

# Sustainability Appraisal (SA) of the emerging East Hampshire Local Plan

Interim SA Report  
Non-Technical Summary

December 2018

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# Introduction

AECOM is commissioned to lead on Sustainability Appraisal (SA) in support of the emerging East Hampshire Local Plan.

Once in place, the Local Plan will establish a spatial strategy for growth and change for the period to 2036, allocate sites to deliver the strategy and establish the policies against which planning applications will be determined. The plan is for that part of East Hampshire that falls outside of the South Downs National Park. The figure below shows the plan area.

SA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, in respect of sustainability issues and objectives, with a view to avoiding and mitigating negative effects, and maximising the positives.

Central to the SA process is preparation of an SA Report for publication alongside the Draft Plan. At the current time, an early draft version of the plan is published for consultation, with an 'Interim' SA Report published alongside.

This report is the Non-technical Summary (NTS) of the Interim SA Report.

## The plan area



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## Structure of the Interim SA Report / this NTS

SA reporting essentially involves answering the following questions in turn:

1) What has plan-making / SA involved **up to this point**?

- including in relation to 'reasonable alternatives'.

2) What are the SA findings **at this stage**?

- i.e. in relation to the draft plan.

3) What happens **next**?

Each of these questions is answered in turn below. Firstly though there is a need to set the scene further by answering the question 'What's the scope of the SA?'

### What's the scope of the SA?

The scope of the SA is reflected in a list of topics and objectives. Taken together, this list indicates the parameters of SA, providing a methodological 'framework' for assessment.

#### The SA framework

Topic	SA objectives
Biodiversity	<ul style="list-style-type: none"> <li>• Protect and enhance local, national and international nature conservation interests</li> <li>• Increase habitat connectivity and support improvements in biodiversity</li> <li>• Contribute towards the maintenance and enhancement of green infrastructure</li> </ul>
Climate change adaptation	<ul style="list-style-type: none"> <li>• Respect the potential impacts of climate change in the location, design and layout of new development</li> <li>• Avoid or reduce the risk of flooding for the District's population</li> </ul>
Climate change mitigation	<ul style="list-style-type: none"> <li>• Support reductions in greenhouse gas emissions, including through the use of sustainable forms of transport, particularly in rural areas</li> <li>• Reduce the need to travel by car and shorten the length and duration of journeys</li> </ul>
Community and wellbeing	<ul style="list-style-type: none"> <li>• Help to meet the changing needs of an ageing and growing population</li> <li>• Support improvements to the health and well-being of the population</li> <li>• Improve accessibility to facilities and services, and to green infrastructure, particularly in rural areas</li> </ul>
Economy and employment	<ul style="list-style-type: none"> <li>• Improve accessibility to local employment and training opportunities especially in higher value-added activities<sup>1</sup></li> <li>• Ensure a range of good quality employment sites are available to suit the needs of the District's businesses</li> </ul>
Heritage	<ul style="list-style-type: none"> <li>• Protect and enhance the significance and special interest of heritage assets and cultural heritage of East Hampshire and their contribution to local character.</li> <li>• Promote understanding, appreciation and care of, and access to, heritage assets.</li> </ul>
Housing	<ul style="list-style-type: none"> <li>• Ensure residents have the opportunity to live in homes that meet their needs, including for affordable housing</li> </ul>
Landscape and townscape	<ul style="list-style-type: none"> <li>• Maintain and enhance the character of the District's rural landscapes and its settlements</li> </ul>
Resources	<ul style="list-style-type: none"> <li>• Support an efficient and sustainable use of the District's resources</li> </ul>
Water	<ul style="list-style-type: none"> <li>• Support sustainable water management and water quality enhancements in East Hampshire</li> </ul>

<sup>1</sup> Such commercial activities include those associated with digital media, business services and the creative industries sectors, according to the Enterprise M3 LEP's Strategic Economic Plan (2018)

# Plan-making / SA up to this point

An important element of the required SA process involves assessing ‘reasonable alternatives’ in time to inform development of the draft proposals, and then publishing information on reasonable alternatives for consultation alongside the draft proposals.

As such, Part 1 of the Interim SA Report explains how work was undertaken to develop and appraise a ‘reasonable’ range of alternative approaches to the allocation of land for development, or ‘spatial strategy alternatives’.

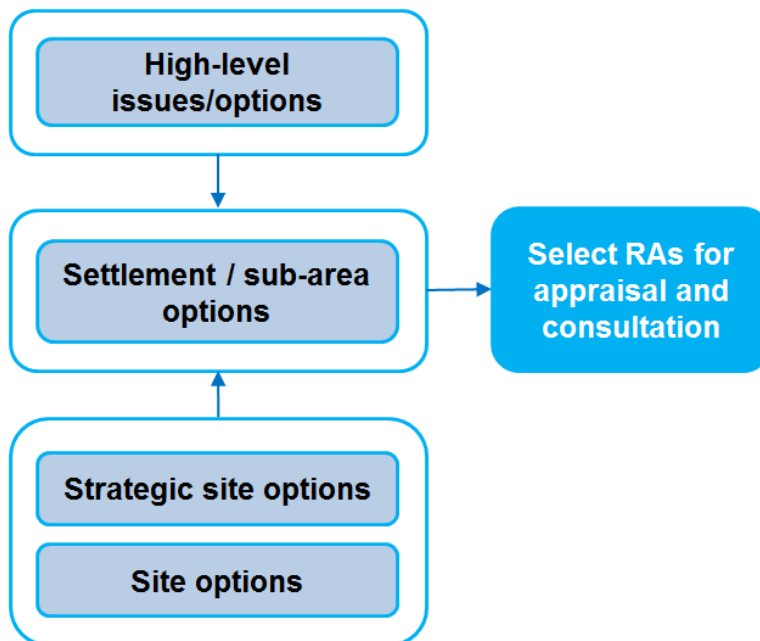
Specifically, Part 1 of the report –

- 1) Explains the process of **establishing** the reasonable alternatives
- 2) Presents the outcomes of **appraising** the reasonable alternatives
- 3) Explains reasons for **establishing** the preferred option, in light of the appraisal

## Establishing reasonable alternatives

The main report explains how reasonable alternatives were established subsequent to a step-wise process, which is summarised in the figure below. The first step was to consider high-level issues/options (‘top down’ factors) and the site options in contention for allocation (‘bottom-up’ factors); the second step was then to consider options for settlements / sub-areas in isolation; and then finally, in light of these steps, it was possible to establish a single set of district-wide reasonable spatial strategy alternatives.

### Establishing reasonable alternatives



Ultimately four reasonable spatial strategy alternatives were established, which are presented in summary within the table below and across the subsequent maps. Each option would involve allocating sufficient sites to meet the District’s housing requirement (550 dwellings per annum, dpa) as well as established needs for other land uses.

