site																
	SM SAC	NF SAC	BH SAC	KV SAC	SCT SAC	SIOWL SAC	CLH SPA	PORH SPA	SSW SPA	NF SPA	SDC SPA	PAGH SPA	CLH Ram	PORH Ram	SSW Ram	NF Ram	PAGH Ram
42. Self and Custom Build Housing	G	G	G	G	G	G	G	G	G	G	G	G	G	G	G	G	G
43. Gypsies, Travellers and Travelling Showpeople	I/L	G	K	G	I/L	K	I/L	I/L	I/L	G	I/L	G	I/L	I/L	I/L	G	G
44. Protecting employment uses	K	G	K	G	K	K	K	K	K	G	K	G	K	K	K	G	G
45. Town, District and Local Centres	I/L	G	K	G	I/L	K	I/L	I/L	I/L	G	I/L	G	I/L	I/L	I/L	G	G
46. Local shops outside of designated centres	G	G	G	G	G	G	G	G	G	G	G	G	G	G	G	G	G
47. Food, Drink and Entertainment Uses	G	G	G	G	G	G	G	G	G	G	G	G	G	G	G	G	G
48. Protecting existing community facilities	G	G	G	G	G	G	G	G	G	G	G	G	G	G	G	G	G
49. Amenity and Pollution	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B
50. Air Quality	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B
51. Aquifer Source Protection Zones	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B

Building A Better Future Local Plan
Habitats Regulations Assessment

Policy	European site																
	SM SAC	NF SAC	BH SAC	KV SAC	SCT SAC	SIOWL SAC	CLH SPA	PORH SPA	SSW SPA	NF SPA	SDC SPA	PAGH SPA	CLH Ram	PORH Ram	SSW Ram	NF Ram	PAGH Ram
52. Contaminated Land	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B
53. Accessibility, Transport and Parking	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B
54. New Accesses onto Classified Roads	G	G	G	G	G	G	G	G	G	G	G	G	G	G	G	G	G
55. Protecting open space	G	G	G	G	G	G	G	G	G	G	G	G	G	G	G	G	G
56. Provision of public open space in new development	G	G	G	G	G	G	G	G	G	G	G	G	G	G	G	G	G
57. Sport and recreation facilities	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B
58. Renewable Energy Infrastructure	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B
59. Employment and Skills Plans	G	G	G	G	G	G	G	G	G	G	G	G	G	G	G	G	G
60. Community New Development Officers	G	G	G	G	G	G	G	G	G	G	G	G	G	G	G	G	G

Table 8: Building A Better Future Local Plan - HRA Screening Matrix - Allocations																	
Allocation	European Site																
	SM SAC	NF SAC	BH SAC	KV SAC	SCT SAC	SIOWL SAC	CLH SPA	PORH SPA	SSW SPA	NF SPA	SDC SPA	PAGH SPA	CLH Ram	PORH Ram	SSW Ram	NF Ram	PAGH Ram
1. Southleigh	I/L	G	L	L	I/L	K	I/L	I/L	I/L	G	I/L	L	I/L	I/L	I/L	G	L
2. Long Copse Lane	I/L	G	L	L	I/L	K	I/L	I/L	L	G	L	L	I/L	I/L	L	G	L
3. Land south of Havant Road (Horse's Field)	I/L	G	L	L	G	K	I/L	I/L	L	G	L	L	I/L	I/L	L	G	L
4. Helmsley House	I/L	G	L	L	I/L	K	I/L	I/L	L	G	L	L	I/L	I/L	L	G	L
5. Southleigh Park House	I/L	G	L	L	I/L	K	I/L	I/L	L	G	L	L	I/L	I/L	L	G	L
6. Land East of Castle Avenue	I/L	G	L	L	G	K	I/L	I/L	L	G	L	L	I/L	I/L	L	G	L
7. Former Oak Park School	I/L	G	L	L	G	K	I/L	I/L	L	G	L	L	I/L	I/L	L	G	L
8. Palk Road	I/L	G	L	L	G	K	I/L	I/L	L	G	L	L	I/L	I/L	L	G	L
9. Belmont Castle Rest Home, 18-20 Portsdown Hill Road	I/L	G	L	L	G	K	I/L	I/L	L	G	L	L	I/L	I/L	L	G	L
10. Land south of Lower Road (Phase 2)	I/L	G	L	L	G	K	I/L	I/L	L	G	L	L	I/L	I/L	L	G	L

Building A Better Future Local Plan
Habitats Regulations Assessment

Allocation	European site																
	SM SAC	NF SAC	BH SAC	KV SAC	SCT SAC	SIOWL SAC	CLH SPA	PORH SPA	SSW SPA	NF SPA	SDC SPA	PAGH SPA	CLH Ram	PORH Ram	SSW Ram	NF Ram	PAGH Ram
11. Kingscroft Farm	I/L	G	L	L	G	K	I/L	I/L	L	G	L	L	I/L	I/L	L	G	L
12. Portsmouth Water Headquarters	I/L	G	L	L	G	K	I/L	I/L	L	G	L	L	I/L	I/L	L	G	L
13. Cabbagefield Row	I/L	G	L	L	I/L	K	I/L	I/L	L	G	L	L	I/L	I/L	L	G	L
14. Strouden Court	I/L	G	L	L	I/L	K	I/L	I/L	L	G	L	L	I/L	I/L	L	G	L
15. Land W of Hulbert Road	I/L	G	L	L	I/L	K	I/L	I/L	L	G	L	L	I/L	I/L	L	G	L
16. Dunsbury Way	I/L	G	L	L	G	K	I/L	I/L	L	G	L	L	I/L	I/L	L	G	L
17. Former Electricity Board, Bartons Road	I/L	G	L	L	G	K	I/L	I/L	L	G	L	L	I/L	I/L	L	G	L
18. Padnell Grange	I/L	G	L	L	I/L	K	I/L	I/L	L	G	L	L	I/L	I/L	L	G	L
19. Blue Star	I/L	G	L	L	G	K	I/L	I/L	L	G	L	L	I/L	I/L	L	G	L
20. Goodwillies Timber Yard	I/L	G	L	L	G	K	I/L	I/L	L	G	L	L	I/L	I/L	L	G	L
21. Waterlooville MDA (Phases 4 and 8)	I/L	G	L	L	G	K	I/L	I/L	L	G	L	L	I/L	I/L	L	G	L
22. South Downs College Car Park	I/L	G	L	L	G	K	I/L	L	L	G	L	L	I/L	L	L	G	L

Building A Better Future Local Plan
Habitats Regulations Assessment

Allocation	European site																
	SM SAC	NF SAC	BH SAC	KV SAC	SCT SAC	SIOWL SAC	CLH SPA	PORH SPA	SSW SPA	NF SPA	SDC SPA	PAGH SPA	CLH Ram	PORH Ram	SSW Ram	NF Ram	PAGH Ram
23. Campdown	I/L	G	L	L	I/L	K	I/L	L	L	G	L	L	I/L	L	L	G	L
24. Waterloo Park	L	G	L	L	G	G	L	L	G	G	G	L	L	L	G	G	L
25. Dunsbury Park strategic site	L	G	L	L	I/L	G	L	L	G	G	G	L	L	L	G	G	L
26. Former Colt Site	L	G	L	L	G	G	L	L	G	G	G	L	L	L	G	G	L
27. Gas Holder Site, Downley Road, New Lane	L	G	L	L	G	G	L	L	G	G	G	L	L	L	G	G	L
28. Langstone Park	L	G	L	L	G	G	L	L	G	G	G	L	L	L	G	G	L
29. Interbridges West	L	G	L	L	G	G	L	L	G	G	G	L	L	L	G	G	L
30. Interbridges East	L	G	L	L	G	G	L	L	G	G	G	L	L	L	G	G	L

Table 9: Building For A Better Future Plan - Summary of Potential Policy Impacts				
Policy	Consequences	Designated Sites affected	Qualifying Feature affected	Impact Pathways
Spatial Strategy	Includes commitment to provide housing within specific areas	▪ Solent Maritime SAC ▪ Singleton & Cocking Tunnels SAC ▪ Chichester & Langstone Harbours SPA ▪ Chichester & Langstone Harbours Ramsar ▪ Portsmouth Harbour SPA ▪ Portsmouth Harbour Ramsar ▪ Solent & Southampton Water SPA ▪ Solent & Southampton Water Ramsar ▪ Solent & Dorset Coasts SPA	▪ SAC Habitats ▪ SPA/Ramsar Birds ▪ SAC bat species	▪ Habitat loss ▪ Recreational disturbance ▪ Coastal Squeeze ▪ Air Quality ▪ Nutrient Neutrality
Defined Settlement Boundary	Specifies areas within which development will be acceptable	▪ Solent Maritime SAC ▪ Singleton & Cocking Tunnels SAC ▪ Chichester & Langstone Harbours SPA ▪ Chichester & Langstone Harbours Ramsar ▪ Portsmouth Harbour SPA ▪ Portsmouth Harbour Ramsar ▪ Solent & Southampton Water SPA ▪ Solent & Southampton Water Ramsar ▪ Solent & Dorset Coasts SPA	▪ SAC Habitats ▪ SPA/Ramsar Birds ▪ SAC bat species	▪ Habitat loss ▪ Recreational disturbance ▪ Coastal Squeeze ▪ Air Quality ▪ Nutrient Neutrality
Regeneration	Facilitates increased housing development within certain areas	▪ Solent Maritime SAC ▪ Singleton & Cocking Tunnels SAC ▪ Chichester & Langstone Harbours SPA ▪ Chichester & Langstone Harbours Ramsar ▪ Portsmouth Harbour SPA ▪ Portsmouth Harbour Ramsar ▪ Solent & Southampton Water SPA ▪ Solent & Southampton Water Ramsar ▪ Solent & Dorset Coasts SPA	▪ SAC Habitats ▪ SPA/Ramsar Birds ▪ SAC bat species	▪ Habitat loss ▪ Recreational disturbance ▪ Coastal Squeeze ▪ Air Quality ▪ Nutrient Neutrality

Table 9: Building For A Better Future Plan - Summary of Potential Policy Impacts				
Policy	Consequences	Designated Sites affected	Qualifying Feature affected	Impact Pathways
Infrastructure and environmental mitigation to support development	Facilitates new development including coastal defences and transport	▪ Butser Hill SAC ▪ Kingley Vale SAC ▪ Solent Maritime SAC ▪ Singleton & Cocking Tunnels SAC ▪ Chichester & Langstone Harbours SPA ▪ Chichester & Langstone Harbours Ramsar ▪ Pagham Harbour SPA ▪ Pagham Harbour Ramsar ▪ Portsmouth Harbour SPA ▪ Portsmouth Harbour Ramsar ▪ Solent & Southampton Water SPA ▪ Solent & Southampton Water Ramsar ▪ Solent & Dorset Coasts SPA	▪ SAC Habitats ▪ SPA/Ramsar Birds ▪ SAC bat species	▪ Habitat loss ▪ Recreational disturbance ▪ Coastal Squeeze ▪ Air Quality ▪ Nutrient Neutrality
Amount of housing	Sets out targets for housing development	▪ Butser Hill SAC ▪ Kingley Vale SAC ▪ Solent Maritime SAC ▪ Singleton & Cocking Tunnels SAC ▪ Chichester & Langstone Harbours SPA ▪ Chichester & Langstone Harbours Ramsar ▪ Pagham Harbour SPA ▪ Pagham Harbour Ramsar ▪ Portsmouth Harbour SPA ▪ Portsmouth Harbour Ramsar ▪ Solent & Southampton Water SPA ▪ Solent & Southampton Water Ramsar ▪ Solent & Dorset Coasts SPA	▪ SAC Habitats ▪ SPA/Ramsar Birds ▪ SAC bat species	▪ Habitat loss ▪ Recreational disturbance ▪ Coastal Squeeze ▪ Air Quality ▪ Nutrient Neutrality

