Overall Mitigation Strategy
Dunsbury Park, Havant

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Section 1: Introduction

1.1. Eight Versa was commissioned in September 2025 by Portsmouth City Council to undertake an Overall Mitigation Strategy to inform the proposed development located at Dunsbury Park, Portsmouth, Hampshire, PO9 4EE hereafter referred to as 'the site'. Inputs by Greengage have also been included within this Strategy to provide a coherent approach across the site.

1.2. The site is centred on OS grid reference SU 699 092. The site comprises a phased development, with Plots 200, 300 and 500 already constructed, and plots 100, 400 and 600 - 601 currently being prepared for planning submission with subsequent planning applications expected in late 2025 and 2026.

Context and Background

1.3. All commitments within this report are applicable to Plot 400 only. While the subject of this strategy requires commentary discussing other plots within the Dunsbury site, any mitigation strategies applicable to individual plots will be confirmed through future planning applications relevant to each plot.

1.4. A hybrid outline planning permission for the phased development of Dunsbury Hill Farm into a business park named Dunsbury Park was granted by Havant Borough Council in 2014 (Reference APP/12/00338). To inform the hybrid outline planning permission and subsequent applications for the individual plots, numerous ecological surveys and reporting were undertaken. These reports include the following which have been used to inform this report where applicable:

- Environmental Statement (Atkins (2012) Dunsbury Hill Environmental Statement Volume 1)
- 2017 Dormouse Survey Results (Atkins (2018) 2017 Dormouse Survey Results. Dunsbury Park.
- Bat Survey and Report (Sylvatica Ecology (2017) Bat Survey and Report. Dunsbury Park Phased Development Projects)
- Ecological Impact Assessment (Atkins (2018) Ecological Impact Assessment. Reserved Matters Application Plot 3B Development. Reference: 5127287)
- Preliminary Ecological Appraisal – Plots 600 – 601 (Greengage (2023) Preliminary Ecological Appraisal. Dunsbury Park Plot 600 - 601. Reference: 551772dpJul23FV01_PEA_600 – 601)
- Reptile Survey Report – Plots 500 - 502 (Greengage (2021) Reptile Survey Report. Dunsbury Park Plot 500 - 502. Reference: 551772dpDec21FV01_Reptiles)
- Reptile Survey Report – Plots 600 - 601 (Greengage (2023) Reptile Survey Report. Dunsbury Park Plot 600 - 601. Reference: 551772dp13Oct23FV01_Reptiles_600 – 601)
- Dormouse Mitigation Strategy – Plots 500 – 502 (Greengage (2022) Dormouse Mitigation Strategy. Dunsbury Park 500 – 502)
- Bat Surveys Report – Plots 500 – 502 (Greengage (2021) Bat Survey Report. Dunsbury Park 500 – 502. Reference: 551772dpDec21FV01_Bat_Activity)
- Preliminary Ecological Appraisal – Plot 400 (Eight Versa (2025) Preliminary Ecological Appraisal. Reference: 11539 - Plot 400-Dunsbury Park - PEA - 2510-16ks
- Preliminary Ecological Appraisal – Plots 100 (Eight Versa (2025) Preliminary Ecological Appraisal. Reference: 11539 - Plot 100-Dunsbury Park - PEA - 2509-09ks

1.5. Alongside the ecological reports, arboricultural reports were also undertaken to inform the plot planning applications[1].

Site Description

1.6. The site is approximately 120 ha in size and is shown on Figure 1.1. Dunsbury Park is located to the east of the A3(M) and comprises areas of built commercial/industrial development with associated infrastructure, woodland, grassland, tree lines, ponds, scrub, bracken, scattered trees and hedgerows. A public footpath runs from north to south through the site. Forty five non-statutory designated sites, known as Sites of Importance for Nature Conservation (SINCs) are located within 2 km of the site. This includes Neville's Park Areas 2 & 3 SINC (HV0039) located 0.13 km south, Beech Wood East SINC (HV0041) located 0.15 km west, The Warren, Cherry Tree Row SINC (HV0040) located 0.17 km south, Havant SINC (HV0049) located 0.25 km south east, Dunsbury Hill Wood SINC (HV0050) located 0.27 km east, Outhurst/Inhurst/Beech Woods SINC (HV0036) located 0.27 km east and Meadow by Bells Copse SINC (HV0048) located 0.28 km north east.

1.7. Across Dunsbury Park comprises a range of habitats including built development on those plots already constructed with associated buildings, hardstanding (used for access, car parking and walkways), infrastructure and landscape planting. Associated with the construction of the completed plots, works and disturbance to plots 100 and 400 were also undertaken including removal of vegetation on plot 100 and the creation of artificial unvegetated, unsealed surfaces. Spoil and arisings from the previous phases were stored on Plot 400 which has ultimately created Open Mosaic Habitat on Previously Developed Land (OMHPDL) which is a Priority Habitat under Section 41 of the NERC Act 2006, along with areas of bracken, artificial unvegetated, unsealed surfaces, willow scrub and lowland mixed deciduous woodland. Plot 600 comprises modified grassland surrounded by lowland mixed deciduous woodland.

1.8. Hampshire Biodiversity Information Centre (HBIC) identified areas of woodland within the site as being located within a Network Opportunity area which are '*An ecological network is a group of habitat patches that species can move easily between maintaining ecological function and conserving biodiversity*'.

