BUILDING
A BETTER FUTURE

# Development Strategy Topic Paper

November 2026



# Development Strategy Topic Paper

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# 1. Introduction

## Purpose of a Development Strategy?

1.1 Preparing a Local Plan provides Local Authorities an opportunity to clearly express their spatial vision for their area, defining what quantity, what distribution, and what quality of development they consider desirable or acceptable for their area.

1.2 Paragraph 20 of the National Planning Policy Framework (NPPF) (2024)[1] provides that in Local Plans, *strategic policies should set out an overall strategy for the pattern, scale and design quality of places.*

1.3 This paper provides an overview of how the Council arrived at the Building a Better Future Plan's development strategy, pointing to key parts of the evidence base and highlighting parts of the plan itself. The expected spatial and qualitative outcomes of that strategy are also rehearsed. The paper demonstrates that the strategy is based on sound planning principles, tested through the SA and backed up by evidence.

## Overview of the Proposed Strategy

1.4 Pages 25 and 26 of the Local Plan provide a high level overview of key influences on the strategy, followed by an introduction to the strategy on pages 27 and 28.

1.5 This is followed by Policy 1, which sets out the Spatial Strategy:

*'The Building a Better Future Plan will deliver the Council's vision for 2043 of a borough with high quality, environmentally sensitive urban and suburban living, where the nature and location of development is shaped by the need to provide homes for all, regenerate urban centres, address climate change and enhance the natural environment'*

1.6 The policy criteria that follow that introduction then set out how the development allocations and the topic policies in the plan achieve the Council's vision, together forming the spatial strategy.

***Sustainable Growth***

*a) Positive planning to meet local development needs, in particular for affordable and market housing as well as employment, as far as is sustainable within environmental and infrastructure limits;*

***Making Efficient Use of Land***

*b) Maximising development in established urban and developed areas and on brownfield sites across the borough;*

*c) Sustaining and enhancing the borough's town centres through a focus on development and regeneration;*

[1] Since the Local Plan is being examined under the 2024 NPPF, all references to the National Framework are to the 2024 version rather than the August 2026 version.

*d) Development densities which make efficient use of land while taking account of the local character context;*

***Enabling well-connected communities***

*e) Promoting development where good accessibility between homes, jobs and services by a wide choice of modes exists or can be achieved;*

***Protecting our most special environments***

*f) Development only where it has no unacceptable impacts on international, national or local ecological designations, or national landscape designations;*

*g) Safeguarding existing public open spaces and expecting new developments to enhance them and/or provide new open spaces;*

***A coastal borough in a changing climate***

*h) Protecting and enhancing our special coastline and harbours for wildlife by managing the coast with a focus on nature, balanced with support for the borough's coastal areas' established role as a visitor destination;*

*i) Sustaining existing communities and protecting them from coastal erosion and sea level rise;*

*j) Responding to the effects of climate change by not adding to the level of risk through a presumption against new housing in areas that are at risk of flooding, now or in the future*

1.7 While Policy 1 provides the Spatial Strategy, the whole suite of policies from Policy 1 to Policy 12 in Part 2 of the Plan should be considered to be the strategic policies in the plan[2].

## Strategic alternatives considered

1.8 The alternative strategy options considered, and their spatial, qualitative and sustainability implications are set out in more detail in the Sustainability Appraisal (SA) Report (SP003 C), at Section 3.

1.9 While in less constrained Local Authority areas, options might typically be based around spatial decisions such as whether to add urban extensions or create new self-contained settlements away from existing urban centres, in Havant Borough, the existing pattern of development and the severely restricted amount of land remaining for development (see the Havant Borough Constraints Study - HS001) makes this approach to options impossible.

1.10 Instead, options were developed and considered on a more qualitative basis, focussed on where the emphasis in addressing competition for the use of land lies, and what outcomes are more desirable locally. Alternatives along a spectrum of different emphases were considered, ranging from an option seeking to maximise environment protection, to a development delivery market driven option with limited expectations for development quality or environmental considerations.

[2] Paragraph 20 NPFF: 'Plans should make explicit which policies are strategic policies.'

1.11 Four clearly distinguishable alternatives along the spectrum were developed and tested. Each strategy option considered brings together a coherent overall approach to:

- the characteristics of sites themselves (i.e. the type of land that would be affected by development eg brownfield or greenfield; any nature conservation, heritage or other protective designations etc);
- locational matters (i.e. where development should take place in relation to other facilities, infrastructure needs etc) and
- qualitative requirements (eg density and quality requirements for housing).

**Simple Overview of the Development Strategy Options Considered**




1.12 The Sustainability Appraisal of the options demonstrates why Strategy Option 2 was selected to be taken forward in developing the Building a Better Future Plan. It concluded that this development strategy is the most appropriate strategy for the plan when considered against the alternatives, because it combines and balances in the most effective way key national and local development objectives when considering all three pillars of sustainable development.

1.13 The chosen strategy option 2 seeks to positively address the reality of climate change and the precarious state of the natural environment while positively planning for development to meet local needs. This also aligns with a locally strongly expressed desire, established through early stages of consultation on the plan, to maximise environmental protection to mitigate the acknowledged need for substantial amounts of development. Importantly, while taking the need for housing delivery and meeting other development needs extremely seriously, it does not ignore the reality of climate change and the precarious state of the natural environment. Flood risk in particular is identified as a key constraint to development in the borough, in particular in coastal areas. A new approach to transport with a pattern of development and infrastructure that puts good accessibility by non-car modes first is built into the proposed development distribution. Biodiversity, habitats- and species protection from the international to the local level influences sites selection and development management approaches; and development is expected to be of a high quality, both in terms of environmental and social standards.

1.14 The approach aligns well with the expression of what the presumption in favour of sustainable development means for plan making, as set out in paragraph 11 of the 2024 NPPF: '*all plans should promote a sustainable pattern of development that seeks to: meet the development*

*needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects'*.

1.15 The pattern of development that results in the chosen option is focussed on long-term sustainable brownfield and greenfield sites on the mainland of the borough only, including very significant greenfield sites delivering thousands of homes and employment floorspace. Sites are not automatically excluded where biodiversity and other environmental constraints exist, but successful mitigation is expected. Greenfield land on Hayling Island is not being put forward for development, primarily on the basis of flood risk, which will increase significantly with climate change. Due to the risk to the single access road on and off the island, as well as a wider consideration of the long term prospects of the island as a suitable place for development, greenfield sites on the island, even where they may not themselves be at risk, are considered unsustainable in the long term. This pattern of development also aligns with the strategic aim to ensure good accessibility and modal choice.

1.16 Individual aspects of the strategy and their spatial implications are discussed in more detail in the body of this paper. It seeks to trace a coherent path from the choses strategy via the evidence base to the detailed proposals (site allocations and topic policies) in the Building a Better Future Plan.

## Process of Refining the Development Strategy and Selecting Sites for Allocation

1.17 It is important to note that in selecting the proposed development strategy, no detailed decisions were made about the detailed spatial distribution of development or what sites to take forward for allocation. The SA of the alternatives considered the options based on high level principles. Following identification of Option 2 as the preferred option through the SA, it was worked up and refined further, resulting in Policy 1 of the Local Plan.

1.18 The process of allocating sites in line with the strategy was a separate process, through preparation of a Strategic Housing Land Availability Assessment (SHELAA) – HS005 and Sustainability Appraisal of developable sites. The process is set out in greater detail in the separate 'Housing Site Allocations' Topic Paper (TP003).

1.19 In parallel with this, the Council was developing the evidence base for the plan. Pertaining to the Development Strategy this crucially included:

- SP003 Sustainability Appraisal (SA) of the Local Plan
- KS001 Corporate Strategy 2024-28
- KS003 Regeneration and Economy Strategy 2022-36
- KS004 Climate Change Strategy and Action Plan 2024-30
- KS007 Biodiversity Strategy
- HS001 Havant Borough Constraints Study
- HS005 Strategic Housing and Economic Land Availability Assessment (SHELAA)
- HS011 Residential Density Evidence Paper
- NE011-A Strategic Flood Risk Assessment (PfSH SFRA) and NE011-B SFRA (Local Plan Sites)
- NE012 Local Nature Recovery Strategy for Hampshire
- NE013 Nature Recovery and Environmental Mitigation Opportunities in Havant Borough

- SI001 Town Centre Regeneration Appraisal Sites Report

Links to these papers and the remainder of the evidence base for the Local Plan are found in the Examination Library.

# 2. The development strategy explored further

2.1 This section explores the key features of the Local Plan Development Strategy and associated site allocations and topic policies in greater detail. By reference to the evidence on specific local circumstances and expected spatial and qualitative outcomes, this will demonstrate that the development strategy put forward is positively prepared, justified, effective and consistent with national policy.

### Sustainable Growth

***Development Strategy Principle: Positive planning to meet local development needs, in particular for affordable and market housing as well as employment, as far as is sustainable within environmental and infrastructure limits***

2.2 Policies 6 and 7 in the Local Plan set out the amount of development to be planned for, supported by the development allocations in the plan. Alongside those for housing and employment, the plan includes safeguarding of land for infrastructure and environmental mitigation needed to support or make lawful the proposed development (Policy 4). The Infrastructure Delivery Plan (Evidence Base Reference IT001) provides further detail on infrastructure requirements and delivery mechanisms.

2.3 The principle of meeting development needs and how for the plan goes to achieving this is not discussed further here. This is covered by separate Topic Papers on Housing Supply (TP002) and Employment (TP006).

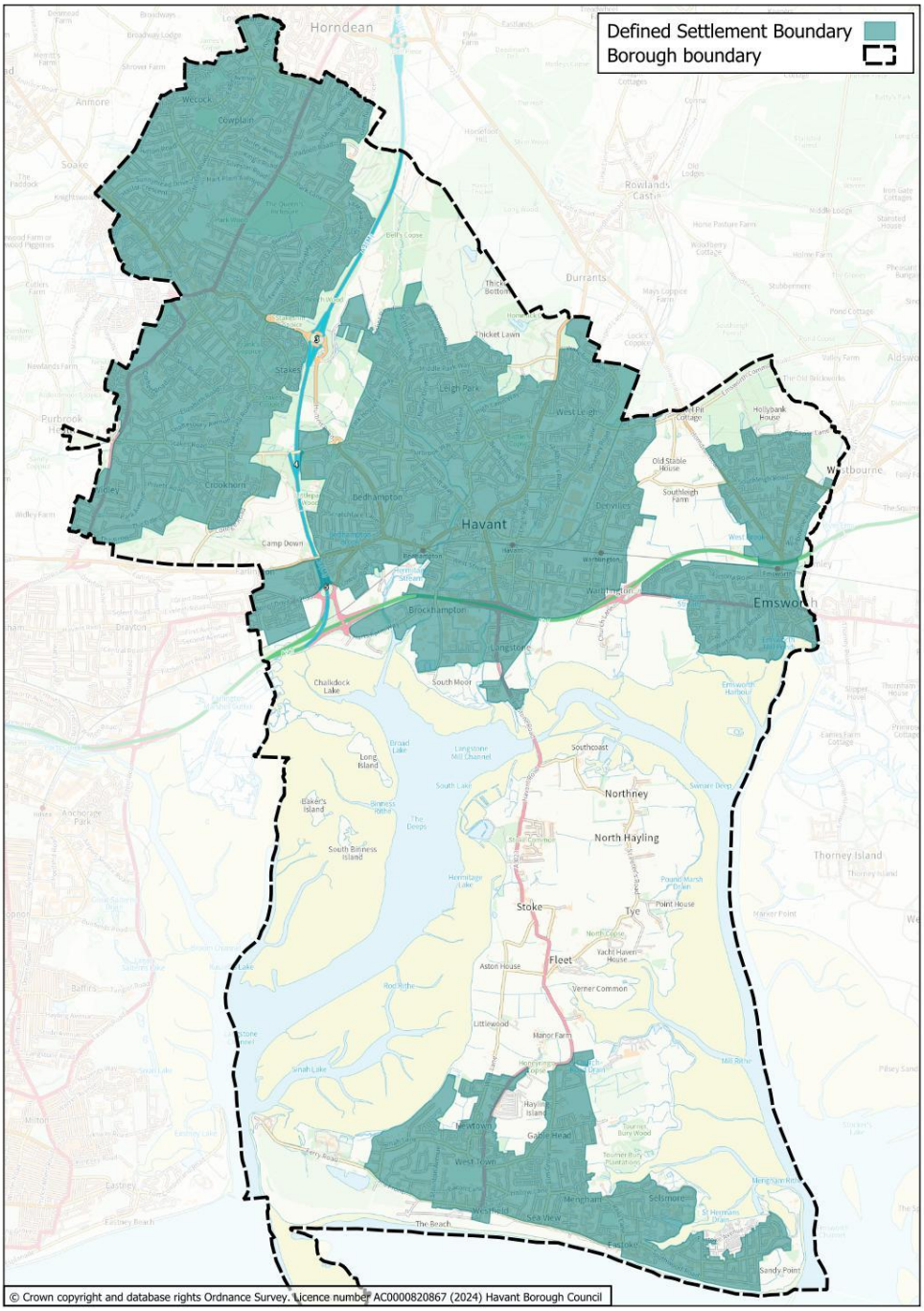
### Making Efficient Use of Land

***Development Strategy Principle: Maximising development in established urban and developed areas and on brownfield sites across the borough***

2.4 In line with the principles set out in paragraphs 124 and 125 of the NPPF as well as reflecting the constrained nature of remaining developable land in the Borough, the Council places great emphasis on making as much use as possible of previously developed or ‘brownfield’ land within settlement boundaries.

