



**Hampshire &  
Isle of Wight  
Wildlife Trust**

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Solent CO<sub>2</sub> Pipeline Project,  
1180 Eskdale Road  
Winnersh  
Wokingham  
RG41 5TU

30<sup>th</sup> September 2024

### **Re. Solent CO<sub>2</sub> Pipeline Project**

To whom it may concern,

As organisations focused on addressing the climate and biodiversity crises and protecting our natural heritage, we have serious concerns regarding the ecological impacts of the proposed Solent CO<sub>2</sub> pipeline, given the scale of the work and the direct impacts to areas of significant biodiversity value. Our primary concern at this point is the lack of information provided in the consultation with regards to ecological assessments, surveys and mitigation measures for all three routes, including the impacts on particularly valuable, sensitive and 'difficult to compensate for' habitats. Without this information, it is impossible to give valid feedback on each of the three routes.

We recognise there may be the need for carbon capture and storage technology to help achieve net zero in hard to decarbonise sectors and industrial clusters, as outlined by the Climate Change Committee. This should not, however, facilitate the continued usage of fossil fuels and should never come at the expense of nature. Healthy natural ecosystems are indeed an essential tool in addressing the climate crisis.

In the absence of clear evidence and assessment of the ecological impacts, it is not possible to assess the compatibility of the project with the legal target in the Environment Act 2021 to halt nature's decline in the UK by 2030 and the global commitment to achieve 30% of land and sea protected for nature by 2030.

To gauge the project's contribution towards, and necessity for, achieving net zero, we would also value further assessment of the amount of carbon dioxide the project itself will generate and how this meets wider greenhouse gas reduction targets and local climate ambition; for example, the New Forest National Park Authority's commitment to a net zero National Park by 2050, as laid out in their Partnership Plan.

Our most significant concerns relate to the predicted impacts of all three routes on designated and protected sites. The corridors identified sit within or very close to the New Forest National Park and the Isle of Wight National Landscape, which include some of the highest levels of nature protection, including: the New Forest Special Protection Area (SPA), the South Wight Maritime SAC, the Isle of Wight Downs SAC, the New Forest Special Area of Conservation (SAC), the New Forest Ramsar site, the Solent and Southampton Water SPA, the Solent and Dorset Coast SPA, a number of designated Sites of Special Scientific Interest (SSSI), as well as important hedgerow

networks and locally important wildlife sites. All routes represent a significant bisection of habitats, protected areas, and ecological networks which risk significant negative ramifications for the functioning of the Solent's ecosystem as a whole.

Many of the habitats found along the proposed routes are irreplaceable and are a stronghold for species that are declining elsewhere. These include summer breeding species, such as ground nesting heathland birds, migrant summer visitors, and coastal seabirds, as well as wintering waders and wildfowl.

The Pipeline Corridor Consultation Booklet (Section 9, p39) outlines that Environmental Impact Assessments (EIAs) and Habitat Regulation Assessments (HRAs) will be carried out between 2024-2026 to establish baseline conditions, develop mitigation and identify opportunities for enhancements. We would expect to see significant weight given to the mitigation hierarchy with avoidance of impacts on key species and habitats built into the proposals.

Whilst we welcome the mention of plans for Biodiversity Net Gain (BNG) in association with the project, further detail on how and when this would be delivered is needed. Given the significance of the area for biodiversity, we recommend a genuine uplift of more than 10% Biodiversity Net Gain. Furthermore, we would like to see full HRAs to determine impacts on these designations and clear rationale for how the proposal meets the development tests set out in National Planning Policy Framework (NPPF) for development within a National Park and National Landscapes.

We welcome the opportunity for early engagement and would be pleased to provide further information.

Yours faithfully,



**Dante Munns**  
Area Manager Dorset,  
Wiltshire, Hampshire &  
Isle of Wight  
RSPB



**Deborah Tann MBE**  
Chief Executive  
Hampshire & Isle of  
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**Chris Edmond**  
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**Ian Boyd**  
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