

BUILDING

A BETTER FUTURE

Sustainability Appraisal of the Plan Objectives and Proposed Approach (Local Plan Regulation 18)

September 2022



1. Introduction

- 1.1 The purpose of the planning system is to contribute to the achievement of sustainable development.
- 1.2 This document is the Sustainability Appraisal (SA) Report accompanying the Regulation 18 consultation on the Building a Better Future Plan, the new local plan for Havant.
- 1.3 Once in place, the new Local Plan will establish a spatial strategy for growth and change for the period to around 2040 (timeframe tbc), identify development sites and protections to deliver that strategy and establish the policies against which planning applications will be determined.
- 1.4 It is a requirement alongside the production of a Local Plan that Sustainability Appraisal is undertaken in line with the Environmental Assessment of Plans and Programmes Regulations 2004, which transpose into national law the EU Strategic Environmental Assessment (SEA) Directive. These regulations remain in force after the UK has left the European Union.
- 1.5 SA is a mechanism for considering and communicating the likely effects of a draft plan, and alternatives to that plan, with a view to avoiding or mitigating adverse effects and maximising positive ones. It is a multi-stage process, most of which is undertaken in separate appraisals of individual plans. The national guidance on strategic environmental assessment and sustainability appraisal sets out the process for local plans in a number of stages¹, as follows:

STAGE A: Setting the context and objectives, establishing the baseline and deciding on the scope

- A1- Identify other relevant policies, plans and programmes and sustainability objectives
- A2- Collect baseline information
- A3- Identify sustainability issues and problems
- A4- Develop sustainability appraisal framework
- A5- Consult the consultation bodies on the scope of the sustainability appraisal report

STAGE B: Developing and refining alternatives and assessing effects

- B1- Test the Local Plan objectives against the sustainability appraisal framework
- B2- Develop the Local Plan options including reasonable alternatives
- B3- Evaluate the likely effects of the Local Plan and alternatives
- B4- Consider ways of mitigating adverse effects and maximising beneficial effects
- B5- Propose measures to monitor the significant effects of implementing the Local Plan

STAGE C: Prepare the SA Report

STAGE D: Seek representations on the SA Report from consultation bodies and the public

STAGE E: Post adoption reporting and monitoring

- E1- Prepare and publish post-adoption statement
- E2- Monitor significant effects of implementing the Local Plan
- E3- Respond to adverse effects

¹ <http://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

1.6 This report represents stages B1 and B2 of this process. Stage A was undertaken in early 2022, and the scoping report is available alongside this report. The remaining parts of stage B will follow as the draft plan is prepared during 2023.

2. Testing the Local Plan Objectives and Proposed Approach (SA Stage B1 and B2)

2.1 This section provides an assessment of the Local Plan objectives against the objectives of the SA Framework an assessment of the Local Plan Proposed Approach against the SA Objectives.

2.2 The Scoping Report established a Sustainability Appraisal Framework, which will be used at each stage of plan preparation to assess the impact of the proposed strategy and policies, as well as alternatives to them.

2.3 The SA themes, objectives and decision making criteria are repeated below for ease of reference².

Sustainability Theme and Objective			Decision Making Criteria: <i>'Does the policy or allocation help to...'</i>	
1	The Natural Environment and Biodiversity	To protect and enhance the natural environment and support biodiversity	a	protect designated sites and protected species from development related harm?
			b	protect ecological networks?
			c	enhance ecological networks?
			d	promote or support biodiversity net gain?
			e	promote or support nutrient neutral development?
2	Climate Change	To minimise the borough's contribution to climate change and ensure resilience to the effects of climate change	a	promote sustainable construction methods?
			b	reduce carbon emissions from buildings? (NB transport covered elsewhere)
			c	reduce water use?
			d	support the switch to low carbon, renewable sources of energy?
			e	promote climate change resilience measures for buildings, infrastructure and public spaces? (NB flood risk covered elsewhere)
3	Homes for All	To provide good quality homes for all	a	provide homes for the people of Havant? (number, type, tenure, size)
			b	provide affordable homes?
			c	provide homes for those with specialist needs?
			d	provide healthy homes? (amenity, space, storage, accessibility, access to private open space)

² The full framework also includes a column of indicators and assessment criteria.