1.9. A number of priority habitats were identified within a 1 km radius of the site. UK Priority Habitats and Species are those subject to conservation action under Section 40 and 41 of the Natural Environment and Rural Communities (NERC) Act 2006 and referred to as Species of Principal Importance (SoPI) or Habitat of Principal Importance (HoPI Priority habitats) include deciduous woodland, ancient and semi-natural woodland, and good quality semi improved grassland. The majority of these are also designated as Sites of Importance

[1] Barrell Tree Consultancy (2025) Arboricultural constraints assessment: Dunsbury Park, Fitzwygram Cresent, Havant PO9 4EE. Report reference: 5098-Constraints-PB

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for Nature Conservation (SINCs) within Hampshire with the closest designated as wet woodland Beech Wood East SINC and deciduous woodland located 0.17 km south of the site.

1.10. Alongside the planning applications for Plots 400 and 600–601, a minimum 10% Biodiversity Net Gain (BNG) is required in accordance with Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). Separate BNG assessments will be undertaken for each plot. Ecological compensation and habitat enhancement measures are currently being explored by Portsmouth City Council and may include a combination of on-site habitat creation, off-site compensation and/or habitat enhancement.

1.11. Post-development landscaping planting will be designed for new users of the site and biodiversity. Planting will comprise native species and species with a known wildlife benefit including mixed native hedgerows, understorey planting, proposed trees, wildflower meadow mixes, native climbers and ground cover and mixed native shrub planting.

Purpose

1.12. The purpose of this report is to provide the overall mitigation strategy in relation to fauna identified onsite. This Strategy has been informed by the previous and ongoing survey work. Each species has been considered separately within this Strategy however; the overall approach will maximise benefits on a landscape scale across the wider Dunsbury Park landholding and into the surrounding landscape.

1.13. This Strategy is a reviewable document that should be updated and revised as required and should be informed by any on-going works at the site. The plan should also be reviewed to ensure the objectives and prescriptions are in accordance with current wildlife legislation and conservation objectives.

Quality Assurance

1.14. All ecologists at Eight Versa are members of CIEEM and abide by the Institute's Code of Professional Conduct.

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Section 2: Legislative Protection and Conservation Status

Legislation

2.1 Specific ecological features, including habitats and species, receive legal protection in the UK under various pieces of legislation, including:

- The Conservation of Habitats and Species Regulations, EU Exit 2018 (the Habitats Regulations) – this affords protection to: sites known as Special Areas of Conservation (SACs) that are of importance at a European level for habitats and species, excluding birds; sites known as Special Protection Areas (SPAs) that are of importance to birds; and it also protects certain species of plant and animal that are considered to be most in need of conservation at a European level including: bats, great crested newt *Triturus cristatus* and hazel dormouse *Muscardinus avellanarius*;
- The Wildlife and Countryside Act (WCA) 1981 (as amended) forms the key legislation protecting habitats and species. Sites of Special Scientific Interest (SSSIs), representing the best examples of our natural heritage, are notified under the Act. This includes bats, birds, reptiles, great crested newt, invertebrates, hazel dormouse and hedgehog;
- The Natural Environment and Rural Communities (NERC) Act 2006 includes a duty on all public authorities, including Local Authorities, to have regard to biodiversity conservation. It adds extra protection to SSSIs. Section 41 protects those Species and Habitats that are of Principal Importance (SoPIs and HoPIs, or 'priority habitats' and 'priority species', respectively) for the purpose of conserving biodiversity in England; and
- Protection of Badgers Act 1992 – specific legislative protection for badger *Meles meles*;
- The National Planning Policy Framework (NPPF) 2025[2] - requires local authorities to avoid and minimise impacts on biodiversity and, where possible, to provide net gains in biodiversity when taking planning decisions;
- Environment Act 2021[3] - Sets out to make provision about targets, plans and policies for improving the natural environment. Introduced a requirement for 10% Biodiversity Net Gain across; and
- The Countryside and Rights of Way Act 2000 – Strengthens species enforcement provisions of the WCA 1981 (as amended) and makes it an offence to 'recklessly' harm or disturb a place of rest or shelter of a protected species.

Local Policies

2.2 Alongside the above, the Local Planning Authority (LPA) have specific local planning policies. For the site, these include:

- Havant Borough Council Core Strategy 2011 (adopted March 2011)[4] – Sets out local policies relating to nature conservation and biodiversity for the site. It advocates for the creation, protection and enhancement of green assets, including parks, gardens, green roofs, native hedgerows and trees; and
- Havant Biodiversity Strategy 2025 – Outlines the biodiversity Strategy to provide a framework for action towards nature recovery[5].

Havant Borough Biodiversity Strategy[6]

2.3 Havant Borough Council have outlined 50 notable species found within the Borough, which provides an indication but not a comprehensive picture of Havant's priority species. This includes serotine bat, brown hare and hazel dormouse. Although not included within the 50 notable species, Bechstein's bat *Myotis bechsteinii*, a species closely associated with mature deciduous woodland has recently been recorded within the Borough.

[2] Ministry of Housing, Communities and Local Government (2025) National Planning Policy Framework.
[3] Environment Act, 2021 – Schedule 14.
[4] Havant Borough Council. Available here.
[5] Havant Borough Council. Available here.
[6] Havant Borough Council (2019) Havant Borough Biodiversity Strategy. Available here.

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Section 3: Bats

3.1 All bats and their roosts are protected under the Conservation of Habitats and Species Regulations 2017 (as amended) and the WCA 1981 (as amended).

Methodology and Survey Results

3.2 HBIC returned numerous records for fourteen species of bats within 2 km of the site. The closest records within the site were for common pipistrelle *Pipistrellus pipistrellus*. Within 0.2 km of the site, numerous other records were returned including soprano pipistrelle *Pipistrellus pygmaeus*, noctule *Nyctalus noctula*, Bechstein's bat *Myotis bechsteinii* and Myotis species.