2.5 The Local Plan includes clearly defined settlement boundaries (Policy 2). The approach taken to the definition of settlement boundaries supports the wider principle of making the most of those parts of the borough that best facilitate sustainable living. On this basis, the defined settlement boundaries are focused on established urban areas with a mixture of facilities and services alongside housing. Smaller groups of dwellings or settlements lacking wider supporting infrastructure are not included in the settlement boundary.

2.6 Site allocations forming urban extensions are also not included within the defined urban area. These are covered by criterion a) of Policy 2 and by their own separate allocations earmarking them for development. The next Local Plan Review will assess whether these sites have been delivered, and if they have, these areas will be included in the urban area in the next Plan.




2.7 The policy establishes that development within the settlement boundaries is acceptable in principle. This will allow the development of windfall sites, giving great weight to the benefits of using suitable sites within existing settlements for homes, in line with Paragraph 73d of the NPPF.

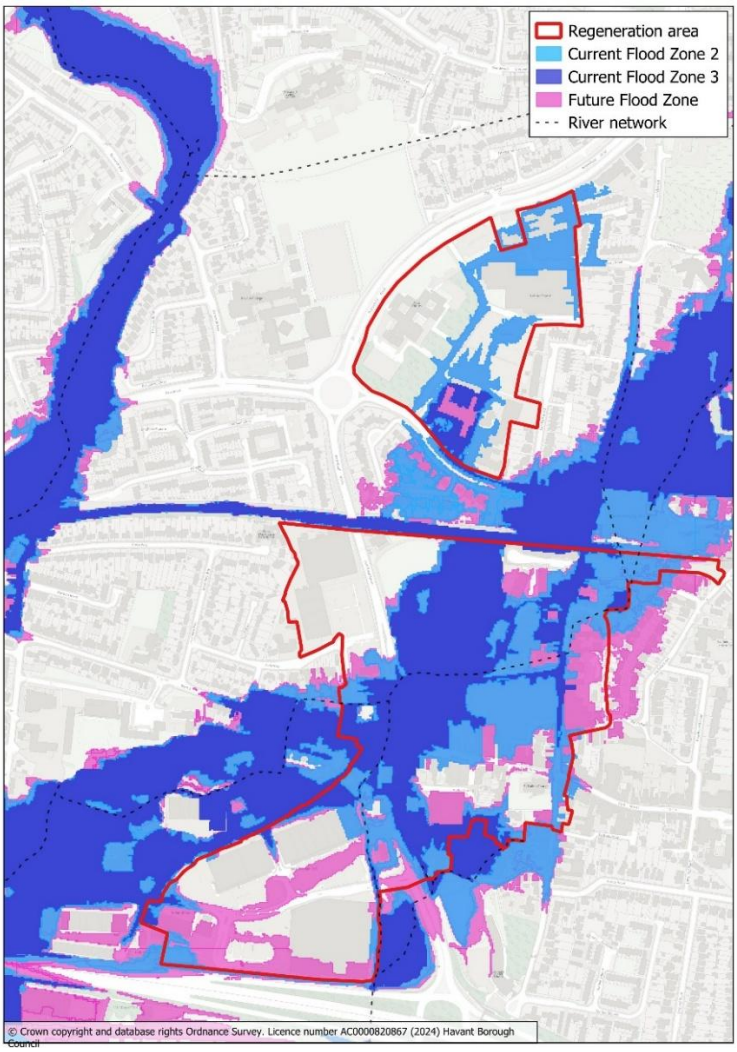
2.8 While, as noted above, the Plan is not being considered against the 2026 NPPF, the Council considers that the settlement boundaries defined in policy 2 of the Local Plan provide an appropriate basis for applying the aspects of that new NPPF which relate to settlement boundaries.

***Development Strategy Principle: Sustaining and enhancing the borough's town centres through a focus on development and regeneration***

2.9 The Council is committed to the regeneration of Havant, Leigh Park and Waterlooville Town Centres as highlighted in the Council's Corporate Strategy (Evidence Base Reference KS001) and the Council's Regeneration and Economic Development Strategy (Evidence Base Reference KS003)

2.10 The identified regeneration areas represent the most sustainable development areas in the Borough, being close to public transport, shops and services, thus minimising the need to use a car day-to-day. They are suitable for high density housing which will help to further support their vitality and viability. These key areas are identified as broad locations for development with the potential to contribute to housing delivery and an enhanced sense of place (Policy 3).

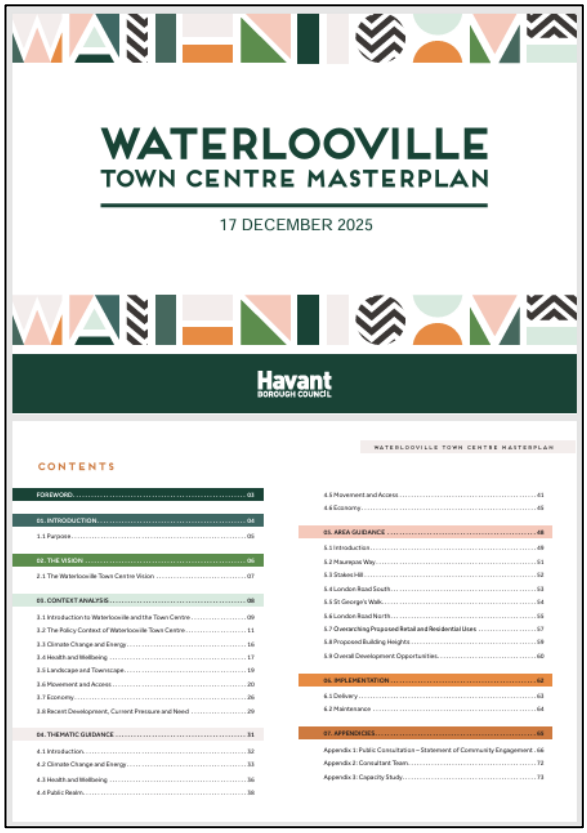
2.11 The National Flood Map for Planning and the Partnership for South Hampshire Strategic Flood Risk Assessment (SFRA Level 1) (Evidence Base Reference NE11-A) highlight significant areas at risk of fluvial flooding, particularly once climate change is taken into consideration. This affects in particular central areas of Havant, which coincide with the existing most heavily urbanised parts of the borough, including Havant Town Centre.

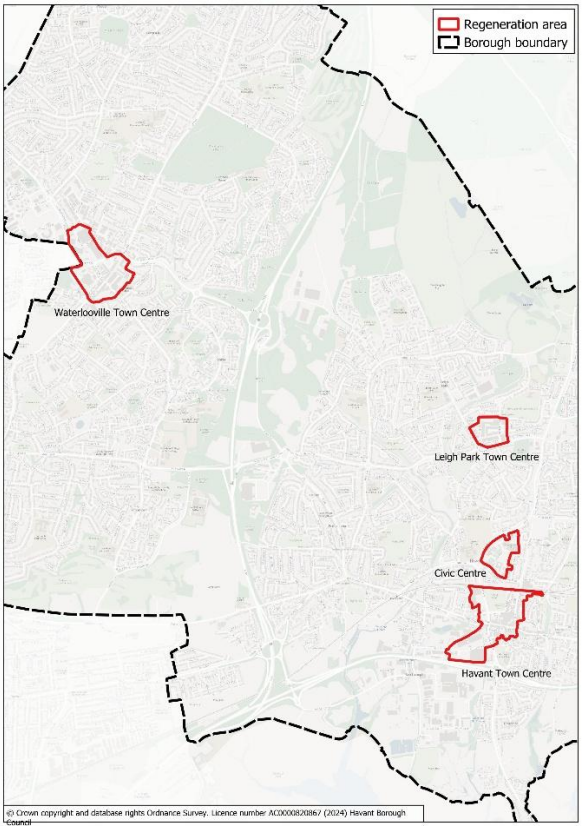


2.1 In Havant Borough, no mapping is available to define with any degree of certainty the functional floodplain for rivers. The SFRA instead recommends that the entirety of Flood Zone 3 for fluvial risk is used as a starting point, so that the risk is not underestimated. In making site allocations, the Council has avoided making allocations in affected areas or has made allocations only where the risk may be avoided within the site. As a result, the Local Plan places no reliance on potential development supply arising from these areas.

2.2 Nevertheless, the Council remains fully committed to bringing about town centre regeneration, including redevelopment opportunities. In relation to the functional floodplain, it is noted that the SFRA indicates that with further modelling it may be possible to refine the area considered to be functional floodplain. As well as modelling at site level to establish the actual risk, the Council, in line with Environment Agency (EA) guidance, will consider the footprint of existing buildings to lie outside of the functional floodplain (see Policy 27), thereby addressing some of the restrictions on development.

2.3 The Council also has an active regeneration team working to bring forward town centre regeneration opportunities. It has initially prioritised the production of a comprehensive masterplan for Waterlooville Town Centre, which was adopted as a Supplementary Planning Document in December 2025.




2.4 Regeneration work at all three town centres is ongoing, with the latest position updated through the regeneration pages of the Council's website. Other development frameworks and/or masterplans will be developed as necessary to support the delivery of regeneration in the other locations identified. The Council is committed to working actively with landowners and developers to bring sites forward as part of a comprehensive regeneration framework for each area. Several strategic land acquisitions and disposals reflect this commitment. Public

sector intervention is considered necessary due to the complex, multiple land ownerships within the town centres requiring a proactive approach to site assembly. A partnership model will be needed to deliver this strategy, with the Council's Regeneration Team taking the lead in facilitating partnerships with landowners and where appropriate directly intervening to address challenges to delivery.

2.5 Overall, while no reliance is placed on them for housing supply calculation purposes, the Council considers that the town centres are capable of contributing to its development needs in the context of regeneration ambitions.

***Development Strategy Principle: Development densities which make efficient use of land while taking account of the local character context***

2.6 The NPPF expects local Planning Authorities to take a robust approach to development densities. At Paragraph 130 it states that

*'Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site.*

*In these circumstances:*

*a) plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination, and should include the use of minimum density standards for city and town centres and other locations that are well served by public transport. These standards should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate;*

*b) the use of minimum density standards should also be considered for other parts of the plan area. It may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range'*

2.7 The Local Plan strategy is predicated on higher densities being brought forward on all sites than has historically been the case in Havant Borough, where low density suburban patterns of development have dominated on greenfield sites in particular.

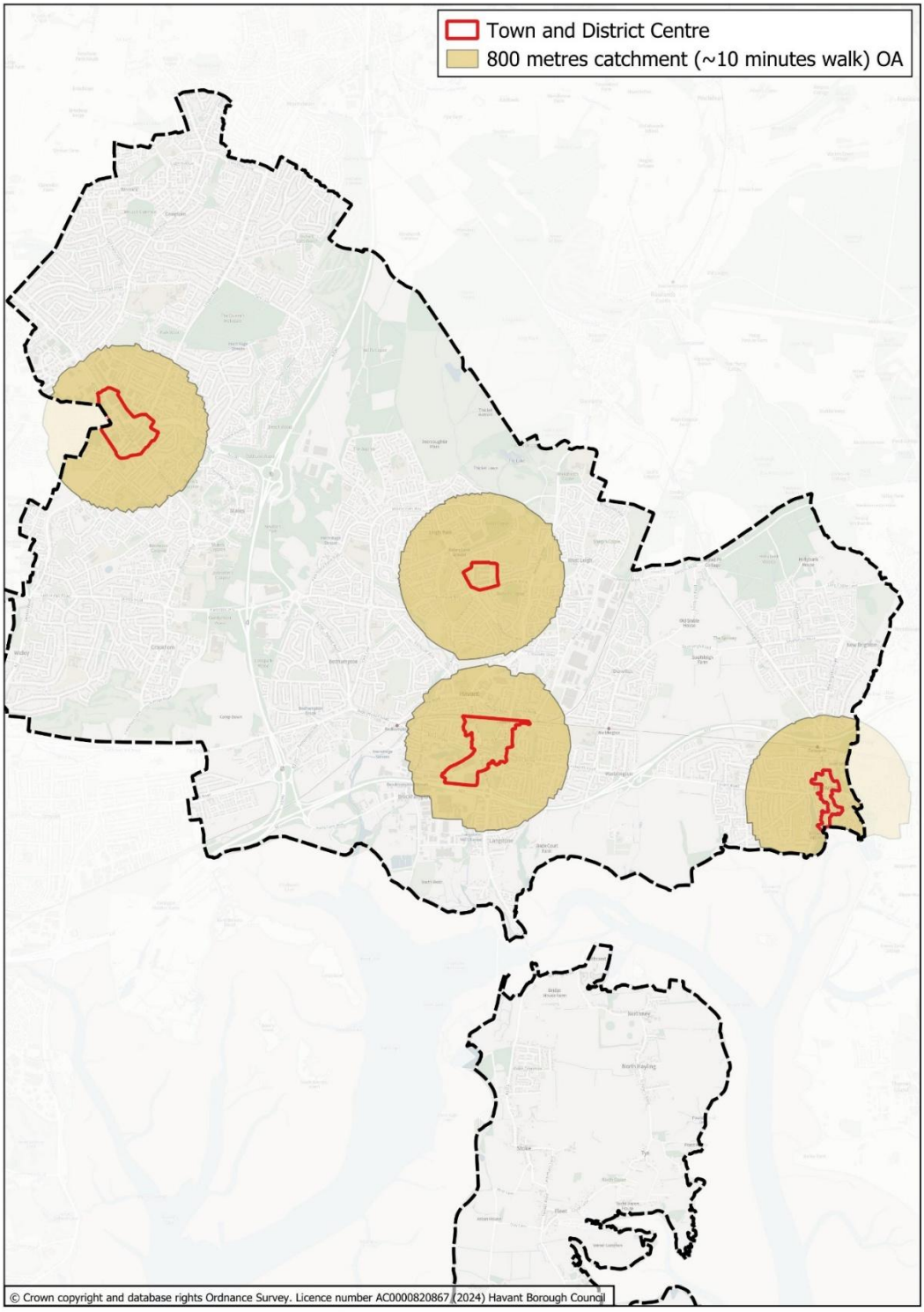
2.8 Policy 14 sets out minimum density levels across the net developable area for three different types of area:

- 80 dwellings per hectare (dph) within Havant, Waterlooville and Leigh Park Town Centres
- 55 dph within defined opportunity areas and
- 40 dph elsewhere in the borough.