4	Healthy and Safe Communities	To promote healthy, inclusive and safe places	a	protect residents' access to natural spaces, green spaces, parks, leisure open spaces and recreational facilities?
			b	improve residents' access to natural spaces, green spaces, parks, leisure open spaces and recreational facilities?
			c	enable and support healthy lifestyles?
			d	promote inclusivity of provision and design of facilities and services?
			e	support equal and safe access to facilities and services, particularly by walking and cycling?
			f	design out crime?
			g	avoid and/or mitigate flood risk?
5	Economy and Employment	To support and enhance the local economy now and into the future	a	be flexible and adaptable to economic changes?
			b	strengthen the function of the Borough's employment areas?
			c	Support the employment prospects of the local community?
			d	support the tourism and visitor economy
			e	support the long-term viability of town centres?
			f	enhance the quality and vitality of town centres?
6	Effective Transport and Communications	To promote an efficient transport and communications network, which supports the move to a low carbon future	a	ensure shops, jobs, services and facilities are within easy reach of homes?
			b	make the use of sustainable modes of transport attractive?
			c	decarbonise the transport system (electrification, road materials etc)?
			d	avoid or mitigate adverse effects of development on highways safety?
			e	address the effects of increased demand on transport infrastructure?
			f	avoid severe residual cumulative impacts of development on the transport network?
			g	support and facilitate communications technology?
7	Natural resources	To protect natural resources from unsustainable levels and patterns of use	a	protect water bodies and systems as a valuable resource?
			b	protect and improve air quality?
			c	avoid irreversible loss of access to or overuse of natural resources (minerals, waste, soil water)?
			d	minimise all sources of pollution?

			e	support efficient management for all types of waste?
			f	Promote the use of sustainable materials and construction methods
8	Landscape, Townscape and Heritage	To protect and enhance the landscape and townscape character of the borough and protect and enhance heritage assets	a	protect and enhance valued landscape?
			b	conserve and enhance the borough's heritage assets?
			c	make best use of land?
			d	ensure appropriate density and scale of development, within the local context?
			e	strive for excellent design and the use of high-quality materials?
			f	be sensitive to the local environment and promote a sense of place?

Testing the Local Plan Objectives

2.4 The Corporate Strategy 2022-2025 provides the overall vision for the Building a Better Future Plan, which is to enhance the lives of our residents, businesses and visitors. This strategy is to be achieved through six themes which will deliver the Council's priorities. These in turn have informed the Objectives for the Local Plan, which are shown below. They are also presented in the Regulation 2018 consultation material for comment.

Council Priorities		Local Plan Objectives	
1	An environmentally aware and cleaner borough	a	Minimising the climate impact from and on new development including by reducing energy demand through the sustainable location, design and construction of new development
		b	Focussing transport improvements on walking, cycling and public transport rather than the private car and providing easy connections for walking and cycling between people and places.
		c	Moving from protecting our natural environment to pursuing a net gain in biodiversity in line with the new Environment Act.
		d	Minimising the impact of development on all types of natural resources.
2	A safe environment, healthier and more active residents	a	Secure high quality development design and layouts that support the wellbeing of all residents, encourage active lifestyles and foster a sense of place and community.
		b	Provide safe, easy access to recreation and leisure facilities, children's play areas and outdoor spaces to support physical and mental health and boost wellbeing.

		c	Make choices about development locations and protection schemes that avoid or minimise the risk of flooding.
3	A thriving local economy	a	Secure business and employment growth in the Borough by identifying appropriate and sufficient employment land which will attract businesses and create new jobs, particularly in the advanced manufacturing and engineering sectors.
		b	Facilitate delivery of the Freeport Tax site at Dunsbury Park including a new skills and innovation centre for Leigh Park.
		c	Protect and enhance the Borough's key existing employment areas.
4	A revitalised borough with infrastructure that meets our ambitions	a	Ensure that infrastructure delivery is fully considered, and provided alongside new development to deliver safe, healthy and vibrant communities.
		b	Ensure that opportunities for active travel are incorporated into new developments, integrating them into the Borough's existing communities.
		c	Provide a sustainable and vibrant future for the town centres and Hayling seafront, whilst improving residents' quality of life and protecting the Borough's environmental assets and coast.
5	A responsive and commercial council	a	Take an active role in the development opportunities to deliver regeneration in our town centres and at Hayling Island seafront, setting out where the Council will use tools such as development agreements and compulsory purchase to focus on the delivery of the most sustainable development sites in the Borough.
6	A quality home for all.	a	Address the need for housing as a basic human right, helping future generations to have the access to an affordable high quality home as has been the case in the past. This will need to be done in a sustainable manner recognising the environmental constraints that exist in Havant Borough, though acknowledging that with a limited number of sites available for development, robust solutions to overcoming site constraints will have to be found.
		b	Maximise development within the urban area, though acknowledging that extensive greenfield development will also be needed to address the need for housing.
		c	Provide a choice of housing which meets the varied needs of residents, including the specific needs of different groups in the community.

2.5 The first stage of the sustainability appraisal of a local plan is testing the objectives. The matrix below shows the results of the testing of the proposed plan objectives for their compatibility with the sustainability objectives.

2.6 It shows a high degree of compatibility, including many cases, where the objectives are fully aligned. This is perhaps unsurprising, as the role of the SA is to support sustainable outcomes from the local plan, and the role of the local plan is to promote sustainable development. Therefore, there is a high degree of overlap between the

objectives of the SA framework and the objectives of the plan, which is reflected in assessment of compatibility.