Table 9: Building For A Better Future Plan - Summary of Potential Policy Impacts				
Policy	Consequences	Designated Sites affected	Qualifying Feature affected	Impact Pathways
Amount of Employment	Sets out targets for employment development	▪ Butser Hill SAC ▪ Kingley Vale SAC ▪ Solent Maritime SAC ▪ Singleton & Cocking Tunnels SAC ▪ Chichester & Langstone Harbours SPA ▪ Chichester & Langstone Harbours Ramsar ▪ Pagham Harbour SPA ▪ Pagham Harbour Ramsar ▪ Portsmouth Harbour SPA ▪ Portsmouth Harbour Ramsar ▪ Solent & Southampton Water SPA ▪ Solent & Southampton Water Ramsar ▪ Solent & Dorset Coasts SPA	▪ SAC Habitats ▪ SPA/Ramsar Birds ▪ SAC bat species	▪ Habitat loss ▪ Recreational disturbance ▪ Coastal Squeeze ▪ Air Quality ▪ Nutrient Neutrality
Five-year housing land supply	Facilitates housing development	▪ Butser Hill SAC ▪ Kingley Vale SAC ▪ Solent Maritime SAC ▪ Singleton & Cocking Tunnels SAC ▪ Chichester & Langstone Harbours SPA ▪ Chichester & Langstone Harbours Ramsar ▪ Pagham Harbour SPA ▪ Pagham Harbour Ramsar ▪ Portsmouth Harbour SPA ▪ Portsmouth Harbour Ramsar ▪ Solent & Southampton Water SPA ▪ Solent & Southampton Water Ramsar ▪ Solent & Dorset Coasts SPA	▪ SAC Habitats ▪ SPA/Ramsar Birds ▪ SAC bat species	▪ Habitat loss ▪ Recreational disturbance ▪ Coastal Squeeze ▪ Air Quality ▪ Nutrient Neutrality

Table 9: Building For A Better Future Plan - Summary of Potential Policy Impacts				
Policy	Consequences	Designated Sites affected	Qualifying Feature affected	Impact Pathways
Development on the Coast	Facilitates new and redeveloped residential development	▪ Butser Hill SAC ▪ Kingley Vale SAC ▪ Solent Maritime SAC ▪ Chichester & Langstone Harbours SPA ▪ Chichester & Langstone Harbours Ramsar ▪ Pagham Harbour SPA ▪ Pagham Harbour Ramsar ▪ Portsmouth Harbour SPA ▪ Portsmouth Harbour Ramsar ▪ Solent & Southampton Water SPA ▪ Solent & Southampton Water Ramsar ▪ Solent & Dorset Coasts SPA	▪ SPA/Ramsar Birds ▪ SAC Habitats	▪ Recreational disturbance ▪ Coastal Squeeze ▪ Air Quality
Residential Annexes	Facilitates new residential development	▪ Solent Maritime SAC ▪ Chichester & Langstone Harbours SPA ▪ Chichester & Langstone Harbours Ramsar ▪ Portsmouth Harbour SPA ▪ Portsmouth Harbour Ramsar ▪ Solent & Southampton Water SPA ▪ Solent & Southampton Water Ramsar ▪ Solent & Dorset Coasts SPA	▪ SPA/Ramsar Birds ▪ SAC Habitats	▪ Recreational disturbance ▪ Nutrient Neutrality
Gypsies, Travellers and Travelling Showpeople	Facilitates new residential development	▪ Solent Maritime SAC ▪ Singleton & Cocking Tunnels SAC ▪ Chichester & Langstone Harbours SPA ▪ Chichester & Langstone Harbours Ramsar ▪ Portsmouth Harbour SPA ▪ Portsmouth Harbour Ramsar ▪ Solent & Southampton Water SPA ▪ Solent & Southampton Water Ramsar ▪ Solent & Dorset Coasts SPA	▪ SPA/Ramsar Birds ▪ SAC Habitats	▪ Recreational disturbance ▪ Nutrient Neutrality

Table 9: Building For A Better Future Plan - Summary of Potential Policy Impacts				
Policy	Consequences	Designated Sites affected	Qualifying Feature affected	Impact Pathways
Town, District and Local Centres	Facilitates potential housing development	▪ Butser Hill SAC ▪ Kingley Vale SAC ▪ Solent Maritime SAC ▪ Singleton & Cocking Tunnels SAC ▪ Chichester & Langstone Harbours SPA ▪ Chichester & Langstone Harbours Ramsar ▪ Pagham Harbour SPA ▪ Pagham Harbour Ramsar ▪ Portsmouth Harbour SPA ▪ Portsmouth Harbour Ramsar ▪ Solent & Southampton Water SPA ▪ Solent & Southampton Water Ramsar ▪ Solent & Dorset Coasts SPA	▪ SAC Habitats ▪ SPA/Ramsar Birds ▪ SAC bat species	▪ Habitat loss ▪ Recreational disturbance ▪ Coastal Squeeze ▪ Air Quality ▪ Nutrient Neutrality

Table 10: Building For A Better Future Plan - Summary of Potential Allocation Impacts				
Allocation	Consequences	Designated Sites affected	Qualifying Feature affected	Impact Pathways
Southleigh	Housing/Older Persons Housing/Employment with capacity for 2100 homes	▪ Butser Hill SAC ▪ Kingley Vale SAC ▪ Solent Maritime SAC ▪ Singleton & Cocking Tunnels SAC ▪ Chichester & Langstone Harbours SPA ▪ Chichester & Langstone Harbours Ramsar ▪ Pagham Harbour SPA ▪ Pagham Harbour Ramsar ▪ Portsmouth Harbour SPA ▪ Portsmouth Harbour Ramsar ▪ Solent & Southampton Water SPA ▪ Solent & Southampton Water Ramsar ▪ Solent & Dorset Coasts SPA	▪ SAC Habitats ▪ SPA/Ramsar Birds ▪ SAC bat species	▪ Habitat Loss ▪ Recreational disturbance ▪ Air Quality ▪ Nutrient Neutrality
Long Copse Lane	Residential up to 325 dwellings	▪ Butser Hill SAC ▪ Kingley Vale SAC ▪ Solent Maritime SAC ▪ Singleton & Cocking Tunnels SAC ▪ Chichester & Langstone Harbours SPA ▪ Chichester & Langstone Harbours Ramsar ▪ Pagham Harbour SPA ▪ Pagham Harbour Ramsar ▪ Portsmouth Harbour SPA ▪ Portsmouth Harbour Ramsar ▪ Solent & Southampton Water SPA ▪ Solent & Southampton Water Ramsar ▪ Solent & Dorset Coasts SPA	▪ SAC Habitats ▪ SPA/Ramsar Birds ▪ SAC bat species	▪ Habitat Loss ▪ Recreational disturbance ▪ Air Quality ▪ Nutrient Neutrality

Table 10: Building For A Better Future Plan - Summary of Potential Allocation Impacts				
Allocation	Consequences	Designated Sites affected	Qualifying Feature affected	Impact Pathways
Land south of Havant Road (Horse's Field)	Residential up to 85 dwellings	▪ Butser Hill SAC ▪ Kingley Vale SAC ▪ Solent Maritime SAC ▪ Chichester & Langstone Harbours SPA ▪ Chichester & Langstone Harbours Ramsar ▪ Pagham Harbour SPA ▪ Pagham Harbour Ramsar ▪ Portsmouth Harbour SPA ▪ Portsmouth Harbour Ramsar ▪ Solent & Southampton Water SPA ▪ Solent & Southampton Water Ramsar ▪ Solent & Dorset Coasts SPA	▪ SAC Habitats ▪ SPA/Ramsar Birds	▪ Habitat Loss ▪ Recreational disturbance ▪ Air Quality ▪ Nutrient Neutrality
Helmsley House	Residential up to 30 dwellings	▪ Butser Hill SAC ▪ Kingley Vale SAC ▪ Solent Maritime SAC ▪ Singleton & Cocking Tunnels SAC ▪ Chichester & Langstone Harbours SPA ▪ Chichester & Langstone Harbours Ramsar ▪ Pagham Harbour SPA ▪ Pagham Harbour Ramsar ▪ Portsmouth Harbour SPA ▪ Portsmouth Harbour Ramsar ▪ Solent & Southampton Water SPA ▪ Solent & Southampton Water Ramsar ▪ Solent & Dorset Coasts SPA	▪ SAC Habitats ▪ SPA/Ramsar Birds ▪ SAC bat species	▪ Habitat Loss ▪ Recreational disturbance ▪ Air Quality ▪ Nutrient Neutrality

Table 10: Building For A Better Future Plan - Summary of Potential Allocation Impacts				
Allocation	Consequences	Designated Sites affected	Qualifying Feature affected	Impact Pathways
Southleigh Park House	Residential up to 61 dwellings	▪ Butser Hill SAC ▪ Kingley Vale SAC ▪ Solent Maritime SAC ▪ Singleton & Cocking Tunnels SAC ▪ Chichester & Langstone Harbours SPA ▪ Chichester & Langstone Harbours Ramsar ▪ Pagham Harbour SPA ▪ Pagham Harbour Ramsar ▪ Portsmouth Harbour SPA ▪ Portsmouth Harbour Ramsar ▪ Solent & Southampton Water SPA ▪ Solent & Southampton Water Ramsar ▪ Solent & Dorset Coasts SPA	▪ SAC Habitats ▪ SPA/Ramsar Birds ▪ SAC bat species	▪ Habitat Loss ▪ Recreational disturbance ▪ Air Quality ▪ Nutrient Neutrality
Land East of Castle Avenue	Residential up to 184 dwellings	▪ Butser Hill SAC ▪ Kingley Vale SAC ▪ Solent Maritime SAC ▪ Singleton & Cocking Tunnels SAC ▪ Chichester & Langstone Harbours SPA ▪ Chichester & Langstone Harbours Ramsar ▪ Pagham Harbour SPA ▪ Pagham Harbour Ramsar ▪ Portsmouth Harbour SPA ▪ Portsmouth Harbour Ramsar ▪ Solent & Southampton Water SPA ▪ Solent & Southampton Water Ramsar ▪ Solent & Dorset Coasts SPA	▪ SAC Habitats ▪ SPA/Ramsar Birds ▪ SAC bat species	▪ Habitat Loss ▪ Recreational disturbance ▪ Air Quality ▪ Nutrient Neutrality

Table 10: Building For A Better Future Plan - Summary of Potential Allocation Impacts				
Allocation	Consequences	Designated Sites affected	Qualifying Feature affected	Impact Pathways
Former Oak Park School	100 bed care home, 21 homes	▪ Butser Hill SAC ▪ Kingley Vale SAC ▪ Solent Maritime SAC ▪ Singleton & Cocking Tunnels SAC ▪ Chichester & Langstone Harbours SPA ▪ Chichester & Langstone Harbours Ramsar ▪ Pagham Harbour SPA ▪ Pagham Harbour Ramsar ▪ Portsmouth Harbour SPA ▪ Portsmouth Harbour Ramsar ▪ Solent & Southampton Water SPA ▪ Solent & Southampton Water Ramsar ▪ Solent & Dorset Coasts SPA	▪ SAC Habitats ▪ SPA/Ramsar Birds ▪ SAC bat species	▪ Recreational disturbance ▪ Air Quality ▪ Nutrient Neutrality
Palk Road	Residential up to 83 dwellings	▪ Butser Hill SAC ▪ Kingley Vale SAC ▪ Solent Maritime SAC ▪ Chichester & Langstone Harbours SPA ▪ Chichester & Langstone Harbours Ramsar ▪ Pagham Harbour SPA ▪ Pagham Harbour Ramsar ▪ Portsmouth Harbour SPA ▪ Portsmouth Harbour Ramsar ▪ Solent & Southampton Water SPA ▪ Solent & Southampton Water Ramsar ▪ Solent & Dorset Coasts SPA	▪ SAC Habitats ▪ SPA/Ramsar Birds	▪ Recreational disturbance ▪ Air Quality ▪ Nutrient Neutrality

