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By email only: contact@solentgateway2.co.uk

Re. Solent Gateway 2: Hampshire & Isle of Wight Wildlife Trust non-statutory consultation response

The Trust welcomes the opportunity to comment on the emerging proposals for Solent Gateway 2 as part of the non-statutory consultation process. It is vital to recognise the limited ecological capacity of the Solent straits and the environmental constraints within which Solent Gateway 2 must operate. Both the Solent and the New Forest are areas already under significant ecological pressure, with many habitats and species experiencing long-term decline. Despite their vital importance for biodiversity and carbon sequestration, coastal habitats including saltmarshes, mudflats and seagrass beds have faced degradation from pressures of coastal squeeze, pollution and increased commercial disturbance. The cumulative effects of successive projects threaten to push the Solent's ecosystems beyond recovery thresholds and adversely impact the special qualities of the New Forest National Park.

Given the exceptional ecological importance of the Solent and its surrounding designated sites, we have significant concerns regarding direct damage to the Dibden Bay SSSI. Indicative plans presented for Solent Gateway 2 within the non-statutory consultation brochure reveal an unprecedented level of encroachment onto designated sites. The project will infringe on more than 100 hectares of land within the Dibden Bay SSSI. Dibden Bay SSSI is one of the richest sites around the Solent for nationally rare and scarce species, home to a nationally important assemblage of invertebrates (including beetles, bees, wasps and flies) and breeding lapwing. This incursion, on a site supporting important breeding bird populations and invertebrates, is wholly inappropriate and fundamentally incompatible with the site's protected status.

The proposals also extend into the Solent and Southampton Water SPA, an intertidal habitat of international importance for wintering waterfowl and waders, including Dark-Bellied Brent Geese. Solent and Southampton Water SPA is used regularly by over 20,000 waterfowl each season, with important coastal habitat for breeding gulls, terns and wintering waterfowl. These designated sites offer a refuge for nationally rare species and make a significant contribution to the integrity of ecological networks. Earmarking these sites for development sets a dangerous precedent, that nowhere is



safe for nature. The mitigation hierarchy must be rigorously applied to avoid and minimise any environmental harm in the first instance, prior to the development of any suitable compensatory strategy. Prior to any works commencing, robust mitigation measures must be secured to maintain the ecological connectivity of the SPA.

Beyond these sites, several other protected areas within the region are likely to experience indirect impacts, including the Hythe to Calshot Marshes SSSI and the Solent and Dorset Coast SPA. Marine habitats in the Solent, home to over 50 species of fish and internationally important breeding birds, will also be placed at risk of further degradation. Plans must carefully consider potential impacts upon the River Test SSSI, which supports globally rare and critically declining populations of Atlantic Salmon. Proximity to the New Forest National Park also raises significant concerns regarding potential impacts on the Forest's special qualities, particularly upon the diversity of internationally important wildlife.

Further clarification from ABP is required to adequately assess the potential environmental value of the proposed Country Park. A minimum 100-year freehold must be secured to protect the park from future development pressures. The park must be actively managed for nature conservation, with clear strategies in place to mitigate recreational disturbance that could adversely affect wildlife.

The above advice is given based on the information made available at this time and may change should further or amended details be submitted. We trust that you will find our comments helpful and if you wish to discuss these matters further, please do not hesitate to contact us. The Trust will continue to engage with ABP on this matter to speak up for nature. I also ask that you keep the Trust informed of the progress of the emerging proposals.

Best regards, Lorna Selby