3.3 Further afield, HBIC also returned records of Barbastelle *Barbastella barbastellus*, brown long-eared bat *Plecotus auritus*, serotine *Eptesicus serotinus*, Daubenton's *Myotis daubentonii* and Natterer's bat *Myotis nattereri* within 2 km of the site.

3.4 According to MAGIC, one historic mitigation licence was identified within 2 km of the site for the destruction of a resting place for common pipistrelle and brown long-eared located 1.4 km west of the site (licence number EPSM2013-5591).

3.5 Bat surveys have been undertaken across the site between 2010 and 2023. Bat activity was generally low across Dunsbury Park with the majority of activity along the woodland margins and dark corridors formed by public footpaths. The majority of the bats observed/recorded were common pipistrelle and soprano pipistrelle, with serotine and Myotis species recorded less frequently and occasional recordings of Nathusius, noctule and brown long-eared bat. A Barbastelle was recorded during the 2017 surveys. During the time which has elapsed since the previous surveys, plots 200, 300 and 500 have been constructed, however the majority of these are located within the central area of the site. Habitats suitable for rarer species of bat including Bechstein's and Barbastelle which are associated with mature deciduous woodland, are all being retained as part of the proposals, including the creation of dark corridors around the boundaries of the site and plots 100, 400 and 600 – 601. No horseshoe species were recorded during the previous surveys undertaken on the site and it is unlikely the species would have occupied the site in the time which has elapsed.

3.6 Across the site, a number of mature trees are also present which have the potential to support roosting bats. The majority of the vegetated habitats across the site are suitable for foraging and commuting bats and provide connectivity across and around the site and into the wider landscape. These habitats are considered to provide foraging, commuting and roosting opportunities for bats, including rarer species such as Barbastelle and Bechstein's.

3.7 Surrounding the built development area, the plots already constructed are subject to security lighting, however this is mainly focussed on the buildings, car parking areas and infrastructure.

3.8 For plot 400, updated activity surveys are not anticipated to be undertaken due to the habitats of highest ecological importance, namely the boundary vegetation being retained, buffered and protected as part of the evolving design. The retention of these habitats will be maintained as dark corridors and will also maintain connectivity to the wider landscape.

Impacts and Mitigation

Impacts

3.9 The proposals have the potential for killing and injury of individual bats, damage or destruction of roosts, if present and isolation or fragmentation of habitat through habitat loss and lighting.

Mitigation

3.10 Where possible, the proposals have been designed to retain and protect features of highest ecological importance for roosting, foraging and commuting bats including woodland, scrub and trees. These features are connected to the wider landscape, including offsite woodland blocks, hedgerows and grassland, offering continuity for species reliant on linear features for navigation. Boundary vegetation around each plot will remain as dark corridors, to continue to provide connectivity around the site and to offsite habitat within the wider landscape.

3.11 Where access is required between plots 400 and 600 – 601, a canopy over the road will be maintained to provide connectivity over the road, and lighting will be designed to avoid directly shining on this canopy. This will maintain this commuting route for nocturnal fauna including bats.

3.12 New planting will comprise native species and species with a known wildlife benefit, including species beneficial to invertebrates, which in turn will provide a foraging resource for bats. The majority of new planting is located adjacent to retained habitats and separated from the built development areas by native hedgerows. Not only will the proposed native hedgerows provide screening, they will also enhance the boundary vegetation and provide a natural buffer for additional foraging and commuting opportunities.

3.13 Although there may be a delay in the establishment of replacement habitats, future habitat enhancement and/or compensation measures are anticipated to provide additional foraging opportunities for bats within the local area.

Lighting

3.14 Lighting on plots 400 and 600 – 601 during the construction and operational phases of the developments will be sympathetic to bats that may be roosting at the site or utilising the site and nearby habitats for foraging and commuting. Each plot has a separate lighting strategy which will follow a similar strategy throughout.

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3.15 This will be achieved through the use of lighting designed to minimise disturbance to bats. Guidance below is in accordance with the "Bats and Artificial Lighting at Night" Guidance Note 08/23[7] (2023).

3.16 During the bat active season, light levels should ideally be maintained below 0.5 lux along the retained boundary vegetation and other key commuting corridors. Lighting should be limited to working hours and/or controlled through timers where health and safety allow. No works are expected to take place outside standard daylight working hours, and retained vegetation will continue to be maintained as dark corridors to minimise light spill.

3.17 Design principles during the construction phase include the following:

- No lighting will be directed towards the retained habitats around the boundaries of the plots.
- Any external security lighting will be set on motion-sensors and short (1 min) timers and will be of a lower wattage than 150W.
- No lighting will be directed towards new roost features installed during the construction phase and, a dark corridor to allow bats the opportunity to commute to the roosts must be maintained.
- Where lighting is required, directional, low-spill LED lights will be used, pointed away from sensitive boundaries (northern, western and eastern boundaries of plot 400 and all boundaries of plots 600–601), using a warm white spectrum (<2700 K) and wavelengths above 550 nm. The current lighting layouts are indicative and will be refined at the next design stage to ensure that the above measures are fully achieved.

3.18 During the operational phase the lighting strategy will follow the principles set out below and the external indicative lighting plan and lighting strategy in Appendix E;

- No lighting will be directed towards new roost features and a dark corridor to allow bats the opportunity to commute to the roosts must be maintained.
- Anticipated light levels at the edge of adjacent woodland, scrub or hedgerows, will remain below 1lux horizontally and vertically.
- Directional LED lights, pointed away from the northern, western and eastern boundaries of the site, using a warm white spectrum (<2700 Kelvin) and wavelengths of higher than 550nm will be adopted. External wall lighting around the car park will be directed away from the boundary habitats and only toward the central car park.
- Column heights and height placement of external light on walls will be carefully considered to minimise light spill, with physical barriers such as retaining walls, fences, hedges and vegetation used where appropriate to provide additional screening along site boundaries.
- Only luminaires with an upward light ratio of 0% and with good optical control will be used.
- Internal lighting will avoid light spill onto habitats and new bat roost features.
- Accessories such as baffles, hoods or louvres will be used to reduce light spill and direct it only to where it is needed.
- Lighting will be directional focussing on the built development areas of the site.
- Where practical and safe to do so, lighting will be on timers and/or sensors to avoid unnecessary lighting when not in use.
- The current lux values shown on the indicative lighting drawings are based on preliminary design assumptions. These will be refined through the detailed design stage to ensure compliance with ILP/BCT guidance.