### The reasonable spatial strategy alternatives

	Option 1	Option 2	Option 3	Option 4	
	High growth in the A31 Corridor	High growth in the North East	High growth in the Southern Parishes	High growth in the A31 Corridor and North East	
<b>Housing supply</b>					
<b>Completions<sup>2</sup></b>	791	791	791	791	
<b>Planning permissions<sup>3</sup></b>	5,947	5,947	5,947	5,947	
<b>Rolled forward allocations<sup>4</sup></b>	165	165	165	165	
<b>Windfall<sup>5</sup></b>	992	992	992	992	
<b>Allocations<sup>6</sup></b>	Alton & environs	1,460	455	455	
	Bentley & environs	70	-	-	
	Four Marks & Medstead	150	-	-	
	Ropley & Ropley Dean	76	-	-	
	Whitehill & Bordon & environs	1,475	1,813	1,475	
	Liphook & environs	140	640	140	
	Grayshott, Headley & H' Down	-	40	-	
	Clanfield & Catherington	100	100	280	
	Horndean & Lovedean	303	303	1,265	
	Rowlands Castle Parish	225	225	257	
	<b>Total dwellings 2017-2036</b>	<b>11,894</b>	<b>11,471</b>	<b>11,767</b>	<b>11,997</b>
	<b>Average dwellings per annum</b>	<b>626</b>	<b>604</b>	<b>619</b>	<b>631</b>
<b>% over housing requirement (550 dpa)</b>	<b>14%</b>	<b>10%</b>	<b>13%</b>	<b>15%</b>	
<b>Other supply</b>					
<b>Constant</b>	Employment, Gypsy and Travellers, Travelling Showpeople, SANG, Community				
<b>Additional</b>	Employment, Hotel	Employment	Employment	Employment	

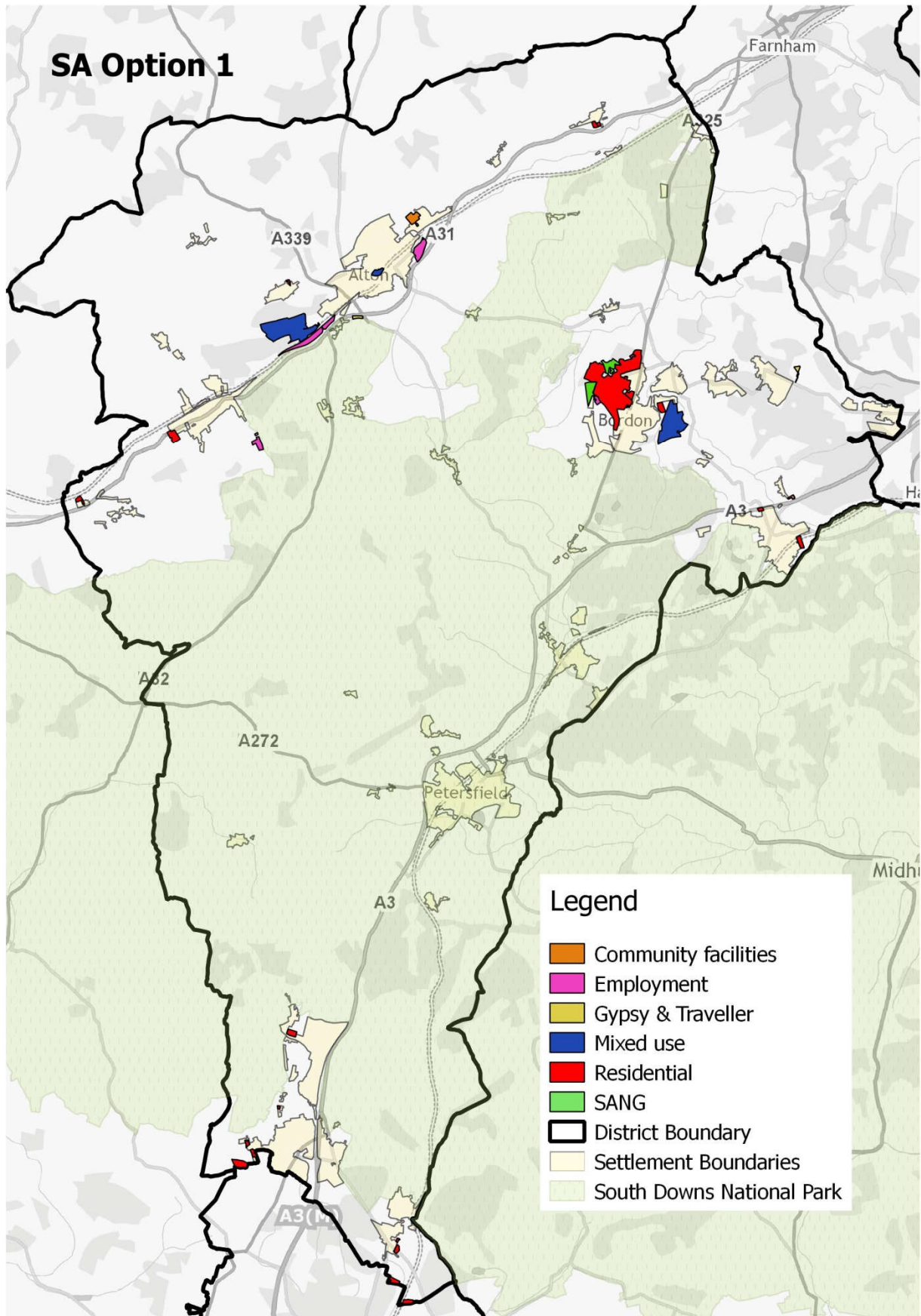
<sup>2</sup> Homes built since the start of the plan period

<sup>3</sup> Homes set to be built at sites with planning permission (either outline or full)

