

Ms L Wells
Havant Borough Council Planning Department
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Havant
Hampshire PO9 2AX

By e-mail only; planning.development@havant.gov.uk

3rd March 2021

Dear Ms L Wells,

Location: Brockhampton West, Harts Farm Way, Havant

Proposal: Outline application for the development of new employment units to provide up to 29,000 sq m (gross internal area) for flexible use across use classes E (light industrial), B2 and B8 with ancillary offices, car parking, service yards, drainage works, landscaping and associated works to prepare the site for development. All matters are reserved except the primary means of access to the site.

Application No: APP/21/00189

Many thanks for giving the RSPB opportunity to comment on the proposals at Brockhampton West, Harts Farm Way. The RSPB **objects** to these proposals because the application fails to consider indirect impacts towards adjacent functionally-linked land to internationally designated sites and therefore is not compliant with The Conservation of Habitats and Species Regulations 2017. The RSPB would like to focus its response around the Solent Wader and Brent Goose Strategy (SWBGS) and impacts towards sites H08, H07A, H07B, and H07C.

The RSPB welcomes the applicant's commitment to contributing to the SWBGS for the loss of Low Use site H08 through S106 agreement. However, the Applicant fails to consider the indirect impacts of the development on the three adjacent SWBGS sites, listed below:

- H07A – Core Area
- H07B – Secondary Support Site
- H07C – Low Use Site

The SWBGS aims to protect the network of non-designated terrestrial wader and brent goose sites that support the Solent Special Protection Areas (SPAs). Land identified within the SWBGS supports the functionality and integrity of the Solent SPAs due to the use of the sites by SPA species and is therefore granted the same level of protection. Due to the proximity of the three SWBGS sites (H07A, H07B, and

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H07C) to the proposed site location, likely significant effects on the integrity of the Solent SPAs through impact pathways such as noise, vibration and light pollution during construction and operation cannot be excluded. Therefore, a Habitats Regulations Assessment (HRA) must be undertaken in accordance with the Conservation of Habitats and Species Regulations 2017 to assess the potential negative impacts upon SWBGS sites H07A, H07B, and H07C.

We hope you have found these comments useful. Please do not hesitate to get in touch should you wish to discuss any of our comments further.

Yours sincerely

A handwritten signature in black ink, consisting of a stylized 'J' followed by a horizontal line.

Jack Thompson

Conservation Officer

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