2.9 The Council's Residential Density Evidence Paper (Evidence Base Reference HS011) provides the background to these figures, by way of good practice examples. It also defines the opportunity areas for higher densities, taking into account accessibility to services and facilities, availability of public transport, and the potential of the different areas to accommodate change.

2.10 It should be noted that no limits to density are identified through the evidence, or in the plan. Developers are encouraged to provide high densities wherever possible, although there is a clear expectation that they are justified within the specific townscape, landscape and local character context.

2.11 It is worth noting that the densities expected through Policy 14 are significantly higher than those considered acceptable in Policy L3 of the 2026 NPPF, thereby demonstrating the Council's ambitions in this regard.



## Enabling well-connected communities

***Development Strategy Principle: Promoting development where good accessibility between homes, jobs and services by a wide choice of modes exists or can be achieved***

2.12 Policy 53: Accessibility, Transport and Parking sets out the strategic approach taken to transport, as well as expectations of developers as they bring sites forward. The policy is based on a clear shift in transport planning seen over recent years, from one focussed on space for cars, to one focussed on space for people and offering modal choice.

2.13 The NPPF, together with guidance from the Department for Transport, is clear that sustainable travel choices must be promoted and supported if climate change and air quality and public health targets are to be achieved. Paragraph 109 and 110 of the NPPF 2024 are clear that 'transport issues should be considered from the earliest stages of plan-making, using a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places' and 'the planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.'

2.14 This is supported by Hampshire County Council's Local Transport Plan 4 (LTP4) (reference KS00), which sets out the vision for future transport and travel infrastructure in the county. To make that vision a reality, LTP4 proposes transformational changes which:

- Shift away from planning for vehicles, towards planning for people and places;
- Meet national priorities to decarbonise the transport system;
- Reduce reliance on private car travel by providing a choice of high-quality travel options;
- Support sustainable economic development and regeneration; and
- Promote active lifestyles.
- LTP4 includes a target for a 10% reduction in total car kilometres in order to achieve the reduction in carbon emissions required by 2030.

2.15 This approach, while expressed in transport terms here, aligns with the regeneration, brownfield land and density focus discussed earlier in this paper, since those locations provide better access to facilities and services, and high densities facilitate improvements to public transport services.

2.16 The strategic approach to the location of development is supported by Hampshire County Council, who in their Regulation 18 Consultation response confirmed that

*'The County Council supports the proposed development strategy to maximise development in urban areas, town centres and on brownfield sites to reduce the need to travel and to promote sustainable transport.*

*Development located near existing services, facilities and public transport routes can be readily accessed by walking, cycling and public transport and served by high quality travel choices. This reflects the Hampshire Local Transport Plan 4 (LTP4) Policy DM1 to Integrate transport and strategic land use planning to reduce car dependency.'*

2.17 The representation goes on to clarify that

*'The County Council supports the allocations of greenfield sites if*

- *they are of sufficient scale and density to provide local essential services and facilities;*
- *can be well served by cycle and pedestrian networks;*
- *support a commercial bus service; and*
- *be well connected by sustainable modes into the surrounding neighbourhoods.'*

2.18 This has been reconfirmed as common ground between the two authorities (SoCG014).

2.19 In developing the Local Plan and determining through Sustainability Appraisal the development sites within it, the Council considered the accessibility of housing sites by non-car modes. Those sites that are better integrated with existing facilities and communities either through locational proximity or by the availability of sustainable transport modes scored more favourably in sustainability terms. Where poor connectivity was noted, it was carefully considered, with input from the Local Highway Authority, whether transport choice and improved connectivity could be achieved through mitigation measures.

2.20 Crucially, in relation to the sites on Hayling Island that were tested for allocation, the SA, based on commentary from the Local Highway Authority, concluded that:

*'Development in this location does not accord with the principles of Local Transport Plan 4, as it would create car dependent development. Hayling Island has very limited modal choice, so does not encourage sustainable travel choices. Development on the site would rely on the highway network resilience of one road on and off the island. It is likely that there will be cumulative impact on the resilience of the highway network especially at the A27/Langstone junction. It is questionable whether choice and connectivity can be significantly improved in this location given the constraints of the locality and the network. It is therefore unlikely that it will be possible to address the predicted individual or cumulative effects on residents' travel choices or on the transport network, resulting in unmitigated negative effects into the future. A site allocation is not recommended.'*

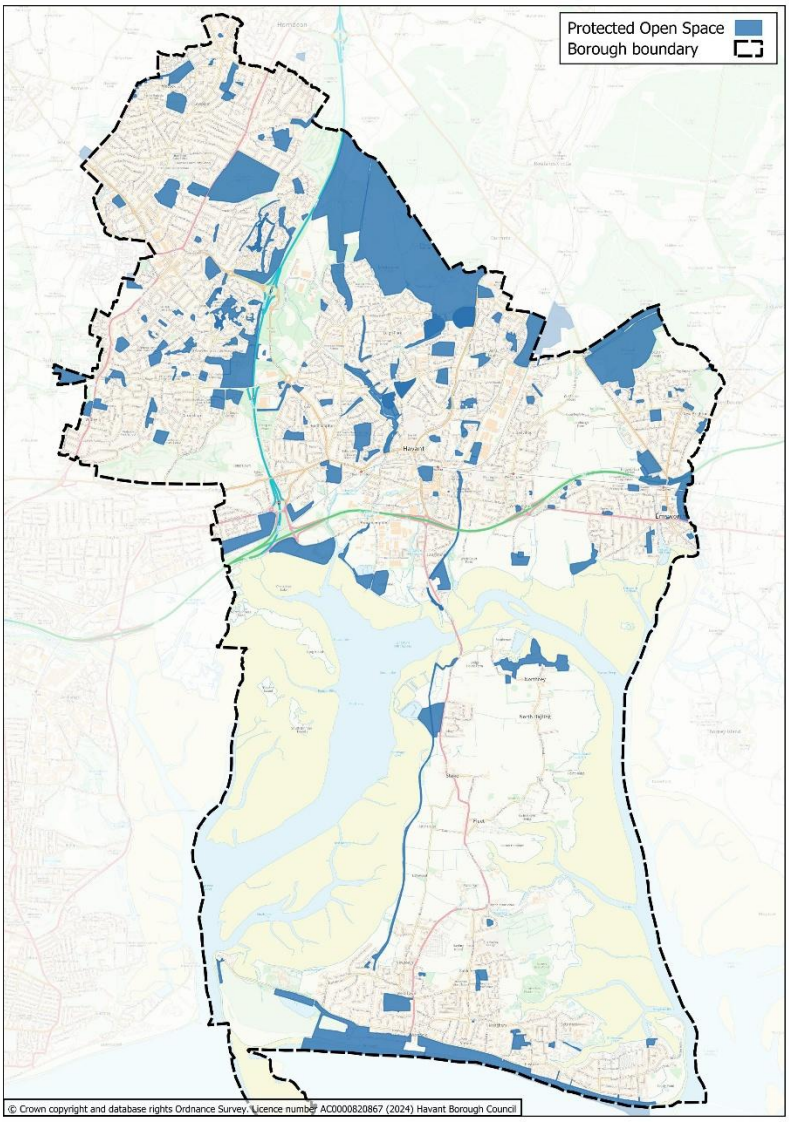
2.21 A Strategic Transport Assessment (STA) for the Local Plan (Evidence Base Reference IT006) has predicted the likely impacts of the proposed quantum and distribution of development in this plan and has set out mitigation measures to address the cumulative effects. Taking the 'decide and provide' approach advocated by LTP4, it is based on an approach to transport planning that seeks to deliver the interventions needed to achieve the agreed transport outcomes. That is, rather than planning mitigation which supplies additional highway capacity to meet increased demand, it actively places an emphasis on modal shift and managing demand for road space. It suggests transport interventions to reduce car dependency, while also understanding any residual highways impact implications and proposing some highways based interventions. The result is a proposed package of walking, cycling and public transport interventions on the local highway network, together with some limited capacity interventions on key routes and junctions leading up to the strategic road network (the A27 and the A3(M)). These are noted in the Infrastructure Delivery Plan (Evidence Base Reference IT001).

## Protecting our most special environments

***Development Strategy Principle: Safeguarding existing public open spaces and expecting new developments to enhance them and/or provide new open spaces***

2.22 Within the urban areas, public open spaces are a valuable resource for residents for leisure and health reasons. This view is supported by the Healthy Borough Assessment (Evidence Base Reference HW004) and the Health Impact Assessment (Evidence Base Reference SP005), and the Open Space Strategy (Evidence Base Reference HW001) further supports the need for protection and improvement of existing spaces.

2.23 On existing open space, the presumption in favour of development established through the settlement boundary does not apply. Rather, there is a presumption with the Local Plan Strategy, detailed through Policy 55, that existing open spaces will be protected, except in exceptional circumstances. In addition, new larger scale developments are required to provide onsite open space (see Policy 56). Policy 5 provides a strategic overview of the importance of blue and green infrastructure.



***Development Strategy Principle: Development only where it has no unacceptable impacts on international, national or local ecological designations, or national landscape designations***

2.24 Decisions on the amount, type and location of development can significantly affect biodiversity, air and water quality. The NPPF is clear that planning policies and decisions should contribute to and enhance the environment by minimising impacts on biodiversity and providing net gains for biodiversity, including establishing coherent ecological networks that are more resilient to current and future pressures. There is also a requirement for plans to identify, map and safeguard areas within the plan for local wildlife and habitats.

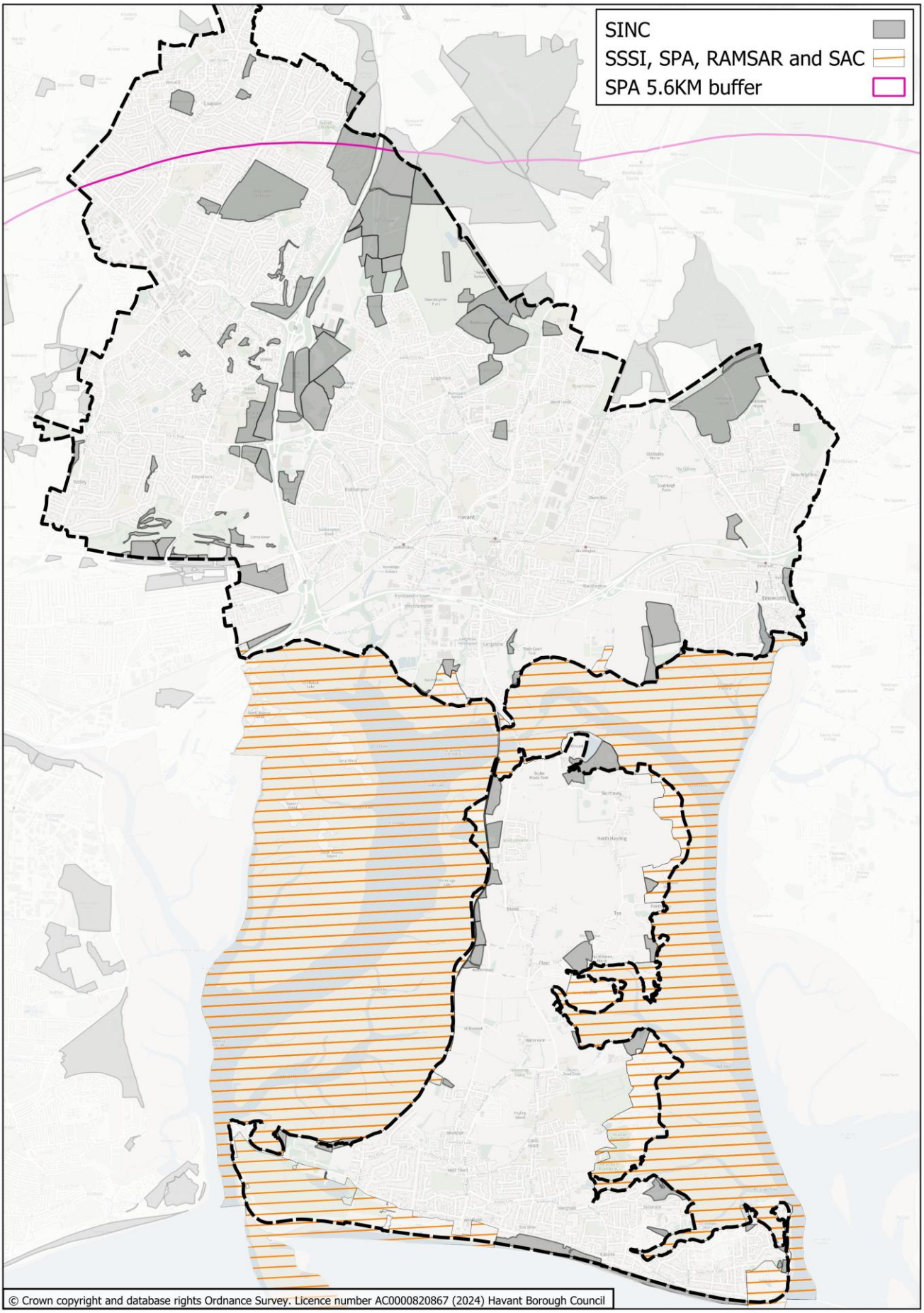
2.25 The Environment Act 2021 has additionally introduced a significant emphasis on environmental protection and enhancement, bringing into sharp focus the need to find an appropriate balance between development needs and the natural environment. The Act also brings with it potentially significant land requirements to achieve biodiversity net gain alongside new development.