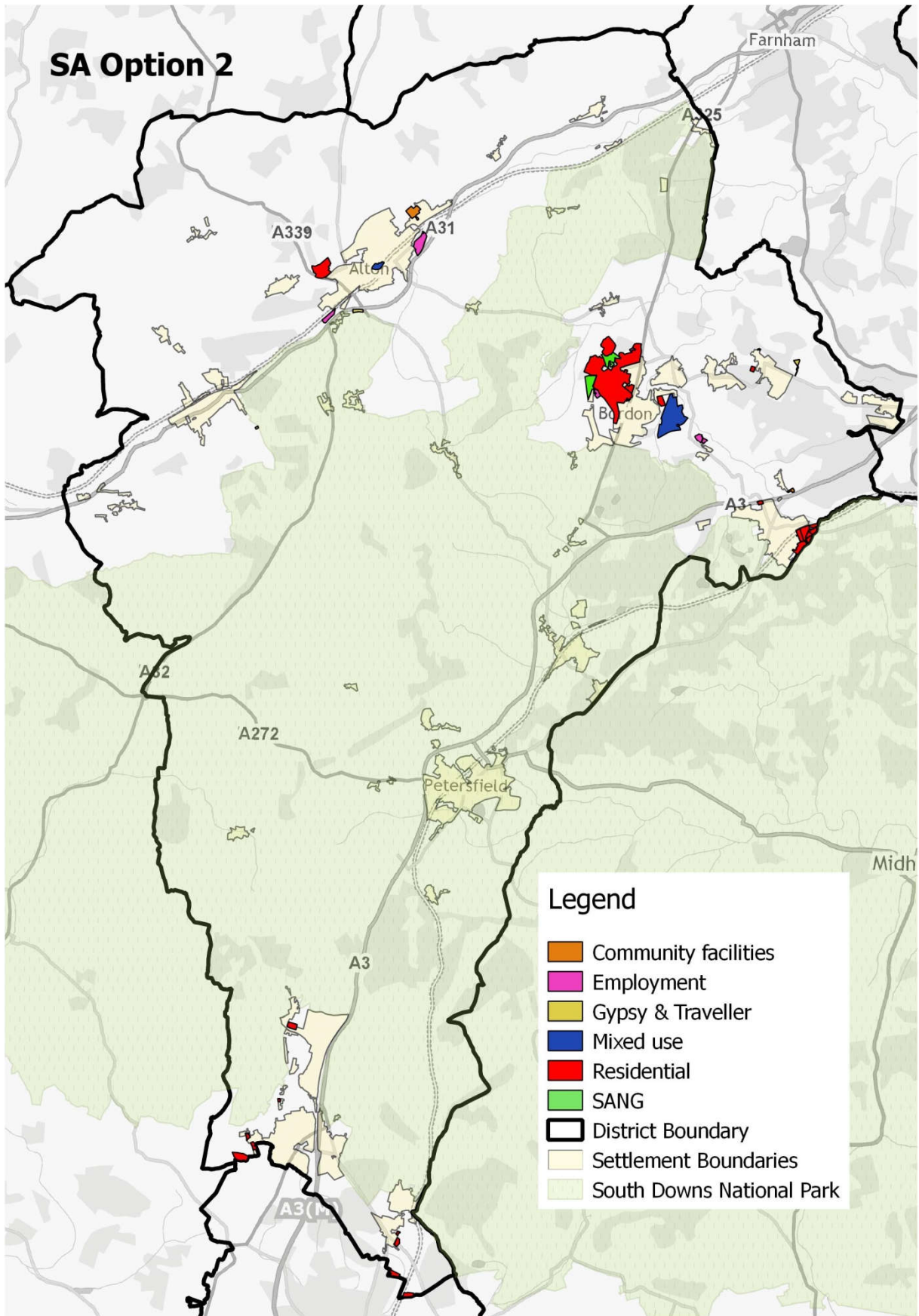
<sup>4</sup> Homes proposed to be built at sites that are an existing allocation without planning permission

<sup>5</sup> Homes built at sites not allocated in the plan, but which are in accordance with policy (primarily within settlement boundaries)

<sup>6</sup> The figures are maximum figures, as further work will likely identify a need to reduce the housing yield at some sites.