Table 10: Building For A Better Future Plan - Summary of Potential Allocation Impacts				
Allocation	Consequences	Designated Sites affected	Qualifying Feature affected	Impact Pathways
Belmont Castle Rest Home, 18-20 Portsdown Hill Road	48 bed care home	▪ Butser Hill SAC ▪ Kingley Vale SAC ▪ Solent Maritime SAC ▪ Chichester & Langstone Harbours SPA ▪ Chichester & Langstone Harbours Ramsar ▪ Pagham Harbour SPA ▪ Pagham Harbour Ramsar ▪ Portsmouth Harbour SPA ▪ Portsmouth Harbour Ramsar ▪ Solent & Southampton Water SPA ▪ Solent & Southampton Water Ramsar ▪ Solent & Dorset Coasts SPA	▪ SAC Habitats ▪ SPA/Ramsar Birds	▪ Recreational disturbance ▪ Air Quality ▪ Nutrient Neutrality
Land south of Lower Road (Phase 2)	Residential up to 43 dwellings	▪ Butser Hill SAC ▪ Kingley Vale SAC ▪ Solent Maritime SAC ▪ Chichester & Langstone Harbours SPA ▪ Chichester & Langstone Harbours Ramsar ▪ Pagham Harbour SPA ▪ Pagham Harbour Ramsar ▪ Portsmouth Harbour SPA ▪ Portsmouth Harbour Ramsar ▪ Solent & Southampton Water SPA ▪ Solent & Southampton Water Ramsar ▪ Solent & Dorset Coasts SPA	▪ SAC Habitats ▪ SPA/Ramsar Birds	▪ Recreational disturbance ▪ Air Quality ▪ Nutrient Neutrality

Table 10: Building For A Better Future Plan - Summary of Potential Allocation Impacts				
Allocation	Consequences	Designated Sites affected	Qualifying Feature affected	Impact Pathways
Kingscroft Farm	Residential up to 120 dwellings	▪ Butser Hill SAC ▪ Kingley Vale SAC ▪ Solent Maritime SAC ▪ Chichester & Langstone Harbours SPA ▪ Chichester & Langstone Harbours Ramsar ▪ Pagham Harbour SPA ▪ Pagham Harbour Ramsar ▪ Portsmouth Harbour SPA ▪ Portsmouth Harbour Ramsar ▪ Solent & Southampton Water SPA ▪ Solent & Southampton Water Ramsar ▪ Solent & Dorset Coasts SPA	▪ SAC Habitats ▪ SPA/Ramsar Birds	▪ Recreational disturbance ▪ Air Quality ▪ Nutrient Neutrality
Portsmouth Water Headquarters	Residential up to 120 dwellings	▪ Butser Hill SAC ▪ Kingley Vale SAC ▪ Solent Maritime SAC ▪ Chichester & Langstone Harbours SPA ▪ Chichester & Langstone Harbours Ramsar ▪ Pagham Harbour SPA ▪ Pagham Harbour Ramsar ▪ Portsmouth Harbour SPA ▪ Portsmouth Harbour Ramsar ▪ Solent & Southampton Water SPA ▪ Solent & Southampton Water Ramsar ▪ Solent & Dorset Coasts SPA	▪ SAC Habitats ▪ SPA/Ramsar Birds	▪ Habitat loss ▪ Recreational disturbance ▪ Air Quality ▪ Nutrient Neutrality

Table 10: Building For A Better Future Plan - Summary of Potential Allocation Impacts				
Allocation	Consequences	Designated Sites affected	Qualifying Feature affected	Impact Pathways
Cabbagefield Row	Residential up to 150 dwellings	▪ Butser Hill SAC ▪ Kingley Vale SAC ▪ Solent Maritime SAC ▪ Chichester & Langstone Harbours SPA ▪ Chichester & Langstone Harbours Ramsar ▪ Pagham Harbour SPA ▪ Pagham Harbour Ramsar ▪ Portsmouth Harbour SPA ▪ Portsmouth Harbour Ramsar ▪ Solent & Southampton Water SPA ▪ Solent & Southampton Water Ramsar ▪ Solent & Dorset Coasts SPA	▪ SAC Habitats ▪ SPA/Ramsar Birds ▪ SAC bat species	▪ Habitat Loss ▪ Recreational disturbance ▪ Air Quality ▪ Nutrient Neutrality
Strouden Court	Residential up to 81 dwellings	▪ Butser Hill SAC ▪ Kingley Vale SAC ▪ Solent Maritime SAC ▪ Singleton & Cocking Tunnels SAC ▪ Chichester & Langstone Harbours SPA ▪ Chichester & Langstone Harbours Ramsar ▪ Pagham Harbour SPA ▪ Pagham Harbour Ramsar ▪ Portsmouth Harbour SPA ▪ Portsmouth Harbour Ramsar ▪ Solent & Southampton Water SPA ▪ Solent & Southampton Water Ramsar ▪ Solent & Dorset Coasts SPA	▪ SAC Habitats ▪ SPA/Ramsar Birds ▪ SAC bat species	▪ Habitat loss ▪ Recreational disturbance ▪ Air Quality ▪ Nutrient Neutrality

Table 10: Building For A Better Future Plan - Summary of Potential Allocation Impacts				
Allocation	Consequences	Designated Sites affected	Qualifying Feature affected	Impact Pathways
Land W of Hulbert Road	Residential up to 100 dwellings	▪ Butser Hill SAC ▪ Kingley Vale SAC ▪ Solent Maritime SAC ▪ Singleton & Cocking Tunnels SAC ▪ Chichester & Langstone Harbours SPA ▪ Chichester & Langstone Harbours Ramsar ▪ Pagham Harbour SPA ▪ Pagham Harbour Ramsar ▪ Portsmouth Harbour SPA ▪ Portsmouth Harbour Ramsar ▪ Solent & Southampton Water SPA ▪ Solent & Southampton Water Ramsar ▪ Solent & Dorset Coasts SPA	▪ SAC Habitats ▪ SPA/Ramsar Birds ▪ SAC bat species	▪ Habitat Loss ▪ Recreational disturbance ▪ Air Quality ▪ Nutrient Neutrality
Dunsbury Way	70 extra care units	▪ Butser Hill SAC ▪ Kingley Vale SAC ▪ Solent Maritime SAC ▪ Chichester & Langstone Harbours SPA ▪ Chichester & Langstone Harbours Ramsar ▪ Pagham Harbour SPA ▪ Pagham Harbour Ramsar ▪ Portsmouth Harbour SPA ▪ Portsmouth Harbour Ramsar ▪ Solent & Southampton Water SPA ▪ Solent & Southampton Water Ramsar ▪ Solent & Dorset Coasts SPA	▪ SAC Habitats ▪ SPA/Ramsar Birds	▪ Recreational disturbance ▪ Air Quality ▪ Nutrient Neutrality

Table 10: Building For A Better Future Plan - Summary of Potential Allocation Impacts				
Allocation	Consequences	Designated Sites affected	Qualifying Feature affected	Impact Pathways
Former Electricity Board, Bartons Road	Residential up to 90 dwellings	▪ Butser Hill SAC ▪ Kingley Vale SAC ▪ Solent Maritime SAC ▪ Chichester & Langstone Harbours SPA ▪ Chichester & Langstone Harbours Ramsar ▪ Pagham Harbour SPA ▪ Pagham Harbour Ramsar ▪ Portsmouth Harbour SPA ▪ Portsmouth Harbour Ramsar ▪ Solent & Southampton Water SPA ▪ Solent & Southampton Water Ramsar ▪ Solent & Dorset Coasts SPA	▪ SAC Habitats ▪ SPA/Ramsar Birds	▪ Recreational disturbance ▪ Air Quality ▪ Nutrient Neutrality
Padnell Grange	Residential up to 83 dwellings	▪ Butser Hill SAC ▪ Kingley Vale SAC ▪ Solent Maritime SAC ▪ Singleton & Cocking Tunnels SAC ▪ Chichester & Langstone Harbours SPA ▪ Chichester & Langstone Harbours Ramsar ▪ Pagham Harbour SPA ▪ Pagham Harbour Ramsar ▪ Portsmouth Harbour SPA ▪ Portsmouth Harbour Ramsar ▪ Solent & Southampton Water SPA ▪ Solent & Southampton Water Ramsar ▪ Solent & Dorset Coasts SPA	▪ SAC Habitats ▪ SPA/Ramsar Birds ▪ SAC bat species	▪ Habitat Loss ▪ Recreational disturbance ▪ Air Quality ▪ Nutrient Neutrality

Table 10: Building For A Better Future Plan - Summary of Potential Allocation Impacts				
Allocation	Consequences	Designated Sites affected	Qualifying Feature affected	Impact Pathways
Blue Star	Residential up to 69 dwellings	▪ Butser Hill SAC ▪ Kingley Vale SAC ▪ Solent Maritime SAC ▪ Chichester & Langstone Harbours SPA ▪ Chichester & Langstone Harbours Ramsar ▪ Pagham Harbour SPA ▪ Pagham Harbour Ramsar ▪ Portsmouth Harbour SPA ▪ Portsmouth Harbour Ramsar ▪ Solent & Southampton Water SPA ▪ Solent & Southampton Water Ramsar ▪ Solent & Dorset Coasts SPA	▪ SAC Habitats ▪ SPA/Ramsar Birds	▪ Recreational disturbance ▪ Air Quality ▪ Nutrient Neutrality
Goodwillies Timber Yard	Residential up to 96 dwellings	▪ Butser Hill SAC ▪ Kingley Vale SAC ▪ Solent Maritime SAC ▪ Chichester & Langstone Harbours SPA ▪ Chichester & Langstone Harbours Ramsar ▪ Pagham Harbour SPA ▪ Pagham Harbour Ramsar ▪ Portsmouth Harbour SPA ▪ Portsmouth Harbour Ramsar ▪ Solent & Southampton Water SPA ▪ Solent & Southampton Water Ramsar ▪ Solent & Dorset Coasts SPA	▪ SAC Habitats ▪ SPA/Ramsar Birds	▪ Recreational disturbance ▪ Air Quality ▪ Nutrient Neutrality

Table 10: Building For A Better Future Plan - Summary of Potential Allocation Impacts				
Allocation	Consequences	Designated Sites affected	Qualifying Feature affected	Impact Pathways
Waterlooville MDA (Phases 4 and 8)	Residential up to 190 dwellings	▪ Butser Hill SAC ▪ Kingley Vale SAC ▪ Solent Maritime SAC ▪ Chichester & Langstone Harbours SPA ▪ Chichester & Langstone Harbours Ramsar ▪ Pagham Harbour SPA ▪ Pagham Harbour Ramsar ▪ Portsmouth Harbour SPA ▪ Portsmouth Harbour Ramsar ▪ Solent & Southampton Water SPA ▪ Solent & Southampton Water Ramsar ▪ Solent & Dorset Coasts SPA	▪ SAC Habitats ▪ SPA/Ramsar Birds	▪ Recreational disturbance ▪ Air Quality ▪ Nutrient Neutrality
South Downs College Car Park	Residential up to 85 dwellings	▪ Butser Hill SAC ▪ Kingley Vale SAC ▪ Solent Maritime SAC ▪ Chichester & Langstone Harbours SPA ▪ Chichester & Langstone Harbours Ramsar ▪ Pagham Harbour SPA ▪ Pagham Harbour Ramsar ▪ Portsmouth Harbour SPA ▪ Portsmouth Harbour Ramsar ▪ Solent & Southampton Water SPA ▪ Solent & Southampton Water Ramsar ▪ Solent & Dorset Coasts SPA	▪ SAC Habitats ▪ SPA/Ramsar Birds	▪ Recreational disturbance ▪ Air Quality ▪ Nutrient Neutrality

Table 10: Building For A Better Future Plan - Summary of Potential Allocation Impacts				
Allocation	Consequences	Designated Sites affected	Qualifying Feature affected	Impact Pathways
Campdown	Residential up to 628 dwellings	▪ Butser Hill SAC ▪ Kingley Vale SAC ▪ Solent Maritime SAC ▪ Singleton & Cocking Tunnels SAC ▪ Chichester & Langstone Harbours SPA ▪ Chichester & Langstone Harbours Ramsar ▪ Pagham Harbour SPA ▪ Pagham Harbour Ramsar ▪ Portsmouth Harbour SPA ▪ Portsmouth Harbour Ramsar ▪ Solent & Southampton Water SPA ▪ Solent & Southampton Water Ramsar ▪ Solent & Dorset Coasts SPA	▪ SAC Habitats ▪ SPA/Ramsar Birds ▪ SAC bat species	▪ Habitat loss ▪ Recreational disturbance ▪ Air Quality ▪ Nutrient Neutrality
Waterloo Park	Employment use	▪ Butser Hill SAC ▪ Kingley Vale SAC ▪ Solent Maritime SAC ▪ Chichester & Langstone Harbours SPA ▪ Chichester & Langstone Harbours Ramsar ▪ Pagham Harbour SPA ▪ Pagham Harbour Ramsar ▪ Portsmouth Harbour SPA ▪ Portsmouth Harbour Ramsar ▪ Solent & Dorset Coasts SPA	▪ SAC Habitats ▪ SPA/Ramsar Birds	▪ Air Quality