3.19 Landscape planting has also been designed to provide screening of artificial lighting onto retained features. This includes hedgerow and tree planting around the boundaries of the built development areas, where possible, and will be reviewed in tandem with the final lighting design to ensure that adequate screening and dark corridors are maintained.

Enhancement

3.20 To enhance the site's biodiversity, post-development soft landscaping plans will include plants known to benefit insects, thereby attracting foraging bats. Input from a suitably experienced ecologist is currently being provided to develop the landscaping plans and to ensure the most appropriate species mix is used to maximise benefits for biodiversity. The Bat Conservations Trust's 'Landscape and Urban Design for Bats and Biodiversity' [8] and the Royal Horticultural Society's 'Plants for Bats List'[9] offer valuable guidance. Species being considered include hawthorn, catchflies *Silene* species, evening primrose *Oenothera biennis*, honeysuckle *Lonicera species*, and common ivy *Hedera helix* and night-scented stock *Matthiola longipetala*. These will encourage night-flying insects and provide a foraging resource benefit for bats.

3.21 To support local bat populations, at least 5 bat boxes will be installed on each remaining plot to be developed, including plots 400 and 600 – 601. Bat boxes made from cement or 'woodcrete' (a mixture of wood shavings and cement) will be used, such as Vivara Pro Build-in WoodStone Bat Box[10] and 2F Schwegler Bat Box[11], Habibat Bat Box 001[12] (or similar) as they are likely to be of interest to a wide range of species and typically have longer lifespans than wooden boxes. The boxes can be integrated into new buildings and/or installed on suitable retained semi-mature and mature trees. The boxes will be located as high as possible, at a minimum of 4m to avoid predation. Bats use dark tree lines or hedgerows for navigation and boxes will therefore be located away from external lighting. Once installed, the bat boxes will be left undisturbed.

3.22 To support local bat populations, at least 5 bat boxes will be installed on each remaining plot to be developed, including plots 400 and 600 – 601. Bat boxes made from cement or 'woodcrete' (a mixture of wood shavings and cement) will be used, such as Vivara Pro Build-in

[7] Institution of Lighting Professionals Bats and BCT (2023) Bats and artificial lighting in the UK – Bats and the Built Environment series (Guidance Note 08/23).
[8] Gunnell, K., Grant, G. and Williams, C. 2012. Landscape and urban design for bats and biodiversity. Bat Conservation Trust
[9] https://www.rhs.org.uk/advice/pdfs/plants-for-bats.pdf
[10] https://www.nhbs.com/vivara-pro-build-in-woodstone-bat-box
[11] https://www.nhbs.com/2f-schwegler-bat-box-general-purpose
[12] https://www.nhbs.com/habibat-bat-box-staffordshire-smooth-red-brick

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WoodStone Bat Box[13] and 2F Schwegler Bat Box[14], Habibat Bat Box 001[15] (or similar) as they are likely to be of interest to a wide range of species and typically have longer lifespans than wooden boxes. The boxes can be integrated into new buildings and/or installed on suitable retained semi-mature and mature trees. The boxes will be located as high as possible, at a minimum of 4m to avoid predation. Bats use dark tree lines or hedgerows for navigation and boxes will therefore be located away from external lighting. Once installed, the bat boxes will be left undisturbed.

3.23 Overall, it is anticipated that the population of bats previously recorded on the site would still be present and would continue to use the site post-development, providing the mitigation outlined above is implemented onsite.

[13] https://www.nhbs.com/vivara-pro-build-in-woodstone-bat-box
[14] https://www.nhbs.com/2f-schwegler-bat-box-general-purpose
[15] https://www.nhbs.com/habibat-bat-box-staffordshire-smooth-red-brick

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Section 4: Badger

4.1 Badgers are protected under the Protections of Badger Act 1992. The legislation aims to protect the species from persecution, rather than being a response to an unfavourable conservation status. As well as protecting the animal itself, the 1992 Act also makes the intentional or reckless destruction, damage or obstruction of a badger sett an offence.

Methodology and Survey Results

4.2 The data search returned two records for badger within 2 km of the site. Evidence of badger was recorded across the site. Outside of the built development areas, the site contained habitats suitable for badger, including scrub, grassland and woodland. No evidence of the presence of badger, such as setts, latrines or dung pits were recorded on plot 400, with the exception of a few mammals runs noted along the northern boundary of the plot and extending offsite. Additionally, some sections of the scrub around the periphery of the site were not fully accessible at the time of the survey due to dense vegetation and may have obscured evidence. The woodland and scrub, particularly around the site boundaries, offer some potential for occasional foraging use by badger. The spoil heaps onsite were generally compact, limiting sett building opportunities onsite. The site boundaries also retain connectivity to the wider landscape to the north and east, where additional suitable habitat is present.

4.3 Woodland across the potential to be used by foraging and sheltering badger and provides extensive opportunities for sett building. Due to the surrounding habitats, the dynamic nature of badger and the connectivity between the site and offsite suitable habitats, badger may colonise the site or use it infrequently as part of the wider foraging resource.

