Hampshire & Isle of Wight Wildlife Trust

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Consultation response to the Fawley Waterside Development Proposal

Hampshire & Isle of Wight Wildlife Trust would like to highlight concerns about the Fawley Waterside development proposal. On the evidence currently available, the proposal presents a risk of direct, indirect and cumulative harm to internationally, nationally and locally important sites; the Solent Waders and Brent Goose network; functionally linked land supporting protected bird populations; and the wider ecological network identified through the Hampshire Local Nature Recovery Strategy (LNRS).

The Solent coast supports more than 90,000 wintering waders and wildfowl and including over 10% of the global population of dark-bellied Brent geese. The development proposal is adjacent to multiple internationally and nationally designated sites containing internationally important mudflats, saltmarshes, coastal grazing marsh, lagoons, reedbeds and intertidal habitats that provide essential feeding, roosting and refuge habitat. The Habitats Regulations provide the primary legal framework for the protection of Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar Wetland Sites, which form the highest tier of wildlife designation in the UK. Any plan or project likely to have a significant effect on a European site must be subject to Appropriate Assessment and may be approved only where the competent authority has ascertained that it will not adversely affect the integrity of the site. Given the scale and coastal location of the proposed development, and the sensitivity of the surrounding habitats, the information currently available is insufficient to establish the nature and extent of the potential effects on the integrity of the relevant internationally and nationally designated sites.

National Planning Policy Framework, policy N2.2 states: *If significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated or, as a last resort, compensated for, then the development should be refused.*

Policy N6, paragraphs 1, 2 and 3, states that development proposals affecting sites of *international importance* should be refused unless an Appropriate Assessment demonstrates that the proposal would not adversely affect the integrity of the site, either alone or in combination, unless the derogation tests are met: that there are no feasible alternative solutions that would be less damaging. Proposals affecting sites of *national importance* or *local importance* should be supported only where there would be no adverse effects, where benefits outweigh the impacts and, where applicable, an Environmental Delivery Plan is satisfied. Irrespective of a site's nature-conservation status, proposals entailing the loss or deterioration of irreplaceable habitats, such as ancient woodland, should be refused unless there are wholly exceptional reasons and a suitable compensation strategy exists. This policy applies whether development is located inside or outside a designated area where it would affect the area's identified biodiversity value.

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Impacts on Internationally and Nationally Designated Sites
The proposed development is located immediately adjacent to a network of internationally and nationally designated sites of exceptional ecological importance, including:

- Solent and Southampton Water Special Protection Area (SPA) and Ramsar Site
- Solent Maritime Special Area of Conservation (SAC)
- Hythe to Calshot Marshes Site of Special Scientific Interest (SSSI)
- Spartina Saltmarsh Irreplaceable Habitat
- Calshot Marshes Local Nature Reserve
- Tom Tiddler's Ground Local Wildlife Site (SINCs)
- Chambers Copse Local Wildlife Sites (SINCs) and Ancient Woodland Irreplaceable Habitat
- Solent View Valley Local Wildlife Sites (SINCs)
- A large area that could become of particular importance for biodiversity (ACB) identified within the LNRS.

These sites are recognised within the Hampshire LNRS as Areas of Particular Importance for Biodiversity (APIBs) and Areas That Could Become of Particular Importance for Biodiversity (ACB). Together, they form part of one of the United Kingdom's most significant coastal ecosystems, contribute to ecological connectivity across Southampton Water and support the resilience of the wider Solent ecosystem. The proposal risks adding pressure to habitats already affected by climate change, sea-level rise, recreational disturbance and coastal squeeze.

Impacts on the Solent Waders and Brent Goose Network
Hampshire & Isle of Wight Wildlife Trust is a key partner in the Solent Waders and Brent Goose Strategy and supports the evidence base identifying the network of habitats used by internationally protected birds. More information about the strategy and the network map can be found here.

The development site is directly adjacent to the Solent Waders and Brent Goose sites, NF61 and NF59, forming part of the Solent and Southampton Water Special Protection Area (SPA) and NF156A, a Primary Support Area for the Solent Waders and Brent Goose Network. Other sites that could be impacted are NF60 (SPA), NF201 (SPA), NF58 (SPA), NF97 (SPA), NF156B Core Area, NF155 Secondary Support Area, NF223 Candidate Site, NF96 Candidate Site, NF95 Secondary Support Area, which are situated less than one mile from the development site.

The Solent Waders and Brent Goose Strategy demonstrates that designated sites do not function in isolation. Protected bird populations depend upon an interconnected network of feeding, roosting and supporting habitats across the wider landscape. Development adjacent to these areas creates a risk of increased recreational disturbance, loss or degradation of functionally linked habitat, lighting and noise effects, habitat fragmentation, increased predation pressure, altered movement patterns and displacement from feeding and roosting areas. The cumulative loss or degradation of supporting habitat may undermine the integrity of SPA bird populations even where development occurs outside designated boundaries.

Coastal Habitats as Critical Natural Infrastructure
The Solent's interconnected network of mudflats, saltmarshes, reedbeds, wet grasslands, freshwater lagoons and coastal scrub should be recognised as critical natural infrastructure rather than viewed solely through the lens of biodiversity. These habitats store and sequester carbon, support climate adaptation, reduce flood risk, improve water quality, provide natural coastal defence and contribute to local tourism and economic value.