Table 10: Building For A Better Future Plan - Summary of Potential Allocation Impacts				
Allocation	Consequences	Designated Sites affected	Qualifying Feature affected	Impact Pathways
Dunsbury Park strategic site	Employment use	▪ Butser Hill SAC ▪ Kingley Vale SAC ▪ Solent Maritime SAC ▪ Singleton & Cocking Tunnels SAC ▪ Chichester & Langstone Harbours SPA ▪ Chichester & Langstone Harbours Ramsar ▪ Pagham Harbour SPA ▪ Pagham Harbour Ramsar ▪ Portsmouth Harbour SPA ▪ Portsmouth Harbour Ramsar ▪ Solent & Dorset Coasts SPA	▪ SAC Habitats ▪ SAC bat species	▪ Habitat Loss ▪ Air Quality
Former Colt Site	Employment use	▪ Butser Hill SAC ▪ Kingley Vale SAC ▪ Solent Maritime SAC ▪ Chichester & Langstone Harbours SPA ▪ Chichester & Langstone Harbours Ramsar ▪ Pagham Harbour SPA ▪ Pagham Harbour Ramsar ▪ Portsmouth Harbour SPA ▪ Portsmouth Harbour Ramsar ▪ Solent & Dorset Coasts SPA	▪ SAC Habitats ▪ SPA/Ramsar Birds	▪ Air Quality
Gas Holder Site, Downley Road, New Lane	Employment use	▪ Butser Hill SAC ▪ Kingley Vale SAC ▪ Solent Maritime SAC ▪ Chichester & Langstone Harbours SPA ▪ Chichester & Langstone Harbours Ramsar ▪ Pagham Harbour SPA ▪ Pagham Harbour Ramsar ▪ Portsmouth Harbour SPA ▪ Portsmouth Harbour Ramsar ▪ Solent & Dorset Coasts SPA	▪ SAC Habitats ▪ SPA/Ramsar Birds	▪ Air Quality

Table 10: Building For A Better Future Plan - Summary of Potential Allocation Impacts				
Allocation	Consequences	Designated Sites affected	Qualifying Feature affected	Impact Pathways
Langstone Park	Employment use	▪ Butser Hill SAC ▪ Kingley Vale SAC ▪ Solent Maritime SAC ▪ Chichester & Langstone Harbours SPA ▪ Chichester & Langstone Harbours Ramsar ▪ Pagham Harbour SPA ▪ Pagham Harbour Ramsar ▪ Portsmouth Harbour SPA ▪ Portsmouth Harbour Ramsar ▪ Solent & Dorset Coasts SPA	▪ SAC Habitats ▪ SPA/Ramsar Birds	▪ Air Quality
Interbridges West	Employment use	▪ Butser Hill SAC ▪ Kingley Vale SAC ▪ Solent Maritime SAC ▪ Chichester & Langstone Harbours SPA ▪ Chichester & Langstone Harbours Ramsar ▪ Pagham Harbour SPA ▪ Pagham Harbour Ramsar ▪ Portsmouth Harbour SPA ▪ Portsmouth Harbour Ramsar ▪ Solent & Dorset Coasts SPA	▪ SAC Habitats ▪ SPA/Ramsar Birds	▪ Air Quality
Interbridges East	Employment use	▪ Butser Hill SAC ▪ Kingley Vale SAC ▪ Solent Maritime SAC ▪ Chichester & Langstone Harbours SPA ▪ Chichester & Langstone Harbours Ramsar ▪ Pagham Harbour SPA ▪ Pagham Harbour Ramsar ▪ Portsmouth Harbour SPA ▪ Portsmouth Harbour Ramsar ▪ Solent & Dorset Coasts SPA	▪ SAC Habitats ▪ SPA/Ramsar Birds	▪ Air Quality

6. Commentary on Effects

- 6.1 The purpose of the HRA screening stage in the preceding chapter is to identify any policy or allocation with potential to lead to a likely significant effect at a European site. This section provides commentary on the range of potential impacts identified through screening. For some impacts (e.g. direct/indirect habitat loss) the effects are discussed in more detail (as impacts are more predictable), whereas for others (e.g. air quality, water resources) the potential effects are viewed at a broader scale.

Habitat Loss

Direct loss

- 6.2 As noted above, none of the policies and allocations within the Local Plan would explicitly result in direct habitat loss within the boundaries of any European site. There may be locations where, for example, coastal defence works may require time-limited operations at the boundaries of a European site or where development may result in impacts such as trampling to protected vegetation (e.g. within the Solent Maritime SAC) and any such proposal would require an appropriate level of assessment to be provided in advance of works as well as suitable mitigation measures.
- 6.3 Policy 4 Infrastructure and Environmental Mitigation to Support Development could facilitate Flood & Coastal Erosion Risk Management Schemes that could potentially entail direct habitat loss within European sites. No details of potential schemes mentioned in the policy – at Broadmarsh, Langstone or Northney – are yet available and any such scheme would be subject to external funding before becoming deliverable. Any proposed scheme would also be subject to detailed Habitats Regulations Assessment.
- 6.4 For the Singleton and Cocking Tunnels SAC, designated for its hibernating populations of rare bat species – Bechstein's Bat and Western Barbastelle - the extent to which bats from the SAC occur within the Local Plan area is unclear. It is considered reasonable to assume that bat populations in south-east Hampshire and adjacent areas of West Sussex are functionally linked although to date only for Natterer's Bat *Myotis nattereri* has a direct link between the SAC and habitat in Havant borough been demonstrated. Natural England have not formally accepted a functional link. For the purposes of the HRA, it is assumed that populations of Bechstein's Bat in the Plan area are functionally linked to populations within the SAC and that therefore any impacts to bat habitat (roosts, foraging/commuting habitat) could result in impacts alone or in combination.
- 6.5 A total of seven policies and eight allocations have been identified where there is a reasonable likelihood of development that could result in the loss of foraging or commuting habitat suitable for bat species associated with the SAC. This habitat includes areas of woodland, trees, hedgerows or grassland situated within the predicted zone of occurrence for the two SAC bat species. The loss – alone or cumulatively – of such habitats has the potential to impact the ability of bats to forage, travel and socialise to the extent that impacts are felt at the population level.

Functional loss

- 6.6 It is possible for impacts to European sites to occur through impacts to land outside their boundaries, or to result in functional loss due to time-limited or seasonal activities within their boundaries. Impacts to non-designated supporting habitat could occur either through direct

habitat loss or through other impacts resulting in the functional loss of habitat. For bird species in particular, their mobility presents difficulties in determining the extent of land necessary for the maintenance of populations at a favourable conservation status. Havant Borough, in common with other local authority areas in the wider Solent, contains areas of land outside designated sites which support SPA/Ramsar bird species seasonally. These areas are identified through the Solent Waders & Brent Goose Strategy (SWBGS). To include these areas within the permanent boundaries of the designated sites would place unreasonable constraints on activities which would otherwise be necessary e.g. land-use planning, agriculture, development, recreation. However, under the Habitats and Birds Directives such land is viewed as analogous to the designated site - insofar as loss or disturbance would undermine a European site's conservation objectives - and therefore impacts need to be considered in the same light.

- 6.7 Certain activities facilitated by a plan, such as water sports, could result in functional habitat loss due to disturbance. Although disturbance impacts on the two SPAs within the borough is discussed in further detail below, the Solent & Dorset Coasts SPA is unusual in that it is designated solely for foraging tern species. Terns forage over open water and therefore it is only through water-based activities that disturbance could potentially occur.
- 6.8 A total of four allocations within the Plan are identified where effects can be reasonably predicted that could result in either direct habitat loss or functional habitat loss to SPA/Ramsar supporting habitat. Table 11 provides a summary of the potential impacts arising from these allocations on Chichester & Langstone Harbours SPA/Ramsar and Portsmouth Harbour SPA/Ramsar.

Table 11: Allocations with potential to result in direct or functional habitat loss impacts to SPA/Ramsar supporting habitat		
Policy or Allocation	SWBGS Site	Details
Land south of Havant Road (Horse's Field)	H22B, H23F	Potential for construction and operational phase impacts to H22B and H23F Secondary Support Areas.
Land East of Castle Avenue	H11	Direct loss of Low Use Site H19.
Portsmouth Water Headquarters	H19	Direct loss of Low Use Site H11.
Campdown	H02A, H02B, H106, H113, H125.	Direct loss of H02A Primary Support Area, H125 Primary Support Area, H106 Secondary Support Area and H113 Secondary Support Area. Potential for construction and operational phase impacts to H02B Candidate Low Use site.

- 6.9 Any of the allocations listed above would, if implemented, potentially result in the loss of SPA supporting habitat, either through direct habitat loss or functional habitat loss. Impacts to supporting habitat could result in the displacement of qualifying species and therefore would be highly likely to undermine the conservation objectives of the SPAs.

- 6.10 For the Solent & Dorset Coasts SPA, Policy 29 Development on the Coast could result in functional loss from disturbance caused by increases in the frequency, duration or distribution of water-based leisure activities on the Hayling Island seafront. Although the Plan contains no firm proposals or recommendations for new water-based activities, Policy 29 does acknowledge 'opportunities for water-based recreation'. Any new or expanded water-based activities here, or elsewhere along the Hayling seafront, could potentially result in increases in the number and distribution of water-based sports activities. This could potentially deter tern species from feeding offshore and undermine the conservation objectives of the SPA.

Recreational Disturbance

- 6.11 Development can increase the recreational use of the coast, which has the potential to cause detrimental impacts on important bird assemblages as well as damage and disturbance to habitats. With respect to birds, this is analogous to impacts from habitat loss as recreation can cause important habitat to be unavailable for use by birds (the habitat is effectively lost, either permanently or for a certain period). Birds can be disturbed by human recreational activities and use valuable resources in finding suitable areas in which to rest and feed undisturbed.
- 6.12 The intertidal mudflats and associated estuarine habitats of Chichester & Langstone Harbours and Portsmouth Harbour contain the primary feeding resource for key overwintering bird species, although for some species (e.g. Dark-bellied Brent Geese, some waders) terrestrial grasslands (including within developed areas) and arable farmland are important feeding/resting areas.
- 6.13 For the purposes of this HRA it is concluded that any net increase in residential development within 5.6km of the two SPAs would lead to a likely significant effect from recreational disturbance, in combination with other development taking place within the wider Solent area. The background evidence on which the 5.6km zone is based is presented within the Solent Recreation Mitigation Strategy⁶.
- 6.14 It is considered that ten policies and all 23 housing allocations could reasonably be assumed to result in potential recreational disturbance impacts by facilitating new housing development.

Air quality

- 6.15 Any policies or allocations committed to either increasing new residential development, certain types of new commercial or energy generation development, or which could result in changes to patterns of road vehicle use, could reasonably be considered to potentially result in increased atmospheric pollution.
- 6.16 The effects of air quality (primarily the deposition of nitrogenous materials) is most obvious on sensitive vegetation communities e.g. calcareous grasslands or heathland and therefore most concern has been focussed on impacts to those sites nearest main roads, such as Butser Hill SAC. It is reasonable to assume that any increase in vehicles within the Borough may result in

6 https://birdaware.org/solent/wp-content/uploads/sites/2/2021/10/Solent_Recreation_Mitigation_Strategy.pdf

increased traffic movements on the strategic road network, in this case the A3(M) corridor and A27.