Impacts and Mitigation

4.4 If construction work affects a newly created sett or in the event of a sett lost or disturbance, this would trigger the legislation protecting badger. Should a new sett be recorded onsite and shows signs of 'current use' as defined in guidance at that time of construction, a Natural England badger licence will be required prior to development in that area and appropriate mitigation agreed and then implemented. Due to the dynamic nature of badgers, an updated survey will be undertaken immediately prior to construction work starting on each plot. Avoidance, mitigation and compensation measures will be implemented across the site to ensure no badger are impacted by the plot developments and that no offence under current legislation takes place.

4.5 Prior to works commencing on the site, a tool box talk will be provided by an ecologist to all contractors working on the site. This will inform them of all ecological constraints and considerations relevant to the construction works, including the presence of badger, other amphibians, reptiles, birds and hedgehog. This will include identification of the species, their legal protection and necessary mitigation measures including what to do if any of these species are encountered on the site during site works.

4.6 Prior to the commencement of any works affecting woodland or other suitable habitat for badger, these areas should be checked by a suitably qualified ecologist for signs of badger activity or active setts. During construction, the following precautionary measures will be adopted to avoid harm to any badger that may move through the site:

- No open trenches or pits should be left uncovered overnight. Where unavoidable, they should include escape ramps (e.g. roughened planks).
- No fires should be lit on site.
- No food waste should be left accessible overnight.
- Vehicle movement should be restricted to existing tracks and areas of hardstanding or habitat clearly unsuitable for badger, unless checked in advance by an ecologist.
- The storage of topsoil or other 'soft' building materials on site will be given careful consideration. Badgers will readily adopt such mounds as setts, which would then be afforded the same protection as established setts. Such mounds will be inspected monthly to check for use by badger throughout the construction period.

4.7 Post-development, the retention and creation of habitats across Dunsbury Park will ensure opportunities are retained onsite and connectivity to the wider landscape is maintained.

Enhancement

4.8 To enhance the site for badger the following measures could be incorporated into landscape planting for each plot:

- Retain and enhance boundary vegetation, such as woodland and scrub, to provide natural shelter and foraging opportunities.
- Create areas of semi-natural grassland or wildflower-rich lawns with varied sward height to encourage invertebrates and increase food availability.
- Avoid the use of chemical pesticides and herbicides, particularly near boundary habitats, to maintain a healthy ground invertebrate population.

4.9 These enhancements would contribute to wider ecological connectivity within the urban fringe and support the long-term resilience of local badger populations.

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Section 5: Nesting Birds

5.1 All British birds, their nests, eggs and young are legally protected under the WCA 1981 (as amended) from disturbance while actively nesting (generally acknowledged to occur between March and August inclusive, although this is not defined in law and birds can nest outside of this time).

Methodology and Survey Results

5.2 The desk study returned a large number of bird records, including Species of Principal Importance, Priority Species and red listed species including skylark *Alauda arvensis*, nightingale *Luscinia megarhynchos*, barn owl *Tyto alba*, and mistle thrush *Turdus viscivorus*. Records of swift *Apus apus* were also returned within 2 km of the site.

5.3 HBIC also returned 'positive' visits to Solent Wader and Brent Goose Strategy sites, all of which are located 2 km south of the site.

The woodland, scrub and adjacent offsite hedgerows have potential to support a range of common species of breeding birds brambling *Fringilla montifringilla*, greenfinch *Chloris chloris* and song thrush *Turdus philomelos*.

5.4 While the site provides suitable foraging opportunities for priority or Schedule 1 bird species, the site has a history of disturbance and has only been relatively recently created. As such, the site is unlikely to support a significant assemblage of priority or Schedule 1 bird species. Due to the habitats present onsite, the site is unlikely to support an assemblage of birds associated with the Chichester and Langstone Harbour Special Protection Area (SPA) or Portsmouth Harbour SPA.

Impacts and Mitigation

Impacts

5.5 The removal of woody vegetation including scrub will displace the birds that are using these habitat features for nesting, foraging and sheltering and risk killing and injury of individuals, including nests, if present. The woodland and scrub have potential to support small numbers of common and widespread species of nesting birds.

Mitigation

5.6 Where the proposed works require the removal of these habitats, this must be carried out between September to February inclusive, to avoid any potential offences relating to nesting birds during the main breeding bird season. If works during the breeding season is unavoidable, then a nesting bird check will be completed by a suitably experienced ecologist prior to the commencement of work. If nesting birds are found to be present, a buffer zone will be established, with no works to be undertaken within the buffer zone until the chicks have fledged or the nest abandoned as confirmed by the suitably experienced ecologist.

5.7 With the proposed landscape planting and retention of habitat across the site it is anticipated that breeding birds can continue to use the site post-development.

Enhancements

5.8 The inclusion of soft landscaping areas will provide suitable areas for invertebrates, which in turn will provide foraging opportunities for birds.

5.9 To enhance the site further for nesting birds, bird boxes suitable for declining species such as swift *Apus apus* and house sparrow *Passer domesticus* (both Species of Principal Importance (SoPI)) will be installed on a north to north-easterly aspect of the proposed buildings and/or on retained semi-mature and mature trees. These boxes will be made of woodcrete (or similar) and installed as per the manufacturer's instructions. Boxes should be located as high as possible and preferably below an overhang or ledge and offset from windows and doors on the proposed buildings.

