Havant
BOROUGH COUNCIL

Statement of Common Ground

Environment Agency &

Havant Borough Council

October 2026

Introduction

This Statement of Common Ground ('SoCG') is a jointly agreed statement between the Environment Agency ('EA') and Havant Borough Council ('HBC') in relation to the Havant 'Building a Better Future' Plan (BBFP) ('The Local Plan').

Overview of Joint Working & Engagement

Throughout the preparation of the Local Plan, officers at Havant Borough Council and Environment Agency have held regular 'check-ins' as and when the need has arisen (see Statement of Cooperation). Through these meetings, the approach to flood risk and coastal change in the Local Plan strategy, the selection of sites and the drafting of topic policies has been jointly progressed.

The Environment Agency also submitted formal consultation responses to the Regulation 18 Draft Local Plan in 2025 and the Regulation 19 Publication Plan in 2026.

Summary of Common Ground

Development Strategy, Strategic Policies and Topic Policies

The Environment Agency confirmed at the Regulation 18 draft plan stage in 2025 that issues within their remit had been well recognised in the plan and that this generally translated forward into clear and robust policies to ensure that the environment is protected as development comes forward in the borough. The support for the approach taken to these matters was again formally expressed at the Regulation 19 consultation.

With regard to the Development Strategy (Policy 1), the EA supports that the strategy seeks to sustain existing communities whilst not increasing risk by avoiding new housing in areas at risk of flooding now or in the future. The EA supports the development strategy that prioritises the avoidance of new development on Hayling Island outside of the defined settlement boundary. This demonstrates the sequential approach to location of development within the Authority boundary, as required by the NPPF.

The EA considers that the extent to which the Local Plan uses the available evidence to avoid allocating development in areas at risk of flooding and coastal erosion is a particular strength in its approach to building resilience to climate change within the Borough. The EA welcomes the integration of development planning with planning for Flood and Coastal Erosion Risk management. This integration is evident in the approach to infrastructure (Policy 4), and also in the approach to development on Hayling Island – this precautionary approach considering uncertainties around funding and viable standards of protection of future schemes will build resilience into the Local Plan with respect to climate change.

The EA have explicitly expressed support for the following strategic and topic policies in the Building a Better Future Plan, considering the Council's approach to be legally compliant and sound:

Policy	Reg19 Representation Reference
Policy 1 - Development Strategy	465
Policy 4 - Infrastructure and Environmental Mitigation	467
Policy 11 - Climate Change	468
Policy 19 - Water Efficiency	469

Policy 27 - Flood Risk	470
Policy 51 - Aquifer Source Protection Zones	471
Policy 52 - Contaminated Land	473

Site Allocation 3 - Land South of Havant Road (Horse's Field)

The Environment Agency noted in their Regulation 19 Representation (Ref 496), that the site allocation information should have noted that there are main rivers within or on the boundary of the site. They note that parts of these rivers are culverted, and some are in open channel. Further assessment of this, including any opportunities for de-culverting should be investigated at planning application stage. The EA suggested that in order to make this site allocation sound, this matter should be recognised within the allocation to ensure that expectations in regard to this are clear.

The EA therefore request:

- recognition of the main rivers on/adjacent the site in the site allocation key features
- Addition of a development requirement to ensure that an appropriate buffer zone is left between any development and the river corridor and de-culverting opportunities should be explored.

The Council is content with these amendments and intends to propose main modifications to address them. Suggested wording is set out at the end of this SoCG.

Relevant evidence base

The extent to which the Local Plan uses the available evidence to avoid allocating development in areas at risk of flooding and coastal erosion is a particular strength in its approach to building resilience to climate change within the Borough, in particular:

- NE011-A Partnership for South Hampshire Strategic Flood Risk Assessment
- NE011-B Strategic Flood Risk Assessment (SFRA) Part 2 (Local Plan Sites)
- NE010 Hayling Island Coastal Management Strategy
- TP001 Development Strategy Topic Paper

Outstanding areas of disagreement

None

Signatories

This statement has been prepared and agreed by the following organisations

Havant Borough Council	**Environment Agency**
D. Hayward	L. Lax
David Hayward Planning Policy Manager	Laura Lax Planning Specialist
Date: 6 November 2026	Date: 6 October 2026

Appendix: Schedule of Agreed Proposed Changes

Text proposed to be deleted is shown as ~~struckthrough;~~ New text to be inserted is shown by <u>underlining</u>

Represention Reference	**Paragraph / policy number**	**Agreed Proposed Change**
496	Allocation 3: Land south of Havant Road (Horse's Field)	**Key features:** …. • Pockets of flood zones 2 and 3 • <u>Main rivers on/adjacent to the site</u> • Risk of surface water flooding
496	Allocation 3: Land south of Havant Road (Horse's Field	**Development Requirements:** ….. • Avoid areas at risk of flooding and demonstrate that development will be safe for its lifetime without increasing flood risk elsewhere; • <u>Provide an ecological and landscape buffer to the main rivers on the edge of the site;</u> • <u>Remove existing culverts and re-naturalise existing river channels, unless to do so would increase flood risk or result in other environmental harm;</u> • Include surface water management systems which restrict runoff to greenfield runoff rates and…..