- 6.17 The A3(M) is the main north-south route from the Borough and passes within a few tens of metres of Butser Hill SAC. The characteristic calcareous grassland habitats of the SAC are considered to be particularly sensitive to nitrogen deposition, acid deposition and ground-level ozone all of which could result in changes to soil chemistry and vegetation cover. Any policies or allocations resulting in increased road traffic, or changes to patterns of road vehicle use, could potentially result in increased deposition affecting Butser Hill SAC.
- 6.18 The A27 is the main east-west route through the Borough and passes within close proximity to parts of the Solent Maritime SAC, Chichester & Langstone Harbours SPA/Ramsar, Portsmouth Harbour SPA/Ramsar and Solent & Dorset Coasts SPA. As with Butser Hill SAC, these sites support habitats which are sensitive to the effects of increased nitrogen deposition, acid deposition and ground-level ozone. Habitats such as upper saltmarsh, coastal grasslands, vegetated shingle and annual vegetation of drift lines may be sensitive to atmospheric pollutants.
- 6.19 Any assessment of air quality issues is complex and must take account of existing and future patterns of road use (itself a result of population increase and any corresponding rise in car use from the existing population), road type, vehicle type, fuel efficiency, weather and climate.
- 6.20 This HRA is accompanied by a full screening assessment of air quality and the impact of new development arising from the Plan. This study is presented as Appendix 2.
- 6.21 For each of the policies and allocations within the Plan in isolation, the air quality assessment concludes that “pollutant contributions associated with the Building a Better Future Local Plan are well below the relevant screening thresholds for all designated sites within 10km of Havant. In all cases, the predicted process contributions (PCs) are less than 1% of the relevant critical levels and/or critical loads for NO_x and NH₃ concentrations, and nutrient nitrogen and acid deposition, and therefore can be considered insignificant in accordance with established guidance”.
- 6.22 The in-combination screening exercise identified that “there is risk for potential effects, with in combination total pollutant contributions exceeding 1% of the critical load or level” for a number of the European site considered. These are shown in Table 11.

Table 11: Summary of In-combination Screening of Potential Air Quality Issues	
European site	Summary of Potential Air Quality Issues
Butser Hill SAC	Potential for 'in-combination' effects from nutrient nitrogen deposition, airborne NOx and airborne NH3.
Chichester & Langstone Harbours SPA/Ramsar	Potential for 'in-combination' effects from nutrient nitrogen deposition, airborne NOx and airborne NH3.
Kingley Vale SAC	Potential for 'in-combination' effects from nutrient nitrogen deposition.
Pagham Harbour SPA/Ramsar	Potential for 'in-combination' effects from nutrient nitrogen deposition, airborne NOx and airborne NH3.
Portsmouth Harbour SPA/Ramsar	Potential for 'in-combination' effects from nutrient nitrogen deposition, airborne NOx and airborne NH3.
Solent & Dorset Coasts SPA	Potential for 'in-combination' effects from nutrient nitrogen deposition, airborne NOx and airborne NH3.
Solent Maritime SAC	Potential for 'in-combination' effects from nutrient nitrogen deposition, airborne NOx and airborne NH3.

Coastal squeeze

- 6.23 Havant Borough has c.48km of coastal fringe, the vast majority of which is hard engineered to protect dwellings, industry and other infrastructure. Coastal protection has been set out in the North Solent Shoreline Management Plan (SMP) which itself has been subject to HRA. In addition, the Hayling Island Coastal Management Strategy comprises a Flood and Coastal Erosion Risk Management (FCERM) Strategy for the Hayling Island coastline. This strategy – informed by the SMP but including greater detail - will shape the approach to coastal change on the island and will affect the way in which existing sea defences are managed and consequently where new development can occur.
- 6.24 None of the policies or allocations within the Plan explicitly lead to development on the coast, although a total of nine policies could feasibly result in either new development on/near the coast or the need for the protection of existing coastal housing or employment development. Policy 29 Development on the Coast does allow for the potential to maintain or redevelop existing residential or non-residential development within coastal areas. It is feasible that this could exacerbate coastal squeeze. In addition, Policy 29 refers to coastal defences and, by inference, the potential for new defences to impact European sites.
- 6.25 Policy 4 Infrastructure and Environmental Mitigation to Support Development refers to three specific areas of the Borough where coastal defence works are likely to be implemented: Langstone, Broadmarsh, and Northney. The effects of these policies could exacerbate impacts arising from coastal squeeze.

Water Resources

- 6.26 There will be an inevitable net increase in housing across the Borough as a result of the Plan. Residential uses are the primary driver for increasing water consumption and wastewater production. Both mechanisms can lead to negative environmental effects on sensitive ecosystems.
- 6.27 Increased water abstraction could result in impacts to freshwater inputs to Chichester & Langstone Harbours and Portsmouth Harbour, affecting those two SPAs/Ramsar sites as well as the Solent Maritime SAC and Solent & Dorset Coasts SPA. Given the interconnected nature

of the Solent, it is considered that other SPAs outside the Borough should be screened-in in the absence of further information.

- 6.28 The groundwaters and springs used to provide water supplies in turn feed into various watercourses entering the harbours. Inputs of freshwater are important to coastal/marine habitats in maintaining salinity gradients and water circulation, as well as driving variations in vegetation communities such as saltmarsh. The composition and distribution of habitats in turn affects the availability of resources for bird species. It is considered that all Local Plan policies leading to or facilitating new housing and commercial development could potentially result in increased demand for water abstraction.
- 6.29 Within Havant Borough, all water resources are managed by Portsmouth Water. Water is abstracted from groundwater sources and springs at locations within the borough. Portsmouth Water's Draft Water Resources Management Plan 2019 (Portsmouth Water, 2017) states that there is currently a surplus of supply up to 2044, taking into account the projected growth in demand (arising in part from new development) and factors such as climate change (Figure 3). This demonstrates that, with the best-available evidence, there is no expected water supply deficit across the Local Plan period and therefore no impacts arising from water abstraction are expected.
- 6.30 Portsmouth Water, in maintaining a supply surplus, is able to operate a bulk supply relationship with Southern Water, providing water supplies to meet demand in other parts of the county and beyond. In recognition of the increasing demand elsewhere, Portsmouth Water is seeking to increase its capacity within Havant borough and its ability to continue to provide bulk supplies. The most effective method of achieving this is to construct a new winter storage reservoir at Havant Thicket.

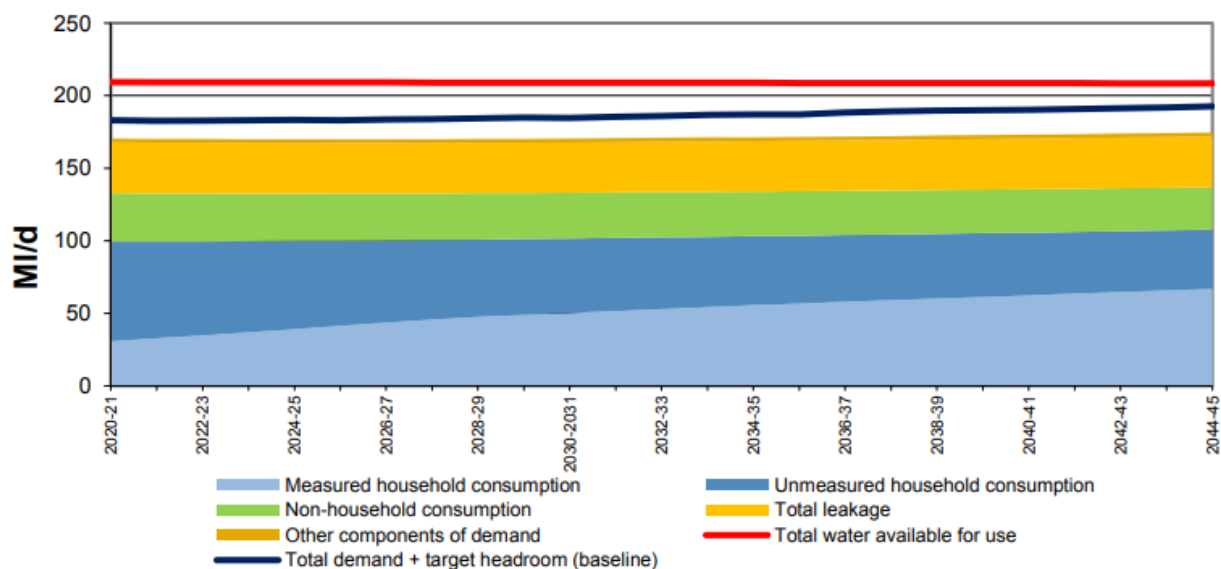


Figure 3: Portsmouth Water Baseline Supply/Demand Balance (Dry Year Annual Average) Exc. Additional Bulk Supplies

Nutrient Neutrality

- 6.31 Water quality can be significantly affected by increased levels of new development. Increases in population can place stress on existing drainage infrastructure and wastewater treatment facilities. Increasing the flow of wastewater to existing treatment facilities could result in increasing the nutrient load in effluent discharges (e.g. at outfalls) thereby decreasing water quality. Impacts to water quality can lead to negative effects on European sites such as increased eutrophication (nutrient enrichment) and algal blooms leading to oxygen depletion affecting aquatic organisms, as well as smothering of marine vegetation and muds.
- 6.32 All new housing development within the borough will require connections to existing drainage infrastructure. Within Havant borough, the bulk of existing drainage infrastructure enters the wastewater treatment works (WwTW) at Budds Farm, with the Emsworth area dealt with at Thornham WwTW. According to the PUSH Integrated Water Management Strategy (IWMS) (PUSH, 2018) *'the growth areas in the Havant Council area are predicted to drain to the Budds Farm Havant WwTW. The water quality assessments indicated that there are no significant constraints to prevent future housing growth in the Council's area, although the WwTW will potentially require capacity upgrades by 2036 and there is a risk of increased sewer network overflows, so improvements might be required. The catchment has nitrate problems and catchment level nitrate measures are required now. To address the uncertainty relating to catchment measures, it is recommended that Local Plans acknowledge the gaps in the evidence base and recognise it will be necessary to respond to emerging evidence to determine whether housing development in later stages of the plan period would require mitigation'*.
- 6.33 Havant Borough Council and Chichester District Council have undertaken a review of current evidence and data into the capacity of the WwTW at Thornham. The 'Review of the position statement for Thornham' sets out that there is current capacity at the WwTWs however, new proposed development should be considered on a case-by-case basis if it intends to connect to Thornham WwTWs considering the developments location, size, property type and updated with the most recent data and information.
- 6.34 The Environment Agency (EA) have issued a technical note regarding the issue of nitrates in the Solent (Environment Agency, 2019). The EA has confirmed that no further upgrade of the Solent WwTWs is required. The technical note states that that *'no further investment is needed to treat wastewater to a tighter nitrogen limit for any of the treatment works in the Solent area'* and *'Where new development can be accommodated within the current water discharge activity permit limits of individual Wastewater Treatment Works, i.e. that there is capacity to take the extra wastewater flows from new development whilst still treating effluent to the same standard, then we consider the development would be acceptable'*.
- 6.35 The PfSH Integrated Wastewater Management Strategy (2018) and PfSH Technical Note: Updated calculation of nitrate loading from housing growth (2020) show that there is capacity at Budds Farm WwTWs. It is worth noting the studies only look to 2036.
- 6.36 In light of Natural England advice to the Solent planning authorities, even if a WwTWs has capacity for new connections it is concluded that any new housing within the borough has the potential to result in a likely significant effect on European sites as a result of increased nutrient inputs. NE have advised that the in-combination effects of increased nutrients have the potential to impact the Solent Maritime SAC, Solent & Isle of Wight Lagoons SAC, Chichester & Langstone Harbours SPA/Ramsar, Solent & Dorset Coast SPA, Portsmouth Harbour SPA/Ramsar and Solent & Southampton Water SPA/Ramsar. Natural England have advised

that all new development will need to demonstrate nutrient neutrality if impacts to these European sites are to be avoided.

- 6.37 There are currently two potential impact pathways leading to increased nutrient inputs to European sites. The majority of waters within Havant Borough are conveyed to the Wastewater Treatment Works (WwTW) at Budd's Farm where, during normal dry weather periods and after treatment, they are discharged into the Solent via the Eastney Long Sea Outfall (LSO). During periods of wet weather combined wastewater and rainfall run-off can be discharged, without robust treatment, directly into the Solent via Combined Sewer Overflows (CSO) in order to prevent flooding. There are CSOs located at Budd's Farm itself alongside a cluster at Court Lane and one at Fort Cumberland. These CSOs discharge directly into Langstone Harbour. The extent to which these CSO discharges impact the wider Solent marine system depends on the patterns of water exchange between the separate harbours. CSOs are part of the WwTW licenses.
- 6.38 An assessment⁷ carried out on behalf of Havant Borough Council investigated the issue of nutrient neutrality. This work looked specifically at source-pathway-receptor elements and assessing the significance of any potential effects on the European sites. In addition, independent investigation has been carried out on the capacity of the Budd's Farm WwTW and will form an addendum to the 2018 PUSH Integrated Water Management Study.
- 6.39 In terms of potential impacts to individual European sites, ongoing assessment by Havant Borough Council has identified the following pathways. For the purposes of this assessment it is assumed that there is sufficient exchange for cumulative impacts to occur.

