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# Sustainability Appraisal of the Pre-Submission Havant Borough Local Plan

ADDENDUM  
September 2020



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## ADDENDUM

Purpose of this paper	<p>Sustainability Appraisal (SA) is an iterative and systematic process which should be carried out alongside the plan-making process to fully consider and communicate the likely impact of the preferred approach. The purpose of SA is to consider ways by which the plan can contribute to improvements in environmental, social and economic conditions, as well as a means of identifying and mitigating any potential adverse effects.</p> <p>SA was undertaken for the 2019 Pre-Submission Havant Borough Local Plan (HBLP). Amendments are being proposed to that plan in 2020. This document is an Addendum to that SA report, to assess the effects of the proposed changes.</p>
Why?	<p>The Sustainability Appraisal (SA) is a legal requirement and forms part of the evidence-base to inform the Pre-Submission Havant Borough Local Plan (HBLP).</p>
Objectives	<p>To assess the proposed changes to the 2019 Regulation 19 Havant Borough Local Plan (thematic policies and proposed development allocations), record the likely environmental, economic and social effects, consider how these could be improved and recommend whether or not to include them in the revised Pre-Submission Havant Borough Local Plan (HBLP).</p>

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# 1. Introduction

- 1.1 As set out in paragraph 32 of the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG), a Sustainability Appraisal (SA) must be carried out alongside the plan making process. It is an iterative and systematic process designed to help plan makers to consider and communicate the likely impacts of the emerging plan, and to promote sustainable development by assessing the extent to which the Plan will help achieve relevant environmental, economic and social objectives. In doing so, the SA is an opportunity to consider ways by which the plan can contribute to improvements in environmental, social and economic conditions, as well as a means of identifying and mitigating any potential adverse effects that the plan might otherwise have.

## **Purpose and Status of this SA report**

- 1.2 This SA has been produced by Havant Borough Council (HBC) in compliance with the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Environmental Assessment of Plans and Programmes Regulations 2004. The latter was prepared to transpose the EU Strategic Environmental Assessment (SEA)<sup>1</sup> Directive into national law.<sup>2</sup>
- 1.3 Many of the requirements of SA have been carried out at earlier stages of plan making. All previous SA reports document the story of the evolution of the plan and are available at [www.havant.gov.uk/localplan/regulatory-requirements](http://www.havant.gov.uk/localplan/regulatory-requirements). In particular, the full SA report published in January 2019 explains in full how the regulatory requirements on SA have been met during the plan preparation process up until the preparation of the Pre-Submission Plan.
- 1.4 Some substantial changes are now proposed to the Pre-Submission Plan, which the Council believes should be subject to SA. These changes affect only parts of the plan, with the bulk of the 2019 Pre-Submission Plan remaining unaltered. Therefore, rather than producing a full new SA report, this report forms an Addendum to the full SA report on the Pre-Submission Plan published in February 2019. It focuses on those changes which need SA over and above the assessments already made in 2019. The two reports should be read in conjunction with each other.
- 1.5 The SA is a legal requirement and forms part of the evidence-base to inform the 2020 revisions to the 2019 Pre-Submission Havant Borough Local Plan (HBLP). As such, statutory consultees, environmental bodies, planning agents, developers and residents are welcome to provide comments on this SA, as part of a second formal Regulation 19 consultation<sup>3</sup> on the Pre-Submission HBLP.

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<sup>1</sup> The EU ratified the Protocol on Strategic Environmental Assessment on 21 November 2008. The SEA Directive (Directive 2001/42/EC) transposes the Protocol in the EU legislation. For more information, please view: <http://ec.europa.eu/environment/eia/sea-legalcontext.htm>

<sup>2</sup> Following the UK's recent departure from the European Union, there is nothing to suggest that these procedures are no longer required.

<sup>3</sup> Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. It is anticipated that this public consultation would take place for 6 weeks in the spring of 2020.

## 2. Havant SA Objectives

- 2.1 Previous iterations of the Local Plan SA process defined 14 objectives against which to consider the emerging Local Plan. The background is explained fully in the SA Scoping Reports, as well as the full 2019 Pre-Submission Plan SA Report. The objectives are repeated below for ease of reference.

No.	SA Objective	Sustainability Theme
1	Develop a dynamic, diverse and knowledge-based economy that excels in innovation with higher value, lower impact activities	Economic factors and quality of life
2	Provide affordable, environmentally sound and good quality housing for all	Housing, population and quality of life
3	Safeguard and improve community health, safety and wellbeing	Health, population and quality of life
4	Promote and support climate change mitigation and adaptation through reducing Havant's greenhouse gas emissions from all sources and plan for anticipated levels of climate change	Climate change
5	Reduce the risk of flooding from all sources and the resulting detriment to public wellbeing, the economy and the environment. Take a sequential approach to development and avoid putting more people and property at risk of being affected by flooding, where possible. Manage flood risk where necessary	Climate change, air, water and soil
6	Protect, enhance and manage buildings, features, areas and landscapes of archaeological, historical and cultural heritage importance and their setting	Historic environment and landscape
7	Protect, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening local distinctiveness and sense of place	Historic environment and landscape
8	Protect, enhance and manage biodiversity and geodiversity – supporting the enhancement and connectivity of ecological green networks	Biodiversity and geodiversity
9	Protect and conserve natural resources	Material assets, air, water and soil
10	Reduce waste generation and disposal, and promote the waste hierarchy of reduce, reuse, recycle/compost, energy recovery and disposal	Material assets
11	Improve the efficiency of transport networks by increasing the proportion of travel by sustainable modes, by promoting policies which reduce the need to travel and provide opportunities for walking and cycling	Climate change, accessibility and transport
12	Improve air, water (ground and surface) and soil qualities through reducing pollution both diffuse and point source	Air, water and soil
13	Reduce poverty and social exclusion and close the gap between the most deprived areas in the Borough and the rest of the Borough	Quality of life, housing
14	Ensure easy and equitable access to services, facilities and opportunities	Accessibility and transport, quality of life, economic factors

**Table 1 – Havant Local Plan Sustainability Objectives**

### 3. Review of Need for SA on Proposed Changes to the Pre-Submission Plan

- 3.1 Before undertaking the appraisal of the 2020 proposed changes, the whole revised plan was reviewed to identify those policies with substantive changes that required SA, and those that were minor only and did not require further assessment.
- 3.2 The review was re-run following a further round of changes to the plan necessitated by the Government's changes to Use Classes, which meant that all policies referring the affected uses classes had to be reviewed. In particular for those policies relating to Town Centres, the review went beyond simple text changes, as the proposed policy approach was no longer workable with the use classes changes.
- 3.3 The results of that process are recorded in the Table 2:

<b>Policy</b> 2019 Reg19 reference <i>(italics denote new policy since 2019)</i>	<b>Re-SA?</b>	<b>Reason</b>
DR1	Yes	Policy deals with development quanta to be planned for through the plan, which have been updated
DR2	No	Text changes proposed are for update and/or clarification only and do not alter the effect of the policy
KP1	Yes	National changes to use classes have necessitated substantial changes in the policy
KP2	Yes	National changes to use classes have necessitated substantial changes in the policy
KP3	Yes	Additional site opportunities and constraints have been identified
KP4	Yes	National changes to use classes have necessitated substantial changes in the policy
KP5	Yes	Amended site boundary, and additional site opportunities & constraints, and policy requirements identified
KP6	Yes	Amendments to policy requirements
KP7	No	Text changes proposed are for update and/or clarification only and do not alter the effect of the policy
KP8	Yes	Change to development quantum proposed
KP9	Yes	Substantial text changes proposed
IN1	No	Although a safeguarded site (IN1K) has been added, this was previously assessed as a stand alone policy (E26)
IN2	Yes	Additional policy requirement added
IN3	Yes	Text changes included changes to requirements
IN4	No	Text changes proposed are for update and/or clarification only and do not alter the effect of the policy
IN5	No	No changes proposed
E1	No	No changes proposed
E2	No	Text changes proposed are for update and/or clarification only and do not alter the effect of the policy
E3	Yes	Additional policy requirement added
E4	No	Text changes proposed are for update and/or clarification only and do not alter the effect of the policy