5.10 Recent studies have shown that swift bricks are being used by red-listed species such as house sparrow, black redstart *Phoenicurus ochruros*, starling *Sturnus vulgaris* and swift as well as other small bird species and could be described as a 'universal brick'[16]. This not only increases the chance of them being used but also, provides a cost-effective ecological enhancement for a variety of bird species[17]. Where possible, at least 5 swift bricks should be installed within the fabric of the buildings. Alternatively, at least 5 suitable bird boxes should be installed on retained trees such as, the Vivara Pro Seville WoodStone Nest Box with 32mm Oval Hole[18], 1B Schwegler Nest Box[19] and Vivara Pro WoodStone Starling Nest Box[20] (other similar specifications would also be acceptable).

[16] Swift Bricks: The 'Universal' Nest Brick – by Dick Newell | CIEEM
[17] https://www.swift-conservation.org/universal_swift_nest_brick02.pdf
[18] https://www.nhbs.com/vivara-pro-seville-32mm-oval-woodstone-nest-box
[19] https://www.nhbs.com/1b-schwegler-nest-box?bkfno=174761
[20] https://www.nhbs.com/vivara-pro-woodstone-starling-nest-box

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Section 6: Hazel Dormouse

6.1 Dormouse is a European Protected Species (EPS) and subject to stringent protection under the Conservation of Habitats and Species Regulations 2017 (commonly referred to as the Habitat Regulations) and WCA 1981 (as amended). Dormouse is also listed as a Species of Principal Importance under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006.

Methodology and Survey Results

6.2 The data search returned sixteen records of hazel dormouse within 2 km of the site. According to MAGIC, three historic mitigation licences were identified within 2 km of the site. The closest is located 0.25 km south for the damage and destruction of breeding and resting places for dormouse (licence number 2014-456-EPS-MIT).

6.3 An updated dormouse survey was undertaken in 2017 by Atkins of Dunsbury Park which identified populations of dormouse within the northern and western boundaries of plot 400 and within woodland adjacent to plot 100. Prior to this, dormouse presence/likely absence surveys were undertaken between 2010 - 2011 to inform the Environmental Statement. The previous surveys have confirmed that hazel dormouse are present within Dunsbury Park.

6.4 Through consultation with the LPA in September 2025 for plot 400, further dormouse surveys for this plot are not required providing a mitigation strategy is prepared and implemented. The majority of built development for plot 400 is located within the central portion of the plot, retaining and buffering existing boundary features including bracken, scrub, hedgerows and woodland, all of which have the potential to be used by hazel dormouse and provide connectivity to habitats within the wider Dunsbury Park and landscape.

6.5 Due to the age of the survey data, updated surveys will be undertaken for plot 600 – 601, starting in October 2025 until 2026 following best practice guidelines to inform a subsequent Natural England (NE) EPS mitigation licence required for this plot in order to allow the works to proceed lawfully and to maintain the dormouse population at a favourable conservation status. For plot 600 – 601, the EPS mitigation licence can be applied for once planning permission is granted and all relevant pre-commencement conditions have been discharged. All mitigation and enhancement measures, with regards to dormice, will be agreed with NE in advance of any works commencing and will follow NE's guidance. The methods employed to minimise impacts on dormice during both the construction and operational phases, which will be included as part of the mitigation licence application, are provided within this report.

Impacts and Mitigation

Impacts

6.6 Hazel dormouse and their associated habitats could be lost, harmed, killed or injured if they are not moved from harm's way prior to habitat clearance. In the absence of mitigation, habitat loss would result in mortality, which would also trigger the legislation that protects hazel dormouse from harm. A strategy to safeguard the hazel dormouse populations are therefore required on plots 400 and 600 – 601, however plot 600 – 601 will be subject to an EPS mitigation licence and separate mitigation strategy, however it will follow the broad principles within this section. All other phases of Dunsbury Park are already built or considered unlikely to support a population of hazel dormouse.

6.7 Within plot 400, without mitigation measures and suitable protection, damage to the retained features of high importance to dormouse (northern and western boundaries) could occur during the construction phase as a result of machinery use or storage of materials damaging root systems. Habitat loss and degradation, potentially resulting in reduced areas of suitable foraging, shelter and breeding habitat, could lead to population fragmentation and isolation. Unmitigated, direct impacts during and post-construction could result in mortality to adult individuals as well as potential mortality to dependent young (if present).

6.8 During the operational stage, there could be an increased risk of disturbance from noise levels, lighting and littering of retained habitats. Without mitigation, these indirect effects would potentially compound habitat loss.

Mitigation

6.9 The proposals have been designed to retain features of highest ecological importance to dormouse where possible and minimise direct impacts of habitat loss. This includes the retention of scrub, woodland and hedgerows across the site to prevent isolation of habitats and retain connectivity to habitats within the wider landscape, particularly those where hazel dormice have been recorded.

6.10 The retention, creation and enhancements of habitats onsite will be managed and monitored through the implementation of a Landscape and Ecological Management Plan (LEMP), to be conditioned for the plots to yet receive planning. Where access is required between plots 400 and 600 – 601, a canopy over the road will be maintained to provide connectivity over the road and lighting will be designed to avoid directly shining on this canopy.

6.11 Mitigation under the EPS licence for plot 600 - 601 is likely to include phased vegetation clearance under ecological supervision during the active dormouse season (April–November, inclusive), retention of habitat corridors where possible, and compensatory planting of structurally diverse native hedgerows and woodland edge habitats. Works must follow a precautionary approach in line with the Dormouse Conservation Handbook[21] to avoid killing or injuring dormouse during site clearance.

Compensation for Habitat Loss and Continued Provision of Breeding Sites/Place of Shelter

6.12 It is considered that the inherent mitigation in the overall design will minimise the impacts as far as possible by retaining the features of most importance to dormouse such as scrub, hedgerow and woodland habitat with additional habitat created on each plot comprising native, structural planting connected to retained habitats, strengthening connectivity further into the wider landscape.