- 2.7 Nevertheless, there are some areas of potential conflict. These potential conflicts largely reflect the fact that the nature of planning is to deal with competing interests in the use of land. The vast majority of the potential conflicts identified relate to this. Two very clear groups of potential conflict are apparent:
- 2.8 Firstly a number of potential conflicts are noted where objectives relate to housing delivery. The high need for housing and the objective to meet this need have the potential to conflict with objectives relating to other potential uses for the same land, such as green spaces, biodiversity or employment. Using land or resources to meet one of these needs reduces the ability to meet another. Similarly, development can also conflict with objectives relating to avoiding flood risk, protecting landscape, townscape and heritage. Development in itself also brings with it an intensive use of natural resources, both during construction and afterwards during human habitation.
- 2.9 It is the role of the planning system and the local plan to balance all of these conflicts. They are not insurmountable. While some impacts from development on all the objectives noted here is likely (and vice versa where development has to be restricted to meet other objectives), the local plan can be used as a tool to actively manage and minimise these conflicts. Policy writers, both of site allocations and thematic policies will use the results of this phase of the SA to ensure that the flagged potential conflicts are addressed through relevant policies which set what development must do to prevent, minimise or mitigate these impacts. The local plan objectives in themselves have also begun to note the need for sensitive management eg Objective 6a seeks to meet housing need, but also flags environmental constraints.
- 2.10 Secondly, conflicts between the objective of protecting the natural environment and increasing biodiversity, and the objectives relating to human access to green spaces are noted. Similarly to managing the potential effects of development, these two conflicting objectives can and will be managed through the local plan, by including protective policies for the most sensitive natural habitats while improving human access to less sensitive spaces, and seeking designs for new open spaces which can accommodate both humans and wildlife.
- 2.11 A third group where potential conflicts arise at this high level of assessing the objectives. The flood risk management objective includes the potential for engineering solutions such as sea defences, which have the potential to conflict with objectives relating to landscape and sense of place in the Borough's coastal areas. Similarly, objectives relating to more intensive use of land eg high densities could also conflict with objectives relating to sense of place and the local built environment. The objective to design out crime and the objective to promote good pedestrian and cycle links could conflict if poorly designed. It is considered that detailed design can minimise or remove the conflict. Policy writers on these topics will have to ensure the potential conflict is addressed and wherever possible removed, in writing the requirements.

Testing the Proposed Approach

2.12 As well as the Vision and Objectives, the Regulation 18 consultation documents sets out the proposed approach and policies for the Local Plan. This section of the SA report uses the SA framework to test the approach and alternatives to it and notes the likely effects, using the following symbols and colours.

Appraisal symbol	Assigned where...
++	<p>Strong Positive</p> <ul style="list-style-type: none"> notable sustainability gains are expected to arise from the policy or development of the site; and/or the policy strongly supports the sustainability objective; and/or
+	<p>Positive</p> <ul style="list-style-type: none"> some sustainability gains are expected to arise from the policy or development of the site; and/or the policy supports the sustainability objective; and/or
+/-	<p>Neutral</p> <ul style="list-style-type: none"> no or minimal effects against the sustainability objective are anticipated from the policy or development of the site; and/or the policy neither works against nor supports the sustainability objective; and/or if negative effects could arise from the policy, the policy also requires mitigation; and/or the policy might have both minor positive or negative effects, but on balance is neutral
?	<p>Uncertain or Unknown</p> <ul style="list-style-type: none"> effects are uncertain or unknown (at the time of the assessment)
-	<p>Negative</p> <ul style="list-style-type: none"> some sustainability losses are expected to arise from the policy or development of the site; and/or the policy works against this sustainability objective
--	<p>Strong Negative</p> <ul style="list-style-type: none"> notable sustainability losses are expected to arise from the policy or development of the site; and/or the policy works strongly against the sustainability objective

2.13 The assessment may help consultees on the regulation 18 plan understand why the Council intends to pursue a particular approach. The anticipated positive effects of doing so are show, while acknowledging any possible downsides.

2.14 Alongside the proposed approach, alternatives to that approach are presented. In each case that includes the alternative of not having an approach or a policy on a particular topic in the local plan. In some cases, additional alternatives are presented.

2.15 Some alternatives are presented, but not evaluated. This is the case where it is considered that it would not be realistic or reasonable to pursue that alternative, or where there is not yet sufficient detail to assess. These tables are coloured fully in pink, and reasons are given for why no assessment is presented.

2.16 In the following tables, headings and numbers running from left to right across the table refer to the SA objectives (see paragraph 2.3).
The policy theme being considered is shown in the heading.