E5	No	Text changes proposed are for update and/or clarification only and do not alter the effect of the policy
E6	No	No changes proposed
E7	No	No changes proposed
E8	No	No changes proposed
E9	No	No changes proposed
E10	No	No changes proposed
E11	No	Text changes proposed are for update and/or clarification only and do not alter the effect of the policy
E12	Yes	Amendments to policy requirements
E13	Yes	Substantial re-write of the policy proposed
E14	Yes	Changes to policy requirements proposed
E15	Yes	Substantial re-write of the policy proposed
E16	Yes	Changes to policy requirements proposed
EX1	Yes	New Policy
E17	Yes	Substantial re-write of the policy proposed
E18	No	No changes proposed
E19	Yes	Changes to policy requirements proposed
E20	No	Text changes proposed are for update and/or clarification only and do not alter the effect of the policy
E21	No	No changes proposed
E22	No	Text changes proposed are for update and/or clarification only and do not alter the effect of the policy
E23	No	No changes proposed
E24	No	No changes proposed
H1	No	Text changes proposed are for update and/or clarification only and do not alter the effect of the policy
H2	No	Text changes proposed are for update and/or clarification only and do not alter the effect of the policy
H3	No	No changes proposed
H4	No	Text changes proposed are for update and/or clarification only and do not alter the effect of the policy
H5	No	Text changes proposed are for update and/or clarification only and do not alter the effect of the policy
H6	No	Text changes proposed are for update and/or clarification only and do not alter the effect of the policy
H7	No	Text changes proposed are for update and/or clarification only and do not alter the effect of the policy
C1	No	Text changes proposed are for update and/or clarification only and do not alter the effect of the policy
C2	No	No changes proposed
C3	Yes	Changes to policy requirements proposed
C4	Yes	Changes to policy requirements proposed
C5	Yes	Changes to policy requirements proposed
C6	Yes	Changes to policy requirements proposed
C7	No	Text changes proposed are for update and/or clarification only and do not alter the effect of the policy
C8	No	Text changes proposed are for update and/or clarification only and do not alter the effect of the policy
EX2	Yes	New Policy
H8	Yes	Changes to policy requirements proposed
H9	No	Policy to be deleted
H10	No	Text changes proposed are for update and/or clarification only and do not alter the effect of the policy

H11	No	Text changes proposed are for update and/or clarification only and do not alter the effect of the policy
H12	No	Text changes proposed are for update and/or clarification only and do not alter the effect of the policy
H13	Yes	Change to site yield, opportunities and constraints and policy requirements proposed
HX	Yes	New Policy
C9	No	No changes proposed
E25	No	Text changes proposed are for update and/or clarification only and do not alter the effect of the policy
H14	No	Text changes proposed are for update and/or clarification only and do not alter the effect of the policy
H15	No	Text changes proposed are for update and/or clarification only and do not alter the effect of the policy
H16	No	Policy to be deleted
H17	No	Text changes proposed are for update and/or clarification only and do not alter the effect of the policy
H18	No	Text changes proposed are for update and/or clarification only and do not alter the effect of the policy
H19	No	Text changes proposed are for update and/or clarification only and do not alter the effect of the policy
H20	No	Text changes proposed are for update and/or clarification only and do not alter the effect of the policy
H21	No	Policy to be deleted
H22	No	Text changes proposed are for update and/or clarification only and do not alter the effect of the policy
H23	No	Text changes proposed are for update and/or clarification only and do not alter the effect of the policy
H24	No	No changes proposed
H25	No	Text changes proposed are for update and/or clarification only and do not alter the effect of the policy
H26	No	Text changes proposed are for update and/or clarification only and do not alter the effect of the policy
C10	Yes	Change to development quantum proposed
E26	No	Policy to be deleted (and included in IN1)
H27	Yes	Changes to policy requirements proposed
H28	No	Text changes proposed are for update and/or clarification only and do not alter the effect of the policy
H29	Yes	Change to development quantum and policy criteria proposed
H30	No	Policy to be deleted
H31	Yes	Change to development quantum proposed
H32	Yes	Changes to policy requirements proposed
H33	No	No changes proposed
H34	No	Text changes proposed are for update and/or clarification only and do not alter the effect of the policy
H35	Yes	Change to development quantum proposed
H36	Yes	Change to policy requirements proposed
H37	No	Text changes proposed are for update and/or clarification only and do not alter the effect of the policy
H38	No	Text changes proposed are for update and/or clarification only and do not alter the effect of the policy
H39	Yes	Change to development quantum and development criteria proposed
C11	No	Text changes proposed are for update and/or clarification only and do not alter the effect of the policy



H40	Yes	Change to site area, development quantum and policy requirements proposed
H41	No	Policy to be deleted
H42	No	No changes proposed
H43	No	Change to development criteria proposed
H44	Yes	Change to development quantum and policy criteria proposed
H45	No	Policy to be deleted
H46	No	Text changes proposed are for update and/or clarification only and do not alter the effect of the policy
H47	No	Text changes proposed are for update and/or clarification only and do not alter the effect of the policy
C12	Yes	Change to development quantum proposed

**Table 2 – Review of need for further SA of proposed changes to 2019 Regulation 19 Plan**

- 3.3 This review has determined that the following policies will need to be subject to sustainability appraisal in this Addendum to the 2019 Pre-Submission Plan appraisal. The table below is ordered to reflect the 2019 SA report. The following chapters set out the findings of the additional SA of these policies.

<b>Policy</b> 2019 Reg19 reference	<b>Site Ref</b> where applicable	<b>Policy Topic / Title</b>	<b>Reason for Re-SA</b>
DR1	n/a	Delivery of Delivering Sustainable Development in Havant borough	Policy deals with development quanta to be planned for through the plan, which have been updated
KP1	n/a	Havant Town Centre	National changes to use classes have necessitated substantial changes in the policy
KP2	n/a	Waterlooville Town Centre	National changes to use classes have necessitated substantial changes in the policy
KP3	n/a	Hayling Island Regeneration	Additional site opportunities and constraints have been identified
KP4	n/a	Leigh Park District Centre	National changes to use classes have necessitated substantial changes in the policy
IN2	n/a	Improving Transport Infrastructure	Additional policy requirement added
IN3	n/a	Transport and Parking	Text changes included changes to requirements
E3	n/a	Landscape and settlement boundaries	Additional policy requirement added
E12	n/a	Efficient use of resources and low carbon design	Amendments to policy requirements
E13	n/a	Historic environment and heritage assets	Substantial re-write of the policy proposed
E14	n/a	The Local Ecological Network	Changes to policy requirements proposed
E15	n/a	Protected Species	Substantial re-write of the policy proposed
E16	n/a	Recreation impact on the Solent European Sites	Changes to policy requirements proposed
EX1	n/a	Water Quality impact on the Solent European Sites	New Policy
E17	n/a	Solent Wader and Brent Goose feeding and roosting sites	Substantial re-write of the policy proposed