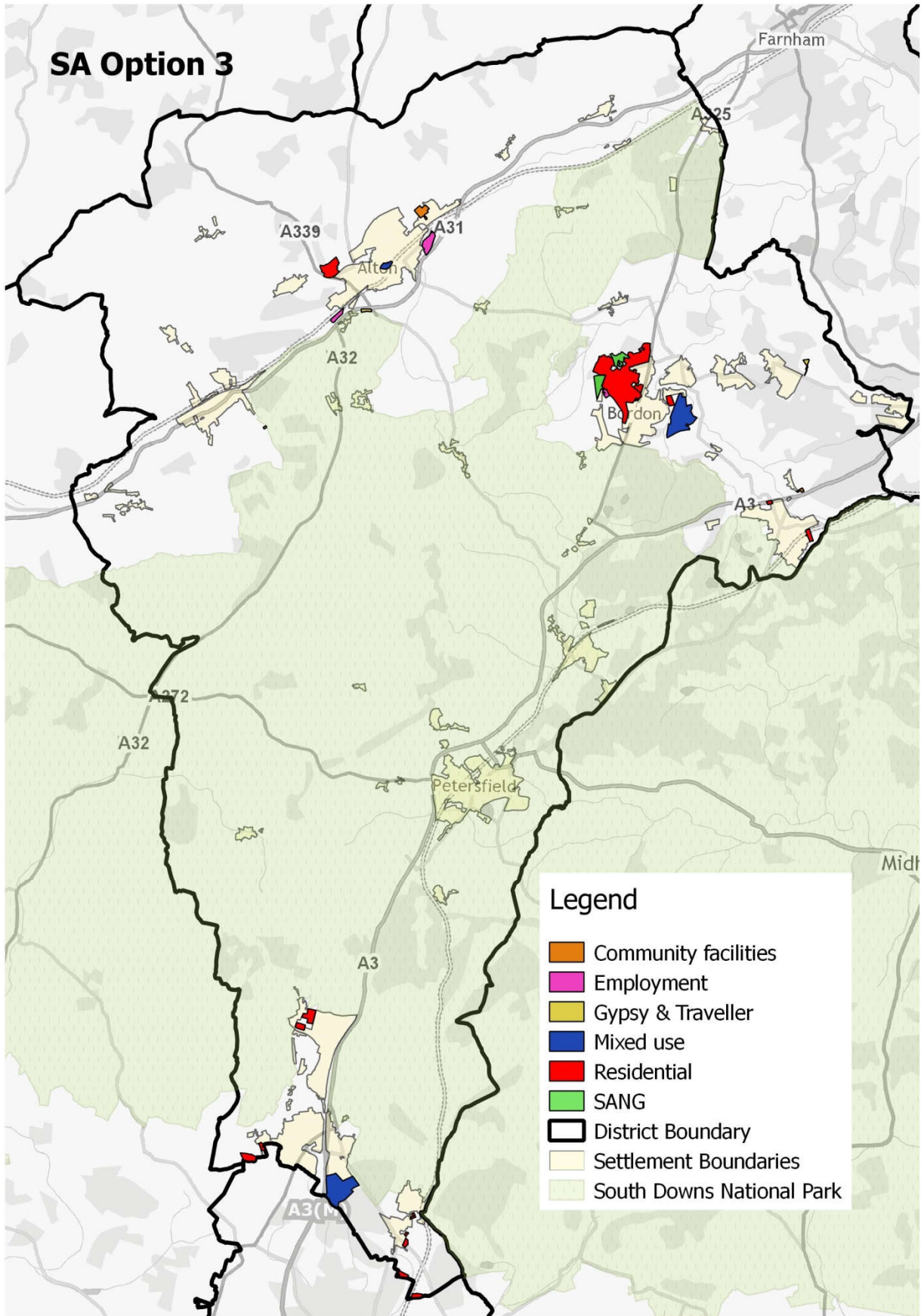


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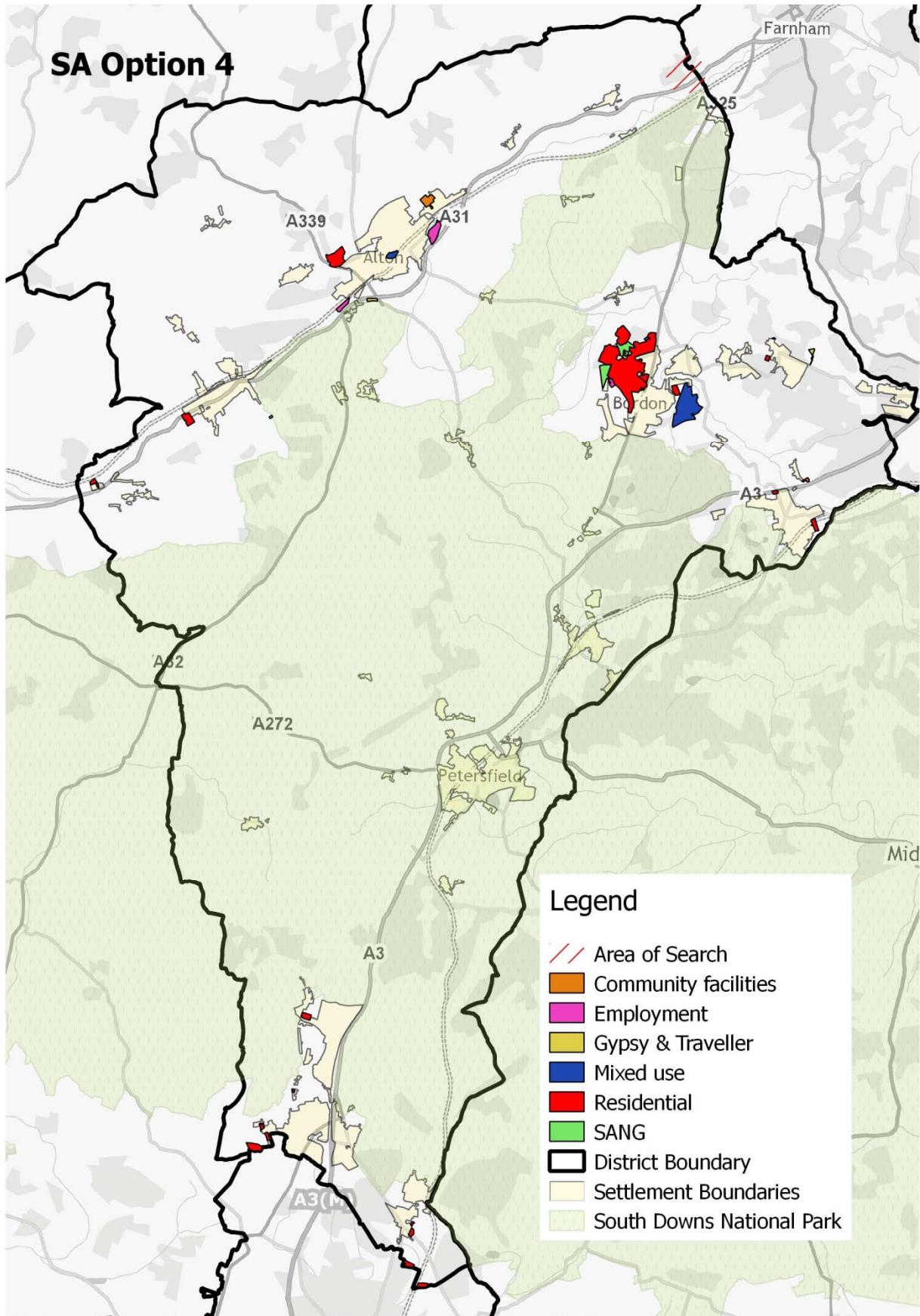


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## Appraising reasonable alternatives

Summary alternatives appraisal findings are presented within the table below. Within each row (i.e. for each of the topics that comprise the SA framework) the columns to the right hand side seek to both categorise the performance of each option in terms of 'significant effects' (using red / green) and also rank the alternatives in order of performance. Also, '=' is used to denote where it not possible to differentiate the alternatives with any confidence.

### Summary of spatial strategy alternative findings (rank and effect categorisation)

	<b>Option 1</b> High growth in the A31 Corridor	<b>Option 2</b> High growth in the North East	<b>Option 3</b> High growth in the Southern Parishes	<b>Option 4</b> High growth in the A31 Corridor and North East
Biodiversity	2	3	1	4
Climate change adaptation	1	2	3	3
Climate change mitigation	1	2	3	4
Community and wellbeing	1	3	3	2
Economy and employment	1	1	3	2
Heritage	=	=	=	=
Housing	2	3	2	1
Landscape and townscape	3	1	2	3
Resources	3	1	1	2
Water	1	1	2	1

### Summary and conclusions

The above table shows that none of the reasonable alternatives for the East Hampshire Local Plan 2017-2036 is significantly better than the rest, against each and every SA objective. However, the options can often be differentiated in terms of the SA objectives, with Option 1 (high growth in the A31 corridor) often performing "better" than the others, except in terms of the effects of development on local landscapes, townscapes and resources. At the other end of the scale, Options 3 and 4 are most frequently "the worst performing options". However, this is an unduly simplistic assessment and it is important to understand more about the differences in ranking against specific SA topics.

The potential effects of the reasonable alternatives are not thought be significant for the SA topics of climate change mitigation, community and wellbeing, and resources. The reasons for these judgements are given in Appendix IV, but reflect the current limitations of reasonable alternatives for the plan's spatial strategy at realising positive effects of sufficient magnitude, in the case of the topics of climate change mitigation and community and

wellbeing; or the fact that the spatial extent of potential negative effects is likely to focus on less valuable/vulnerable areas, in the case of the SA topic of resources.

Some of the significant effects that have been identified for the reasonable alternatives are positive in as much as they are potentially in accordance with, and help to further one or more of the SA objectives; whilst others are negative in as much as they potentially conflict with some of those same objectives. In all instances, it should be recalled that the Council is still in the early stages of plan-making so there are many things, such as the design and layout of new development, that are wholly unknown but which are important for identifying the significance of potential effects. At this time, the potential effects that have been identified are often uncertain, but predicted on the basis of matters of principle, taking a precautionary approach where significant adverse effects *could* result from development. A further iteration of the SA Report, to accompany a future pre-submission (Regulation 19) version of the local plan, will identify potential significant effects with greater certainty.

The significant negative (adverse) effects that have identified through the appraisal process concern the SA topics of biodiversity, heritage, landscape and townscape, and water. These predictions reflect the “worst case scenario” where development measures to mitigate or avoid effects prove insufficient. In this context, and when there is a difference in the performance of the options, it is noteworthy that the effects for Options 1 and 2 are considered to be less negative than those for Option 4; which means that these options have a lower risk, or may generate adverse effects of a lower severity than Option 4 in terms of certain SA topics. For example, Options 1 and 2 distribute less housing to areas in close proximity to biodiversity sites of international and national importance, and they could therefore better avoid or reduce the effects of development and/or associated recreational activity on areas of biodiversity value. Overall, Option 4 is the option that could result in the most geographically wide-ranging effects on areas protected for their biodiversity interest, and could also result in harm to the rural landscapes of the District (particularly in the A31 corridor). By contrast, Option 3 is considered to offer the lowest risk to sites of biodiversity importance of all the options; and also performs better than Options 1 and 4 with regard to the potential for negative adverse effects on landscapes and townscapes, by focusing development in areas that are generally less sensitive, taking account of the South Downs National Park. Option 3 could nonetheless have the greatest negative impacts on water quality, with potential knock-on effects for the natural environment (SACs, SSSIs, SPAs in the Solent area due to wastewater outflows) and for human health (i.e. by affecting drinking water quality).