Housing																																													
proposed approach	<p>The proposed approach is for the plan to seek to address the Borough’s housing need of 516 homes a year, identifying all possible available land that could contribute towards Havant’s objectively assessed need, including both brownfield and greenfield land, on sites of varying sizes across the borough, in town centres and a strategic site. Cooperation with neighbouring authorities on unmet need. Policies will set out the overall requirement (requirement per year starting off lower and then stepping up once larger, more complex sites are brought forward) and a suite of housing allocations identifying suitable sites.</p>																																												
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	Biodiversity					Climate Change					Homes for All				Healthy Communities					Economy				Transport				Natural Resources				Landscape & Heritage													
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<p>The proposed approach supports the sustainability objective of providing homes for all, but doing so could bring with it negative effects against the environmental, natural resources, landscape/townscape and heritage objectives, as well as affecting transport networks and some elements that make for healthy and safe communities. Against the economy objective, both negative and positive effects are noted – land for homes competes with land for employment used, but the local economy will only do well if sufficient homes are provided to meet local need. Homes in town centres can help improve their vitality and viability.</p>																																													
alternative:	<p>no specific local approach or policy / reliance on national policy</p>																																												
	<p>Government requires all Local Planning Authorities to address the area’s need for housing based on the standard method. It is not considered a realistic alternative to exclude from the plan a consideration of how much development is required for the plan period.</p>																																												

Economy & Employment

proposed approach	The plan will consider the overall need for employment land over the plan period, on new and existing employment sites, and whether any employment sites are no longer needed and should be released proactively to other uses such as homes. The approach will also support the Solent Freeport as an opportunity to create jobs and investment for the local area, in particular, an innovation, educational and skills centre to support skills and employment opportunities for Leigh Park. Policies will confirm the employment land requirement for the plan period; protect existing employment sites, setting out criteria for future releases to other uses, including housing and make new allocations if needed																																												
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The approach primarily deals with setting out the overall need for employment land. This is expected to be accommodated in existing employment areas or previously developed land, so effects on sustainability objectives other than that supporting and enhancing the local economy are expected to be minimal. In relation to the objective of providing homes, both positive and negative effects are expected from the approach (therefore showing as neutral), which will consider release of some sites to other uses, while protected others from loss.																																													
alternative	no specific local approach or policy / reliance on national policy																																												
	National policy expects local plans make sufficient provision to meet that area's need for employment land. It is not considered a realistic alternative to exclude from the plan a consideration of how much development is required for the plan period.																																												
alternative	not protecting employment land																																												
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A lack of employment land protection would likely lead to loss of a number of sites to housing. National policy expects local plans make sufficient provision to meet the area's need for all uses. It would not appropriate to pursue a strategy which favoured uncontrolled release of all employment land to other uses.																																													

Land and Densities

proposed approach	<p>The fact that there is a high need for housing and a limited number of brownfield and greenfield sites in the borough will be partly managed through higher density development. In areas that are close to public transport, shops and services, there is a particularly good opportunity to provide even higher density development. Policies will set out expected minimum densities, while allowing for specific circumstances of a site. Brownfield development will be a priority.</p>																																														
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<p>Setting appropriate minimum densities for new development is noted to have largely neutral or positive effects. It is particularly positive in supporting meeting housing need and has transport benefits. The approach will support the town centres and help to protect more sensitive ecological and landscape areas from development. At the same time, there is the potential that higher densities make it more difficult to achieve the aim of healthy homes with good amenity, and a decent amount of indoor and outdoor space. This will need to be controlled by policy provisions on those matters, to work in tandem with density requirements. While the approach directly addresses aims of making best use of land, it is uncertain what the effects will be on the sense of place, as undoubtedly the build form in the borough will change as a result of this proposed approach. It is also uncertain, whether density requirements and biodiversity net gain requirements will be able to work successfully together - biodiversity net gain is a new concept in planning and will need to be explored on a variety of schemes before conclusions can be drawn.</p>																																															
alternative	<p>no specific local approach or policy / reliance on national policy</p>																																														
	<p>The NPPF expects Local Plans to set density standards, particularly for town centres, in order to optimise the use of land and meet as much housing need as possible. Not including the policy is therefore not considered to be a realistic alternative.</p>																																														
alternative	<p>Setting lower densities in the proposed policy</p>																																														
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<p>The policy itself and the density requirements within it will be assessed fully during policy drafting. Nevertheless, based on current evidence and the proposed approach and density levels, it is considered that setting lower densities would not achieve the sustainability objectives expected by the NPPF of making best use of land and would undermine the ability of the plan to meet housing need. The more spread out housing is, the more likely it</p>																																															

		also is to impact on land that is ecologically sensitive. Lower densities than appropriate to the local area could also have negative effects on sense of place.																																												
		Setting higher densities in the proposed policy																																												
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		The policy itself and the density requirements within it will be assessed fully during policy drafting. Nevertheless, based on current evidence and the proposed approach and density levels, it is considered that setting higher densities could have negative effects of sense of place by resulting in development that is inappropriate to the local area.																																												