2.26 Representations received during the 2022 Regulation 18 consultation on the Local Plan also clearly expressed that the plan should avoid or mitigate effects on the natural environment – this was chosen as the top priority for the plan by the local community. The protection of designated landscapes was also considered to be a high priority.

2.27 The approach taken to the natural environment is set out in a specific Topic Paper on the Natural Environment, but key spatial features in the borough are also set out below, since they materially influenced the development strategy.

2.28 The borough of Havant has a wealth of protected habitats and land which supports important species. Defining features include the internationally protected harbours and biodiverse coastline and linked inland sites, the chalk streams and river valleys of the Ems and Westbourne, and the pastureland and woodland heritage associated with the Forest of Bere.

| Statutory Designations | Hierarchy | Name |
|---|---|---|
| Special Protection Area (SPA) | International | Chichester and Langstone Harbour |
| Special Area of Conservation (SAC) | International | Solent Maritime<br>Singleton and Cocking Tunnels |
| Ramsar | International | Chichester and Langstone Harbour |
| Site of Special Scientific Interest (SSSI) | National | Chichester Harbour, Langstone Harbour, Sinah Common and Warblington Meadow |
| Local Nature Reserve | Local | Brook Meadow, Farlington Marshes, Gutner Point, Hayling Billy, Hazleton Common, Sandy Point, The Kench, West Hayling |
| Sites of Importance for Nature Conservation (SINCs) | Local | 110 sites |
| *International, national and local designations hierarchy* | | |


SINC
SSSI, SPA, RAMSAR and SAC
SPA 5.6KM buffer
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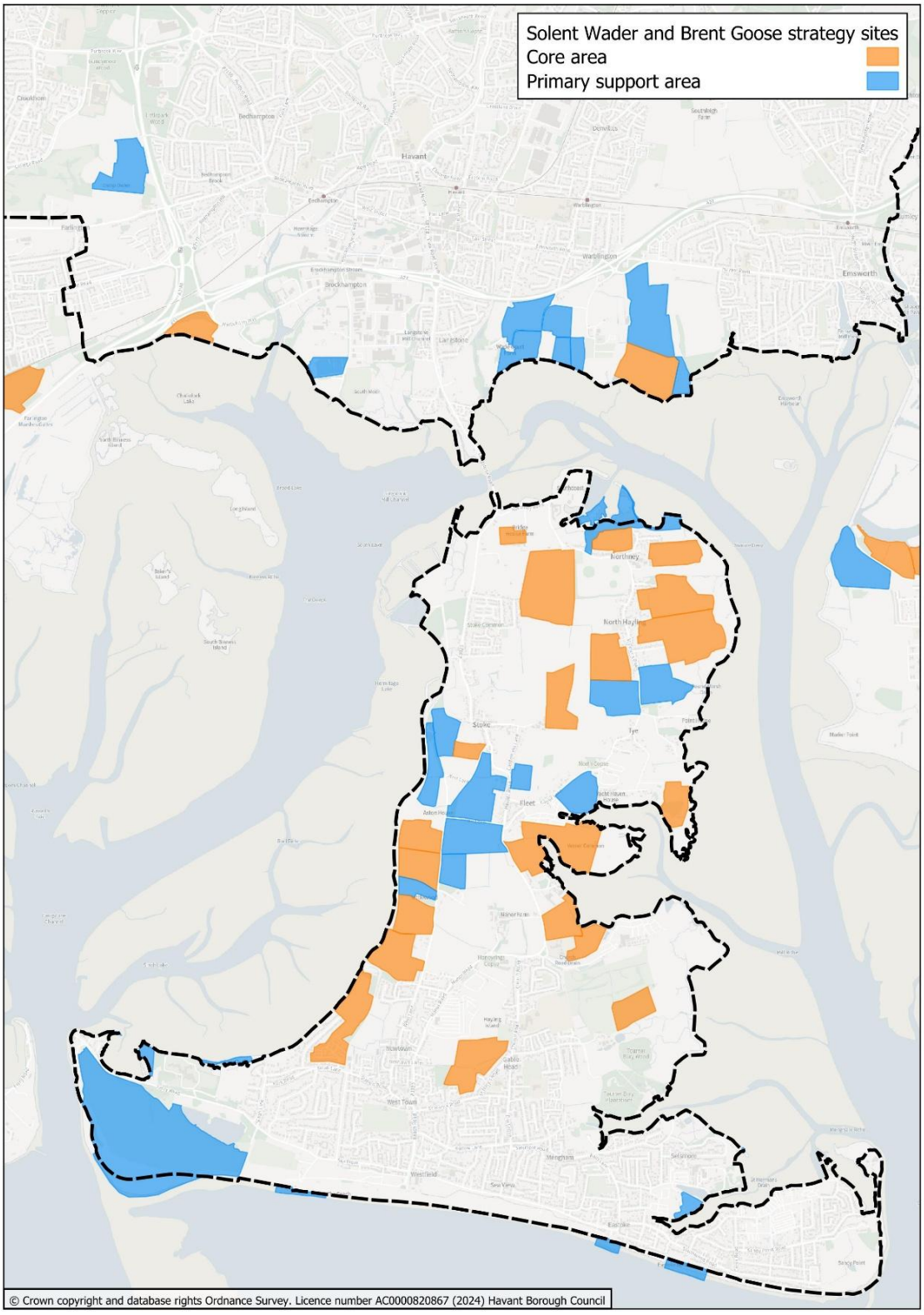
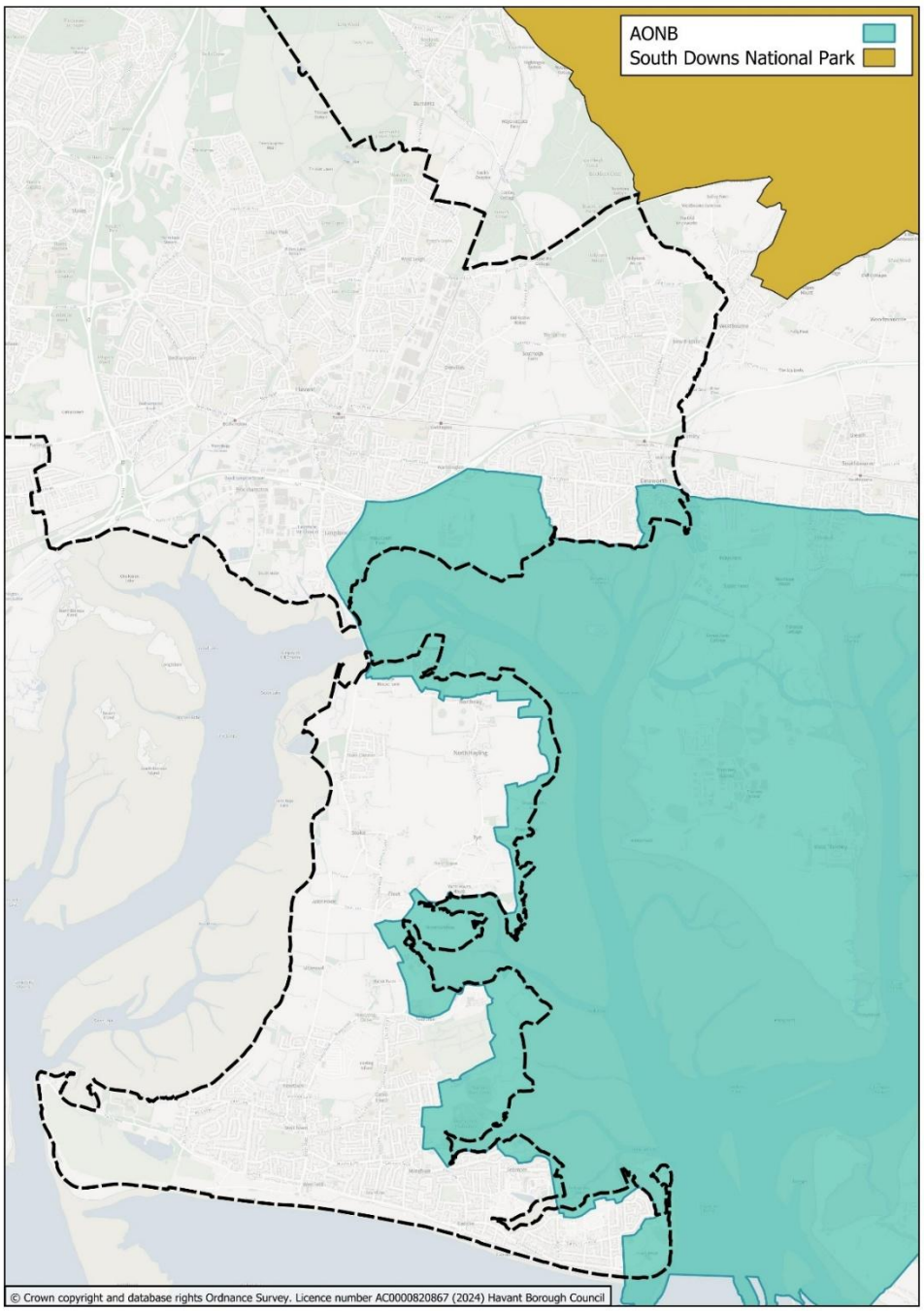
2.29 Not formally designated and therefore not mentioned in the table above but intrinsically linked to the habitats provided by the designated harbours, are the coastal and inland sites that support the Solent Waders and Brent Geese. A well-established strategy that seeks to protect their feeding and roosting sites (Solent Wader and Brent Goose Strategy (Evidence Base Reference NE002) further significantly influences where development is considered appropriate.



2.30 The borough is highly built up, making undeveloped areas a scarce resource of significant importance. This is true for biodiversity reasons, but also in landscape terms.

2.31 Immediately to the north of the borough lies the South Downs National Park, while the Chichester Harbour Area of Outstanding Natural Beauty (AONB) covers parts of the land and the harbour withing the borough. Both are designated as National Landscapes and are afforded protection from significant development in national policy. The development strategy reflects this and these landscapes are recognised and protected from harm by Policy 30.