It should be stressed at this stage that significant adverse effects have been identified in principle, but that there are also many ways of avoiding such adverse effects through good planning and design.

In addition to the potential for adverse effects, all of the options could – to a greater or lesser extent – have positive effects in terms of certain SA topics. For example, development in accordance with Options 3 and 4 (amongst others) could have significant positive effects in terms of the SA topics of housing and (particularly for Option 4) economy and employment. Option 4 would provide the largest number of new homes of any of the options and is more likely to deliver substantial quantities of affordable housing, whilst distributing new employment-related development to strategically significant locations (Whitehill & Bordon and the A31 corridor). Option 3 could address, to a more significant extent than others, the recognised shortfall in housing provision in the Portsmouth Housing Market Area. Options 1 and 2 perform well in respect of limiting the exposure of future residents to the potential effects of climate change, by distributing development away from areas of flood risk; these are significant positive effects in as much as the distribution has the potential to create more resilient communities in the face of likely future environmental challenges. Option 1 and 2 could also have significant positive effects for local economy and employment levels, whilst Option 1 also performs reasonably well in terms of providing a large number of new homes and for providing suitable opportunities for the development of affordable housing.

Clearly the overall picture is nuanced, with Option 4 performing in a strongly positive but also a strongly negative fashion against different SA topics, whilst Option 3 shows the opposite general characteristics of performing in a weakly positive and a weakly negative fashion. Option 2 performs well against topics with significant adverse effects but shows a mixed performance against topics with significant positive effects. Option 1, as already mentioned, might appear to be the “best option” as it performs strongly against SA topics with significant positive effects, but also limits the severity of negative effects and thus performs well against topics with significant adverse effects; however, even in this case, it is important to note the option’s relatively weak performance for maintaining and enhancing the landscapes and townscapes of East Hampshire. In the context of these outcomes, a simple overall ranking of the options would be inappropriate, as this would require judgements to be made between the relative importance of the SA topics; judgements that would reflect policy choices and not simply concern the objective matters of fact. Therefore, at this interim and early stage in the plan-making process all of the options demonstrate relative advantages and disadvantages for sustainable development and it is for the Council to conclude on “the best” option for its local plan.

## Establishing the preferred option

The following is the response to the District Council's officers to the appraisal / reasons for supporting the preferred option (Option 4, with modifications) –

The emerging local plan offers the Council an opportunity to review progress on the current local plan, comprising the Joint Core Strategy (adopted June 2014), the Part 2 Local Plan (adopted April 2016), and its spatial strategy for development until 2028. An important element of the current spatial strategy is the regeneration of the former Bordon Garrison at Whitehill & Bordon, to provide a new town centre, business premises, community facilities, open space (including significant natural greenspace) and more than 2,700 new homes. As mentioned previously, the regeneration of Whitehill & Bordon is currently being implemented and it is important for the Council to continue to support its delivery. In this context, the Council is mindful that appraisals for all four of the options suggest that a continuation of this strategic approach could have townscape and heritage benefits for Whitehill & Bordon, whilst also ensuring local accessibility to local jobs and training opportunities.

The allocation of additional development sites in/around Whitehill & Bordon could help to facilitate further regeneration of the town, by providing more than sufficient Suitable Alternative Natural Greenspace (SANG) to avoid recreational impacts on the Wealden Heaths Phase II SPA. Additional housing development could also better support the vitality and viability of the new town centre, by providing a larger local customer base. Nevertheless, the Council recognises that by focusing the majority of housing development in the north east (Option 2), this would provide fewer opportunities for buying or renting housing in other parts of the District. Option 2 does not perform as well as other options in terms of the Housing topic of the SA, which is of particular concern for the Council, given that the provision of land for over 2,700 additional new homes (i.e. beyond what has been delivered since 2017, is currently planned/has planning permission, or is likely to come forward as windfall) will be an important function of the emerging local plan. A wide distribution of new housing opportunities across East Hampshire (outside of the South Downs National Park) is also important to help deliver new affordable homes in all sub-areas.

The importance of delivering new housing opportunities places a focus on Options 1, 3 and 4, all of which could deliver more new homes than Option 2. Although every option could deliver the objectively assessed need for housing – one of the reasons why each option is reasonable – there is some risk that additional unmet needs from adjoining local authority areas could be identified at later stages in the plan-making process. More importantly at this stage, the Council will need to ensure that a five-year supply of housing would be met throughout the entire plan period, for the sake of positive planning and meeting the requirements of the Government's Housing Delivery Test. A large amount of the housing requirement to 2036 will be delivered through existing commitments (especially existing planning permissions which will be developed in the early years), and so reasonable alternatives for the spatial strategy must be capable of delivering significant numbers of new homes later in the plan period. This, together with the outcomes from the SA appraisal against the housing topic, suggests that Options 1, 3, and 4 are currently in a stronger position to provide a spatial strategy that will meet all of the requirements of the NPPF.

The Council also notes the economic benefits that have been identified for Options 1 and 4, which would involve new employment land associated with new settlement options and Chawton Park Farm and Northbrook Park respectively. Option 3 has been ranked slightly less positively in terms of its economic and employment-related effects as it would appear more likely to support out-commuting to jobs and training opportunities elsewhere (in Portsmouth and the wider Solent area) rather than providing substantial opportunities to address job/training needs internally, within East Hampshire. The Council considers this a weakness of Option 3 for purposes of choosing a sustainable spatial strategy. Options 3 and 4 are also considered to be less positive than the other two options in terms of enabling future development to adapt to the effects of climate change, principally with respect to avoiding the impacts of flooding. The Council considers these to be potential weaknesses, but notes that this is an early stage of the plan-making process and the options for mitigation of flood risk have not been fully explored.

In addition to the potential for the abovementioned positive significant effects, the Council has also been mindful of the outcomes from the appraisal that suggest potential for significant adverse effects arising from new development in accordance with the options.

The significant potential effects on the District's biodiversity often concern areas that are internationally or nationally designated for their biodiversity importance; for example, the Wealden Heaths Phase II Special Protection Area. It is recognised that the SA takes a precautionary approach in its assessment, which is apt in the context of this early stage of plan-making, when details such as the design and layout for new development on promoted sites are neither clear nor firmly committed. Nevertheless, the Council has a good record in ensuring the delivery of mitigation measures to avoid impacts on biodiversity assets, as exemplified through the regeneration at Whitehill & Bordon, which includes substantial areas of SANG at Bordon and Hogmoor inclosures. The Council anticipates that, through working with stakeholders, it would be in a strong position to avoid impacts arising from new development in sensitive areas and to this end, the emerging local plan includes strong policies for the protection of the natural environment. Opportunities for the mitigation of impacts on biodiversity are also indicated in the SA of the reasonable alternatives and these could be investigated and implemented, where feasible. Taking account of all of this, the Council believes that Options 3 and 4 could, if developed in accordance with robust planning policies, take advantage of the opportunities to facilitate the delivery of green infrastructure enhancements to the northern Wey Valley (Option 4) or to the Havant Thicket Reservoir area (Option 3); and that this could have biodiversity benefits. Opportunities for improving habitat connectivity at Chawton Park Farm (Option 1) are also noted, but these must be qualified by the potential for increased recreational/development-related disturbance on large parcels of ancient woodland in this area.