Retail & Town Centres

proposed approach	<p>The Building a Better Future Plan will set out a hierarchy of centres: The town centres of Havant and Waterlooville, the district centres of Cowplain, Leigh Park, Mengham and Emsworth, and a network of local centres across the borough. Finally it will acknowledge and support the role of small scale shops outside of centres. The plan will be flexible about the types of uses it supports in town centres, in acknowledgement of the fact that their role is no longer focussed on retail, but is as much about services, entertainment and places to live. Residential will be an essential part of the mix. The design and concentration of food, drink and entertainment uses will be controlled to protect residential amenity and health.</p>																																												
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<p>No negative effects are expected from the proposed approach to town centres, while a number of positives are expected in relation to the objectives of providing homes for all (including in town centres), supporting the economy (which town centres form a major part of) and reducing the need to travel. The quality of local town centres contributes to the sense of place and pride people feel in their area. Controlling potentially harmful uses supports the health of the community and the amenity of residents and reduces the potential for pollution and antisocial behaviour.</p>																																													
alternative	<p>no specific local approach or policy / reliance on national policy</p>																																												
<p>The Council considers that accessible, attractive and vibrant centres are critical to the achievement of sustainable development. The NPPF expects Local Plans to define a network of centres, set out primary shopping areas, and define the range of uses acceptable in those locations. It is not considered to be a reasonable alternative for the Local Plan not to include an approach to its town centres.</p>																																													
alternative	<p>Omit explicit support for small scale shops and services outside of town centres</p>																																												
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<p>The proposed approach is to support small scale shops and services even outside of defined town centres, through policies which on the one hand seek to protect such uses, and supports new very small scale provision outside of town centres. Without a policy to protect community facilities and shops it is likely more such facilities would be lost. Not supporting small scale provision across the borough by the same token could have adverse effects on the economy and employment, community wellbeing and access to services and social inclusion. At the same time, it is not considered that these elements would have notable negative effects on economic objectives. It is concluded that including these provisions would have greater positive sustainability effects than omitting them from the plan.</p>																																													

Flood Risk

proposed approach	The development strategy and development management policies will seek to manage flood risk from all sources. The Council will take into account flood risk and coastal change now and in the future when deciding which sites to allocate for development through the Building a Better Future Plan, and will avoid inappropriate development in areas at risk of flooding and coastal change. The Plan will actively support investment in coastal defence, drainage and wastewater infrastructure. Development Management policies will support applications for development which avoid areas at risk of flooding and coastal change now and in the future. Policies will set out what is expected of developers in terms of addressing any flood risk and drainage issues on their site and demonstrating that development is safe for its lifetime without increasing flood risk elsewhere.																																																		
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The proposed approach clearly aligns with the sustainability objective of avoiding and/or mitigating flood risk. Flood risk avoidance is likely to be neutral in terms of biodiversity, but management and mitigation could potentially have impacts on particular habitats and species (eg hard sea walls can create coastal squeeze, but equally inland habits could benefit from protection), so an uncertain effect has been recorded. Likely positive effects arise from protection of transport and other infrastructure. Requiring avoidance of areas at risk of flooding has the potential to limit the supply of homes, but on the other hand will ensure that homes are safe, producing a neutral effect overall.																																																			
alternative	no specific local approach or policy / reliance on national policy																																																		
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While there is significant national policy and guidance on development and flood risk and negative effects from not having a local policy would therefore be limited to a degree, flood risk is a key consideration in Havant, being a coastal authority with multiple watercourses, as well as known drainage issues. It is therefore considered that it has sustainability benefits to include policies on this topic in the local plan. In the absence of such a local approach it would be difficult to clarify the application of national guidance at the local level, resulting in potentially negative outcomes in relation to flood risk. It is concluded that including a local approach would have greater positive sustainability effects than omitting it from the plan.																																																			
alternative	An approach that takes a more lenient approach in relation to flood risk																																																		
It is not considered that this would be a reasonable alternative, both in terms of alignment with national policy and in terms of local outcomes.																																																			

		Climate Change																																					
proposed approach	Development will be expected to make a substantive contribution to addressing climate change through policies requiring low carbon design and sustainable construction; EV charging; sustainable drainage and waste management and policies protecting existing green spaces and trees, as well as requiring trees and open spaces in new development.																																						
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Unsurprisingly, the proposed approach of including policies which are designed to manage and mitigate climate change performs well against objectives relating to climate change, healthy communities, biodiversity and natural resources. The EV charging element will help with the part of the transport objective which is concerned with decarbonisation of the transport system. However, there are some uncertainties around the effects of requiring sustainable design and construction on sense of place, as it will no doubt lead to changes in the way buildings look from what has been traditional in the area. The historic environment is of particular concern in this regard, and policies will need to build in flexibility to manage any potential conflicts.																																							
alternative	no specific local approach or policy / reliance on national policy																																						
	The NPPF is clear that Local Plans should include policies to address climate change mitigation and adaptation. It is not considered to be a reasonable alternative to exclude such a policy.																																						
alternative	There will be alternatives to the content of the policy/ies as they are developed - for example around the required levels of energy or water efficiency, or the number of EV charging points.																																						
	Alternatives will be examined further as policies are drawn up.																																						