E19	n/a	Managing flood risk in new development	Changes to policy requirements proposed
C3	n/a	Cowplain District Centre	Changes to policy requirements proposed
C4	n/a	Emsworth District Centre	Changes to policy requirements proposed
C5	n/a	Mengham District Centre	Changes to policy requirements proposed
C6	n/a	Local centres, local shops and services	Changes to policy requirements proposed
KP3	HY6; HY16-18	Hayling Island	Additional site opportunities and constraints have been identified
KP5	n/a	Southleigh	Amended site boundary, and additional site opportunities & constraints, and policy requirements identified.
KP6	n/a	Langstone Technology Park	Amendments to policy requirements
KP8	HB14	Havant and South Downs College	Change to development quantum proposed
KP9	n/a	Havant Thicket Reservoir	Substantial text changes proposed
EX2	n/a	Warblington Farm	New Policy
H8	EM7	Land north of Long Copse Lane	Changes to policy requirements proposed
H13	EM3	Fowley Cottage	Change to site yield, opportunities and constraints and policy requirements proposed
HX	EM8	Land Rear of 15-27 Horndean Road	New Policy
C10	BD11	Brockhampton West	Change to development quantum proposed
H27	HY8	Rook Farm	Changes to policy requirements proposed
H29	HY4	Land north of Sinah Lane	Change to development quantum and policy criteria proposed
H31	HY3	Manor Nurseries	Change to development quantum proposed
H32	HY2	Pullingers, Elm Grove	Changes to policy requirements proposed
H35	LP6	Colt Site	Change to development quantum proposed
H36	LP4	Scottish and Southern Energy Office	Change to policy requirements proposed
H39	LP1	Strouden Court	Change to development quantum and development criteria proposed
H40	WV6	Campdown	Change to site area, development quantum and policy requirements proposed
H44	WV2	Padnell Grange	Change to development quantum and policy criteria proposed
C12	BD54	Former BAE Systems Park	Change to development quantum proposed

**Table 3 – Policies subject to further SA in this report**

## 4. Appraisal Findings

### Grading Symbols

- 4.1 This chapter sets out the findings of the assessment of the likely sustainability effects of the proposed 2020 version of the Pre-submission Havant Borough Local Plan. The assessment takes as its starting point the 2019 Pre-Submission Plan SA report, and considers whether that assessments still stands with the proposed changes to the plan, or whether any changes are needed.
- 4.2 The SA objectives (see Table 1) provide a framework in which sustainability effects can be analysed and compared. The extent to which a thematic policy or development allocation meets each of the 14 SA Objectives is assessed using the grading system set out below.

Grade	Appraisal
Strong positive effect	++
Positive effect	+
Neutral/no effect	0
Negative effect	-
Strong negative effect	--
Uncertain effect	+/-

**Table 4 - SA assessment grades**

### Sustainability Effects of Proposed Changes to Pre-Submission Plan

- 4.3 Tables 5-7 below show the summary of the findings of the 2019 SA<sup>4</sup>. Added to this is a commentary on the effects of the changes now proposed to the plan.
- 4.4 It should be noted that the changes referred to are only those which change the intention or the effect of the policy. Those changes only designed to improve clarity or update the position are not assessed specifically.
- 4.5 The assessment shows that the vast majority of the changes serve to improve the policy wording, without having a significant effect on the expected effects against sustainability objectives. This is with the exception of two policies:
- 4.6 Policy E3 Landscape and Settlement boundaries is now proposed to incorporate a specific requirement to consider historic as well as natural features in the design of the scheme, and to protect them from destruction and deterioration. While other policies in the plan already safeguarded historic assets, it is considered that this addition makes a positive contribution to

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<sup>4</sup> The full assessment of each policy with commentary is found in the Appendices to the 2019 report

objectives 6 and 7. This specific addition warrants an upgrade of the SA score in relation to Objective 6 to a strong positive effect. **Change SA Objective 6 from + to ++**

- 4.7 Development C12 BAE Systems Park also warrants a change from a neutral to a positive grading under Objective 1 (Economy). This is to reflect the fact that it is proposed to add significant employment element to the allocation, which in the 2019 Pre-Submission Plan was for leisure uses only. This is considered to make a positive contribution to the economy objective 1. **Change SA Objective 1 from 0 to +.**

Objective / Policy	Objective 1	Objective 2	Objective 3	Objective 4	Objective 5	Objective 6	Objective 7	Objective 8	Objective 9	Objective 10	Objective 11	Objective 12	Objective 13	Objective 14	SA commentary on changes proposed to the 2019 Regulation 19 Plan
DR1 Delivery of Sustainable Development	+	+	0	0	0	0	0	0	+	0	0	0	+	+	Changes proposed to the policy are to update the development requirements to roll them forward in order to ensure that the Local Plan covers the minimum period of 15 years from the date of adoption. This is a necessary change to the plan to make it sound, and ensure it continues to meet the development needs of the borough. The 2019 SA give positive scores for those objectives which met those needs, with a particular focus on Objectives 1 and 2. The rolling forward of the figures allows the plan to continue to make a positive contribution to these objectives. Overall, the assessment made in 2019 remains sound. <b>No change to SA.</b>
KP1 Havant Town Centre	+	+	+	+	0	0	+	0	0	0	+	0	+	+	In September 2020, the Government introduced extensive changes Use Classes, which necessitated changes to the town centre policy. With a much larger range of uses now allowed in the same use class as retail, it is no longer considered effective to include a marketing requirement for proposed changes away from that class. While this limits the tools available to the council to protect retailing in the town centre, this is a national issue and not a direct effect of the plan itself. Overall, the policy still supports the town centre economy as best as possible, and it is concluded that the positive assessment of Objective 1 still stands. <b>No Change to SA.</b>
KP2 Waterlooville Town Centre	+	+	+	+	0	0	+	0	0	0	+	0	+	+	As KP1 above <b>No Change to SA.</b>
KP4 Leigh Park Town Centre	+	+	+	+	0	0	+	0	0	0	+	0	+	+	As KP1 above <b>No Change to SA.</b>
IN2 Improving Transport Infrastructure	+	+	+	+	0	0	0	0	0	0	+	0	+	+	A criterion is proposed to be added to the policy, in support of the delivery of new, or improvements to existing rights of way, to enhance the network of sustainable and leisure travel routes; This confirms the positive scores given to the policy in relation to objectives 3,4 and 11 relating to health, climate change and sustainable transport. Overall, the assessment made in 2019 remains sound. <b>No change to SA.</b>
IN3 Transport and Parking in New Development	+	+	+	+	0	0	+	0	0	+	+	+	+	+	The changes proposed to the policy are largely intended to clarify the council's intentions. However, these changes do include an additional reference to the assessment of cumulative transport impacts of development. This serves to strengthen the policy, which already has a positive score in relation to transport related objective 11. Overall, the assessment made in 2019 remains sound. <b>No change to SA.</b>