2.32 In assessing potential sites for allocation the council considered nature conservation designations as well as national landscape designations in determining the suitability of land for development. The SHELAA confirms that

- *Nationally or internationally designated sites are almost certainly unsuitable for housing or commercial development in line with the NPPF, but an adjacent designation can also act as a constraint that needs to be considered. The relationship of the proposal with the protected area will need to be considered as well as the impact of potential users of the development. Sites identified as Core and Primary Support Areas in the Solent Wader and Brent Goose Strategy will not be considered suitable, unless there is significant evidence to justify otherwise.*

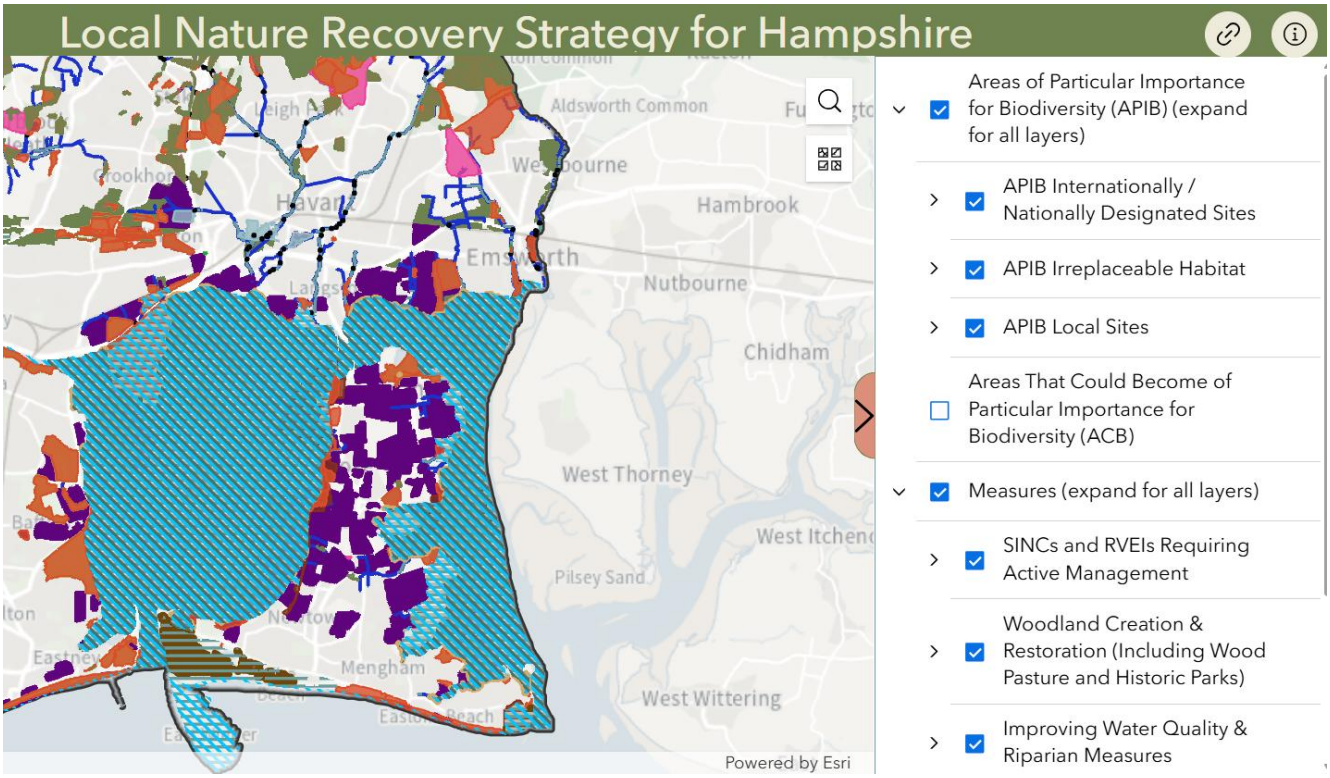
- *An Area of Outstanding Natural Beauty (AONB) is a national landscape designation identified in the NPPF as an area where development should be restricted. Whilst a site located in an AONB is not automatically discounted for development; the primary purpose of an AONB designation, to conserve and enhance nature beauty, should not be undermined. The limited availability of land in the Borough means that aside from when development impacts on landscapes of national significance (Chichester Harbour and South Downs National Park), it is not likely to be an absolute constraint. However, the potential Yield (net) of site can be affected due to the need to minimise impact on the wider landscape, through design and layout, and the incorporation of buffers and planting.*

2.33 The Council acknowledges that it has proposed a site allocation (Allocation 3: Land south of Havant Road (Horse's Field)) within the Chichester Harbour National Landscape. This is addressed further in the Housing - Site Allocations Topic Paper (TP003)

2.34 Biodiversity Net Gain (BNG) is a legal requirement under the Environment Act 2021 which introduced Schedule 7A of the Town and Country Planning Act 1990. This approach aims to address historic declines in biodiversity and ensure that new significant developments leave the natural environment in a measurably better state than it was before development took place. Notably, BNG is additional to existing biodiversity protections discussed above. Whilst BNG is universal across the country, in Havant Borough and the Solent sub-region, this must be added to the land already required for water quality for all development and Brent goose and wader refuges for specific sites. This is because these are both separate mitigation measures required in order for developments to be legally compliant with the Habitats Regulations.

2.35 BNG in the borough should deliver tangible nature recovery benefits that are suited to the Borough's rich and varied local landscape. BNG efforts should be focussed on enhancing the existing ecological network, recognising the importance of locally significant habitats, and ensuring that BNG is suited to local conditions, landscape character and conservation priorities. BNG within Havant Borough will therefore be guided by the Local Nature Recovery Strategy (LNRS) for Hampshire (Evidence Base Reference NE0013).

2.36 Mapping for the LNRS shows extensive opportunities for nature recovery on land in Havant and in particular on Hayling Island.




*Local Nature Recovery Strategy for Hampshire Local Habitat Map (screenshot Nov 2026)*

2.37 It is not possible, at the Local Plan level, to set aside formally all land that may be required to deliver nature recovery and/or mitigation for development. That is because the details of the requirements can only be known once the impacts of development at individual sites is considered in detail at the development proposal stage. On this basis, safeguards within the Local Plan are limited to those for which more detailed studies have been undertaken (see Policy 4).

2.38 Nevertheless, the Council's strategy is designed with the knowledge that a significant amount of land will be needed to deliver BNG and environmental mitigation to allow development to go ahead legally. With this in mind, the background Paper 'Nature Recovery and Environmental Mitigation Opportunities in Havant Borough' (Evidence Base Reference NE013) explores options for nature recovery opportunities on land within Havant Borough. It highlights the potential for land to be used in ways other alternative to built development. That report shows that significant opportunities exist to deliver:

- Strategic nature recovery
- Biodiversity Net Gain
- Solent Water and Brent Goose mitigation
- Green and Blue Infrastructure
- Habitat Compensation and Restoration Programme
- Nutrient mitigation
- Stacking environmental benefits

2.39 Opportunities exist on both private and public land and landowners are actively encouraged to consider these. It is likely that they will provide opportunities for income generation as alternatives to current land uses or to development. In the context it is vital to understand that without the delivery of BNG and environmental mitigation where required, development on other sites – both in Havant and in the wider sub-region - may not lawfully be able to go

ahead. Therefore, while specific sites have not been safeguarded through the plan to meet all potential BNG, mitigation and nature recovery needs, retaining a supply of undeveloped land for this purpose will prove essential for the delivery of development both in the borough and the wider area. The Opportunities paper referenced above demonstrates that land in Havant could play a significant role in delivering BNG and environmental mitigation to support development. If opportunity sites are developed, these opportunities will be lost forever, which could limit development supply both in Havant and beyond, given the legal requirements for BNG and mitigation.

2.40 Policies 20 to 26 provide a suite of policies to effect ecological protection and enhancement, while sites specifically safeguarded for environmental mitigation are identified in Policy 4.

## A coastal borough in a changing climate

***Development Strategy Principle: Protecting and enhancing our special coastline and harbours for wildlife by managing the coast with a focus on nature, balanced with support for the borough's coastal areas' established role as a visitor destination***

2.41 The coastal areas of the Borough are some of the most sensitive areas to develop, with complex habitats, flood risk and erosion, landscape and public enjoyment of the waterfront to be considered. The plan's strategy seeks to balance all of these important functions of the coast, recognising it as a key feature of the borough's identity and local distinctiveness, and the plan, in addition to a suite of policies covering these themes, includes an additional policy covering the considerations that are particular to development on both the developed and the undeveloped coast (Policy 29).

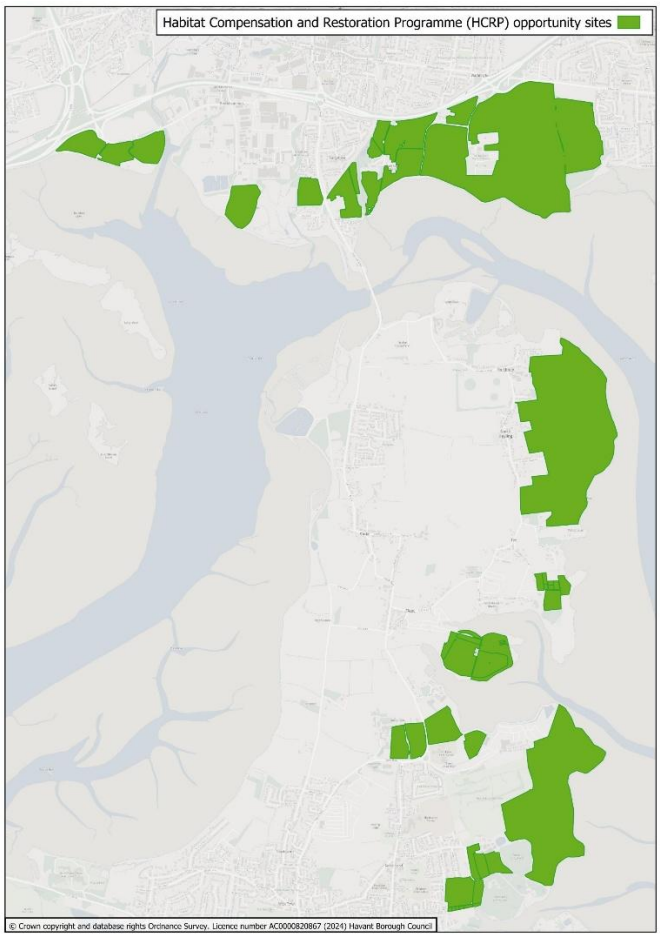
2.42 The nature conservation element is discussed in detail in the previous section and is not rehearsed again here, save to add that the well-established Bird Aware Solent Strategy (Evidence Base Reference NE001) is also embedded into the Plan. This strategy provides a framework for continuing to support development by mitigating the likely recreational disturbance arising from the inhabitants of new development on coastal bird populations. Policy 26 takes the approach forward into the Local Plan.

2.43 Flood and Coastal Erosion Risk Management (FCERM) schemes (discussed further below), while bringing many benefits for human populations, can affect or lead to losses of key habitats in and on the edge of the harbours, which are of key importance from the local to the international level. This is one of the reasons the development strategy seeks to balance the management of the coast for human benefit with nature conservation objectives.

2.44 The Habitat Compensation and Restoration Programme (HCRP) is the Government's approved mechanism for delivering strategic habitat compensation for FCERM schemes, to ensure compliance with the Conservation of Habitats and Species Regulations 2017 (as amended) (commonly referred to as the Habitats Regulations). The HCRP is led by the Environment Agency, and in the Solent and South Downs area, Coastal Partners (hosted by Havant Borough Council) is working with the Environment Agency to deliver the programme. A number of schemes are in the pipeline in the wider area, but additional land is required.

2.45 Sites already well advanced in the exploration of their suitability are specifically safeguarded through the Local Plan (Policy 4). Considerable opportunity has been identified within Havant

Borough, especially within and adjacent to Chichester and Langstone Harbours. Opportunities to deliver further compensation schemes must not be lost to development, since a lack of compensation land could compromise the ability of FCERM schemes to be delivered, putting existing communities, as well as the potential for future development at risk. It should be noted that this applies not just to Havant Borough, but to the wider Solent Coastline, across which FCERM schemes will continue to be needed to protect existing communities and additional development.




2.46 Hayling Island seafront is recognised by the Council as a key attraction for local residents as well as visitors from further afield with a strong role in the Borough's visitor economy. Given the coastal flood and erosion risk in this area (discussed in greater detail below) major investment in development, particularly residential, would be inappropriate here. Instead, the focus here is on public realm improvements and supporting a leisure offer which contributes to the enjoyment of the seafront, such as formal and informal sport, recreation, entertainment, play and cultural activities. This is underpinned by the Council's Hayling Seafront Ambition (Evidence Base Reference EC004) and Policy 3.

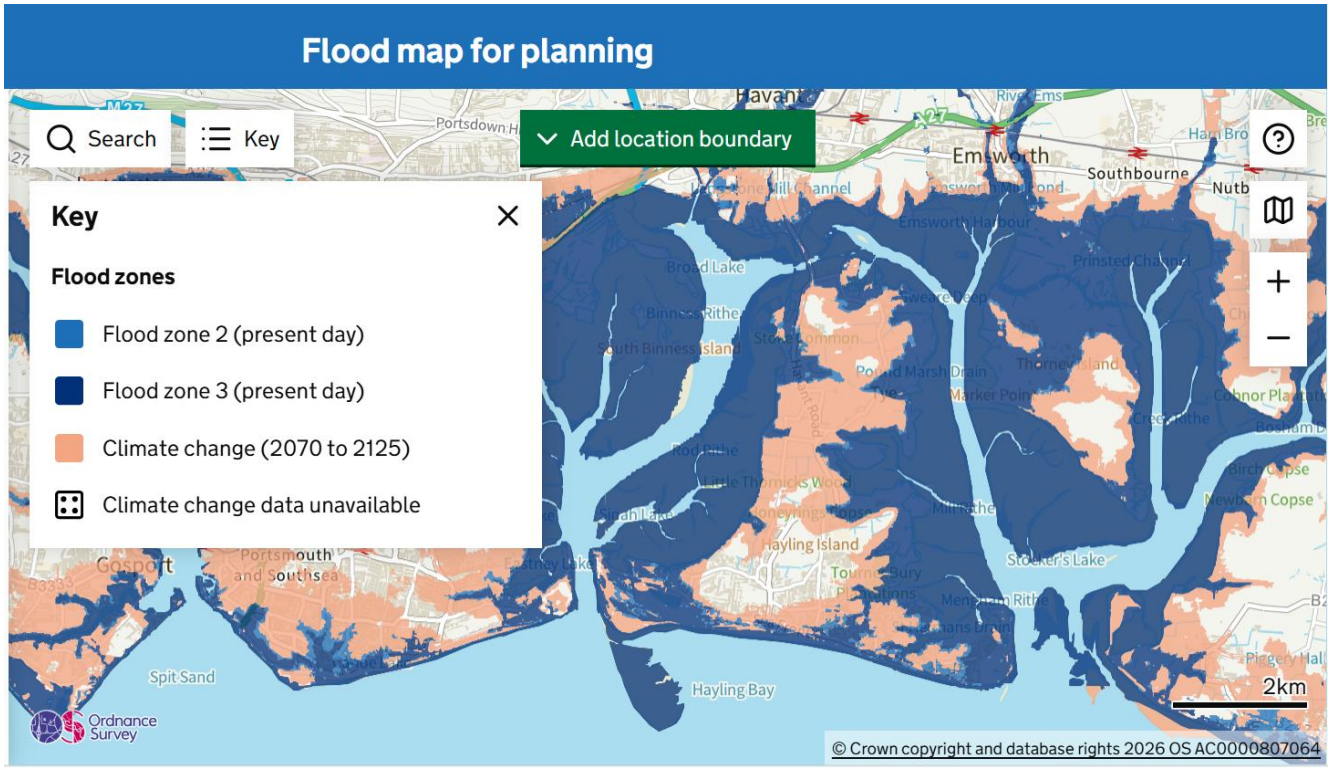
***Development Strategy Principle: Sustaining existing communities and protecting them from coastal erosion and sea level rise***

2.47 A reality of living by and with the sea is the risk of tidal flooding and erosion. With nearly 50km of coastline, significant areas of land are at risk of tidal flooding. With climate change, the

extent of the areas at risk is expected to grow and flooding events are predicted to become more frequent and more extreme.