Local Nature Designations

Local Nature Designations																																																																																															
proposed approach	<p>The proposed approach will be to protect, conserve and enhance the Borough’s local nature designations, and to ensure that development avoids fragmentation of the local ecological network. A policy will set out under what circumstances development affecting local sites such as SINCs would be acceptable, and the benefit of development must clearly outweigh the conservation value of the site. Avoidance and mitigation plans will be required. The Council will aim to ensure connectivity across boundaries by working with neighbouring local authorities to ensure the ecological network within the Borough connects with ecological sites outside of the Borough as best as possible.</p>																																																																																														
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<p>The proposed approach performs well against the biodiversity objective. Similarly, positive effects are noted against natural resources, as biodiversity measures often simultaneously protect natural resources, such as land, water and air. The natural areas of the Borough, and particularly the coastal and near coastal landscapes contribute much to the sense of place. By contrast, limitations may arise for human use of certain natural spaces, in particular on or near the coast, which could have negative effects against the healthy communities and the economy (tourism) objectives. It is also likely that implementation of the approach limits the developability of some sites, so could be seen to have a negative effect on housing delivery and healthy communities.</p>																																																																																															
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<p>Local designations do not enjoy the same level of legal protection as national and internationally designated sites and species. As such, not having a local policy approach is likely to lead to significantly poorer outcomes in relation to biodiversity, natural resources and sense of place. Potential negative effects identified in the proposed approach, however, would be removed.</p>																																																																																															
The local approach could be to seek to protect all locally designated sites, without exception.																																																																																															
alternative																																																																																															
<p>There is no strong legal framework to protect local sites to this degree, and it is therefore considered improbable that such an approach would be found sound at examination, and therefore is not considered to be a reasonable alternative</p>																																																																																															

Affordable Housing

		A percentage of the dwellings on sites of 10 units and above will be required to be affordable (as defined by the NPPF) homes, subject to viability. The exact level and split will be determined by further evidence on current need, including consideration of whether and how 'First Homes' may help meet these needs compared to other affordable ownership products.																																													
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		This policy approach will help add to the supply of affordable homes in the borough. While affordable housing requirements are often seen as potentially negative for other objectives due to competition on developers' resources, the approach recognises that the policy is subject to viability, which will be tested at a plan level. Therefore, the approach is considered to be neutral against other objectives.																																													
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		requiring a percentage of affordable housing is one on the main tools in which affordable housing is delivered. Not including such a policy requirement in the Local Plan would have a negative effect on the objective of providing affordable homes.																																													
		Setting a requirement for all housing schemes to provide affordable homes																																													
alternative																																															
		This is not considered to be a reasonable alternative, as there is national policy restricting the ability of councils to require affordable housing on schemes of fewer than 10 units.																																													

Housing Design Standards and Specialist Accommodation																																			
proposed approach	As well as meeting the need for the number of new homes, the plan must ensure that they meet the needs for different types, including any specialist needs such as accommodation for the elderly and self and custom builds. New evidence will determine the mix of types and sizes that will be expected on development sites. It is vital for health and wellbeing that homes are good quality and meet the needs of future occupiers. The Council will be guided by the evidence and consultation feedback as to whether new standards should be introduced. These could cover some or all of: minimum internal space standards, provision of gardens and balconies, accessibility and adaptability standards and wheelchair accessibility standards.																																		
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This policy approach will support the supply of specialist homes in the borough, and if standards are included, will help provide healthy homes. The approach is considered to be neutral against other objectives.																																			
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There are potential negative effects against the supply of specialist homes, and the standards of all homes, if these policies are not included, as market forces will determine the nature of development based on profitability.																																			
alternative	There will be alternatives to the content of the policy/ies as they are developed - for example around the required the level of accessibility standards and minimum size requirements for dwellings and outdoor space																																		
	Alternatives will be examined further as policies are drawn up.																																		

		Restrict loss of agricultural land																																																			
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Infrastructure

Infrastructure																																																																																												
proposed approach	<p>Timely provision of infrastructure to support the level of development proposed is necessary to make sure that the quality of life of existing communities is maintained, and that development does not have a detrimental impact upon amenity, safety or the environment. The plan and supporting evidence will set out the infrastructure requirements across the borough and to support individual development sites, including what will be expected from developers. Land will be safeguarded for key projects if required.</p>																																																																																											
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<p>Improving infrastructure in line with development can have a number of positive effects, in particular in relation to the economy, transport and ensuring communities have the facilities in place to support are healthy lives and lifestyles. The exact effects will depend on the nature of the development and the nature of the infrastructure required, so cannot be elaborated on at this stage. NB land may be safeguarded for ecological 'infrastructure', but this has been reflected in the assessment under the biodiversity and natural environment topics above.</p>																																																																																												
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<p>The NPPF emphasises the role of local plans in considering and planning for infrastructure. Not making local commitments to working with infrastructure providers and developers to deliver infrastructure to support the development in the plan would not necessarily mean these things would not be delivered, but equally, the positive effects that can be expected from pursuing a more active approach would not materialise.</p>																																																																																												