E3 Landscape and Settlement Boundary	0	0	0	0	0	+	+	+	0	0	0	0	0	0	0	A reference is proposed to be added to the policy to require the incorporation of historic as well as natural features in the design of the scheme, and to protect them from destruction and deterioration; While other policies in the plan already safeguarded historic assets, it is considered that this addition makes a positive contribution to objectives 6 and 7. This specific addition warrants an upgrade of the SA score in relation to Objective 6 to a strong positive effect. Overall, the assessment made in 2019 remains sound. <b>Change objective 6 from + to ++</b>
E12 Low Carbon Design	+	+	+	+	0	0	0	+	+	+	0	+	+	0	0	The policy has substantially been rewritten to improve clarity. In addition, a specific policy requirement has been added to achieve a maximum water use of 110 litres of water per person per day in new development with overnight accommodation. This is specifically designed as a measure to promote and support climate change mitigation as envisaged by objective 4, as already identified in the earlier version of this policy in the 2019 SA. Overall, the assessment made in 2019 remains sound. <b>No change to SA.</b>
E13 Historic Environments and Heritage Assets	0	0	+	0	0	+	+	0	0	0	0	0	0	0	0	The policy is proposed to be substantially rewritten to address Historic England concerns about specific wording. There is a direct link between this policy and SA objectives 6 and 7 regarding the historic environment, landscape and townscape and local distinctiveness. The 2019 SA already gave strong positive scores for this policy for these objectives. Overall, the assessment made in 2019 remains sound. <b>No change to SA.</b>
E14 Local Ecological Network	0	0	+	+	0	+	+	+	+	0	0	+	+	+	+	Proposed changes to the policy include the application of the policy to all development, and the consideration of the Local Ecological Network across administrative boundaries. These are designed to reflect latest national policy and strengthen the policy in relation to positive effects on biodiversity (objective 8). It must be acknowledged that this policy now applies to a greater number of schemes and therefore could have the effect of making small scale schemes more expensive to deliver. However, the policy already applied to new dwellings and commercial development, and it is anticipated that it is mainly such schemes as householder extensions that will be affected by the proposed change. These make little contribution – positive or negative – to the strategic sustainability objectives. It is therefore considered that the assessment given in the 2019 SA remains valid. <b>No change to SA.</b>
E15 Protected Species	0	0	0	0	0	0	0	+	+	0	0	0	0	0	0	The policy is proposed to be substantially rewritten to address Natural England concerns about specific wording. There is a direct link between this policy and SA objective 8 regarding biodiversity. The 2019 SA already gave strong positive scores for this policy for these objectives. Overall, the assessment made in 2019 remains sound. <b>No change to SA.</b>
E16 Recreation impact on the	0	+	0	0	0	0	+	+	+	0	0	0	0	0	0	The proposed change to the policy clarifies that the requirement to mitigate recreation impacts on the Solent European Sites applies to commercial overnight accommodation as well as dwellings. It must be acknowledged that this would add

Solent European Sites															additional costs to development involving overnight accommodation and therefore could have an effect on SA objective 1, that effect is considered to be minor, and does not warrant a negative score against the objective overall. In any case, the requirement arises from the Habitats Regulations, rather than the Local Plan per se. Overall, the assessment made in 2019 remains sound. <b>No change to SA.</b>
E17 Solent Wader and Brent Goose Feeding & Roosting Sites	0	+	0	0	0	0	0	+	0	0	0	0	0	0	Proposed changes to the policy are mainly designed to clarify the requirements with regard to Brent Goose and Wader mitigation for three particular development allocations. One of these sites is linked to mitigation at a newly identified mitigation site, assessed separately in this SA (see Policy EX2 below). Overall, the effect of these changes is to strengthen this policy with regard to Objective 8, which was already scored as positive in the 2019 SA. There are not likely to be any changes to the effect on other objectives as a result of these changes. Overall, the assessment made in 2019 remains sound. <b>No change to SA.</b>
E19 Managing Flood Risk in New Development	+	+	+	+	+	0	+	+	0	0	0	+	0	0	The changes proposed to this policy clarify that the Council expects the flood risk sequential test and flood risk assessments to be prepared for development in Flood Zones 2 & 3 as defined for the future with climate change in addition to the present day extent. This will strengthen the positive effects of the policy in relation to objective 5 already identified in the 2019 SA, and contribute to environmentally sound housing (obj 2), safeguard community health and wellbeing (obj 3). Overall, the assessment made in 2019 remains sound. <b>No change to SA.</b>
C3 Cowplain District Centre	+	+	+	+	0	0	+	0	0	0	+	0	+	+	The proposed change to the policy removes the specific restriction on B1a offices in areas of the district centre outside of the primary shopping area, while maintaining the requirement that uses here should be active main town centre uses. This introduces a level of flexibility in support of the vitality and viability of the centre, adding to the positive score given to the economy objective (obj1) in the 2019 SA. In September 2020, the Government introduced extensive changes Use Classes, which necessitated further changes to the policy. With a much larger range of uses now allowed in the same use class as retail, it is no longer considered effective to include a marketing requirement for proposed changes away from that class. While this limits the tools available to the council to protect retailing in the centre, this is a national issue and not a direct effect of the plan itself. Overall, the policy still supports the district centre economy as best as possible, and it is concluded that the positive assessment of Objective 1 still stands. Overall, the assessment made in 2019 remains sound. <b>No change to SA.</b>
C4 Emsworth District Centre	+	+	+	+	0	0	+	0	0	0	+	0	+	+	As C3 above.
C5	+	+	+	+	0	0	+	0	0	0	+	0	+	+	As C3 above.

Mengham District Centre															
C6 Local Centres, Local Shops and Services	+	+	+	+	0	0	+	0	0	0	+	0	+	+	<p>The proposed change to the policy removes the specific restriction on B1a offices in local centres, while maintaining the requirement that uses here should be active main town centre uses. This introduces a level of flexibility in support of the vitality and viability of local centres, adding to the positive score given to the economy objective (obj1) in the 2019 SA. Further changes to wording had to be added as a result of national changes to use classes in September 2020. However, these did not substantially affect the meaning of this policy. Overall, the assessment made in 2019 remains sound.</p> <p><b>No change to SA.</b></p>

**Table 5: Review of SA of Thematic Policies**

Objective / Policy	Objective 1	Objective 2	Objective 3	Objective 4	Objective 5	Objective 6	Objective 7	Objective 8	Objective 9	Objective 10	Objective 11	Objective 12	Objective 13	Objective 14	SA commentary on changes proposed to the 2019 Regulation 19 Plan
KP3 Hayling Island	+	+	+	+	-	0	0	0	0	0	0	0	+	0	<p>The policy combines allocations for a number of sites on Hayling Island. The following additional site opportunities and constraints and/or development requirements are proposed:</p> <ul style="list-style-type: none"> <li>For West Beach, an opportunity to create a nature reserve to the western area of Hayling Island.</li> <li>For Northney Marina the need for sewerage network reinforcements in advance of occupation</li> <li>For Beachlands and Northney Marina, the need for a Flood Risk Assessment</li> </ul> <p>These amendments relate most directly to objective 8 (biodiversity) and objective 5 (flood risk). While the proposed additions to the policy make a positive contribution to outcomes against these objectives, it is acknowledged that they are not sufficient to change the assessment made in the 2019 SA. Changes to clarify the use classes in Sept 2020 also make little change to the effect of the policy. Overall, the assessment made in 2019 remains sound.</p> <p><b>No change to SA.</b></p>



KP5 Southleigh	+	+	+	0	0	0	-	-	-	0	+	0	+	+	The proposed changes are to reduce the boundary of the site (see below new policy HX), and to add to the development requirements: <ul style="list-style-type: none"> <li>Provision of specialist accommodation for people with support or care needs;</li> <li>The need for sewerage network reinforcements in advance of occupation</li> <li>Consideration of the South Downs National Park Dark Night Sky Reserve;</li> </ul> These amendments relate most directly to objectives 2 (housing for all), 5 (flood risk); and objective 7. While the proposed additions to the policy make a positive contribution to outcomes against these objectives, it is acknowledged that they are not sufficient to change the assessment made in the 2019 SA. Overall, the assessment made in 2019 remains sound. <b>No change to SA.</b>
KP6 Langstone Technology Park	+	0	+	+	0	0	+	0	0	0	+	0	+	+	It is proposed that a specific development quantum be added to the policy, and requirement be added for a heritage statement to accompany any application for development. This is to reflect the heritage and architectural value of the buildings on site. While the proposed additions to the policy may make a positive contribution to outcomes against the economy and the heritage objectives, the textual changes to not necessitate an amendment to the assessment made in 2019, which remains sound. <b>No change to SA.</b>
KP8 Havant and South Downs College	+	+	+	+	0	+	+	0	0	0	+	0	+	+	The main change proposed is to increase the development yield of the Havant College development site. This is to reflect further information on the possible form of development, as well the fact that the site lies close to the town centre (KP1) and an area of opportunity for higher densities. In increasing the yield, it makes a greater contribution to objective 2, while the other site requirements continue to safeguard against any potential negative effects against other objectives. Overall, the assessment made in 2019 remains sound. <b>No change to SA.</b>
KP9 Havant Thicket Reservoir	+	0	+	+	+	0	0	-	0	0	+	+	+	+	Proposed changes seek to place greater importance on the safeguarding of historic and natural features and ecology. While the proposed additions to the policy make a positive contribution to outcomes against these objectives, it is acknowledged that they are not sufficient to change the assessment made in the 2019 SA. Overall, the assessment made in 2019 remains sound. <b>No change to SA.</b>