2.48 Paragraph 162 of the NPPF is clear that 'Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, ….. Policies should support appropriate measures to ensure the future health and resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure. Managing flood risk, in particular in the context of climate change, is therefore one of the defining issues in planning for new development in the borough.

2.49 The National Flood Map for Planning and the Partnership for South Hampshire Strategic Flood Risk Assessment (SFRA Level 1) (Evidence Base Reference NE11-A) show the extent of the areas likely to be affected by tidal and fluvial flood risk. These are recognised as a key constraint in the Havant Borough Constraints Study (Evidence Base reference HS001-A), at paragraphs 7.33-36 and associated mapping Evidence Base Reference HS001-B). In the case of the area south of the A27 in Havant and Langstone, as well as on Hayling Island, these are extensive:




*Flood Map for Planning – Present and Future areas at risk of tidal flooding (screenshot Nov2026)*

2.50 It is a key focus of the Local Plan strategy to sustain existing communities and protect them from coastal erosion and sea level rise.

2.51 The Council has a strong track record of delivering flood and coastal erosion risk management infrastructure. Coastal Partners are part of Havant Borough Council and manage coastal flood and erosion risk across 246km in five local authorities. Coastal Partners work to reduce the

risk of coastal flooding and erosion to people and the environment through working at the strategic level to deliver Shoreline Management Plans and Coastal Flood and Erosion Risk Management (CFCERM) strategies. These plans enable Coastal Partners to bid for funding to implement the recommended approach for each area of the coast. The team then design and deliver the CFCERM schemes which improve the standard of flood and erosion protection.

2.52 In nearby Portsmouth, the team has successfully delivered significant and coastal schemes at both North Portsea and Southsea. The Southsea Coastal Scheme is the UK's largest local authority-led coastal defence project and has received multiple prestigious national and regional awards for engineering, placemaking, and infrastructure leadership.

2.53 In Havant Borough, Coastal Partners are working to deliver an FCERM scheme at Langstone, located on the mainland south of Havant and North of Hayling Island. Over the next 100 years, 120 homes in Langstone are at risk of tidal flooding in an extreme event. The aim of the scheme is to develop and implement a scheme which will reduce the risk to the community as well as the A3023 where it connects from Hayling Island onto the mainland. This implements the Shoreline Management Plan policy of 'hold the line' and the Portchester to Emsworth FCERM Strategy policy for this area of improving the defences to a minimum of 1:75 year standard of protection. Planning permission for the schemes was granted in June 2026.

2.54 Coastal Partners have also successfully developed the Hayling Island Coastal Management Strategy (Evidence Base Reference NE010), which was approved by the Environment Agency in 2024. The strategy confirms that the condition, standard of protection, and expected life of existing defences on the island is highly variable. It notes that significant areas of land across the Island are at risk of flooding from large storm events, and that in the future, with the increased storminess and rising sea levels due to climate change, the risk is likely to increase significantly.

***Development Strategy Principle: Responding to the effects of climate change by not adding to the level of risk through a presumption against new housing in areas that are at risk of flooding, now or in the future.***

2.55 The primary objective of the Hayling Island Coastal Management strategy is to provide a long-term plan to reduce the risk of coastal flooding and erosion for the next 100 years. However, crucially, implementation of the strategy is subject to gaining required consents and to funding availability, which is subject to fierce competition and favours projects which deliver direct protection to existing properties. At the time of preparing the Building a Better Future Plan, there is no guarantee that the options presented in the strategy will be progressed. Without evidence of the deliverability of defence schemes, the Council considers it appropriate to take this into account in making decisions on the distribution of development in the Local Plan.

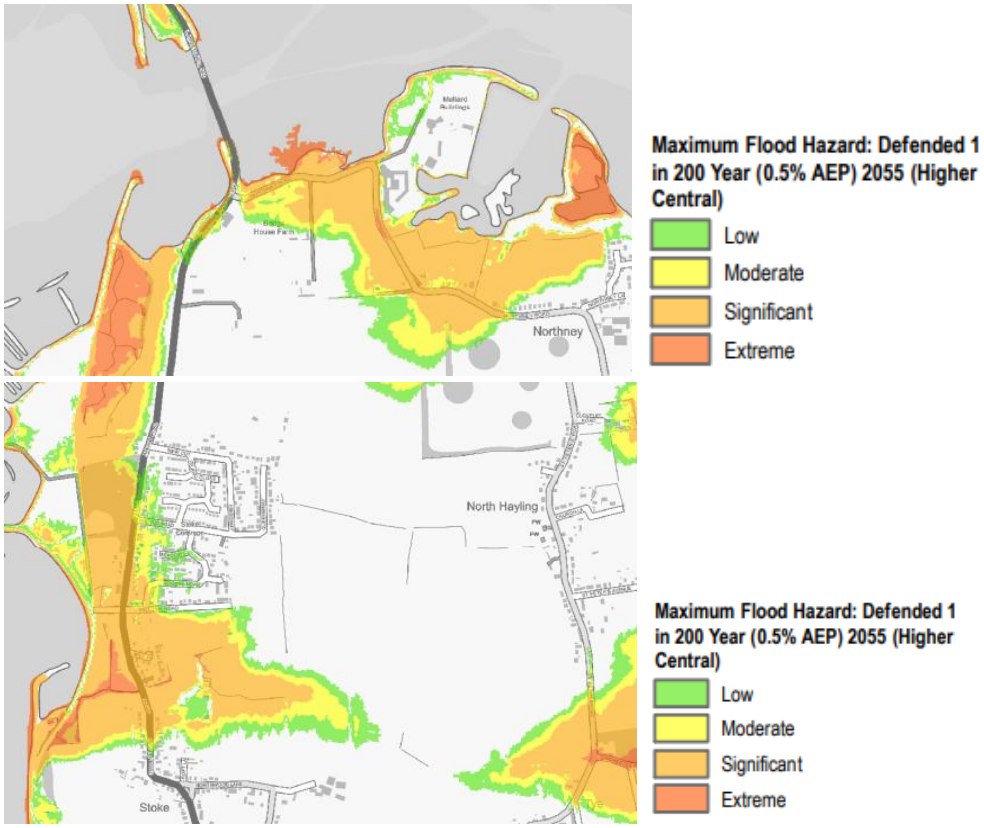
2.56 The PPG on 'Flood Risk and Coastal Change' also advises that in taking a sequential approach to development, initially the presence of flood risk management infrastructure should be ignored, as the long-term funding, maintenance and renewal of this infrastructure is uncertain.

2.57 The NPPF acknowledges flood risk as a key factor in directing the location of new development. 'Avoidance' represents the top of the flood risk management hierarchy. On this

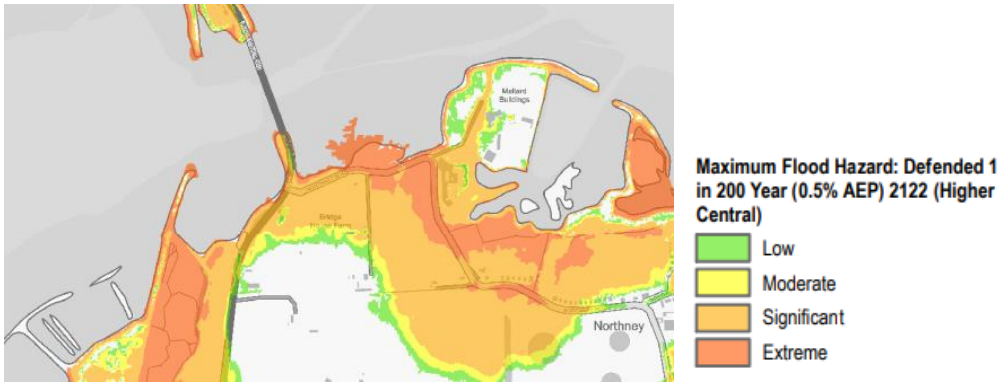
basis, inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. Local Plan policies and allocations of land for development should be informed by a strategic flood risk assessment (SFRA) and should manage flood risk from all sources.

2.58 In arriving at the development strategy, and in making decisions on individual land allocations for development, flood risk both at the site level, and the wider issue described above were taken into account. The guiding principle was to avoid flood risk into the future, or if this is not possible, to mitigate it.

2.59 The Council's Strategic Flood Risk Assessment (SFRA) (Evidence Base Ref NE011), has identified that the area at risk of flooding notably includes the single access road onto and main route through Hayling Island, the A3023, as well as some of the alternative route through Northney. The SFRA not only identifies the areas at risk but has also modelled likely flood depths and hazard ratings (depth and velocity). Hazard levels on the road are considered to be low to medium in the present day. However, even assuming the lower impact climate change scenario of the two used in planning, by 2055 sections of the road, both at the end of the bridge and further south on the island increase to 'significant', worsening further by 2122.




*Extract from PfSH SFRA hazard mapping for 2055*




*Extracts from PfSH SFRA hazard mapping for 2122*

2.60 The above maps present the situation with the current flood defences in place. Upgraded sea defences to keep pace of climate change could reduce the risks, but as noted above, funding and delivery of these are not guaranteed, so cannot be relied upon.

2.61 The PPG advises that 'wherever possible, safe access routes should be provided that are located above design flood levels and which avoid flow paths. Where this is not possible, limited depths of flooding may be acceptable, provided that the proposed access is designed with appropriate signage etc. to make it safe. The acceptable flood depth for safe access will vary depending on flood velocities and the risk of debris within the flood water. Even low levels of flooding can pose a risk to people in situ (because of, for example, the presence of unseen hazards and contaminants in floodwater, or the risk that people remaining may require medical attention)'. (PPG Paragraph: 047 Reference ID: 7-047-20220825)

2.62 Given the depth and hazard levels identified in the SFRA, with flood depths on parts of the road modelled to reach 1m and in some parts more, it is not considered that safe access and egress routes onto and off the island exist.

2.63 The Council's Chief Emergency Planner (Gold Command) has confirmed[3] that they consider that unique circumstances exist on Hayling Island, namely:

- Evacuation complexity and timing – Increased population associated with further development would significantly increase the number of residents who may need to be moved in advance of tidal or coastal flooding events, placing additional strain on a constrained transport corridor.
- Emergency service access and resilience – The ability for emergency services to reach the Island, or manoeuvre within it, may be compromised at critical times, particularly where access routes are already limited.
- Risk amplification during concurrent events – In scenarios involving severe weather, coastal flooding, or widespread incidents, the combination of increased population and restricted access magnifies the overall risk profile.

[3] The full Gold Command Letter to the Strategic Director for Growth and Place is attached at Appendix A

2.64 The letter also sets out that these challenges have been recognised in discussions with Local Resilience Forum partners, where concerns have been raised about the impact that additional development could have on emergency response capability and overall risk on the Island. These concerns are grounded in operational experience and emergency planning arrangements currently in place across the Borough. From an Emergency Planning perspective it is considered that:

- Additional housing growth on Hayling Island would increase the number of people exposed to existing risks, including coastal flooding and constrained access.
- Without significant and demonstrable mitigation, such growth would exacerbate the challenges associated with evacuation and emergency response.
- The cumulative effect would be to increase risk to life and reduce resilience, contrary to the objectives of national planning policy.

2.65 This is supported by the PPG, which is clear at paragraph 048 that *'Proposals that are likely to increase the number of people living or working in areas of flood risk require particularly careful consideration, as they could increase the scale of any evacuation required. To mitigate this impact it is especially important to look at ways in which the development could help to reduce the overall consequences of flooding in the locality, either through its design (recognising that some forms of development may be more resistant or resilient to floods than others) or through off-site works that benefit the area more generally. Where the impact cannot be wholly mitigated, developers need to cover the full cost of any additional emergency services provision needed, consistent with the 'agent of change' policy contained in the National Planning Policy Framework (at paragraph 187).'*

2.66 Under these circumstances, the Council in its Planning and Emergency Planning and Response functions, supported by Coastal Partners, considers it inappropriate to make development allocations which could add a substantial number of households to the island. There are significant uncertainties surrounding both the effects of climate change and the funding for and feasibility of maintaining coastal defences to an adequate standard into the future. It is unlikely that the scale of development possible on the island could contribute sufficient funding to bring these forward.

