Havant
BOROUGH COUNCIL

Statement of Common Ground

Natural England &

Havant Borough Council

October 2026

Introduction

This Statement of Common Ground (SoCG) is a jointly agreed statement between Natural England (NE) 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 have held regular 'check-ins' as and when the need has arisen (see Statement of Cooperation).

Natural England have submitted formal consultation responses to the Regulation 18 Draft Local Plan in 2022, 2025 and the Regulation 19 Publication Plan in 2026 and Natural England and Havant Borough Council have met several times inside and outside of formal consultation periods.

Summary of Common Ground

Natural England responded to the Building a Better Future Plan Regulation 18 consultation in July 2025. They set out that their 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.

For the regulation 18 consultation Natural England commented on a number of policies and evidence base documents these included:

- The plan's vision and development strategy
- Policy 20 International and National Nature Conservation
- Policy 19 Biodiversity Net Gain
- Policy 21 The Local Ecological Network
- Policy 22 Recreational Disturbance on International Sites
- Policy 25 Solent Waders and Brent Goose Strategy Sites
- Policy 23 Water Quality Effects on International Sites
- Policy 18 Water Efficiency
- Policy 24 Protected and Notable Species
- Policy 49 Protecting Open Space
- Policy 50 Provision of Public Open Space in New Development
- Green Infrastructure (GI)
- Climate Change Adaptation
- Health and Wellbeing
- Soils
- Air Quality
- Local Plan Site Allocations
- Habitat Regulations Assessment
- Sustainability Appraisal

Following the comments received on the above policies and topics amendments a meeting was held between Natural England and HBC in October 2025 and further information was provided by Natural England in June 2026.

Natural England provided a further consultation response on the regulation 19 consultation in September 2026. Natural England state that they welcome the strong engagement they have had with HBC and the acceptance of their feedback to date. They state they were pleased to note the

Council has responded positively to many of the matters and comments made during post regulation 18 and the meeting that followed. They then go to address the following matters for the regulation 19 consultation.

Recreational Disturbance

Havant Borough Council have sat on the Board for the Solent Recreation Mitigation Partnership which operates under Bird Aware Solent for many years and also attended the Steering Group until it was merged into the Partnership for South Hampshire Natural Environment Group. As an organisation Havant Borough Council value and support the work that the partnership have done and continue to do.

Natural England welcomes the policy and the Council's continued commitment to the Solent Recreation Mitigation Partnership. Natural England reinforces the need for developers to have early engagement with Natural England and HBC to ensure that any bespoke mitigation is sufficient and robust.

Solent Waders and Brent Goose Strategy

Havant Borough Council continues to support the work of the Solent Wader and Brent Goose Strategy and its Steering Group which Havant Borough Council has been a consistent member of.

Natural England welcome Policy 26 and the Council's consideration of comments received from Natural England within their regulation 18 response. In order to strengthen the policy further Natural England have recommended to further enhance the policy's soundness that further text be added to the policy which states that mitigation packages should be discussed with relevant stakeholders through the SWBGS Steering Group. The Council agrees and has provided proposed modification in the attached Annex.

Water Quality Effects in International Sites

Natural England welcomes Policy 24 and its requirements for development and mitigation packages. Natural England also welcomes the plan-level nutrient budget which has been completed as part of the Habitats Regulations Assessment.

Development on the Coast

Natural England supports the inclusion of Policy 29 which incorporates Coastal Change Management Areas and the Council's proactive response to managing the long-term impacts of coastal change. Natural England supports the requirement that development within CCMAs must not prevent the implementation of coastal management measures identified though the Shoreline Management Plan. Natural England therefore 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 occurs.

The mapping within the plan has been undertaken in line with the strategies listed above. The Council will check and ensure that such review mechanism is captured within the monitoring indicators of the plan.

Green and Blue Infrastructure

The policy on Green and Blue Infrastructure was included following Natural England's regulation 18 comments. Natural England welcomes the policy included in the regulation 19 plan and the Council's commitment that decisions relating to blue and green infrastructure should be guided by Natural England's Green Infrastructure Planning and Design Guide.

Local Nature Recovery Strategy (LNRS) and Connecting People to Nature

Natural England welcomes references to the LNRS within the Local Plan and supporting documents, including within site allocations. And supports the Council's commitment to healthy and inclusive placemaking for resident through the Local Plan

Habitat Regulations Assessment

Natural England are content with the HRA and its conclusions overall and have confirmed in meetings that the plan is in compliance with the Habitat Regulations. Therefore, they have raised no soundness or legal concerns.

Natural England note that the nutrient budget only addresses the nutrient load generated by the Plan and does not outline a budget of nutrient mitigation to cover the proposed developments during the plan period from specific mitigation schemes.

Whilst Natural England and the Council acknowledges that in an ideal situation, we would be able to provide upfront mitigation solutions for the plan period this is currently not possible due to mitigation being provided within the private sector via third-party. However, through the Habitats Regulation Assessment the Council has included evidence to show that there is relative certainty that nutrient credits are likely to be available within Havant's catchment. The Council's approach to ensure the correct mitigation is secured is set out in the Council's Position Statement and Mitigation Plan for Nutrient Neutral Development. As such Natural England confirmed they were satisfied with the conclusion of the Habitat Regulations Assessment that adverse effects on the European site integrity can be avoided.

Sustainability Appraisal

Natural England noted that the Sustainability Appraisal identifies Development Strategy Option 2 as the preferred approach and welcome the positive effects for biodiversity, climate change, healthy communities, natural resources and landscape the option will have.

Conclusion

The Council has proposed minor amendments in order to strengthen policies. Natural England recognises the progress made by the Council since the Regulation 18 consultation and appreciates the constructive engagement that has taken place throughout the plans preparation. The Council will continue to engage with Natural England throughout the remaining Local Plan process.

Signatories

This statement has been prepared and agreed by the following organisations

Havant Borough Council	**Natural England**
David Hayward	*Victoria Huth*
David Hayward Strategic Planning Manager	Victoria Huth Senior Officer Sustainable Development
Date: 02/11/2026	Date: 18/11/2026

Appendix: Schedule of Agreed Proposed Changes

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

Paragraph / policy number	**Agreed Proposed Change**
Policy 26, criterion c)	c) If demonstrated to be necessary to avoid an adverse effect, an avoidance and mitigation package in accordance with the Solent Wader and Brent Goose Strategy Guidance on Mitigation and Offsetting Requirements is provided and secured in perpetuity by legal agreement. Proposed mitigation packages will be reviewed by and discussed with key stakeholders such as Natural England and the Solent Waders & Brent Goose Strategy Steering Group.