**Table 6: Review of SA of Key Project (KP) Policies**

Objective / Policy	Objective 1	Objective 2	Objective 3	Objective 4	Objective 5	Objective 6	Objective 7	Objective 8	Objective 9	Objective 10	Objective 11	Objective 12	Objective 13	Objective 14	SA commentary on changes proposed to the 2019 Regulation 19 Plan
H13 Fowley Cottage (EM3)	+	+	+	+	0	0	0	0	0	0	+	+	+	+	It is proposed to lower the development yield from 40 to 20, and to add additional site opportunities and constraints and development requirements: <ul style="list-style-type: none"> <li>Sewerage network reinforcements in advance of occupation</li> <li>Protection of the protected and mature trees on site.</li> </ul> These changes have the potential to reduce negative impacts on the protected landscape of the AONB (Objective 7), safeguard against flood risk (Objective 5) and protect trees (objectives 3,4,7 and 8). However, the development will still have some effect on these objectives, so overall the 2019 appraisal remains valid. <b>No change to SA.</b>
H8 Land north of Long Copse Lane (EM7)	+	+	0	0	0	0	-	-	0	0	0	+	0	-	It is proposed to add additional development requirements to consider the South Downs National Park Dark Night Sky Reserve; This may make a positive contribution to objective 7, but overall, it must still be acknowledged that the development will take place on a greenfield site which will have a significant negative impact on this objective, as identified in the 2019 SA. <b>No change to SA.</b>
C10 Brockhampton West (BD11)	+	0	-	0	0	0	0	0	0	0	0	0	+	0	The main change proposed is to increase the development yield of the site. In increasing the yield, it makes a greater contribution to objective 1, This was already assessed as having a strong positive effect in the 2019 SA. The other site requirements continue to safeguard against any potential negative effects against other objectives. Overall, the assessment made in 2019 remains sound. <b>No change to SA.</b>
H32 Pullingers, Elm Grove (HY2)	+	+	+	+	0	0	+	0	0	0	+	0	+	+	The proposed change to the policy removes the specific restriction on B1a offices, while maintaining the requirement that uses here should be active main town centre uses. This introduces a level of flexibility in support of the vitality and viability of the centre, adding to the positive score given to the economy objective (obj1) in the 2019 SA. Overall, the assessment made in 2019 remains sound. <b>No change to SA.</b>
H31 Manor Nurseries (HY3)	+	+	-	0	0	0	0	0	0	0	0	0	+	0	The proposed change is for a reduction in development yield, based on a further information now available. To remain consistent with the assessments made in the 2019 SA, this reduction does warrant a reduction in the assessment score against the housing objective 2. Overall, the assessment made in 2019 remains sound. <b>No change to SA.</b>

H29 Land north of Sinah Lane (HY4)	+	+	+	0	0	0	-	-	0	0	0	0	+	0	It is proposed to highlight the need for sewerage network reinforcements in advance of occupation, and to slightly reduce the development yield from 210 to 195 in light of further information now available. The site allocation continues to make a positive contribution to the housing objective, and the highlighted development constraint safeguards against negative effects from one particular type of flood risk. Overall, the assessment made in 2019 remains sound. <b>No change to SA.</b>
H27 Rook Farm (HY8)	+	+	+	0	0	0	-	-	0	0	+	0	+	+	An additional development requirement is proposed to create a vista to the Grade II* listed St Mary's Church through the development and to retain views of the church from the public footpaths wherever possible. This is in support of objectives 7. Nevertheless, the negative effects on landscape character identified in the 2019 SA remain applicable, so there is no improvement in the assessment against this objective. <b>No change to SA.</b>
H39 Strouden Court (LP1)	+	+	+	+	0	0	+	0	0	0	0	0	+	+	It is proposed to highlight the need for sewerage network reinforcements in advance of occupation, and to reduce the development yield from 75 to 55 in light of additional information from the site promoter about the amount of land available. The site allocation continues to make a positive contribution to the housing objective, and the highlighted development constraint safeguards against negative effects from one particular type of flood risk. Overall, the assessment made in 2019 remains sound. <b>No change to SA.</b>
H36 Scottish and Southern Energy Offices (LP4)	+	+	+	+	0	0	+	0	0	0	+	0	+	+	It is proposed to add a development requirement to retain and integrate the protected tree on the site (objectives 3,4,7 and 8). However, this is a minor additional requirement, so overall the 2019 appraisal remains valid. <b>No change to SA.</b>
H35 Colt Site (LP6)	+	+	+	+	0	0	+	0	0	0	0	0	+	0	The proposed change is for an increase in the development yield from 90 to 100, based on a refinement of the information available. Overall, the assessment made in 2019 remains sound. <b>No change to SA.</b>
H44 Padnell Grange (WV2)	+	+	+	+	0	0	+	-	0	0	+	0	+	+	It is proposed to reduce the development yield from 95 to 80 dwellings, to reflect further information which has come to light about site constraints. Further changes clarify requirements around the historic buildings on site, and the need to deliver sewerage network reinforcements in advance of occupation to avoid an increased risk of foul water flooding. These changes relate to objectives 2, 5 and 6. None are significant enough to warrant a change to the 2019 assessment <b>No change to SA.</b>
H40 Campdown (WV6)	+	+	+	0	0	+	-	-	0	0	0	0	+	0	The development area and yield have been reduced significantly in order to provide protection to the adjacent scheduled ancient monument. This puts in place additional safeguards and reduces some of the uncertainty in relation to objective 6. Nevertheless, the overall effect on the scheduled ancient

															monument can only be assessed fully when a detailed scheme is known, and it is therefore considered precautionary to retain the uncertain assessment. <b>No change to SA.</b>
C12 Former BAE Systems Park (BD54)	+	0	+	+	0	0	+	0	0	0	+	0	+	+	Since the 2019 Pre-Submission Plan, a satisfactory scheme for a mix of employment and leisure uses has come forward. An employment element has therefore been added to the policy. This is considered to make a positive contribution to the economy objective 1. <b>Change objective 1 from 0 to +.</b>

**Table 7: Review of SA of Development Allocation Policies**

# Sustainability Effects of Proposed New Policies

4.8 Three new policies are proposed for inclusion in the 2020 Pre-Submission Plan. These are

- EX1 Water Quality Impact on the Solent European Sites
- EX2 Warblington Farm
- HX Land rear of 15-27 Horndean Road, Emsworth

These proposed new policies are assessed in tables 8 -10 below.