Transport & Communications

proposed approach	<p>The Local Plan will reflect the emerging Local Transport Plan and the Environment and Climate Change Strategies. The development strategy will seek to focus development in locations that give residents of new development good access to shops, services and facilities. It will also support higher densities in development to improve the viability of public transport. Developers will be expected to design their developments in a way that encourages people to get around on foot or bicycle for short journeys. However, access to the strategic network of the A27 and the A3(M) by car remains important for longer trips, and where necessary, mitigation measures will be built into the infrastructure requirements set out in the plan. The plan will also support infrastructure which supports a shift to low carbon transport, such as electric vehicle charging points.</p>																																														
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<p>The proposed approach to transport, and the location and nature of development for ease of access to services brings with it a number of sustainability benefits. This is not only in relation to transport objectives themselves, but also in making communities healthier and more coherent, supporting the economy, reducing pollution and saving resources. One uncertain effect is noted, which is on designing out crime, as it is sometimes considered that cycle and pedestrian connectivity can also create easy escape routes for criminals. Design of such routes will have to be very carefully considered to avoid negative effects.</p>																																															
alternative	<p>no specific local approach or policy / reliance on national policy</p>																																														
	<p>Transport is one of the key matters that concerns local people, and a place cannot function without a working transport network. It is therefore not considered a reasonable alternative not to set out how the Local Plan will consider and plan for the effects of development on the transport network.</p>																																														
alternative	<p>Greater emphasis on improving conditions for car travel</p>																																														
	1					2					3				4					5					6					7					8												
	Biodiversity					Climate Change					Homes for All				Healthy Communities					Economy					Transport					Natural Resources					Sense of Place												
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<p>The proposed approach places a much greater emphasis than previously on active and sustainable travel modes. The alternative would be to continue to plan for increased capacity for drivers. While positive effects would be achieved in relation to transport and the economy, many of the additional positive effects achievable through the proposed approach would be lost, and indeed worked against (healthy and cohesive communities, natural resources)</p>																																															

Green Infrastructure

proposed approach	The Local Plan will resist the loss of existing open space in the Borough. A policy will set out the exceptional circumstances where a loss would be supported. Policies will also require open space in all new developments. It is suggested that this should include specific standards for play and community food growing.																																												
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	Biodiversity					Climate Change					Homes for All				Healthy Communities						Economy					Transport						Natural Resources					Sense of Place								
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Protecting existing open spaces and requiring new ones alongside new development has positive effects on biodiversity, community health, natural resources and a sense of place, as well as helping with climate change adaptation.																																													
alternative	no specific local approach or policy / reliance on national policy																																												
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	Biodiversity					Climate Change					Homes for All				Healthy Communities						Economy					Transport						Natural Resources					Sense of Place								
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Not including a policy to protect open space would leave such places vulnerable to development. This would have detrimental sustainability impacts against the objectives relating to healthy communities, but also wouldn't achieve secondary positive impact a local protection and provision policy would have on biodiversity, natural resources and the local environment / sense of place.																																													
alternative	There will be alternatives to the content of the policy/ies as they are developed - for example around the required level and nature of open space in new development, or the criteria which would allow exceptional loss of existing spaces																																												
Alternatives will be examined further as policies are drawn up.																																													

Sports and Recreation

In line with the NPPF and Sport England’s Playing Fields Policy and Guidance Document the Council will resist development that results in the loss (part or whole), or reduction in accessibility, of facilities and/or land used for sports and recreation due to the important role they play in improving the physical and mental health and wellbeing of communities.																																														
proposed approach	1		2			3		4				5			6				7			8																								
	Biodiversity		Climate Change			Homes for All		Healthy Communities				Economy			Transport				Natural Resources			Sense of Place																								
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<p>The approach is designed to promote mental and physical health and wellbeing and has positive effects on the objective of promoting healthy communities and places. There is an expectation at the national level that this matter should be addressed through the planning system. It is unlikely that this approach will have notable effects on other sustainability objectives.</p>																																														
no specific local approach or policy / reliance on national policy																																														
alternative	1		2			3		4				5			6				7			8																								
	Biodiversity		Climate Change			Homes for All		Healthy Communities				Economy			Transport				Natural Resources			Sense of Place																								
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<p>Not including a policy to protect sport and recreation facilities would leave such places vulnerable to development. This would have detrimental sustainability impacts against the objectives relating to healthy communities.</p>																																														