Potentially significant adverse effects on heritage have also been identified through the SA, but it is noted that all of the options raise these issues, due to potential impacts on conservation areas, listed buildings and the transformational effect that development could have on their settings. The SA has ranked all options equally, so this topic is not decisive in selecting an option for the spatial strategy of the local plan. Once again, the emerging draft local plan includes robust policies to conserve and enhance local heritage, so the Council is confident that through working with stakeholders, potential adverse impacts can be avoided or mitigated.

Landscape and townscape is another SA topic that is of concern, given the identified potential for significant adverse effects and the fact that East Hampshire contains part of the South Downs National Park. This is an area which is described as having "the highest status of protection" in relation to the issues of conserving and enhancing landscape and scenic beauty (paragraph 172, NPPF). Options 1 and 4 are recognised as having the potential for adverse, transformational effects on the rural landscapes of the A31 corridor/the northern Wey Valley, whilst both Chawton Park Farm (Option 1) and Northbrook Park Area of Search (Option 4) are in close proximity to the South Downs National Park. Nevertheless, the Council considers that new settlements present opportunities to achieve the highest standards of design and the most sustainable development layouts. It is also noted that the SA identifies landscape features that could provide a context for development in the case of both Northbrook Park and Chawton Park Farm.

Mindful of the SA results for the landscape topic, the Council considers that there are additional contextual factors affecting how these results are interpreted, for the sake of informing the local plan's spatial strategy. Option 3 is ranked higher in the SA than Options 1 or 4 under the landscape topic, largely due to potential for the promoted second phase of Land East of Horndean (LAA reference: RC-009) to connect with the site that is currently allocated in the Part 2 Local Plan (reference: HN1); and because the site (RC-009) has some visual containment that could reduce impacts on the South Downs National Park. However, the Council is concerned about the risks of creating urban sprawl in this area. The allocated site and the newly promoted extension might not be developed to provide a coherently planned eastward extension to Horndean, because these sites are at very different stages in the planning process and there is no firm commitment on the part of the development interests to reconsider the area as a whole, to achieve the most sustainable new settlement option. Unless and until this context for development changes (e.g. through consultation responses to the draft local plan), the Council considers that the risk of a large-scale development that is unsustainable in landscape/townscape terms – i.e. a sprawling development that lacks a defined centre and therefore a sense of place – is prohibitive for advancing with Option 3.

The final SA topic against which the potential for significant adverse impacts has been identified is that of water. The Council is mindful of the potential for significant adverse effects on water quality arising from Option 3, which constitutes a reason for being circumspect over the quantity of new housing to be delivered in the southern parishes sub-area (the parishes of Clanfield, Horndean & Rowlands Castle). The potential for restricted water supply in the northern areas of the District is also noted, but because there are ways of mitigating this through the design of new development, which can promote sustainable water use, and because any shortfalls would be beyond the plan period; this is of lesser concern for a spatial strategy. The Council is working with other PUSH authorities to identify a way forward to the forthcoming difficulties with demonstrating compliance with water quality objectives in the Solent area and is confident that a satisfactory way forward will be found for new development. However, there is a risk to the timely delivery of new housing, if new water treatment/drainage network infrastructure is required, or if new catchment management solutions need to be devised and implemented, in order to address any problem that needs to be resolved.

Taking both the significant positive and negative effects into account, the Council considers that Option 4 is, at present, the most sustainable basis for its spatial strategy for the emerging draft local plan. Option 1 is also judged to have significant merits, but ultimately the Council is less convinced that this option can deliver biodiversity enhancements as part of its proposed new settlement at Chawton Park Farm; and would prefer to offer more support to on-going regeneration efforts at Whitehill & Bordon (Option 4 involves a greater quantity of new housing in the Whitehill & Bordon area than Option 1). Option 4 would also deliver the greatest quantity of new homes, in a more widely dispersed fashion, which is of great importance in the context of the national need to “fix our broken housing market”. Option 3 is not as widely regarded because of the weaknesses identified above in connection with the potential for a less coherent development (and its consequent impacts on local the local landscape/townscape) and also because of concerns relating to the potential impacts of development on water quality. Option 2, whilst in some ways attractive because of its support for regeneration at Whitehill & Bordon, simply does not deliver enough new homes or across a wide enough area to satisfy the Council in the context of the alternatives and the potential for unmet housing needs to emerge later in the plan-making process.

Although Option 4 is a good basis for the spatial strategy, it is not accepted in its entirety. The Council takes decisions on the basis of evidence but also considers this evidence in light of local priorities for future development. The SA has identified that in landscape/townscape terms, there is potential for one LAA site option (HEA-013) that forms a part of Option 4 to be developed to result in a perceptual narrowing of the gap, or even coalescence, between Headley Down and Arford. This is of great local concern, because the open and dispersed character of development in this area of the District makes any intervening areas of undeveloped land of particular importance for maintaining the identity of distinct settlements. The Council considers that this site should therefore be excluded from the spatial strategy of its draft local plan. Accordingly, the Council is consulting on a draft local plan that corresponds to Option 4 with regard to its spatial strategy, minus the site option of HEA-013 (Land at Beech Hill Road, Headley).

## Appraisal findings at this stage

Part 2 of the Interim SA Report presents an appraisal of the Draft Plan, as a whole as a series of narratives under the ten 'SA framework' topic headings. The conclusions of each narrative are repeated below.

### Biodiversity

On balance the proposed spatial strategy delivers a mixed performance in biodiversity terms despite the level of constraint in the District. Northbrook Park and Whitehill & Bordon strategic expansion give rise to opportunities to deliver a strategic approach to biodiversity mitigation and enhancement, particularly in relation to provision of bespoke and strategic SANG and green infrastructure. In this context there are clear opportunities for biodiversity enhancement within the draft plan as a whole. However, a number of strategic and non-strategic sites are identified as having potential to negatively affect SINCs, Local Nature Reserves or other designated sites. It will be important that mitigation is effectively delivered in each case.

Additionally, the plan makes some site-specific references to achieving biodiversity enhancement or seeking opportunities for biodiversity net gain. This is positive, though it is recommended that a corresponding strategic policy is considered which requires development to explore opportunities to contribute to achieving strategic biodiversity net gain across the District where possible.

On balance, **neither significant negative nor positive effects** are predicted.

### Climate change adaptation

In the context of widespread groundwater flood risk, which makes it challenging to find areas of the District completely free of all risk types, the spatial strategy generally performs moderately well in terms of directing development towards areas of lower risk. Whitehill & Bordon is largely at low risk from all types of flooding aside from areas nearest the River Wey in the east, meaning strategic growth at the north and west of the town will be predominantly free of flood risk constraint. The southern parishes are notable for the general low flood risk of all types, though there are some notable site specific exceptions to this in terms of groundwater flood risk. The spatial strategy performs less well in these instances, as directing strategic development to areas of considerable flood risk constraint is unlikely to be positive in flood risk terms.