- 4.9 Proposed Policy EX1 Water Quality Impact on the Solent European Sites has been assessed as not having any “uncertain”, “negative” and/or “strong negative effects” against the SA objectives. All effects are considered either neutral or positive, with positive effects noted against the biodiversity objective, as well as against objectives for the delivery of housing and economic development. While the main purpose of the policy is to protect water quality, the SA objective on this topic actually refers to improving water quality, which this policy does not specifically set out to achieve. It is therefore scored as neutral against this objective.
- 4.10 Proposed Policy EX2 Warblington Farm has been assessed as not having any “uncertain”, “negative” and/or “strong negative effects” against the SA objectives. All effects are considered either neutral or positive, with positive effects noted against biodiversity and water quality objectives (the main reason for including this policy).
- 4.11 Proposed site allocation Policy HX Land Rear of 15-27 Horndean Road, Emsworth has been assessed as have a number of positive and neutral effects, but also some negative ones. Negative effects are possible against the landscape, biodiversity and the protection of natural resources, but not of these are strongly negative. The site had previously been allocated as part of the adjacent Southleigh Strategic Site, because it was considered that development of this smaller site separately would have a strong negative effect due to the loss of the SINC and the inability of the development in isolation to mitigate for its loss. Further evidence has now been considered, and the Council considers that there is a reasonable prospect of this being achieved.
- 4.12 Having been assessed and no strong negative effects found, and mitigation against any potential negative effects built into the policies, all three policies are recommended for inclusion in the revised Pre-Submission Havant Borough Local Plan (HBLP) 2036.

## EX1 Water Quality Impact on the Solent European Sites

**Background:** This policy is proposed as a result of a new issue that has arisen since the publication and consultation on the 2019 Regulation 19 Plan. It has been found that new development could increase the nutrient load on the Solent European Sites, which would constitute a likely significant effect under the Habitats Regulations. In order to avoid this negative effect, the only way that a new housing scheme could prevent this likely significant effect is for there to be no increase in nutrients into the harbour, i.e. for it to be 'nutrient neutral'. The new policy sets out how this can be achieved by development proposals.

Obj	Description	Assessment
Obj 1	Develop a dynamic, diverse and knowledge-based economy that excels in innovation with higher value, lower impact activities	The Council has a legal obligation to consider effects on the European Sites as part of the development process. If it cannot be shown that no harm would occur to the Solent European Sites, then <u>it would be unlawful for the Council to grant planning permission for new housing or allocate sites in a Local Plan.</u> While the effect is largely on residential development, this could have a significant impact on the Council's growth and development ambitions for the Borough. While it must be acknowledged that there is a cost associated with the mitigation which could affect the attractiveness of the borough to housing developers, and other development with overnight accommodation, it is the purpose of the policy to provide a mechanism which allows development to take place whilst fulfilling the statutory requirement to prevent a significant effect on the Solent European Sites. In this way, this policy has a "positive effect" against this objective.
Obj 2	Provide affordable, environmentally sound and good quality housing for all	The Council has a legal obligation to consider effects on the European Sites as part of the development process. If it cannot be shown that no harm would occur to the Solent European Sites, then <u>it would be unlawful for the Council to grant planning permission for new housing or allocate sites in a Local Plan.</u> This could have a significant impact on the Council's growth and development ambitions for the Borough. While it must be acknowledged that there is a cost associated with the mitigation which could affect the attractiveness of the borough to housing developers, it is the purpose of the policy to provide a mechanism which allows development to take place whilst fulfilling the statutory requirement to prevent a significant effect on the Solent European Sites. In this way, this policy has a "positive effect" against this objective.
Obj 3	Safeguard and improve community health, safety and wellbeing	The policy has no bearing on human health, safety or wellbeing. As such, the policy has been assessed as having "no effect" against this objective.
Obj 4	Promote and support climate change mitigation and adaptation through reducing Havant's greenhouse gas emissions from all sources and plan for anticipated levels of climate change	The policy has no bearing on climate change mitigation or adaptation. As such, the policy has been assessed as having "no effect" against this objective.

Obj 5	Reduce the risk of flooding from all sources and the resulting detriment to public wellbeing, the economy and the environment. Take a sequential approach to development and avoid putting more people and property at risk of being affected by flooding, where possible. Manage flood risk where necessary.	This policy has no bearing on flood risk. As such, the policy has been assessed as having "no effect" against this objective.
Obj 6	Protect, enhance and manage buildings, features, areas and landscapes of archaeological, historical and cultural heritage importance and their setting	This policy has no bearing on the historic environment and heritage assets. As such, the policy has been assessed as having "no effect" against this objective.
Obj 7	Protect, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening local distinctiveness and sense of place.	This policy has no bearing on the landscape. As such, the policy has been assessed as having "no effect" against this objective.
Obj 8	Protect, enhance and manage biodiversity and geodiversity – supporting the enhancement and connectivity of ecological green networks	The policy is specifically designed to protect the Solent habitats and the species which use them, by applying strict tests to development and restricting development to those which are shown to be 'nutrient neutral'. Therefore, the policy has been assessed as having a "strong positive effect" against this objective.
Obj 9	Protect and conserve natural resources	The policy has no bearing on the protection and conservation of natural resources. As such, the policy has been assessed as having "no effect" against this objective.
Obj 10	Reduce waste generation and disposal, and promote the waste hierarchy of reduce, reuse, recycle/compost, energy recovery and disposal	This policy has no direct bearing on waste reduction, generation and disposal. As such, the policy has been assessed as having "no effect" against this objective.
Obj 11	Improve the efficiency of transport networks by increasing the proportion of travel by sustainable modes, by promoting policies which reduce the need to travel and provide opportunities for walking and cycling	The policy has no bearing on the efficiency of the transport network and sustainable modes of transport. As such, the policy has been assessed as having "no effect" against this objective.
Obj 12	Improve air, water (ground and surface) and soil qualities through reducing pollution both diffuse and point source	The policy is specifically designed to safeguard water quality in nearby harbours, estuaries and in the Solent. As such, the policy as is assessed as neutral against this objective.
Obj 13	Reduce poverty and social exclusion and close the gap between the most deprived areas in the borough	The policy has no bearing on the reduction of poverty and social exclusion. As such, the policy has been assessed as having "no effect" against this objective.
Obj 14	Ensure easy and equitable access to services, facilities and opportunities	The policy has no bearing on access to services, facilities and opportunities. As such, the policy has been assessed as having "no effect" against this objective.

**Table 8: Sustainability Appraisal of proposed new policy on Water Quality Impact on the Solent European Sites**

## EX2 Warblington Farm

**Background:** This policy allocates land for water quality mitigation and as a Brent Goose and Wader refuge, in order to address two key mitigation measures to safeguard the integrity of the Solent European Marine Sites.

Obj	Description	Assessment
Obj 1	Develop a dynamic, diverse and knowledge-based economy that excels in innovation with higher value, lower impact activities	The allocation policy has no bearing on the local economy. As such, the policy has been assessed as having "no effect" against this objective.
Obj 2	Provide affordable, environmentally sound and good quality housing for all	The allocation policy itself has no bearing on the provision of affordable, environmentally sound and good-quality housing, although as a mitigation proposal for potential negative effects, it does have the potential to help deliver homes. Overall, the policy has been assessed as having "no effect" against this objective, as the positive effects have been reflected in the assessment for the policies
Obj 3	Safeguard and improve community health, safety and wellbeing	The policy has no bearing on community health, safety or wellbeing. As such, the policy has been assessed as having "no effect" against this objective
Obj 4	Promote and support climate change mitigation and adaptation through reducing Havant's greenhouse gas emissions from all sources and plan for anticipated levels of climate change	The policy has no bearing on climate change mitigation and adaptation. As such, the policy has been assessed as having "no effect" against this objective
Obj 5	Reduce the risk of flooding from all sources and the resulting detriment to public wellbeing, the economy and the environment. Take a sequential approach to development and avoid putting more people and property at risk of being affected by flooding, where possible. Manage flood risk where necessary.	The allocation policy has no bearing on flood risk. As such, the policy has been assessed as having "no effect" against this objective.
Obj 6	Protect, enhance and manage buildings, features, areas and landscapes of archaeological, historical and cultural heritage importance and their setting	The allocation policy has no bearing on the historic environment and heritage assets. As such, the policy has been assessed as having "no effect" against this objective.
Obj 7	Protect, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening local distinctiveness and sense of place.	The development of a Brent Goose and Wader Refuge would not require any built development. In addition, the allocation policy requires the landscaping of the refuge to reflect its coastal location. Due to the above, it is considered that the allocation of the refuge would not negatively impact on the character and appearance of the landscape. As such, the allocation policy has been assessed as "neutral" against this objective.