2.67 Paragraph 172 of the NPPF states that *'where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, the NPPF goes on to say that LPAs should seek opportunities to relocate development, including housing, to more sustainable locations.*' While relocating existing communities is not proposed in this Local Plan, the national policy stance on managing climate change related flood risk and coastal change strongly suggests that these are questions which will need to be asked and answered in the future.

2.68 The Council notably also considers that this stance is in line with its duties under Section 19(1A) of the Planning and Compulsory Purchase Act 2004, which requires that *'Development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change'*

2.69 The Environment Agency notes in their Regulation 19 response that the plan's approach to development on Hayling Island demonstrates an integration of the Local Plan with Flood and Coastal Erosion Risk Management Strategies and Schemes, which they welcome, and that '*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*'[4].

2.70 Beyond the narrow question of the risk to the access road, wider questions have also been asked t regarding the sustainability of continuing to invest in development and infrastructure in an area with such significant flood risk. Even taking into account that solutions need to be found to support the existing population, supporting substantial additional investment in the area and increasing the population on the island by introducing a significant number of new properties in previously undeveloped areas is considered to be short sighted and not to represent sustainable development in the long term.

2.71 As a result, no additional greenfield allocations are made on Hayling Island, as this would represent significant new investment, development and population growth into an area at risk, which is unsustainable and on balance unjustifiable at this time. At the same time, it is acknowledged that existing populations and settlements exist and must be sustained, so the Local Plan strategy does support brownfield windfall development within the defined settlement boundary on the island.

2.72 The Environment Agency in their response to the Regulation 18 and the Regulation 19 draft Local Plan confirmed their support for the development Strategy, submitting similar comments at both stages of the plan's development to the relevant policies.

2.73 *'We support the approach set out in Policy 1 that seeks to sustain existing communities whilst not increasing risk by avoiding new housing in areas at risk of flooding now or in the future. We support the development strategy that prioritises the avoidance of new development on Hayling Island outside of the defined settlement boundary, due to the vulnerability of the A3023 access road connecting Hayling Island with the wider Havant Borough Council area. This demonstrates the sequential approach to location of development within the Authority boundary, as required by the NPPF.*[5]

*In the context of the Development Strategy set out in Policy 1 (and the Flood Risk Policy 27) the Agency also considers that 'The Plan makes strong links with the Partnership for South Hampshire Strategic Flood Risk Assessment and Hayling Island Coastal Management Strategy, recognising the increasing risk of flooding over time'* and 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'*[6]

2.74 The Council is pro-development and seeks to deliver development to meet need – it is therefore entirely open to changing the approach taken in this Local Plan in future Local Plans.

[4] Environment Agency Regulation 19 representation on Policy 4, noting the plan as legally compliant and sound
[5] Environment Agency Regulation 19 representation on Policy 1, noting the plan as legally compliant and sound
[6] Environment Agency Regulation 19 representation on Policy 1, noting the plan as legally compliant and sound

However, this can only be contemplated when greater certainty exists, i.e. funding has been secured for schemes presented in the Hayling Island Coastal Defence Strategy and should the long terms protection of the island from tidal flood risk be secured.

2.75 The Council wrote to ministers in October 2025 to set out the above situation and to seek Government support for FCERM infrastructure funding with the explicit aim of unlocking development potential (full letter attached at Appendix B). Ministers returned a response which did not address the particular circumstances of Havant Borough (full letter attached at Appendix B). The response to the letter does not increase the certainty of funding for FERM schemes within the strategy and instead sets out the approach that Local Planning Authorities should take when the constraints of the area prevent the total need for development being met.

2.76 The Council acknowledges that since it approved the Publication Local Plan, a number of appeals have been allowed for developments on Hayling Island, granting outline planning permission for

- up to 300 homes at Rook Farm / Land off St Mary's Road (Application reference APP/21/01434; Appeal reference: 6004299);
- up to 29 dwellings at Land north of the Oysters, Station Road (Application reference APP/21/01350; Appeal reference 6010200);
- up to 60 dwellings at Land South of Saltmarsh Lane (Application reference APP/21/01351; Appeal reference 6010237).

2.77 The Rook Farm appeal decision was issued before those on the other two schemes, and that earlier decision was relied upon extensively by the inspector considering the latter two. The appeal inspectors for all three developments concluded that flood risk to the access on and off the island was low, and that the overall adverse effect of the risk of flooding was limited and did not outweigh the housing delivery that the schemes would provide.

2.78 The Council has considered whether its strategy remains sound in the light of these permissions and stands by its proposed development strategy which does not include further site allocations on Hayling Island.

2.79 The appeal inspector for Rook Farm noted the emerging Local Plan’s stance, but also noted that in terms of the appeal, limited weight could be attached to the emerging Local Plan. The Council acknowledges this stance as correct in terms of the appeal(s), but also considers that it does not necessarily follow that the strategy is inappropriate for the Local Plan.

2.80 Further, the appeal inspectors’ consideration of flood risk was narrowly focussed on the appeal site itself and on the access to the island. It did not take a strategic view of the long term sustainability of further significant investment in an area so significantly impacted by flood risk in the light of climate change. While the Council accepts the appropriateness of this approach at the development management level, the council considers that at the plan making level a more strategic long term stance should be taken.

2.81 The Council accepts the outcome of the appeals, but nevertheless considers that the strategy remains appropriate and that the Local Plan should not contain additional site allocations on the Island.

Coastal Change

2.82 Distinct from flood risk, Havant Borough also has notable areas at risk of coastal change. Taking into account policy F3 or the 2026 NPPF, as well as PPG Paragraph 072 (Reference ID: 7-072-20220825), the Council has defined Coastal Change Management Areas (CCMAs) for those areas of the borough where significant shoreline change is expected, and where the SMP intent is anything other than hold or advance the line, or where there is uncertainty about securing funding for the implementation of hold policies.

2.83 The extent of the CCMA has been defined using two sets of data:

- NCERM erosion zones

  The coastline on the mainland of the borough, as well as the west and east sides of Hayling Island, which all lie within the more sheltered areas of Langstone and Chichester Harbours show limited erosion risk, but substantial areas on the open coast at the southern end of Hayling Island are at more notable risk of coastal erosion without intervention. While the SMP policy for these areas is to hold the line, there remains significant uncertainty about funding for the implementation of this policy, as described in the flood risk section above and the full extent of the NCERM erosion zones have been defined as CCMAs on this basis.

- Best available data on other potential areas of coastal change

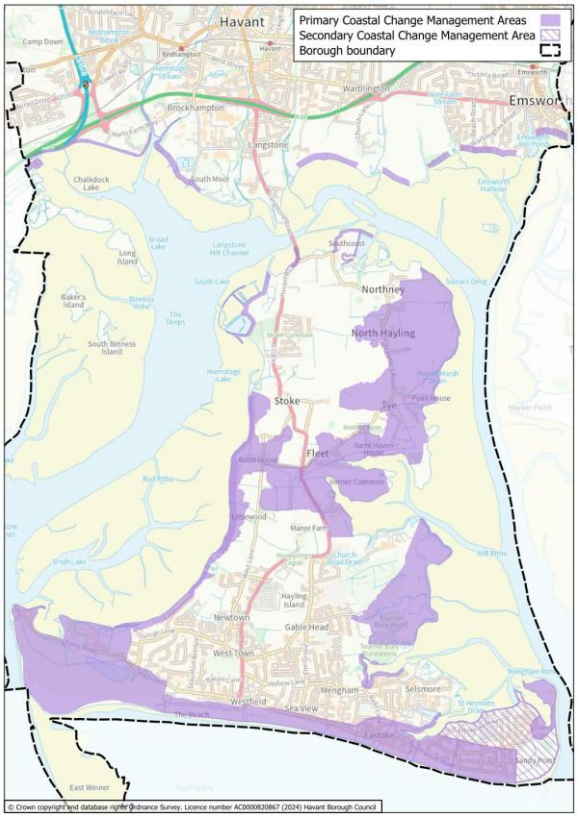
  The Hayling Island Coastal Management Strategy (Evidence Base Reference NE010) has served to update the SMP intents and identifies some areas where managed realignment or no active intervention may result in coastal change. These areas are accordingly also identified as CCMAs. Mapping was included in the Regulation 19 Plan, based on the flood zones behind the frontages. Upon further review, more refined mapping is available showing only those areas likely to be subject to tidal inundation. This is based on data available from Solent Dynamic Coast Project used for the Habitat Compensation and Restoration Programme (HCRP). Use of this date reduces the areas needing to be subject to CCMAs compared to those shown in the Regulation 19 Plan. A modification has been proposed accordingly.

2.84 Planned or proposed development should be located and designed to be safe from the risks caused by coastal change in the long term. Policy 29 ‘Development on the Coast’ defines the CCMAs and sets out what development is acceptable here. Within the CCMAs development potential is limited and an assessment of the vulnerability of the development is expected through.

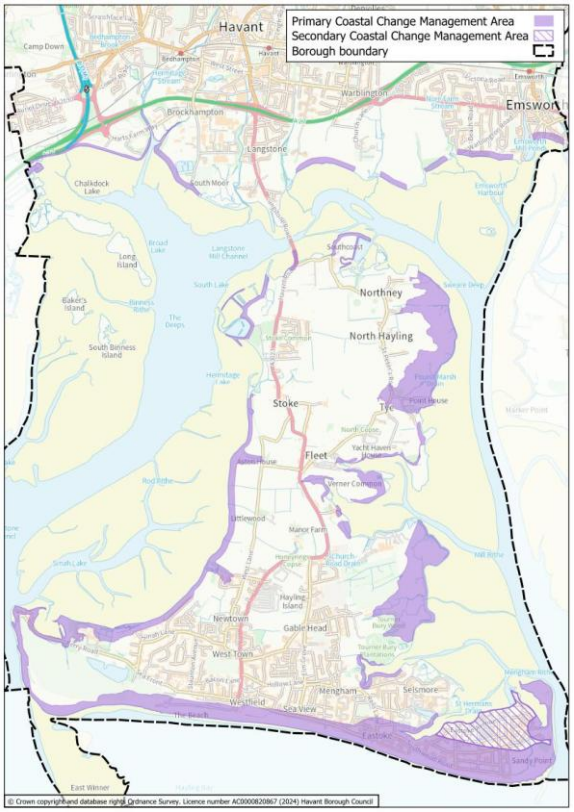
2.85 As well as the CCMAs based on the mapping described above, a secondary CCMA has been designated on the Eastoke Peninsula on Hayling Island although much of the land here is not in itself considered to be at risk of erosion or coastal change. This is because the land which forms the access onto the peninsula via Southwood Road, south of Fishery Creek, is

considered to be at risk of erosion and is designated as CCMA. This secondary CCMA designation seeks to highlight the risk to the wider Eastoke peninsula, so that prospective developers can consider this risk in making investment decisions. Some types of development will still be acceptable, but permanent new residential development is considered inappropriate in both the primary and secondary CCMAs.

2.86 Some areas defined as being with the settlement boundary discussed above are affected by the proposed CCMA. The plan (Policy 2 'Settlement Boundaries') makes clear that the support for development within the settlement boundary conferred by that policy is in-principle only and remains subject to the other policies in this plan and in national policy. Where a conflict arises, all relevant policies will be weighed in the planning balance, and development proposals within the settlement boundary may still be deemed unacceptable overall. CCMAs could be one such example.




Policy 29 CCMAs proposed at Regulation 19




Policy 29 proposed revised CCMAs

# 3. Concluding Comments

3.1 The spatial distribution of development planned for through the development strategy in the Building a Better Future Plan focuses on the existing built-up areas across the borough, with the addition of less constrained and long-term sustainable greenfield land. Accessibility and choice of transport modes is a key consideration. Habitats and species protection and national landscape designations limit which areas are considered suitable for development or where strict mitigation measures will be required. Existing open space for use by local communities is also protected. Flood risk provides a further key constraint given the borough's coastal location and evidence of climate change and sea level rise.

3.2 The Council considers that this approach aligns fully with Paragraph 11 a) of the NPPF: *'all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;'*

3.3 It is fully acknowledged that under the Building a Better Future Plan, standard method housing need is not met, though employment land need is.

3.4 Being conscious of the high need in particular for housing and affordable housing in the area, the Council takes its responsibilities in relation to meeting development requirements extremely seriously. However, to deliver truly sustainable development this must be balanced with other needs and drivers. The Council's Sustainability Appraisal demonstrates that more limited sustainability gains arise from those options that prioritise development delivery over all other matters, and that the environmentally focussed option would reduce too far the already constrained supply of development land. The chosen strategy seeks to positively address the reality of climate change and the precarious state of the natural environment while still making available all possible developable land that can be brought forward within these parameters. This is in line with the Council's duties under Section 19(1A) of the Planning and Compulsory Purchase Act 2004 to contribute to the mitigation of, and adaptation to, climate change.

