

APP/21/00809 Hermitage Park, Harts Farm Way, Havant 22.0597

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Dear Selina,

APP/21/00809 | Proposed Gas fuelled Capacity Mechanism embedded generation plant to support the National Grid. A resubmission of previously approved applications (APP/17/00511 as amended by APP/18/01281) in order to secure a further three years to commence development following transfer of ownership of the site. | Hermitage Park, Harts Farm Way, Havant 22.0597

Thank you for consulting me on this application. Thank you for your patience.

The application is accompanied by a Shadow Habitats Regulations Assessment (Biora, October 2022).

The HRA includes a detailed assessment of individual European designated site qualifying features and explores the potential impacts from various pathways on each of these. I am satisfied that the HRA methodology used is appropriate. The HRA focusses on various air quality pathways.

In accordance with the previous AQA, the HRA concludes that predicted exceedances within European sites are unlikely to result in Likely Significant Effect, based on the fact that the exceedances are within a relatively limited geographical area and are within habitats (in this instance intertidal mudflats) that are not particularly sensitive to the effects of nitrogen deposition. I note that Natural England have confirmed that they do consider the HRA content to be acceptable.

To clarify (although this does not affect the overall assessment): the various sites listed within the Solent Waders & Brent Goose Strategy (SWBGS) are not 'candidate' sites but rather each is graded according to its importance to overwintering SPA bird species (Core site, Primary, Secondary etc.). In line with Natural England guidance, these non-SPA sites are treated as functionally linked land and therefore analogous to the SPA in terms of their function to SPA qualifying species: in this case bird species. Their treatment as 'seasonal' SPA habitat is to ensure that impacts arising from development related impacts are considered fully. I acknowledge that many SWBGS sites comprise improved grassland, often of amenity value, and as such are

not analogous with the often highly sensitive vegetation communities found within European sites such as SPAs and SACs. I am unsure whether SWBGS sites should be assessed within HRA as, in the context of AQ impacts, equivalent to locally designated sites or should be treated as an extension of SPA habitat – this is something that LPAs need clarification on from Natural England.

In any case, I am now satisfied that sufficient analysis has been undertaken of the potential for impacts to European sites.

If you have any queries, please don't hesitate to contact me.

Kind regards,

Tristan

Tristan Norton

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Coronavirus (Covid-19)

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