Obj 8	Protect, enhance and manage biodiversity and geodiversity – supporting the enhancement and connectivity of ecological green networks	The allocation of a refuge and for nutrient neutrality, would mitigate part of the impact on the SPA protected birds and their habitat from residential development in Havant Borough. It is considered that, if provided to the required high standard, the development of a refuge would lead to a net biodiversity gain. In addition, nutrient neutrality in the harbour safeguards biodiversity. For this reason, the allocation policy has been assessed as having a “strong positive effect” against this objective.
Obj 9	Protect and conserve natural resources	The allocation policy does not propose built development and, therefore, has no bearing on the protection and conservation of natural resources. The policy has been assessed as having “no effect” against this objective.
Obj 10	Reduce waste generation and disposal, and promote the waste hierarchy of reduce, reuse, recycle/compost, energy recovery and disposal	The allocation policy has no bearing on waste reduction, generation and disposal. As such, the policy has been assessed as having “no effect” against this objective.
Obj 11	Improve the efficiency of transport networks by increasing the proportion of travel by sustainable modes, by promoting policies which reduce the need to travel and provide opportunities for walking and cycling.	The allocation policy has no bearing on the efficiency of the transport network and sustainable modes of transport. As such, the policy has been assessed as having “no effect” against this objective.
Obj 12	Improve air, water (ground and surface) and soil qualities through reducing pollution both diffuse and point source	Part of this allocation is specifically designed to safeguard water quality in nearby harbours, estuaries and in the Solent. As such, the policy as a strong positive effect against this objective.
Obj 13	Reduce poverty and social exclusion and close the gap between the most deprived areas in the borough	The allocation policy has no bearing on the reduction of poverty and social exclusion. As such, the policy has been assessed as having “no effect” against this objective.
Obj 14	Ensure easy and equitable access to services, facilities and opportunities	The allocation is not for built development, but instead for a refuge for Solent Waders and Brent Geese, as well as water quality mitigation. From this, it is considered that the allocation has no bearing on access to services, facilities and opportunities. As such, the policy has been assessed as having “no effect” against this objective.

**Table 9: Sustainability Appraisal of proposed new policy on Warblington Farm**

## HX Land rear of 15-27 Horndean Road

**Proposed Development:** Residential development of about 16 dwellings

**Background:** The site was not included in the Local Plan (Core Strategy) [March 2011] or the Local Plan (Allocations Plan) [July 2014]. The site was first proposed as part of the Southleigh Strategic Site in the Local Plan Housing Statement (LPHS) [December 2016]. Following this, the site was submitted to the Council, separately to Southleigh, during a Call-for-Sites in February 2017. The submission was considered, but the Council concluded in the Sustainability Appraisal of the Draft Havant Borough Local Plan (HBLP) 2036 that the site should remain as part of the Southleigh Strategic Site. Both the Regulation 18 and Regulation 19 Plans included the land as part of the Southleigh Strategic Site, supported by the SA. Specifically, that work concluded that only a comprehensive approach to development could provide the management and enhancement of the SINC to offset the residential development of this smaller site. During, and since this consultation, further information has been submitted by the site promoter to justify a separate housing allocation.

Obj	Description	Assessment
Obj 1	Develop a dynamic, diverse and knowledge-based economy that excels in innovation with higher value, lower impact activities	Addressing housing need and providing high quality new homes will attract employers and skilled employees. This will help develop a stronger economy.
Obj 2	Provide affordable, environmentally sound and good quality housing for all	The allocation policy has been assessed as having a “strong positive effect” against this objective as development would provide about 16 high-quality new dwellings. In line with Policy H3 (Affordable Housing), this provision would include about 4 affordable new dwellings.
Obj 3	Safeguard and improve community health, safety and wellbeing	The Council’s Environmental Health Team screened the site and highlighted a noise consideration due to the proximity of Horndean Road. In addition, the team identified the site as a Radon Class 2 area. The site has been assessed as “neutral” against these points as the allocation requires a Noise Impact Assessment and Land Contamination Investigation Report (to include gas monitoring) to investigate the above in support of, and to inform, a planning application. As set out in the Havant Borough Open Space Strategy, Fields in Trust (FIT) [November 2015] provides guidance in relation to the quality, quantity and accessibility of open space. The site is adjacent to Emsworth Recreation Ground which contains a football pitch and tennis courts. The recreation ground is identified as a public park and garden in the Open Space Strategy and contains a local equipped area for play (LEAP) for children and young people. In addition, the site is within the FIT 480m catchment of Hollybank Recreation Ground. This recreation ground is identified as an amenity greenspace in the Open Space Strategy and contains the Hollybank LEAP. The site is also in proximity to St James Primary School. It is considered, therefore, that there are many opportunities for informal recreation in proximity to the site. As such, the site has been assessed as “positive” against the above.

Obj 4	Promote and support climate change mitigation and adaptation through reducing Havant's greenhouse gas emissions from all sources and plan for anticipated levels of climate change	The site is adjacent to Emsworth Recreation Ground and St James' Primary School, and is also within 800m of the Belle Vue Lane bus stop and Emsworth Railway Station. The proximity and use of public transport and services will help minimise Havant Borough's greenhouse gas emissions. A policy provision requires pedestrian and cycle links to the recreation ground and beyond. However, it is acknowledged that residents are likely to use the private car as the site is outside the 800m Ped-Shed of Emsworth District Centre. In addition, this is a greenfield site and the loss of open greenspace will reduce the ability of the natural environment to adapt to climate change. The site has been assessed as "neutral" against this objective in recognition of the balance between the proximity of public transport, the loss of a greenfield site and the likelihood of private car use.
Obj 5	Reduce the risk of flooding from all sources and the resulting detriment to public wellbeing, the economy and the environment. Take a sequential approach to development and avoid putting more people and property at risk of being affected by flooding, where possible. Manage flood risk where necessary.	It is acknowledged that Emsworth (as a whole) has known drainage capacity issues due to underlying geology. The Strategic Flood Risk Assessment (SFRA) outlines that the western part of the site is affected by fluvial Flood Zones 2 and 3 due to proximity with the West Brook. The SFRA outlines that although the Sequential Test has not been passed, it is considered possible to pass the Exception Test as development which is safe from flooding can still be achieved by taking the sequential approach on site. The site has been assessed "neutral" against this objective as the allocation policy stipulates that areas at risk of flooding now, and in the future, must be avoided. The allocation policy also sets out that further work will be needed in relation to the required volumes and location of compensatory storage to be provided. It is acknowledged that Emsworth (as a whole) has known drainage capacity issues due to underlying geology. To overcome this, the above requirements will need to be provided as part of a drainage solution on site which reduces surface water run-off and contributes onwards identified flood alleviation schemes in the area, in line with Policies E19 and E20.
Obj 6	Protect, enhance and manage buildings, features, areas and landscapes of archaeological, historical and cultural heritage importance and their setting	There are no known historic assets on or in proximity to the site. There are no archaeological sites currently recorded at this location and very little recorded in the immediate vicinity. The HCC Archaeologist has identified the site has having archaeological potential, albeit, low. The proposed development provides an opportunity to investigate this and recover any archaeological deposits that exist onsite. As such, the allocation includes a requirement for a Heritage Statement to assess the potential for previously unidentified archaeological deposits and the impact of the proposed development.