Table 12: Summary of Screening of Potential Nutrient Enrichment Issues		
European site	Impact source/pathway	Effect
Solent Maritime SAC	Increased use of Budd's Farm and Thornham WwTWs Long-term cumulative addition of nitrogen into Solent marine system	Increased nitrogen discharge directly into the northern part of Langstone Harbour, leading to eutrophication
Solent & Isle of Wight Lagoons SAC	Increased use of Budd's Farm and Court Lane CSOs Long-term cumulative addition of nitrogen into Solent marine system	There is some interchange of waters between Langstone Harbour and the saline lagoon system at Farlington Marshes. Introduction of nitrogen-laden waters into lagoons at spring tide, leading to eutrophication. The Court Lane CSO is directly west of the lagoon.

⁷ Review of the Need for Nutrient Neutral Development in the Budds Farm Wastewater Treatment Works catchment (2020)

Table 12: Summary of Screening of Potential Nutrient Enrichment Issues		
European site	Impact source/pathway	Effect
Chichester & Langstone Harbours SPA/Ramsar	Increased use of Budds Farm and Thornham WwTWs Dispersion of effluent into harbour via Eastney LSO Long-term cumulative addition of nitrogen into Solent marine system	Evidence suggests net flow is from Chichester Harbour into Langstone Harbour (east to west), therefore limited potential for effects on Chichester Harbour elements of Chichester & Langstone Harbours SPA/Ramsar. Potential for eutrophication of waters within Langstone Harbour. Eastney LSO discharge is currently within Environment Agency permits. Dispersion plume data for total effluent discharge and tidal circulation modelling data show little transfer of water into the harbours, with effluent remaining predominantly mid-Solent.
Portsmouth Harbour SPA/Ramsar	Increased use of Budds Farm WwTW CSOs Dispersion of effluent into harbour via Eastney LSO Long-term cumulative addition of nitrogen into Solent marine system	Data show minimal exchange between Langstone Harbour and Portsmouth Harbour. Impacts from CSO discharges therefore considered unlikely. Eastney LSO discharge is currently within Environment Agency permits. Dispersion plume data for total effluent discharge and tidal circulation modelling data show little transfer of water into the harbours, with effluent remaining predominantly mid-Solent.
Solent & Dorset Coast SPA	Increased use of Budds Farm and Thornham WwTWs Dispersion of LSO effluent into harbour Long-term cumulative addition of nitrogen into Solent marine system	Potential for impacts to foraging tern species via increased eutrophication resulting in smothering of prey habitat/changes in prey distribution/abundance. Eastney LSO discharge is currently within Environment Agency permits. Dispersion plume data for total effluent discharge and tidal circulation modelling data show little transfer of water into the harbours, with effluent remaining predominantly mid-Solent. Small nitrogen inputs from Budd's Farm WwTW acting in combination with other WwTWs and agricultural sources may prevent baseline water quality targets for favourable condition being met.
Solent & Southampton Water SPA/Ramsar	Long-term cumulative addition of nitrogen into Solent marine system	Small nitrogen inputs from Budd's Farm WwTW acting in combination with other WwTWs and agricultural sources may prevent baseline water quality targets for favourable condition being met.

Conclusions of Screening

6.40 A total of eleven policies and 30 allocations within the Plan are considered to have the potential to result in likely significant effect on a European site either alone or in-combination.

- Nine policies and 16 allocations are considered to have potential to result in either direct habitat loss impacts or functional habitat loss impacts to Solent Maritime SAC, Singleton & Cocking Tunnels SAC, Chichester & Langstone Harbours SPA/Ramsar, Portsmouth Harbour SPA/Ramsar and/or Solent & Dorset Coasts SPA.
- Eleven policies and 23 allocations are considered to have potential for recreational disturbance impacts to Chichester & Langstone Harbours SPA/Ramsar, Portsmouth Harbour SPA/Ramsar and/or Solent & Southampton Water SPA/Ramsar.
- Nine policies are considered to have potential for increasing the potential impacts of coastal squeeze on Solent Maritime SAC and Chichester & Langstone Harbours SPA/Ramsar.
- Nine policies and 30 allocations are considered to have the potential for in-combination impacts related to increases in atmospheric pollution on and/or Butser Hill SAC, Kingley Vale SAC, Solent Maritime SAC, Chichester & Langstone Harbours SPA/Ramsar, Pagham Harbour SPA/Ramsar, Portsmouth Harbour SPA/Ramsar, and Solent and Dorset Coast SPA.
- Ten policies and 23 allocations are considered to have potential to result in in-combination impacts relating to nutrient neutrality on Solent Maritime SAC, Solent & Isle of Wight Lagoons SAC, Chichester & Langstone Harbours SPA/Ramsar, Portsmouth Harbour SPA/Ramsar, Solent & Dorset Coasts SPA or Solent & Southampton Water SPA/Ramsar.

Table 2: Summary of Policies/Allocations with potential to result in Likely Significant Effect	
European Site	Policy/Allocation with potential to result in Likely Significant Effect
Solent Maritime SAC	Policies 1-4, 6-8, 29, 41, 43, 45 Allocations 1-30
Butser Hill SAC	Policies 1-4, 6-8, 29 Allocations 1-30
Kingley Vale SAC	Policies 1-4, 6-8, 29 Allocations 1-30
Singleton & Cocking Tunnels SAC	Policies 1, 2, 6-8, 45, 47 Allocations 1, 2, 4, 5, 13-15, 18, 23, 25
Chichester & Langstone Harbours SPA	Policies 1-4, 6-8, 29, 41, 43, 45 Allocations 1-30

Table 2: Summary of Policies/Allocations with potential to result in Likely Significant Effect

European Site	Policy/Allocation with potential to result in Likely Significant Effect
Chichester & Langstone Harbours Ramsar	Policies 1-4, 6-8, 29, 41, 43, 45 Allocations 1-30
Pagham Harbour SPA	Policies 1-4, 6-8, 41, 43-45 Allocations 1-30
Pagham Harbour Ramsar	Policies 1-4, 6-8, 41, 43-45 Allocations 1-30
Portsmouth Harbour SPA	Policies 1-4, 6-8, 41, 43-45 Allocations 1-30
Portsmouth Harbour Ramsar	Policies 1-4, 6-8, 41, 43-45 Allocations 1-30
Solent and Dorset Coast SPA	Policies 1-4, 6-8, 29, 41, 43-45 Allocations 1-30
Solent & Southampton Water SPA	Policies 1-4, 6-8, 41, 43-45 Allocations 1-23
Solent & Southampton Water Ramsar	Policies 1-4, 6-8, 41, 43-45 Allocations 1-23

7. Appropriate Assessment & Integrity Test

- 7.1 Having carried out a screening assessment of the Building A Better Future Local Plan, it is the Council's view that without mitigating measures a total of twelve policies and 30 allocations may lead to likely significant effects, either alone and/or in-combination, in relation to eleven of the European sites within the scope of the study.
- 7.2 It is concluded that the Plan will require appropriate assessment in order to test the plan for its effects on European site integrity. Regulation 105 of the Habitats Regulations states that a plan may only be agreed '*...after having ascertained that it will not adversely affect the integrity of the European site or the European offshore marine site (as the case may be).*'
- 7.3 Table 14 provides a summary of the mitigation measures considered necessary in order to avoid impacts to site integrity, and the Building A Better Future Plan will need to ensure the delivery of such measures.
- 7.4 Further discussion is provided below on these mitigation measures and how they can be implemented to allow the competent authority to ultimately conclude that impacts to European site integrity will be avoided.

Table 14: Proposed Mitigation Measures			
Impact Pathway	Mitigation Measures	Policy	Impact to Site Integrity?
Habitat Loss – SPA/Ramsar	Solent Waders & Brent Goose Strategy (including the Guidance on Mitigation and Off-setting Requirements) – strategic measures to assess and mitigate impacts to SPA supporting habitat. No development permitted unless impacts assessed and appropriate mitigation strategy, based on accepted mitigation framework, secured.	Policy 26: Solent Wader and Brent Goose feeding and roosting sites Policy 21: International and national nature conservation sites	NO
Habitat Loss - SAC	Commitment to consideration of Singleton & Cocking Tunnels SAC and Bechstein's Bat protection within Local Plan policy. Requirement for appropriate survey, impact assessment and mitigation, compensation and enhancement measures.	Policy 21: International and national nature conservation sites Policy 25 Protected and Notable Species	NO

Building A Better Future Local Plan
Habitats Regulations Assessment

Recreational disturbance	Solent Recreation Mitigation Strategy – strategic measures to address impacts to qualifying bird species within SPA boundaries. All new residential development within 5.6km of Solent SPAs subject to agreed financial contribution, secured by Local Planning Authority. Payments will fund Solent-wide mitigation measures. All new development with potential to impact Solent SPAs must be accompanied by ecological assessment and, where required, detailed mitigation measures.	Policy 23: Recreation disturbance on international sites	NO
Air quality	Commitment to implementation of any recommended mitigation measures following the air quality assessment study. Commitment to continued partnership working with neighbouring authorities via the Partnership for South Hampshire.	Policy 53: Accessibility, Transport and Parking Policy 21: International and national nature conservation sites	NO
Coastal squeeze	Adherence to principles of North Solent Shoreline Management Plan. All development at the coast must be accompanied by an appropriate level of ecological assessment.	Policy 29: Development on the Coast Policy 21: International and national nature conservation sites	NO
Nutrient Neutrality	Adoption of recommendations of PUSH IWMS. Policy requirements for all new development to ensure protection of surface waters and groundwater sources and to ensure appropriate treatment of surface waters and drainage, incorporating SuDS wherever appropriate. Policy requirement for all new development resulting in overnight stays to provide a nutrient budget and provide appropriate mitigation.	Policy 24: Water quality effects on international sites	NO

Habitat Loss

- 7.5 The screening exercise demonstrated that there are no policies or allocations that would result in direct land take within a European site.
- 7.6 The Local Plan contains several policies which ensure that, prior to any development-related works taking place that have the potential to result in impacts (direct or indirect) to the qualifying features of any European site, ecological assessment is carried out and the potential risks to the site are assessed.
- 7.7 Policy 21: International and national nature conservation sites states that 'Any development with the potential to result in a 'likely significant effect' on any international designated site will need to undertake a Habitats Regulations Assessment (HRA)'. The policy specifically states that:
- *'...development which is likely to have an impact on an internationally designated sites will be subject to a Habitats Regulations Assessment to determine the potential for a likely significant effect. Development which has a likely significant effect either alone or in combination with another plan or project will not be permitted unless it can demonstrate that either:*
 - *The necessary avoidance or mitigation is secured so that there will be no adverse effects on the integrity of the designated site(s); or*
 - *There are no alternatives, but there are imperative reasons of overriding public interest and compensatory provision is secured'.*
- 7.8 It is concluded that Policy 21 alone would provide sufficient safeguard that no development could conceivably take place that would potentially affect a European site without first ensuring that any impacts are understood, and an appropriate level of mitigation is secured, such that impacts to site integrity are avoided.

Impacts to SPA/Ramsar Supporting Habitat

The Solent Waders & Brent Goose Strategy (SWBGS)

- 7.9 There are a total of ten policies and four housing allocations that would be likely to result in the loss (direct or functional) of SPA/Ramsar supporting habitat. The ten policies would generally facilitate new housing or employment development, potentially affecting supporting habitat, whilst the four allocations would potentially affect specific supporting habitat sites.
- 7.10 In recognition of the potential conflicts between human activities (particularly built development and recreation) in and around the Solent coastal plain and the distribution and population status of various migratory bird species, the SWBGS was initiated approximately 20 years ago. The purpose of the strategy is *'to inform decisions relating to strategic planning as well as individual development proposals, to ensure that sufficient feeding and roosting resources continue to be available and the integrity of the network of sites is restored and maintained, in order to ensure the survival of these coastal bird populations'* (SWBGS, 2024). The SWBGS has been instrumental in raising awareness of and providing a consistent approach towards the consideration of SPA/Ramsar supporting habitat throughout the wider Solent area. The SWBGS is fully supported by Natural England.

