Entered 18.9.26 - NOTE ONLY _ SEE FULL REP - Ref: 306389618

Date: 08 September 2026
Our ref: 553909

Customer Services
Hornbeam House
Crewe
CW1 6GJ

[redacted]

Havant Borough Council

BY EMAIL ONLY

Dear Sir/Madam,

Planning Consultation: Havant Draft Local Plan - Regulation 19

Thank you for your consultation on the above. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England commented on the Havant Local Plan at Regulation 18 stage in July 2025 (our reference 511907). We provided further advice in our meeting with your authority on 30th October 2025 and in our email to Gill Glover dated 19th June 2026 (regarding the Pre-Submission Local Plan). Please refer to these previous comments alongside this response for further advice.

Natural England welcomes the strong engagement we have had with Havant Borough Council and the acceptance of our feedback. We are pleased to note that the Council has responded positively to many of the matters raised in Natural England's previous representations.

Recreational Disturbance on International Sites

We welcome the inclusion of Policy 23 which covers recreational disturbance on designated sites in the Solent. Natural England welcomes Havant Borough Council's continued commitment to the Solent Recreation Mitigation Partnership also known as 'Bird Aware Solent' as a method for addressing in-combination impacts of recreational disturbance on the Solent Special Protection Area (SPA) sites. If bespoke mitigation options for development were to come forward, we would recommend developers hold early discussions with Natural England and Havant Borough Council to ensure their mitigation is sufficient and robust.

Solent Waders and Brent Goose Strategy (SWBGS) Sites

Natural England welcomes Policy 26 which covers Solent Waders and Brent Goose Strategy sites. Sites are classified based on certain criteria and the Strategy is regularly updated and reviewed. We welcome your consideration of the SWBGS reclassifications identified in our Regulation 18 response.

We welcome that Policy 26 states that where adverse effects on SWBGS sites are identified, an avoidance and mitigation package in accordance with the SWBGS Guidance on Mitigation and

Offsetting Requirements must be provided. Natural England recommends that this Policy states that such mitigation packages should be discussed with relevant stakeholders. Natural England can support this through the SWBGS Steering Group.

Water Quality Effects on International Sites

Natural England welcomes Policy 24 covering Water Quality Effects on International Sites. We welcome the Policy's requirement for a nutrient budget to be produced and appropriate mitigation secured for all applications with a net gain in overnight accommodation which would cause a likely significant effect on internationally designated sites. Natural England notes reference in Policy 24 to the strategic mitigation package for developments unable to achieve nutrient neutrality on site and or for a developer-provided mitigation package delivered in perpetuity.

We welcome that a plan-level nutrient budget has been completed which identifies the nutrients generated by allocations and policies in the Local Plan. Currently, the nutrient budget only includes nutrients generated by the Plan. At the Local Plan level we would usually expect the budget to outline the nutrient mitigation to cover proposed development during the plan period. Natural England notes the options for onsite and offsite nutrient mitigation are outlined within the Position Statement and Mitigation Plan for Nutrient Neutral Development.

Sustainable Drainage Systems (SuDS)

Natural England welcomes that the Local Plan contains a dedicated Flood Risk Policy (27) and Drainage Policy (28) which includes the incorporation of Sustainable Drainage Systems (SuDS) in any proposals for development. Natural England supports well designed sustainable drainage schemes. In addition to the management of the quantity of surface water, SuDS can significantly reduce a development's impacts on surrounding water quality and above-ground SuDS features can contribute to Green Infrastructure, biodiversity net gain and natural capital provision(s). Where a development site drains or is hydrologically linked to a designated site, it is particularly important that SuDS are appropriately designed to protect the water quality of the receiving waterbody and the designated site. We advise that policy ensures SuDS schemes are designed to maximise other environmental benefits wherever possible and where there could be impacts to designated sites, water quality is protected and management and monitoring is secured for the lifetime of the development.

Development on the Coast

Natural England supports the inclusion of a Development on the Coast Policy (29), which incorporates Coastal Change Management Areas (CCMAs) within the Havant Local Plan and supports the Council's proactive approach to managing the long-term impacts of coastal change. The identified CCMAs are informed by the North Solent Shoreline Management Plan and the Hayling Island Coastal Management Strategy, reflecting the best available evidence on coastal erosion, flood risk and adaptation requirements. This approach is consistent with the National Planning Policy Framework (NPPF) for managing development in areas vulnerable to coastal change.

Natural England particularly supports the requirement that development within CCMAs must not prevent the implementation of coastal management measures identified through Shoreline Management Plans, Coastal Strategies and future adaptation planning. We also welcome the safeguarding of land needed for future coastal adaptation and intertidal habitat creation via the Chichester Harbour Investment and Adaptation Plan (CHIAP), as illustrated in Figure 9. Safeguarding suitable land will help ensure future habitat creation, restoration and compensation measures can be delivered where required, supporting the resilience of designated sites and the natural processes on which they depend.

Natural England encourages the Council to keep the extent of CCMAs and safeguarded areas under review as further evidence emerges through the CHIAP and updates to coastal strategies, national coastal erosion risk mapping and shoreline management planning occur.

Green and Blue Infrastructure

Natural England welcomes the inclusion of a dedicated Blue and Green Infrastructure policy (Policy 5) and the commitment that decisions relating to blue and green infrastructure should be guided by the Natural England's Green Infrastructure Planning and Design Guide.

Local Nature Recovery Strategy (LNRS)

Natural England welcomes the incorporation of references to the Hampshire Local Nature Recovery Strategy within the Local Plan and supporting documents, including within the site allocations.

Connecting People with Nature

We welcome the commitment of the Plan to healthy and inclusive placemaking for residents. We support the commitment to respond to health inequalities through active health, healthy eating, mental health, safety and accessibility to green space.

Habitats Regulations Assessment

We welcome that a plan-level nutrient budget has been completed which identifies the nutrients generated by allocations and policies in the Local Plan. Currently, the nutrient budget provides a reasonable estimate for the quantity of credits which would be required. It does not include reference to specifically available credits. This element of the budget could be strengthened, but we agree there is relative certainty that nutrient credits are likely to be available within this catchment. As such, we are satisfied with the conclusion of the Habitat Regulations Assessment that adverse effects on European site integrity can be avoided.

Sustainability Appraisal

Natural England notes that the Sustainability Appraisal identifies Development Strategy Option 2 as the preferred approach. We welcome that Option 2 would provide positive effects for biodiversity, climate change, healthy communities, natural resources and landscape.

Natural England recognises the progress made by Havant Borough Council since the Regulation 18 consultation and appreciates the constructive engagement that has taken place throughout the plan preparation.

Yours faithfully,

Benjamin Leigh
Higher Officer - Sustainable Development
Thames Solent Team