High Quality Design

		<p>The Local Plan will set out design expectations for development, covering not only the proposed buildings themselves, but also their context and surroundings; Good design is not only about visual appeal, but also about amenity, ease of getting around, crime prevention, and environmental considerations, and the policies in the plan will reflect this. Site allocation policies will highlight any particular features on a site or its context which should be taken into consideration in design strategies. The Council will also consider developing a Local Design Code (depending on progress and detail of the Levelling Up and Regeneration Bill).</p>																																												
proposed approach		1					2					3				4					5					6					7					8										
		Biodiversity					Climate Change					Homes for All				Healthy Communities					Economy					Transport					Natural Resources					Sense of Place										
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		<p>As well as the obvious gains in relation to townscape / sense of place, the proposed approach has the potential to have positive effects on all the sustainability objectives, and has been assessed as such. However, in order for these positive effects to be achieved, the policy or policies on design will have to include provisions for design elements that address each of these themes. As just one example, design elements such as small scale biodiversity measures (bee bricks, bat boxes etc) could be considered so that design makes a contribution to biodiversity. Overall, it is expected that this policy approach has the potential to make a lot of positive contribution to sustainable development.</p>																																												
alternative	<p>no specific local approach or policy / reliance on national policy</p>																																													
		<p>As shown in the assessment of the proposed approach, good quality design has positive impacts on many sustainability objectives. The NPPF places significant emphasis on good design, so would provide a reasonable framework for promoting and negotiating good design in new development. Therefore some positive effects could still be achieved. However, the NPPF expects local design policies to be put in place, and a wider national direction in planning (for example through the Levelling Up and Regeneration Bill) sees an increased emphasis on local design policy. As such, it is not considered a reasonable alternative not to have a local approach to this matter.</p>																																												

Heritage and Historic Environment

proposed approach	<p>The Local Plan will seek to protect, conserve and enhance its heritage assets and their setting, both through criteria-based policies and through its development allocation selection. Development in these sensitive areas will be limited and where it does take place would have to be to the highest quality, retaining as much of the heritage as possible. Any proposal which would affect, or has the potential to affect, a heritage asset will be required to provide a Heritage Statement in order for all potential harm caused as a result to be assessed. Conservation character appraisals and management plans will continue to be updated where appropriate in order to ensure the conservation areas.</p>																																																				
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<p>The approach is narrowly focussed on heritage and as such as strong positive effects on the objective to conserve and enhance the borough's heritage assets, with expected wider benefits to landscape, townscape and sense of place. However, given the sensitivity of historic assets, the approach has the potential to hinder the achievement of other objectives of providing sufficient homes, making best use of land and using more modern sustainable construction methods.</p>																																																					
alternative	<p>no specific local approach or policy / reliance on national policy</p>																																																				
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	Biodiversity					Climate Change					Homes for All				Healthy Communities					Economy					Transport					Natural Resources					Sense of Place																		
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<p>Since there is a strong national legal framework for heritage protection, the outcomes on the environment are likely to be similar, even without a local approach. However, highlighting heritage matters in local policy, alongside local proactive measures is likely overall to achieve better outcomes.</p>																																																					

		Pollution																																																		
proposed approach	Policies will seek to protect existing and future occupiers from projected levels of noise, odour, vibration, light, water and air pollution. Developers will be expected to submit sufficient information to establish whether a significant negative effect is likely to result from development in isolation and in combination with other development. If it is, a mitigation strategy will be needed.																																																			
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	Biodiversity					Climate Change					Homes for All				Healthy Communities					Economy				Transport					Natural Resources				Sense of Place																			
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The approach is specifically concerned with pollution from all sources and residential amenity, so performs well against the objectives of quality homes for all and the protection of natural resources from pollution, as well as creating quality environments more generally. However, pollution control could limit certain activities and therefore could have negative effects on parts of the economy (although equally it should be noted that regimes other than planning regulate such activities – see also the no policy option below).																																																				
alternative	no specific local approach or policy / reliance on national policy																																																			
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	Biodiversity					Climate Change					Homes for All				Healthy Communities					Economy				Transport					Natural Resources				Sense of Place																			
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Since there is a strong national legal framework for pollution protection, the outcomes on the environment are likely to be similar, even without a specific local approach. However, highlighting pollution and amenity matters in local policy, is likely to target any required interventions more effectively at the local level, and make the requirements and limitations clear before applicants enter the process.																																																				
alternative	Control the design and concentration of food, drink and entertainment uses																																																			
	Please see Retail and Town Centres assessment																																																			

3. Consultation and Next Steps

- 3.1 Havant Borough Council is undertaking a 'Regulation 18' consultation on its proposed approach to its Local Plan from 3 October to 14 November 2022.
- 3.2 This SA report and the SA Scoping Report that preceded this report are being made available as part of that consultation. The contents of this report can be used as a tool to help consultees understand why a particular course of action is being proposed. Consultees are invited to comment on the plan, the SA report or both.
- 3.3 Details of the consultation, and how to respond can be found at <https://www.havant.gov.uk/local-plan>
- 3.4 Following the consultation, the Borough Council will consider all the responses received. These, together with a new and updated evidence base, will influence the content of the draft (Regulation 19) Local Plan. As well as the topics presented in the Reg 18 report and assessed through this SA, the draft plan will identify the sites and areas which the Council proposed to allocate for development or protect from development.
- 3.5 When the draft plan is published, it will be accompanied by a full SA report, in fulfilment of the remained of stage B and Stage C of Sustainability Appraisal (see section 1.5). That SA report will again will be subject to consultation.