[21] Bullion, S., Wolton, R., & White, I. (2025). Hazel Dormouse Conservation Handbook (3rd ed.). The Mammal Society

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Enhancements

6.13 There are also opportunities to deliver ecological enhancements for dormouse in line with national and local planning policy. Ten dormouse boxes will be placed in suitable locations within retained woodland, scrub and hedgerow habitat to the north, east and west of plots 400 and 600 – 601 to provide further dormouse nesting opportunities within the wider site.

6.14 Boxes will be sited on suitable trees in advance of sufficient establishment of new planting. Boxes will be GPS referenced for future monitoring, remain in place and will be monitored for any signs of use and maintained in case of damage, with details to be provided within the Landscape and Ecological Management Plan (LEMP).

6.15 The improved connectivity, continuous arboreal links and additional hedgerow, scrub and tree planting will provide additional suitable habitat and strengthen connectivity to habitats across the site and the wider landscape. Proposed species of benefit to dormice will include hazel *Corylus avellana*, honeysuckle *Lonicera periclymenum*, bramble *Rubus fruticosus*, oak *Quercus robur* and field maple *Acer campestre*. Detailed planting proposals for each plot, which are expected to be conditioned, will include the species and specification for planting including the age of specimens.

6.16 The installation of dormouse nest boxes within retained and newly created habitat should also be considered to increase nesting opportunities.

Aftercare

6.17 A LEMP will control creation and management of dormouse habitat on each plot and the wider Dunsbury Park. The LEMP can be controlled through a planning condition and will includes management prescriptions. This will include long-term management (e.g. sympathetic hedgerow cutting and rotational coppicing) to ensure the development maintains and enhances habitat quality for dormouse.

6.18 Details of dormouse monitoring will also be included in the NE licence application, based on the following principles. Monitoring will be undertaken in September/October, when the probability of finding dormice is highest, in years 2 and 5, following completion of plot 600 - 601. This will entail a check of dormouse nest boxes on site by a licenced dormouse ecologist or experienced accredited agent. Records of dormouse presence, age and sex will be taken, and provided to the local ecological record centre as well as NE. In the event boxes are damaged or missing, they would be replaced, and any old nests recorded and cleared out.

6.19 Provided that the dormouse mitigation strategy, described above, can proceed in accordance with the above measures and a mitigation licence will be submitted and granted for plot 400, it is considered that it would be compliant with legislation in respect of hazel dormouse.

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Section 7: Reptiles

7.1 Common reptiles are protected under the Wildlife and Countryside Act (WCA) 1981 (as amended) from 'intentional' killing and injury. The Countryside and Rights of Way Act (CRoW) 2000 tightens this protection by making it an offence to 'recklessly' cause harm or death. Slow worm is also a 'Priority Species'.

Methodology and Survey Results

7.2 The data search returned numerous records of for grass snake *Natrix helvetica*, adder *Vipera berus*, common lizard *Zootoca vivipara* and slow worm *Anguis fragilis* within 2 km of the site. This included recorded from Dunsbury Park for common lizard.

7.3 Reptile surveys were undertaken to inform the Environmental Statement for the hybrid application between 2011 and 2021. Updated surveys have been undertaken to inform each subsequent plot. Reptile surveys on plot 500 - 502 were undertaken between September and October 2021. The surveys identified a low population of common lizard, slow worm and adder. Reptile surveys were undertaken between May and July 2023 on plot 600 - 601 which identified an 'exceptional' population of slow worm, 'good' population of common lizard and 'low' populations of adder and grass snake.

7.4 Although updated surveys have not been undertaken for plot 400, the plot has been subject to disturbance for a number of years. However, the plot does support areas of suitable sheltering and foraging habitat for common reptile species, including woodland, scrub and offsite, adjacent hedgerow bases as well as a mosaic of habitats onsite including grassland and ruderal vegetation. The northern and eastern boundaries provide connectivity to habitats within the wider landscape including SINCs which may also support a population of reptiles. As the plot is surrounded by suitable habitat and confirmed populations (plot 600 – 601), reptiles could be transitionally present on the plot which have established since the major disturbance activities have ceased, such as heavy machinery use onsite and the movement of spoil. The remaining plots on site are also subject to annual management which have prevented a thick thatch layer and tussocky vegetation forming across the majority of the site. However, due to the short time which has elapsed since the disturbance activities have ceased, any population is anticipated to be low. Plot 100 comprises almost entirely of artificial unvegetated; unsealed surface and therefore considered unsuitable for reptiles.

Impacts, Mitigation and Receptor Site

Impacts

7.5 Reptiles could be harmed, killed or injured if they are not moved from harm's way prior to habitat clearance. In the absence of mitigation, habitat loss would result in mortality, which would also trigger the legislation that protects common reptiles from harm. A strategy to safeguard the reptile populations are therefore required on plots 400 and 600 – 601. All other plots of Dunsbury Park are already built or considered unlikely to support a population of reptiles. Each plot translocation will be undertaken separately; however, the overall approach will be similar.

Mitigation - Translocation

7.6 Permanent reptile exclusion fencing will be installed along the northern and eastern boundaries of Plot 400 to prevent reptiles re-entering the site during the construction phase. Temporary reptile exclusion fencing will also be installed around the remaining boundaries of each plot, as required, during the relevant translocation and construction works.