- 7.11 The SWBGS provides a framework for identifying sites lying outside the physical boundaries of SPA/Ramsar sites, but which are, or may be, used by bird species associated with the European sites. Such sites are termed Functionally Linked Land⁸. These sites serve a function to the species (e.g. by providing feeding or resting opportunities) and are functionally linked to the designated site(s) due to their potential for providing an important role in maintaining populations of the species at a favourable conservation status. SPA/Ramsar species may spend a significant proportion of their time feeding or resting within such non-designated areas.
- 7.12 Each SWBGS site should be subject to sufficient survey effort (counting birds) to enable its importance to be determined with the ultimate aim of identifying a coherent network of sites across the wider Solent area, comprising important sites plus others which provide secondary/additional habitat.
- 7.13 The SWBGS has undergone comprehensive revision with the aim of reducing uncertainty over the status of birds on numerous sites and providing a robust assessment on which sites are most valuable to maintaining a coherent network across the Solent and the level of evidence necessary for assessing impacts.
- 7.14 During the period 2016-2018, a series of surveys focussed on identifying the key network of sites across the eastern Solent through investigating site use and bird movements. This provided new data on the condition and use of individual sites as well as analysis of the functional links between sites. Analysis of survey data has allowed a more nuanced site classification methodology to be developed with a strong emphasis on protecting key network sites.
- 7.15 The SWBGS is the most up-to-date mechanism for assessing the potential impacts on supporting habitat and now includes detailed information on mitigation measures required to avoid, reduce or compensate any impacts arising from development activities. The SWBGS has been adopted and implemented by all Solent planning authorities. Havant Borough Council is committed to implementing the SWBGS.

Mitigation Measures for Impacts to Supporting Habitat

- 7.16 In conjunction with an expert Steering Group comprising Natural England, the Hampshire & Isle of Wight Wildlife Trust (HIOWWT), the Royal Society for the Protection of Birds (RSPB), Coastal Partners, and Local Planning Authorities, Havant Borough Council has been involved in the development of a framework of strategic mitigation measures for impacts to SPA/Ramsar supporting habitat. Given the landscape-scale of the issue of terrestrial supporting habitat, a strategic Solent-wide mitigation solution is the most desirable mechanism for ensuring that functionally linked land is addressed appropriately through the planning system.
- 7.17 The SWBGS Guidance on Mitigation and Off-setting Requirements (SWBGS Steering Group, October 2024) provides a tiered framework of mitigation requirements, linked to the status of each SWBGS site. For each level of site, specific costed mitigation requirements are provided. It is the view of the Steering Committee that by applying these mitigation requirements, impacts
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⁸ <http://publications.naturalengland.org.uk/publication/6087702630891520>

to supporting habitat can be effectively mitigated such that the conservation objectives of the Solent SPAs are not compromised.

7.18 Table 15 summarises the mitigation requirements for each level of SWBGS site.

Table 15: Mitigation Requirements for Impacts to SPA Supporting Habitat	
SWBGS Site Status	Summary of Expected Mitigation Requirements
Candidate	Additional surveys required to confirm status. When status resolved, apply appropriate mitigation package.
Low Use	On-site mitigation preferred option. If not feasible, financial contribution secured towards protection/maintenance of wider SWBGS network.
Secondary	On-site mitigation preferred option. If not feasible, financial contribution secured towards protection/maintenance of wider SWBGS network, ideally within similar geographic location.
Primary	Applications addressed on case-by-case basis through Local Plan. On-site mitigation preferred option. If not feasible, alternative land providing same or increased function within similar geographic location. Financial contribution secured for long-term lease and management by appropriate body.
Core	Presumption that impacts are avoided. Applications addressed on case-by-case basis through Local Plan. Mitigation as per Primary plus at least same extent and function of replacement land in similar geographic location plus long-term management lease and suitable management by appropriate body.

7.19 Policy 26: Solent Wader and Brent Goose Feeding and Roosting sites sets out the Council's approach to ensuring that impacts to SPA/Ramsar supporting habitat are assessed. The policy states:

- *'Development proposals with the potential to impact Solent Wader and Brent Goose Strategy sites will only be granted planning permission where:*
 - *Development proposals are assessed in accordance with the Habitats Regulations 2017. Such proposals will need to provide evidence to inform a Habitats Regulations Assessment (HRA) and must assess potential impacts alone and in combination with other plans or projects;*
 - *Impact assessments are informed by robust data, using existing SWBGS records and/or bespoke field surveys as required; and*
 - *If demonstrated to be necessary to prevent a significant effect, an avoidance and mitigation package in accordance with the Solent Wader and Brent Goose Strategy is provided and secured in perpetuity by legal agreement'.*

7.20 It is considered that Policy 26 ensures that impacts to SPA/Ramsar supporting habitat are assessed robustly and, where impacts are identified, appropriate avoidance and mitigation measures are secured to ensure that impacts to European site integrity are avoided or mitigated. Mitigation measures must be in accordance with the agreed Solent Waders and Brent Goose Strategy.

Recreational Disturbance

- 7.21 A total of eleven policies and 23 housing allocations have potential to contribute towards a cumulative increase in recreational disturbance, either directly (by facilitating residential development) or indirectly (by facilitating changes/increases in the scale, location or type of recreational activity).
- 7.22 As with impacts to SPA supporting habitat, Solent planning authorities have approached the issue of recreational disturbance in a strategic manner.

The Solent Recreation Mitigation Strategy (SRMS)

- 7.23 Research into the impact of recreation on birds was carried out on a Solent-wide scale under the Solent Disturbance and Mitigation Project (SDMP): this research concluded that there is an overall likely significant effect on SPA/Ramsar sites due to recreational disturbance arising from development. The research was taken forward through the Solent Recreation Mitigation Partnership (SRMP) Interim Strategy 2014. In December 2017 a definitive strategy, the SRMS⁹, was published and adopted by the Solent authorities, including Havant Borough Council. This was revised in November 2024 through the revised Bird Aware Solent Strategy.
- 7.24 The strategy includes detailed mitigation measures to address the identified impacts arising from recreational disturbance. Mitigation measures comprise: a ranger team; communications, marketing and education initiatives; initiatives to encourage responsible dog walking; codes of conduct; site-specific visitor management and bird refuge projects; and monitoring.
- 7.25 To fund the strategy, a financial levy is generally provided for each new dwelling situated within 5.6km of the Solent SPAs¹⁰. This levy then funds the mitigation measures.
- 7.26 The strategy is fully supported by Natural England and is considered by them to provide sufficient mitigation to offset the bulk of recreational pressure from new development within the Borough. There may be situations however where on-site mitigation, in addition to the strategy mitigation, is deemed necessary due to the scale or location of development. It is expected that any increase in dwellings in the Borough over the lifetime of the Building A Better Future Plan will continue to contribute towards the strategy and thus any recreational impacts are mitigated. However, the Local Planning Authority will continue to assess whether additional on-site or off-site mitigation measures are needed in addition to contributions in consultation with Natural England. Havant Borough Council is committed to implementing the Bird Aware Solent Strategy.
- 7.27 Policy 23: Recreation Disturbance on International Sites sets out the Council's expectations for development that would be likely to result in increased recreational disturbance. The policy states:

⁹ <http://www.birdaware.org/strategy>

¹⁰ Portsmouth Harbour SPA, Chichester & Langstone Harbour SPA and Solent and Southampton Water SPA.

- *'Planning permission will be granted for new dwellings and/or overnight accommodation that avoids and/or mitigates the likely significant effect on the Solent SPA and Ramsar sites from recreational disturbance' and*
- *'Where these [avoidance and mitigation] measures cannot be provided development proposals will be refused, unless the applicant can show, subject to meeting the tests of the Habitats Regulations, that there would not be a likely significant effect on the Solent SPA and Ramsar sites either alone or in combination with other plans or projects'.*

7.28 It is considered that Policy 23 provides a robust mechanism for ensuring that the impacts of increased recreational disturbance from new housing or accommodation are assessed and, where impacts are likely, suitable mitigation is secured.

Air Quality

- 7.29 The Air Quality Screening Assessment (WSP, 2026) concludes that “the in-combination results show that the contribution of the Havant Local Plan is consistently small in the context of the in-combination impact. In isolation, the Havant Local Plan contributes 0.2% or less of the critical load or level. As a percentage of total in combination nutrient nitrogen deposition, NO_x or NH₃ concentrations where there are in combination exceedances of the CL, Havant's contribution is consistently 5.1% or less of the total. For the potential impact of greatest concern (nitrogen deposition), the contribution from the Havant Local Plan is consistently 0.1% to 0.5% of the total”.
- 7.30 The assessment then states that “reductions to the Havant contribution, even if substantial in terms of significant reductions to AADT, would not result in a meaningful reduction in the level of in combination exceedance for any pollutant in exceedance at any of the habitats. It is concluded that the scale of influence for the Havant Local Plan is negligible relevant to other plans and projects forming the majority of the potential effect of in combination exceedances. ”
- 7.31 The assessment concludes that none of the policies or allocations within the Plan in isolation will lead to any adverse effect on any of the European sites considered. For the identified in-combination effects to some sites from some sources, the contribution of the Plan is negligible in comparison to other plans considered.
- 7.32 The Plan includes a number of policies which cumulatively will help to reduce air quality impacts. Policy 53: Accessibility, Transport and Parking sets requirements for new development to fully consider opportunities to reduce travel demand and the need to travel, and to embed sustainable travel modes.
- 7.33 In addition, Policy 21: International and National Nature Conservation Sites requires that any development proposal is accompanied by appropriate assessment of potential impacts – including air quality matters - in accordance with the Habitats Regulations. Development proposals will not be permitted unless demonstrating that adverse effects on European site integrity is avoided, mitigated or compensated.
- 7.34 Havant Borough Council is committed to addressing air quality issues in collaboration with neighbouring authorities and will continue to work collaboratively with its PFSH partners on strategic air quality matters.

Coastal Squeeze

- 7.35 Coastal protection in Havant Borough has been set out in the North Solent Shoreline Management Plan and seeks to promote a sustainable coastal defence scheme for managing coastal erosion and flood risk.
- 7.36 The default protection scenario across the borough is 'hold the line' as demonstrated within the North Solent Shoreline Management Plan and further detailed by the Eastoke Sectoral Strategy Study, the Portchester to Emsworth Strategy and South Hayling Beach Management Strategy (East Solent Coastal Partnership, 2018) and the South Hayling Island Beach Management Plan 2024-2029 (Coastal Partners, 2023). Holding the line will entail an ongoing programme of physical coastal defence improvements whilst maintaining the general 'line' of current defences.
- 7.37 Further detailed assessment work has been undertaken through the Hayling Island Coastal Management Strategy (Coastal Partners, 2024). This Strategy expands on the Shoreline Management Plan and provides a more detailed assessment of coastal management and identifies schemes or risk management options for implementing the Shoreline Management Plan policies.
- 7.38 For various locations in the borough such as South Moor, Warblington and Conigar Point, the 'hold the line' strategy will be maintained for the foreseeable future, or until further detailed studies justify and instigate further actions. For some areas a move away from 'hold the line' towards potential 'managed realignment' options is being considered, but no firm details are available. Further detailed scheme-specific studies will help to identify coastal management risks, assist with funding applications and identify opportunities for establishing compensatory habitat.
- 7.39 Policy 29 Development on the Coast sets out the expectations for any development within the coastal fringe of the Borough, explicitly stating that development will only be permitted where:
- 'is in line with the North Solent Shoreline Management Plan or any subsequent Coastal Strategies, and
 - is in line with the Marine Plan for the area'.
- 7.40 This policy also defines Coastal Change Management Areas within which there are stringent requirements for the consideration of development impacts on the coast.
- 7.41 It is considered that Policy 29 provides a robust policy mechanism for adaptive coastal management that addresses the issue of coastal squeeze and ensures that development activities around the borough's coastline are fully consistent with the Shoreline Management Plan and any subsequent Coastal Strategies.

Water Resources/Nutrient Neutrality

- 7.42 There will be an overall net increase in housing across the Borough as a result of the Building a Better Future Plan. Residential uses are the primary driver for increasing water consumption and wastewater production. Both mechanisms can lead to negative environmental effects on sensitive ecosystems.
- 7.43 Within Havant Borough, water supply is wholly within the remit of Portsmouth Water. Portsmouth Water's Water Resources Management Plan (WRMP) demonstrates that the borough's strategic supply demands can be accommodated fully, with a surplus, taking into

account existing water abstraction licenses and as supplemented by the proposed Havant Thicket Winter Storage Reservoir.

