Hampshire & Isle of Wight Wildlife Trust

Beechcroft House
Vicarage Lane
Curdridge
Hampshire
SO32 2DP

01489 774400

Sam Dumbrell
Hampshire County Council
EII Court
The Castle
Winchester
SO23 8UD

To: planning@hants.gov.uk

Dear Sam Dumbrell,

Re: Planning application: 26/10501, Proposed highway improvements on the A326 between and including the junctions with Michigan Way in west Totton and Main Road at Dibden.

Hampshire & Isle of Wight Wildlife Trust objects to the proposed highway improvements on the A326.
While we recognise the importance of transport infrastructure in supporting local communities and the economy, we do not consider that the application adequately demonstrates that significant ecological impacts can be avoided or that the environmental consequences of the scheme have been fully assessed.

Our principal concerns relate to the loss and deterioration of irreplaceable habitats, fragmentation of ecological networks, impacts on the New Forest National Park, and the failure to adequately assess the cumulative and in-combination effects of this scheme alongside wider development proposals that it is specifically intended to support, including Solent Gateway 2.

Impacts on Irreplaceable Habitats and Ecological Networks
The scheme would result in the loss of mature trees and woodland habitat, including impacts on ancient woodland and veteran trees, which are recognised in national planning policy as irreplaceable habitats. Such habitats cannot be recreated through replacement planting or offsetting measures within any meaningful timescale.

Beyond the direct loss of habitat, the scheme would increase fragmentation along an already heavily trafficked corridor. This risks weakening ecological connectivity between the New Forest, the Solent coast and the wider network of habitats that support species movement, ecological resilience and nature recovery. While mitigation and habitat creation measures are proposed, these do not compensate for the immediate loss of mature habitat or the reduction in ecological function that is likely to result from the scheme.

Impacts on the New Forest National Park
The proposed works would require both permanent and temporary encroachment into land within the New Forest National Park and would further urbanise the A326 corridor through highway widening, engineering works and vegetation removal. The ecological importance of the National Park extends beyond designated sites and includes wider habitat networks, wildlife corridors and buffer areas that contribute to the integrity and resilience of the landscape.

We are concerned that the scheme would result in incremental degradation of these ecological functions and contribute to the gradual erosion of the natural character of the National Park.

Construction Impacts
The construction programme is expected to extend over several years and has the potential to generate substantial ecological disturbance. Noise, lighting, vibration, dust, increased traffic movements and habitat disruption may affect protected and priority species across a prolonged period. We are not satisfied that the long-term ecological consequences of these construction impacts have been fully evaluated, particularly when considered alongside other planned development and infrastructure projects within the Waterside area.

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Registered Office: Beechcroft House, Vicarage Lane Curdridge, Hampshire, SO32 2DP | Registered Charity Number: 201081

Failure to Adequately Assess Cumulative Effects
A key concern is the treatment of cumulative impacts within the Environmental Impact Assessment.
The application documentation makes clear that the A326 Improvement Scheme is intended to facilitate and accommodate future growth associated with a range of major development proposals, including Solent Gateway 2, port expansion activities, Freeport investment and wider strategic growth across the Waterside.

In our view, the environmental assessment does not adequately evaluate the combined impacts of these proposals on biodiversity, ecological networks and the wider environment. Instead, the highway scheme has largely been assessed in isolation despite its clear relationship with planned development that is expected to generate the need for additional highway capacity.

This raises concerns that the true scale of environmental effects has been underestimated. Habitat loss, fragmentation, disturbance, recreational pressure, air quality impacts and effects on protected species are all likely to be greater when assessed collectively rather than as individual projects.

Environmental Impact Assessment
We do not consider that the Environmental Impact Assessment provides a sufficiently robust assessment of the likely in-combination effects of the A326 scheme and associated strategic developments. Where a highway scheme is being promoted, in part, to enable future growth, it is essential that decision-makers understand the cumulative environmental consequences of both the infrastructure and the development it supports. In this case, there appears to be a disconnect between the growth assumptions used to justify the scheme and the environmental impacts assessed through the application.

Without a comprehensive assessment of these linked proposals, it is not possible to fully understand the implications for biodiversity, habitat connectivity and nature recovery across the Waterside.

Conclusion
Hampshire & Isle of Wight Wildlife Trust objects to the proposed highway improvements on the A326 because:

- it would result in harm to irreplaceable habitats, including ancient woodland and veteran trees;
- it would further fragment important ecological networks and wildlife corridors;
- it would adversely affect the ecological integrity and natural character of the New Forest National Park;
- significant construction-related ecological impacts remain insufficiently addressed; and
- the Environmental Impact Assessment fails to adequately assess the cumulative and in-combination effects of the scheme alongside Solent Gateway 2 and other strategic development proposals that it is intended to facilitate.

Hampshire & Isle of Wight Wildlife Trust considers that the application fails to demonstrate adherence to the mitigation hierarchy, relies heavily on compensation for impacts to mature and irreplaceable habitats, and does not adequately assess the cumulative environmental effects arising from linked development proposals, including Solent Gateway 2. As a consequence, the application is contrary to national planning policy relating to biodiversity and irreplaceable habitats and provides insufficient information for the competent authority to properly assess the full extent of likely ecological impacts. The Trust therefore objects to the proposal and requests that planning permission be refused.

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,

Niam Tickner
Planning Policy and Campaigns Officer

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