Obj 7	Protect, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening local distinctiveness and sense of place.	The site is identified in the Landscape Capacity Study (May 2015) as part of parcel 22.1. As outlined in the study, this parcel of land has a medium capacity to accept change. However, the site is not in the least sensitive landscape area and has been highlighted as existing green infrastructure. Due to the above, the site has been assessed as "negative" against this objective.
Obj 8	Protect, enhance and manage biodiversity and geodiversity – supporting the enhancement and connectivity of ecological green networks	The site comprises a small area of semi-improved grassland with boundary hedgerows, scrub and trees. The entire site forms part of the "Land west of Emsworth Recreation Ground" SINC, which covers this site and an area beyond it. The Council's Ecologist has confirmed that residential development would lead to the destruction of this section of the SINC. However, there is the opportunity to explore whether the SINC can be mitigated on site, or compensated elsewhere, in line with Policy E14. Having considered further evidence, the Council considers that there is a reasonable prospect of this being achievable. For this reason, the earlier assessment of a strong negative effect has been revised to a negative effect. Overall, an allocation for development is considered acceptable, with strong policy provisions included in the allocation policy and Policy E14 to ensure that the SINC is mitigated and/or compensated as well as net biodiversity gain provided.
Obj 9	Protect and conserve natural resources	The site is in the Mineral Safeguarding Area (MSA) as it is likely to be underlain by sand and gravel. The site has been assessed as "neutral" against this point as the site is smaller than the threshold for a requirement for the prior extraction of minerals, but the site opportunities and constraints highlights the possibility for incidental extraction for use on site. The GIS shapefiles downloaded from Natural England's website indicate that the site has an agricultural land classification (ALC) of Grade 3. As such, the site is likely to contain the best and most versatile (BMV) agricultural land. Despite this, any future development would not be required to provide onsite community food growing provision as development would be less than 50 dwellings. For this reason, the site has been assessed as "negative" against this objective.
Obj 10	Reduce waste generation and disposal, and promote the waste hierarchy of reduce, reuse, recycle/compost, energy recovery and disposal	The development impact of this objective is dependent on design and layout and will be influenced by relevant local plan policies as well as the Hampshire Minerals and Waste Plan.
Obj 11	Improve the efficiency of transport networks by increasing the proportion of travel by sustainable modes, by promoting policies which reduce the need to travel and provide opportunities for walking and cycling	The Havant Borough Transport Assessment (TA) demonstrates that all the development in the proposed Local Plan, if accompanied by the potential mitigation measures modelled, can be accommodated on the network without causing severe traffic impacts within Havant Borough. This

		<p>allocation, while a new policy, does not add to the numbers already assessed in 2019.</p> <p>In terms of EM8, the site is adjacent to Emsworth Recreation Ground and St James' Primary School, and is within 800m of the Belle Vue Lane bus stop and Emsworth Railway Station.</p> <p>The above could be assessed positively against this objective, however, it is recognised that the site is not within 800m of Emsworth District Centre. As such, the use of the private car would still be likely to access local shops, services and facilities.</p> <p>In recognition of the balance between proximity of public transport and the likelihood of car use, the allocation policy has been assessed as "neutral" against this objective.</p>
Obj 12	Improve air, water (ground and surface) and soil qualities through reducing pollution both diffuse and point source	<p>The PUSH Air Quality Impact Assessment indicates that air quality targets are unlikely to be exceeded from the proposed levels of growth over the plan period. However, without continued efforts to limit emissions which contribute towards poor air quality, there remains a risk that pollutant concentrations could increase. The site has been assessed as "neutral" against this point as development would be required to maintain current, and secure improvements in, air quality in accordance with Policy E23 (Air Quality). This will be primarily achieved through design of the development, through the incorporation of site-specific mitigation measures proportionate to the impact of emissions generated by that development.</p> <p>New homes in Emsworth will increase the demand for water and increase pressure on the capacity of the Thornham WwTW. The Thornham WwTW was assessed separately as part of the Chichester Water Quality Assessment (WQA). The Chichester WQA used combined housing growth predictions for both Chichester District and Havant Borough. The WQA outlines that due to the nature of the catchment solution, it is highly recommended that nitrate water efficiency measures commence as soon as possible to ensure the required levels of reduction are achieved. In addition, the assessment concludes that Thornham WwTW will require capacity upgrades by 2025 to provide increased volumetric capacity. Due to the above, a cautionary approach has been taken and the site has been assessed as "uncertain" against this point. However, there is potential to improve the site's assessment to "neutral" against this point in the future. This is because, firstly, future housing growth will not be limited providing</p>

		<p>capacity upgrades are identified and delivered in the next water company business plan. Secondly, the PUSH IWMS modelled the future growth in Havant Borough as a whole (i.e. not excluding Emsworth). As such, there could be potential for Southleigh and Emsworth to drain to Budds Farm WwTW should Thornham WwTW reach capacity.</p> <p>In addition, the Council has continued to liaise with the water companies through the production of the Infrastructure Delivery Plan (IDP). From this, requirements have been set out in Policies IN1 (Effective Provision of Infrastructure) and E20 (Drainage Infrastructure in New Development).</p>
Obj 13	Reduce poverty and social exclusion and close the gap between the most deprived areas in the borough	<p>Emsworth is one of the least deprived areas in Havant Borough; however, affordability remains an issue. Development would provide a small number of new affordable homes in proximity to a primary school, as well as Emsworth Recreation Ground and Railway Station. In addition, Emsworth District Centre is (slightly) further on, around 1km away. It is considered that development would help to reduce poverty, close the gap between the most deprived areas and contribute to social inclusion. For these reasons, the site has been assessed as having a “strong positive effect” against this objective.</p>
Obj 14	Ensure easy and equitable access to services, facilities and opportunities	<p>The Residential Density Evidence Paper sets out how “Ped-Shed” research can be used to inform the HBLP 2036. A Ped-Shed is defined as a reasonable walking distance to services and public transport facilities which, for Havant Borough, is considered to be 800m or a 10-minute walk. The walking and cycling distances for Havant Borough’s town and district centres were mapped in Section 3.7 of the Havant Borough Transport Assessment (TA). As shown in Section 3.7 the site is not within the 800m Ped-Shed of Emsworth District Centre. However, the site is adjacent to Emsworth Recreation Ground and St James’ Primary School, and is also within 800m of the Belle Vue Lane bus stop and Emsworth Railway Station. It is acknowledged that the site is not within 800m of a town, district or local centre. As such, the site has not been assessed as “positive” against this objective. Nevertheless, there is still easy and equitable access to services, facilities and opportunities within 800m of the site. This includes public transport provision to further services and opportunities. For this reason, the site has been assessed as “neutral” against this objective.</p>

**Table 10: Sustainability Appraisal of proposed new policy on Land rear of 15-27 Havant Road, Emsworth**

# Conclusion

- 4.5 The full assessment matrices for all thematic policies, key projects and development allocation are in Appendices 2 to 12 of the 2019 SA report. This Addendum report has shown necessary amendments to these assessments based on the proposed changes to the Plan, and has provided assessments for new policies proposed.
- 4.6 Overall, it is found that, with the necessary amendments, the 2019 SA report remains robust. It is also found that the amended wording to the 2019 Pre-Submission Plan, and the inclusion of three additional policies is sound in light of SA objectives.
- 4.7 It is acknowledged that the scale of proposed development will, undoubtedly, have an impact on Havant Borough. However, throughout an iterative SA process, the Council has considered measures and requirements to mitigate any potential adverse effects to ensure that new development, through this Plan, would help achieve the relevant environmental, economic and social objectives for Havant Borough. It is, therefore, considered that the Pre-Submission HBLP 2036, as amended in 2020, sets out preferred approach to sustainable development in Havant Borough.