3.5 In taking forward its strategy the Council has also considered the requirement in Paragraph 11b) of the NPPF that *'strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless: i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.'*

3.6 This paper has signposted the evidence base for each element of the development strategy and has highlighted the strong reasons, in particular in relation to habitats and areas at risk of flooding or coastal change, which have led to the strategic policies and the subsequent development allocations in the plan.

3.7 Importantly, even if it were to be determined that the adverse impacts of pursuing the strategy did not significantly and demonstrably outweigh the benefits of providing more developable land, it is clear from the Council's evidence base that no strategy alternative exists which is capable of delivering a plan that meets objectively assessed needs – even will all developable SHELAA sites included, need would not be met.

3.8 The development strategy proposed is therefore considered to be the most appropriate strategy for the Building a Better Future Plan, in that it combines and balances in the most effective way key national and local objectives and overall represents the most sustainable strategy, when considered against the alternatives.

# Appendix A:

**Emergency Planner (Gold Command) note to Strategic Director for Growth and Place**

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**FAO: Claire Griffiths, Strategic Director, Growth and Place**

Via email:
Claire.griffiths@havant.gov.uk

**Enquiries to:** Matt Goodwin
**Phone:** 02392 446501
**Email:** Matt.goodwin@havant.gov.uk

**Date:** 24 June 2026

Dear Claire,

**Emergency Planning Considerations – Future Development on Hayling Island**

As Chief Executive of Havant Borough Council, and in my role as Gold Command for a category one responder under the Civil Contingencies Act, I am writing to set out my concerns regarding any further housing development on Hayling Island and the impact that it would have on emergency incidents affecting the borough.

Hayling Island presents a set of unique geographic and infrastructure constraints which materially impact the safe and effective management of emergency incidents. These factors must be given significant weight in any future development considerations.

From an emergency planning perspective, the Island's most fundamental constraint is its reliance on a **single primary access route via Hayling Bridge**. This creates an inherent vulnerability during major incidents, particularly those requiring evacuation or large-scale emergency response. As has been identified in operational planning, this access route is itself susceptible to flooding, with **tidal conditions potentially affecting the southern end of the bridge approach and necessitating early evacuation decisions**. As a consequence, any restrictions or closure to the road access present a clear concern with respect to the health and wellbeing of residents.

The implications of this are considerable:

- **Evacuation complexity and timing** – Increased population associated with further development would significantly increase the number of residents who may need to be moved in advance of tidal or coastal flooding events, placing additional strain on a constrained transport corridor.
- **Emergency service access and resilience** – The ability for emergency services to reach the Island, or manoeuvre within it, may be compromised at critical times, particularly where access routes are already limited.
- **Risk amplification during concurrent events** – In scenarios involving severe weather, coastal flooding, or widespread incidents, the combination of increased population and restricted access magnifies the overall risk profile.

These challenges have been recognised in discussions with Local Resilience Forum partners, where concerns have been raised about **the impact that additional development could have on emergency response capability and overall risk on the Island**. These concerns are grounded in operational experience and emergency planning arrangements currently in place across the Borough.

From an Emergency Planning perspective we consider:

- Additional housing growth on Hayling Island would increase the number of people exposed to existing risks, including coastal flooding and constrained access.
- Without significant and demonstrable mitigation, such growth would exacerbate the challenges associated with evacuation and emergency response.
- The cumulative effect would be to increase risk to life and reduce resilience, contrary to the objectives of national planning policy.

As Gold Command, my primary responsibility is to protect life and coordinate a safe and effective response during emergencies. In that context, the cumulative impact of additional housing development and population increase on Hayling Island represents a significant strategic concern. Growth in population without commensurate mitigation of infrastructure, of which there are no current proposals, constrains risks creating scenarios where emergency services cannot respond as effectively or safely as required.

It is essential that decisions about future development on Hayling Island account for the unique constraints it faces in emergency planning terms. I would therefore strongly urge that any future proposals for development on Hayling Island give due regard to these emergency planning considerations.

Yours sincerely,



Matt Goodwin (Gold Command)
Chief Executive Officer
**Havant Borough Council**

.cc David Hayward, Strategic Planning Manager
Jacqueline Boulter, Principal Planning Policy Officer

# Appendix B:

**HBC Letter to Minsters regarding Hayling Island FCERM and MHCLRG response**

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**The Rt Hon Steve Reed OBE MP**
Secretary of State for Housing, Communities and Local Government

**The Rt Hon Emma Reynolds MP**
Secretary of State for Environment, Food and rural Affairs

**The Rt Hon James Murray MP**
Chief Secretary to the Treasury

**Enquiries to:** Cllr Philip Munday
**Direct line:**
**Email:** philip.munday@havant.gov.uk
**My reference:**
**Your reference:**
**Date:** 3 October 2025

Dear Secretaries of State and Chief Secretary

**RE: CRITICAL FLOOD RISK INFRASTRUCTURE TO SUPPORT NEW DEVELOPMENT**

I am writing to seek Government support in the delivery of substantial additional development, which can only be achieved with funding for the delivery of appropriate flood and coastal erosion and risk management (FCERM) infrastructure.

Havant Borough Council is a proudly pro-development local authority with our Administration's Corporate Strategy looking to swiftly progress the development of our new Local Plan – entitled the Building a Better Future Plan. We are looking to positively contribute to the Government's objective of building 1.5 million new homes within the current Parliament. Our Administration is also looking to explicitly support the provision of new affordable housing and the regeneration of the Borough to facilitate further housing and commercial growth.

Our local plan looks to take clear, demonstrable steps to increase the supply of homes including increasing the density of new developments and bringing forward strategic scale developments at pace. Our plan is also clear that whilst we are looking to maximise the amount of development which can be provided on brownfield development sites, significant greenfield development will also be needed.

However, Havant Borough, like many smaller, urban local planning authorities, is significantly constrained. This has been explored through a specific Constraints Study, showing clear and demonstrable constraints in particular related to flood risk, heritage, landscape and ecology, sufficient for the study to conclude "*the simple fact is that Havant is largely developed to its administrative boundary".*

Havant also suffers from comparatively low residential values compared to the majority of the southeast, limiting the amount of planning gain available for infrastructure and other priorities.

Given Havant's coastal location and extensive coastline, flood risk is a particular constraint to development in the area. Much of the Borough is affected by flood risk, which will obviously increase with the effects of climate change. This is clearly articulated in the Partnership for South Hampshire's Strategic Flood Risk Assessment and also through the National Assessment of Flood and Coastal Erosion Risk (2024). Tidal flood risk has a notable impact on Hayling Island, where the A3023 single access road is at significant risk today without defences in place. There is no other vehicular access to the island. As such, tidal flood risk represents not only a risk to life and property but also a significant emergency planning consideration for the Island.

Reflecting on this significant risk to the island today and into the future with climate change, the Local Plan does not allocate any greenfield development sites on the island. This is a necessary step to ensure that the Building a Better Future Plan responds to climate change, recognises the constraints which this area of the Borough faces and ultimately provides sustainable development. Nonetheless, this also of course impacts on the amount of new development which can be provided in Havant Borough. The Sustainability Appraisal of the Draft Local Plan has shown that 763 further homes could be developed on Hayling Island, should sites be able to be considered suitable for development.

The Borough Council, through Coastal Partners, has led the way nationally and internationally in managing coastal flood and erosion risks along our coastline. The Council is currently delivering an FCERM scheme at Langstone (which would protect the mainland section of the A3023 access road to Hayling Island). This is currently at the planning application stage and anticipated to commence in 2026.

The Council adopted, and the Environment Agency has approved, a FCERM Strategy for Hayling Island (2025). This sets out strategic management options and a programme of work to sustainably address coastal flood and erosion risk on the Island over the next 100 years. The Strategy reflects the critical need to maintain the viability of the A3023 into the future, through its recommendation to construct new defences over time to address future risks and ensure safe access and egress over the next 100 years.  Critically, however:

- Although the Strategy recommends economically sound strategic options to manage flood and erosion risk, delivery of these options is dependent on funding availability. Therefore, there is no guarantee that schemes will progress.
- Under current Defra partnership funding rules, FCERM grants are prioritised for schemes directly protecting people and significant numbers of existing property, rather than roads.
- An FCERM study for the A3023 has been proposed in the Strategy's short term action plan, to inform the need for a future defence scheme to address risks to the

road, however this is not due to start until 2029 and again, is subject to securing funding.

The Council welcomes Government's announcement on 11 June 2025 of £4.2 billion to build and maintain flood defences from 2026–27 to 2028–29, as part of the Spending Review 2025, along with the recent DEFRA funding reform consultation. Nonetheless, there is anticipated to be considerable pressure from schemes which will be prioritised higher under the criteria in relation to the direct protection of existing large communities as opposed to the road and the smaller rural communities of Northney and Stoke.

It is also recognised that there are sources of funding which could be accessed to help facilitate the development of sites meeting certain criteria, but these would not be appropriate for a number of reasons:

- **Brownfield Land Release Fund** – this fund only relates to local authority sites and grants would not be of sufficient scale to cover FCERM schemes. In addition, sites on Hayling Island are predominantly greenfield.
- **Home Building Fund – infrastructure loans** – this fund provides support in the form of loans to cover infrastructure and enabling costs. However it is only available for developments of a minimum of 1000 homes.

The Council also operates a successful Community Infrastructure Levy (CIL) regime, which has made significant contributions to FCERM schemes as a key priority, including the Langstone scheme to the North of Langstone Bridge. However, the CIL income achievable from development in the Borough is not sufficient to provide the FCERM infrastructure required for the Island, particularly if other infrastructure needs to support development are also taken into consideration.

Based on the work undertaken for the Hayling Island FCERM Strategy, at 2025 prices, we are able to assess the cost of a FCERM scheme to protect the access to Hayling Island and protect the A3023 south to the island's main settlements, over the next 100 years, sufficient to enable new development to take place. This would take the form of a frontline flood defence, with increased length and height over time to keep pace with sea level rise together with additional works further south at Stoke. This would have a cost of over £16 million (2025 prices).

Havant Borough Council is therefore requesting the provision of extensive further funding for ourselves for this specific case and other local authorities to support the delivery of FCERM infrastructure which would unlock further development opportunities. In the absence of any other funding sources given the analysis above, it is regrettably not possible for such sites to be allocated in the Council's emerging Local Plan, restricting the amount of development which can be achieved. The Council, as instructed by Ministers, is progressing the Local Plan's development at pace and with support from Government needs to submit

by the end of the 2026 calendar year. As such, we would not be able to delay the plan's development in order for funding schemes not yet in development to become available.

We would be very happy to discuss this matter further with ministers or civil servants to discuss the opportunities and challenges of bringing these sites forward. Of course, should you require further information or have any queries, please do let me know.

I look forward to your response on this critical issue.

Yours sincerely

**Cllr Philip Munday**
Leader of Havant Borough Council

Ministry of Housing, Communities & Local Government

**Baroness Taylor of Stevenage**
*Parliamentary Under-Secretary of State for Housing and Local Government*
2 Marsham Street
London
SW1P 4DF

Our reference: MC2025/27511

Cllr Phil Munday
Leader
Havan Borough Council
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31st October 2025

Dear Councillor Munday

Thank you for your letter of 3 October regarding flood risk infrastructure and new development. I have been asked to reply.

I understand that you are seeking Government support to enable additional development, which you believe is contingent upon funding for appropriate flood and coastal erosion risk management (FCERM) infrastructure. I hope the below information is helpful.

On 14 October 2025, the Government announced major changes to its flood and coastal erosion funding policy. These changes are designed to simplify funding rules, accelerate delivery of flood defences, and increase investor confidence. More information on this can be found here: www.gov.uk/government/news/deprived-communities-to-get-new-flood-defences-faster.

The reforms will make it quicker and easier to deliver the right flood defences in the right places by simplifying our funding rules. This will increase investor confidence, close funding gaps, and reduce administrative burdens on local communities.

The new funding policy will optimise funding between building new flood projects and maintaining existing defences and will ensure that deprived communities continue to receive vital investment. We will use Government funding to unlock investment from public, private and charitable sources, making every £1 of Government investment go further. We will also invest at least £300 million in natural flood management over ten years, the highest figure to date for the floods programme.

In relation to your Local Plan, it is important to note that, to be found sound by an independent Inspector at examination, local plans must be positively prepared, justified, effective and consistent with national policy. They must provide an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.

When preparing strategic policies, it may be concluded that insufficient sites or broad locations have been identified to meet objectively assessed needs, including the identified local housing need.

Current Planning Practice Guidance states that, in the first instance, strategic policy-making authorities will need to revisit their assessment, for example to carry out a further call for sites, or changing assumptions about the development potential of particular sites to ensure these make the most efficient use of land. This may include applying a range of densities that reflect the accessibility and potential of different areas, especially for sites in town and city centres, and other locations that are well served by public transport.

If insufficient land remains, then it will be necessary to investigate how this shortfall can best be planned for. If there is clear evidence that strategic policies cannot meet the needs of the area, factoring in the constraints, it will be important to establish how needs might be met in adjoining areas through the process of preparing statements of common ground, and in accordance with the duty to cooperate.

If following this, needs cannot be met, then the plan-making authority will have to demonstrate the reasons why as part of the plan examination.

Thank you for taking the time to write.

Yours sincerely,



**BARONESS TAYLOR OF STEVENAGE**
Parliamentary Under-Secretary of State for Housing and Local Government