In general, the A31 Corridor area of the District is the most extensively affected by fluvial, surface and groundwater flood risk. This has implications for the draft plan's site allocations in this sub-area though the draft plan largely avoids the worst affected areas. Nevertheless, sites at Alton will need to be carefully planned to avoid areas of risk, and Site SA18 (Molson Coors Brewery) will likely need detailed and extensive mitigation.

In general the draft plan appropriately identifies areas of medium and high fluvial and surface water flood risk, identifying risk and potential mitigation at a site-specific scale and providing a policy framework for achieving this mitigation in practice.

Overall, it is considered that the plan performs reasonably well at directing the majority of strategic and non-strategic development away from areas of the highest risk. However, there are notable exceptions to this. In light of this, and in light of the otherwise good distribution of development away from areas of highest risk, **significant effects are not predicted**.



## Climate change mitigation

The spatial strategy has a mixed performance overall, with both positive and negative elements. Directing growth to locations where there are more likely to be opportunities to integrate new development into existing settlements through green infrastructure provision, enhancing sustainable linkages for both new and existing residents, is a significant positive. However, some growth, including strategic growth, is directed to locations which are more distant from existing services and facilities and the extent to which mitigation will be possible in these instances is not always clear.

The range of strategic and detailed policies which seek the incorporation of, or connectivity with, green infrastructure and walking cycling opportunities is considered positive. A number of site specific policies include reference to mitigation opportunities, such as identifying potential for connecting with and enhancing existing walking and cycling routes, linking new development with existing services and facilities and reducing the need to travel by delivering services on site. However, there are notable exceptions to this and potential negative effects are not always considered at a site specific level, meaning opportunities to identify mitigation can be missed.

On balance, it is considered that the plan as a whole is multifaceted in terms of climate change mitigation and whilst there are considerable positives, there remain a number of drawbacks as well. Therefore, in conclusion the plan's performance is mixed and **neither significant positive or negative effects** are predicted.

## Community and wellbeing

The spatial strategy performs well, distributing strategic growth, and the associated opportunities for delivering significant new community infrastructure, to each sub-area of the District. Directing growth to Whitehill & Bordon will enable the delivery of new green infrastructure, and strategic development will contribute strongly to the eco-town initiative. This will likely make a significant contribution to the health and wellbeing of residents through encouraging and enabling walking and cycling to become attractive transport options. Strategic growth proposed elsewhere will likely lead to delivering of a range of community assets, as well as enhanced green infrastructure and opportunities for outdoor recreation and leisure.

A number of the non-strategic site options also include provision of community infrastructure and facilities which will contribute to enhancing accessibility at a localised scale. There is recognition throughout the plan that meeting the needs of an aging population will be of great importance and a range of strategic and detailed policies present measures for achieving this through the design, location and layout of development. Havant Thicket Reservoir offers a unique opportunity to deliver an exceptional recreation and leisure resource, and this could benefit the health and wellbeing of both local residents and those from further afield.

Overall, the draft plan is predicted to achieve **significant positive effects** in respect of community and wellbeing.

## Economy and employment

The Spatial Strategy performs well in terms of contributing to providing a range of good quality employment sites and improving accessibility to local employment and training. Directing substantial growth to Whitehill & Bordon will help deliver and sustain the new town centre, as set out in detail in site SA11 (Bordon Garrison) and Policy DM23 (Whitehill & Bordon new town centre). The spatial strategy ensures these policies deliver new employment in combination with new housing at a key future economic hub of the District.

Further, the distribution of new employment land between the key higher tier settlements, with a focus at the main town of Alton but with a good overall distribution is considered likely to help the District consolidate and enhance its economic diversity and vitality. Extending existing Strategic Employment Sites at Alton and at Whitehill & Bordon, provided this is supported by appropriate infrastructure as necessary, is considered positive. It is considered that housing growth near the key Strategic and Locally Significant Employment Sites can be part of the short term solution to recruitment shortfalls by providing a larger local skills pool to draw upon. The draft plan delivers above need in terms of employment floorspace which will help enable businesses to choose from a variety of accommodation to enable different types and sizes of businesses to best meet their needs and a good range of accommodation should help ensure that businesses are not prevented from expanding locally. It is particularly notable that some employment sites at Alton are within flood risk zones. However, by virtue of their proposed use the risk is acceptable as long as mitigation is delivered as necessary and as required by policy.

The draft plan includes a range of policy tools aimed at protecting existing employment sites, particularly those which might be vulnerable to loss through conversion. There is also good awareness of the needs of rural business, and an acknowledgement of the potential for these needs to develop over the plan period as the nature of rural business evolves over time.

Overall it is considered that the plan is likely to have **significant positive effects** in relation to economy and employment.

## Heritage

The plan draft plan performs broadly well overall, setting out strong and proportionate protection for the range of historic assets within the District, making reference to the significance both of designated and undesignated assets and recognising their contribution to the character of the area. The spatial strategy performs well in general, with the bulk of development directed towards Whitehill & Bordon which are largely unconstrained by heritage considerations. However, delivering a strategic new settlement at Northbrook Park is likely to have significant implications for the setting and character of the listed buildings on the site, though it is acknowledged that design and layout of any future scheme will contribute to mitigating these risks.

Whilst SA21 (Land at Northbrook Park) does acknowledge the heritage constraints on site, it does little to identify the particular prominence of the listed buildings within the site or identify that mitigation of the heritage constraint must take place within the context of mitigation of biodiversity and flood risk constraints. Additionally, there is little to no reference to potential opportunities for enhancing access to and understanding of the District's historic and cultural heritage. The draft plan, particularly Policy S28, would be strengthened by additional reference to such opportunities, and it is recommended that that development should be expected to seek to secure enhancements where possible. Alternatively, there may be scope for an additional DM policy to be included or the scope of an existing DM policy expanded, though it is considered more appropriate to address the issue of access and understanding through a strategic policy.

Additionally, it is notable that Policy S28 effectively repeats paragraph 195 of the NPPF verbatim. It is unnecessary to repeat national policy in Local Plan policies, and could risk a situation in which future updates to the NPPF potentially result in a conflict between local and national policy. It is considered that this has some potential to affect performance against the SA Heritage objective as potential policy conflict in future may weaken the capacity of the council to ensure protection and enhancement of historic and cultural heritage.

In conclusion, although the draft plan performs well in some aspects, **significant effects are not predicted.**

## Housing

The spatial strategy performs well, distributing housing growth widely around the District. The strategy will help ensure a wide variety of homes will be delivered at Whitehill & Bordon, contributing to delivery of transformational growth at the town and offering potential to meet the a wide range of needs through development. Delivery of strategic growth at Northbrook Park will provide an opportunity to deliver a mix of housing types and tenures pepper potted throughout the site. Broadly, housing growth is well distributed, largely avoiding over concentrations at settlements which have had seen most significant recent growth (particularly Four Marks and Clanfield) whilst still dispersing allocations between the majority of higher tier settlements. However, there is a notable focus on growth in the north east of the District with more modest growth in the southern parishes. Strategic scale growth at Land East of Horndean ensures that the southern parishes also benefit from provision of development which has potential to deliver a wide variety of types and tenures, potentially including an aged care facility and other specialist provision.