- 7.44 In terms of water quality, work has taken place to investigate the requirement for new or enhanced water treatment capacity within the borough through the PUSH Integrated Water Management Strategy (IWMS). In conjunction with Natural England and the Environment Agency, PUSH identified that additional research is required in order for water quality issues to be addressed within the Local Plan period. Calculations completed by the PUSH group for the Integrated Water Management Strategy, concluded that there is currently capacity at Budds Farm WwTW for the timeframe the study looked to which was 2036. Capacity was based on an occupancy are of 2.4 persons/household: this is consistent with advice from Natural England.
- 7.45 To achieve nutrient neutrality, many developments will be required to secure appropriate mitigation. To satisfy the provisions of the Habitat Regulations, any required nutrient mitigation must have a high degree of certainty both in terms of its effectiveness and deliverability, and be secured prior to any impacts being created (prior to occupation).
- 7.46 A nutrient budget has been put together in order to demonstrate that sufficient mitigation is likely to be available to satisfy the quantum of development within the emerging Havant Borough Local Plan. Appendix 3 of this report shows the expected nutrient demand over the plan period (2025-2043). The majority of the Havant Local Plan is affected by the East Hampshire Rivers nutrient catchment. There is one allocation located in the Western Streams nutrient catchment.
- 7.47 Figure 4 is an extract from a recent PfSH report considering the supply and demand for nutrient credits within the sub region. The figure shows the expected level of nutrient mitigation which will be available in the East Hampshire Catchment over the next 5 years.

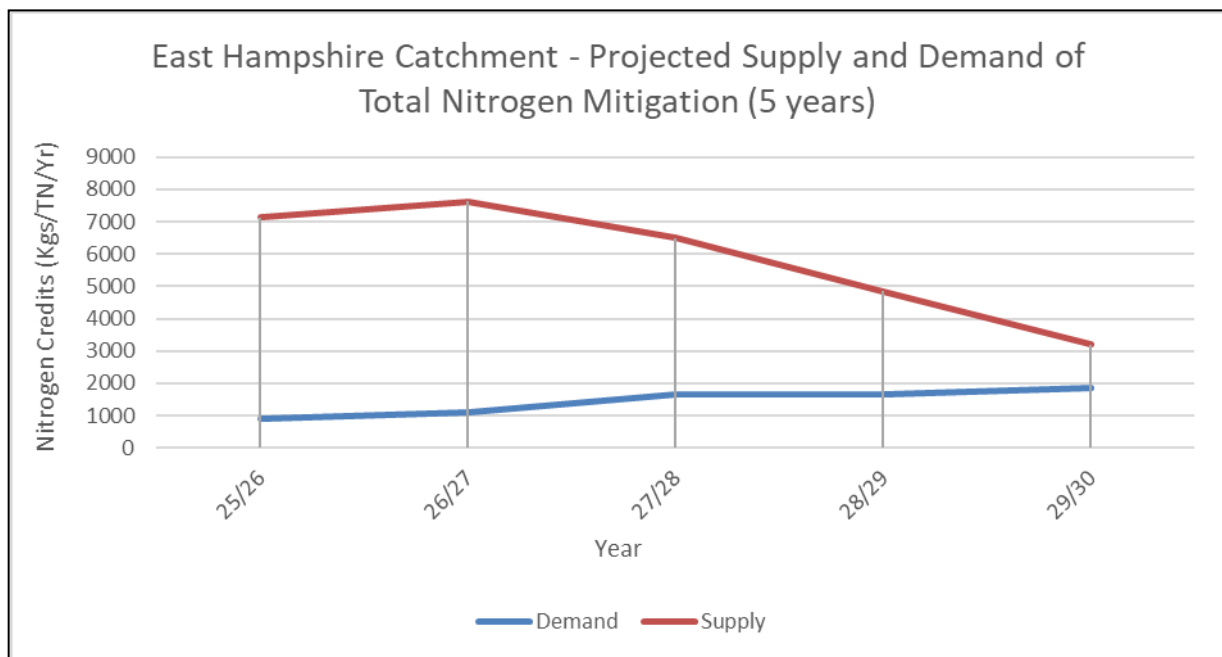


Figure 4 – Projected supply and demand of nutrient mitigation in the East Hampshire catchment (5 years) (Source: PfSH December 2025 Joint Committee)

- 7.48 As shown in Appendix 3, the estimated phasing of units between 0-5 years would generate a nutrient need of approximately 224 Kg/TN/Yr. This is comfortably within the range of estimated supply of nutrient credits within the East Hampshire catchment show in Figure 2.

7.49 Figure 5 is also from the recent PfSH report¹ and shows the expected level of nutrient mitigation which will be available in the Western Streams Catchment over the next 5 years. The graph also includes years 6 – 10 as the current level of supply is not expected run out until 2032/33.

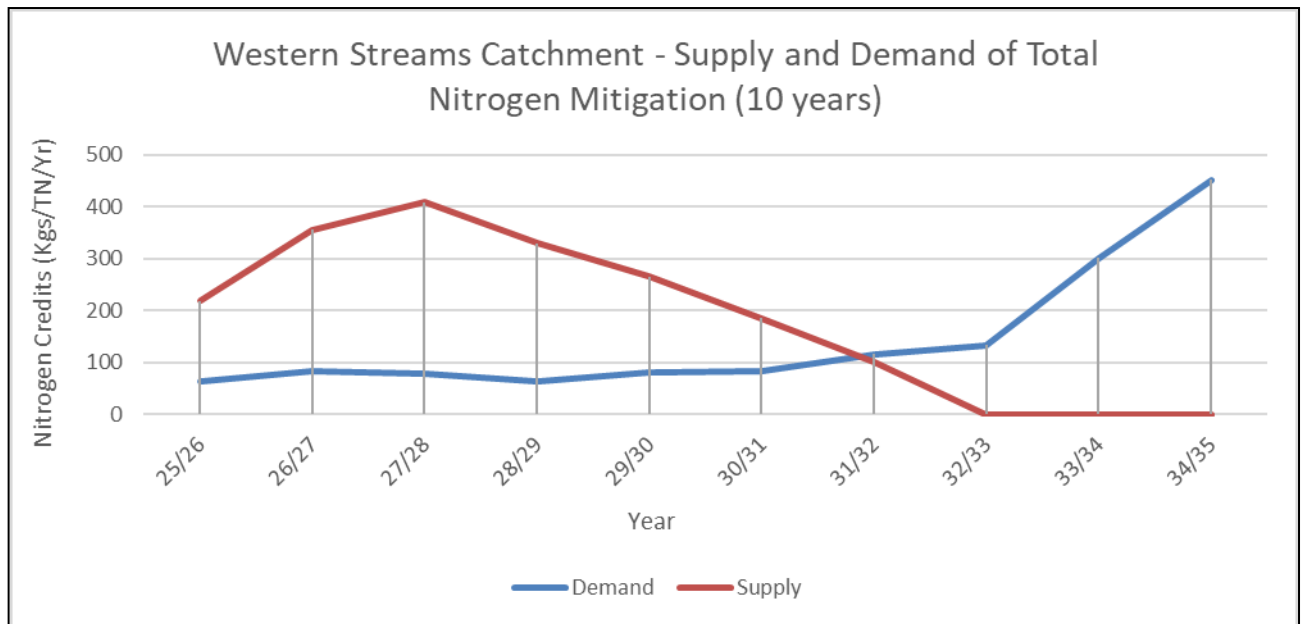


Figure 5 – Projected supply and demand of nutrient mitigation in the Western Streams catchment (10 years) (Source: PfSH March 2025 Joint Committee)

- 7.50 As shown in Appendix 3, the estimated phasing of units between 0-5 years would generate a nutrient need of approximately 20 Kg/TN/Yr. This is comfortably within the range of estimated supply of nutrient credits within the Western Streams catchment show in Figure 5.
- 7.51 Beyond 5 years Appendix 3 estimates that an additional 4659 Kg/TN/Yr will be required to satisfy demand across all nutrient catchments affecting Havant Borough. The majority of this demand (87%) is in the East Hampshire catchment with only (13%) in the Western Streams. While nutrient mitigation has not yet been identified to satisfy these years, the current rate of mitigation schemes coming online is expected to continue and be able to meet future demand. This is informed by the investment strategy of organisations such as the Solent Mitigation Partnership who received funding from MHCLG to create large-scale nutrient mitigation sites to enable housing delivery. Beyond the next 5 to 10 years, it is likely that mitigation will be supplemented by enhancements to regional Wastewater Treatment Works (WwTW) which have a 5+ year investment cycle. For example, WwTW serving over 2000 population will be upgraded to Technically Achievable Limits (TAL) by 2030. This was mandated through the Levelling Up and Regeneration Act (LURA) 2023 and will result in a reduction in the overall demand for nutrient mitigation in the catchment. Alongside this, it is expected that other strategic solutions will also come forward such as Environmental Delivery Plans (EDPs). These are being developed by Natural England and are expected to come forward in the medium term as another form of nutrient mitigation that developers can utilise. However, when exactly the EDPs will come forward and whether they will provide suitable mitigation for the allocations is currently unknown.
- 7.52 On this basis we can conclude that sufficient nutrient mitigation credits will be available to satisfy the development needs of the Havant Borough Local Plan 2043 over the plan period, and therefore the Plan meets the provisions of the Habitat Regulations.

- 7.53 Bespoke policy for all new development should ensure that development would only be permitted where appropriate investigations have identified the risk to groundwaters, and a deliverable mitigation strategy is provided. Development should be expected to take full account of Source Protection Zones and the Environment Agency and Portsmouth Water will be consulted on all developments within sensitive locations.
- 7.54 In addition, the Plan should include robust requirements for surface water and sub-surface drainage management within development sites. Any future policy should ensure that drainage requirements are considered at the design stage and developed and implemented in accordance with recognised standards.
- 7.55 Policy 24 Water Quality Effects on International Sites provides robust requirements that all new development must ensure protection of surface waters and groundwater sources and must ensure appropriate treatment of surface waters and drainage, incorporating SuDS wherever appropriate.
- 7.56 Policy 24 also includes the requirement for all new development resulting in overnight stays to provide a nutrient budget and provide appropriate mitigation.
- 7.57 Havant Borough Council will continue to work collaboratively with its PfSH partners and Natural England on the issue of water quality.

8. Summary and Record of the HRA

- 8.1 Having carried out a Habitats Regulations screening assessment of the Building A Better Future Plan, it is the Council's view that in its current form and in the absence of mitigating measures the plan may lead to likely significant effects, both alone and in-combination with other plans or projects, in relation to some of the European sites within the scope of the study.
- 8.2 The HRA screening exercise has concluded that eleven policies and 30 allocations have the potential to result in a likely significant effect, either alone or in-combination, on eleven European sites.
- 8.3 These policies and allocations were taken forward for further assessment to determine whether, after taking into account strategic and proposal-specific mitigation measures embedded within the Plan, there are residual impacts to European site integrity either alone or in combination with other plans and projects.
- 8.4 It is concluded that through the application of plan-led strategic and site-specific mitigation measures, the Plan would not result in adverse effects on the integrity of European sites within the Plan's zone of influence.
- 8.5 The Council places a high level of confidence in the strategic-level mitigation measures detailed within this assessment. These have been developed over many years with the cooperation of Natural England, local planning authorities, and non-governmental organisations and are based on the best-available scientific knowledge, collected, analysed and interpreted using well-established methods alongside authoritative expert judgement.

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Building A Better Future Local Plan
Habitats Regulations Assessment

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APPENDIX 1A - LOCATION OF SPECIAL AREAS OF CONSERVATION WITHIN 10KM OF HAVANT BOROUGH

APPENDIX 1B – LOCATION OF SPECIAL PROTECTION AREAS AND RAMSAR SITES WITHIN 10KM OF HAVANT BOROUGH

APPENDIX 1C – LOCATION OF SOLENT & DORSET COAST SPA

APPENDIX 2 – AIR QUALITY ASSESSMENT

APPENDIX 3 – NUTRIENT BUDGET