Data Centre Concerns
The proposal includes two data centre sites. Whilst the applicant suggests that operational noise can be mitigated and that cooling systems may utilise closed-loop technology, substantial uncertainty remains regarding the wider environmental impacts of data centres.

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The Wildlife Trusts have highlighted significant concerns regarding the environmental consequences of large-scale data centre development, including increased energy demand, greenhouse gas emissions, water consumption and thermal impacts[1]. Data centres may require substantial water resources and generate significant waste heat, while the cumulative environmental implications remain poorly understood.

Of particular concern at Fawley Waterside are:

Heat impacts. Data centres generate considerable waste heat. Emerging evidence suggests large facilities can contribute to localised temperature increases and "heat island" effects. The potential impacts on adjacent coastal habitats, intertidal systems, fish populations, bird populations and wider ecological processes remain insufficiently understood.

Wildlife can be extremely sensitive to changes in temperature and climate. Research from the Wildlife Trusts highlights concerns about the impacts of heat generated by data centres, which occur due to waste heat, water vapour from evaporative cooling and even spent cooling water discharged directly to rivers and streams. Researchers have identified a significant data centre heat island effect. Their results showed that around a data centre temperatures were anywhere from 2C to 9C higher, and that even 4.5 kilometres away from a hyperscale data centre, the average monthly temperature could be 1C higher.[2]

Water resource impacts. Although the applicant suggests water cooling may operate within closed-loop systems, the final cooling technology remains unknown.

The environmental implications for local water resources, abstraction requirements and resilience during periods of drought have not been adequately demonstrated. Water resource pressures are already a major challenge across Hampshire and the wider Solent region.

Research from the Wildlife Trusts states that “a medium sized data centre can use up to 300 million litres of water per year. A hyperscale data centre can use 1.5 million litres per day - although Thames Water say it can be much higher at 19 million litres per day. This would make many data centres the single biggest water user in their catchment.” Additionally, if data centres discharge the water they have used into sewers, then this would create permanent extra load, meaning sewers were less able to cope during heavy rainfall.

Ecological uncertainty. The applicant acknowledges that the final cooling solution will depend upon future occupiers. This creates uncertainty regarding future environmental effects. Without detailed operational information, it is not possible to robustly assess thermal discharges, water consumption, energy demand, carbon emissions nor long-term impacts on nearby designated sites, rare and internationally important birds and wildlife.

Given the proximity of internationally protected habitats, the precautionary principle should apply.

Need for robust environmental assessment
The scale, location and complexity of the proposal, particularly when considered alongside the proposed data centres, require a comprehensive Environmental Impact Assessment and Habitats Regulations Assessment. These assessments must address direct, indirect and in-combination effects; long-term operational and climate-change effects; water-resource implications; recreational disturbance; effects on functionally linked land; bird displacement; thermal effects; and cumulative effects on designated sites. The evidence currently available does not provide the necessary certainty that adverse effects on site integrity can be excluded.

[1] https://www.wildlifetrusts.org/sites/default/files/2026-09/A_Check_For_Nature.pdf

[2] https://www.wildlifetrusts.org/sites/default/files/2026-09/A_Check_For_Nature.pdf

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Cumulative impacts with Solent Gateway 2
The proposal must not be considered in isolation. Fawley Waterside lies on the same stretch of coast as the proposed Solent Gateway 2 development, and the cumulative and in-combination effects of both projects must be assessed in full. Potential effects include increased pressure on protected sites, additional disturbance to SPA bird populations, further habitat fragmentation and greater pressure on ecological networks identified through the LNRS. Any failure to assess these effects comprehensively would risk materially understating the environmental consequences of development across Southampton Water.

Conclusion
For the reasons set out above, Hampshire & Isle of Wight Wildlife Trust would like to register these concerns in relation to the Fawley Waterside proposal.

The development is located adjacent to an exceptional concentration of internationally, nationally and locally important ecological assets, including SPA, SAC, Ramsar and SSSI designations, irreplaceable habitats, Local Wildlife Sites (SINCs) and Solent Waders and Brent Goose Strategy sites.

The submitted information does not demonstrate, to the standard required, that the proposal would avoid adverse effects on the integrity of protected sites, functionally linked habitat and protected bird populations. Material uncertainty also remains regarding the environmental effects of the proposed data centres, particularly in relation to heat generation, water resources, climate effects and long-term ecological impacts.

Accordingly, the proposal should ensure there are robust ecological assessments and environmental appraisals to demonstrate that there would be no adverse effect on the integrity of designated sites, no unacceptable effect on the Solent Waders and Brent Goose network, and no significant cumulative or in-combination effects arising from development across the wider Southampton Water area. Any conclusion to the contrary must be supported by complete, project-specific evidence and secured mitigation capable of being delivered, monitored and enforced for the lifetime of the development.

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 do so. I also ask that you keep the Trust informed of the progress and outcome of this application.

Best regards,
Niaṁ Tickner
Planning Policy and Campaigns Officer
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