Beyond the opportunities presented at the strategic sites, Policy S5 (Housing mix and type) will theoretically contribute to achieving housing mix at all major development. The dispersal of sites to which this policy would apply is broad, and so the delivery of mixed types and tenures has potential to be well distributed across the plan area. This is complemented by Policy DM8 (Self and custom housebuilding) which has potential to help introduce a new and under exploited source of housing delivery via self and custom build, particularly at the strategic sites.

In light of the above the plan overall performs strongly and is predicted to lead to **significant positive effects**.

## Landscape and townscape

The South Downs National Park is a significant feature within East Hampshire District and it is appropriate that the draft plan attaches great weight to conserving the landscape and scenic beauty of the Park and its setting. The spatial strategy recognises this as far as it is able, directing significant growth to within or adjacent to the existing urban area of Whitehill & Bordon which is away from the immediate influence of the SDNP. However, the inclusion of a new settlement option in a rural area in close proximity to the SDNP has clear potential for negative effects on its setting. There is potential for both positive and negative effects on landscape in localised areas across the District and it is difficult to conclude with any certainty what the residual effect for the landscape character of the District as a whole will be. The spatial strategy directs the majority of development outside of strategic growth at Whitehill & Bordon and Northbrook Park to locations within or adjacent to existing urban areas and this will likely help ensure negative landscape effects are minimised. It is noted that part of the plan area falls within the setting of the Surrey Hills AONB. It is considered that as development is directed elsewhere in the District the plan is unlikely to have an effect on the AONB or its setting.

Although there are a number of site allocations with a degree of likely or potential landscape sensitivity, as noted above, the plan as a whole includes strategic and detailed policies aimed at mitigating negative effects and it is considered that these are comprehensive and proportionate, identifying areas at particular risk and establishing design criteria aimed at minimising harm and maximising gain at all sites. Therefore, although the draft plan has the potential for both positive and negative effects on landscape there is potential for sufficient mitigation to be achieved through high quality design and layout where required. It is also acknowledged that there could potentially be opportunities to enhance the landscape setting of some parts of the plan area, such as at the western edge of Whitehill & Bordon via the new strategic SANG allocation. However, it is considered that there is potential for minor negative effects at prominent greenfield sites at the edge of settlements, particularly at Alton, Lovedean and, potentially, south of Liphook. However, it is considered that the draft plan is likely to have an overall positive effect on townscape, particularly in light of the significant

potential for townscape enhancement at Whitehill & Bordon via site SA9 (Whitehill & Bordon Strategic Development Area). Similarly, transformation of site SA18 (Molson Coors Brewery) will provide an outstanding opportunity to deliver positive townscape effects in central Alton, and the high level of protection required by the draft plan will see existing historic assets and character areas safeguarded from negative effects where possible.

Overall, when effects on landscape and townscape are balanced, it is considered that the draft plan is likely to have **no significant effect** on landscape and townscape.

## Resources

Overall the plan performs well, with development concentrated at land not in agricultural use, leaving the highest value agricultural land largely unaffected by development as a result. By particularly focussing growth at Whitehill & Bordon the plan takes advantage of significant opportunities to recycle poor quality, vacant urban land which reduces the amount of land take necessary at greenfield sites. Where greenfield land is allocated for development, it is largely directed away from land in productive agricultural use even where the agricultural land dataset indicates the presence of higher quality land.

A number of strategic policies in the plan establish protection in principle for the District's natural resources, including best and most versatile agricultural land, minerals deposits and geodiversity. This is considered a robust position from which to help ensure the efficient and sustainable use of resources.

Overall, in light of the above, the draft plan is predicted to lead to **no significant positive or negative effects**.

## Water

The spatial strategy performs well, with the draft plan ensuring the majority of new development will be delivered away from areas of the greatest water quality sensitivity. Significantly, this means that there will be no strategic development in an SPZ, which is a notable positive. Nevertheless, ten non-strategic sites identify a potential risk of contamination of the aquifer from development and highlight the associated need to mitigate this risk.

The draft plan does not flag capacity issues at wastewater treatment works which serve the District. Nevertheless, it establishes a range of policy criteria aimed at ensuring the continued sustainability of wastewater management in the District. The ambitious water efficiency target set out in policy DM28 is positive, though this ambition might better feed through into site allocation policies, particularly in the water stressed northern areas of the District.

Given the existing level of water stress in much of the plan area, particularly in the northern parts of the District, it would be difficult to conclude that the plan will have positive effects overall. However, support for the delivery of the Havant Thicket Reservoir will help unlock additional supply and enhance overall resilience. In this context it is considered that the plan is likely to have **no significant positive or negative effect** in respect of supporting sustainable water quality management and water quality enhancements on the assumption that the Havant Thicket Reservoir is delivered in a timely fashion.

## Next Steps

### Preparation of the Proposed Submission Plan

Subsequent to the current consultation it is the intention to prepare the proposed submission version of the plan for publication in-line with Regulation 19 of the Local Planning Regulations 2012. The proposed submission plan will be that which the Council believes is 'sound' and intends to submit for Examination. Preparation of the Proposed Submission Plan will be informed by the findings of this Interim SA Report, responses to the current consultation and further appraisal work.

The SA Report will be published alongside the Proposed Submission Plan. It will provide all of the information required by the SEA Regulations 2004.

### Submission and examination

Once the period for representations on the Proposed Submission Plan / SA Report has finished the main issues raised will be identified and summarised by the Council, who will then consider whether in-light of representations received the plan can still be deemed 'sound'. If this is the case, the Plan will be submitted for Examination, alongside a statement setting out the main issues raised during the consultation. The Council will also submit the SA Report.

At Examination the Inspector will consider representations (alongside the SA Report) before then either reporting back on the Plan's soundness or identifying the need for modifications. If the Inspector identifies the need for modifications to the Plan these will be prepared (alongside SA) and then subjected to consultation (with an SA Report Addendum published alongside).

Once found to be 'sound' the Plan will be formally adopted by the Council. At the time of Adoption a 'Statement' must be published that sets out (amongst other things) 'the measures decided concerning monitoring'.

## Monitoring

At the current time, in-light of the appraisal findings presented in Part 2 (i.e. predicted effects and uncertainties), it is suggested that monitoring efforts might focus on -

- perceptions of landscape;
- loss of best and most versatile agricultural land;
- community infrastructure delivery and capacity;
- wastewater treatment works capacity;
- air quality within Brentwood town centre and at other locations of concern;
- achievement of 'biodiversity net gains' at appropriate scales;
- impacts to the setting of listed buildings; and
- delivery of decentralised low carbon heat/energy generation, and other measures for minimising CO2 emissions from the built environment and transportation.