7.7 Reptile fencing will be installed by a specialist contractor (TBC), who have suitable experience of installing reptile exclusion fencing, during the active season for reptiles (March-October inclusive). Prior to works commencing on each plot, a tool box talk will be provided by a suitably qualified and experienced ecologist to all contractors working at the site. This will inform them of ecological constraints and considerations relevant to the construction works, including the presence of reptiles and other fauna including badgers, amphibians, birds, hazel dormouse and hedgehogs (see other sections of this Strategy). This will include identification of the species, their legal protection and necessary mitigation measures including what to do if any of these species are encountered on the plots during the site works and found prior to completion of the translocation programme. Additional toolbox talks may be required as additional contractors become involved with site works, to ensure that all contractors working on the plots during initial site clearance/preparation works are familiar with the potential ecological constraints of the plots and protected species, in order that protected species are sufficiently protected, should they be encountered.

7.8 In addition, contractors will be made aware of the purpose of reptile exclusion fencing, and any additional protective fencing on the site (such as to protect trees) to ensure that these areas are protected, as required, and that fencing remains undamaged and functional throughout the duration of works on the site, as required. The route for the fencing will be marked out on each plot by the contractor with advice and under ecological supervision, and subject to a hand search by the ecologist on site. Considerations will also be given to other fauna, such as nesting birds, amphibians and small mammals.

7.9 Details for the reptile translocation are provided below, and will be undertaken by personnel with suitable training and experience in reptile handling, including adder:

- A minimum of 30 days translocation will be undertaken within the active season for reptiles (dependent on suitable weather conditions but generally considered to be between March to October inclusive);
- Artificial refugia comprising 0.5 x 1 m pieces of bitumen roofing felt would be placed within the areas of suitable habitat to be impacted upon at a density of at least 100 refugia per hectare. Refugia would be mapped to allow for identification of locations where captures occur. These would then be allowed to settle for at least 7 days, to allow them to 'bed in' and increase their likelihood of being used by reptiles. Therefore, a total of 60 bitumen felts are required;

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- Refugia will be checked by an ecologist within suitable weather conditions, namely when the air temperature is between 9°C and 18°C, avoiding rainy or windy conditions as far as possible, at least once a day, with optimal timing generally between 8.30 and 11.00 and between 16.00 and 18.30, subject to the weather (Froglife, 1999[22]);
- Any reptiles found will be caught, by hand, and carefully placed into a vivarium or pillow case to ensure they cannot escape. These reptiles will be kept out of direct sunlight for a short period of time, whilst the refugia are checked, before their release into the proposed receptor site within the same day;
- Trapping will be undertaken for the 30 days and continue for 5 clear days, or until a catch depletion curve demonstrates that reasonable effort, within suitable weather conditions, has been used, whichever is sooner, at the discretion of the lead ecologist and to be agreed with the LPA; and
- Following this, habitat manipulation will be employed under the supervision of an ecologist, to gradually reduce the extent of suitable habitat and to concentrate remaining reptiles within certain, smaller areas to aid trapping efficiency.

7.10 Habitat manipulation will be undertaken across plots 400 and 600 – 601 in a systematic way, under ecological supervision. The location and direction of manipulation will be determined by the ecologist and work will include the following:

- Any features with potential to be used by reptiles as natural refugia, such as beneath the roots of scrub or woody vegetation, rubble/stone or wood piles, or other debris, should be carefully searched by hand by an ecologist and subsequently dismantled by hand under ecological supervision, to capture any reptiles using them;
- Suitable habitat, including grassland and vegetation at the base of dense and scattered scrub within the working area will be cut to a height of approximately 10 cm with a brush cutter or strimmer, as appropriate and the brashings and cut vegetation removed from the site. As this may coincide with the nesting bird season (which is March to September, inclusive) and areas of scrub vegetation may also provide nesting opportunities for breeding birds, clearance would need to be preceded by a check for active nests by a suitably qualified ecologist. If any active nests are found to be present, a suitable buffer would need to be retained until the young have fledged and the nest is no longer active;
- Artificial refugia will be returned to their previous locations following vegetation clearance or concentrated within remaining uncut vegetation as habitat manipulation continues. Cut vegetation will be left for at least 24 hours in suitable weather conditions (the same as described for the translocation above) before further areas are manipulated, to allow any reptiles to move to beneath artificial refugia within the remaining trapping areas, within suitable reptile habitat; and
- A destructive search of remaining suitable habitat will follow completion of the trapping period. The remaining vegetation within these areas will then be cut/strimmed to ground level within suitable weather conditions to ensure that any reptiles, still present, would be active i.e. dry with an air temperature above 9°C, before being scraped back to the soil using a toothed bucket, under ecological supervision, to ensure that the areas are no longer suitable for reptiles;
- At this point the areas subject to trapping and translocation will be released for site works.

7.11 Following completion of reptile translocation works, areas being developed will be maintained as bare earth for the duration of construction to discourage reptiles from re-entering the works areas. Any building materials, such as stones or bricks, will be stored on pallets and in as few locations as possible to discourage reptiles from using them as shelter. Any demolition materials or those arising from vegetation removal/management will be stored in skips or similar containers rather than in piles on the ground.

7.12 Reptile exclusion fencing will remain in place throughout the duration of construction works and would be subject to monthly fence checks to ensure that it is maintained within a functional condition, in particular during the period when reptiles would be expected to be active i.e. March to October inclusive. Vegetation strimming may be required adjacent to the fencing, in order to prevent vegetation growing to the height of the fencing, which would otherwise allow reptiles to cross over the fencing, to be advised by the ecologist.

7.13 Once reptile translocation works are complete, temporary reptile fencing associated with each plot will be removed following completion of the relevant construction works for that plot. Permanent fencing around the eastern and northern boundaries of Plot 400 will be retained during construction to prevent reptiles re-entering the site.

Receptor Site

7.14 A proposed receptor site has been identified in the south of the site which forms part of Cherry Tree Row SINC. A walkover of the proposed receptor site was undertaken in September 2025 which identified the area as comprising a mosaic of habitats including rough, tussocky grassland with ruderals, bramble and scrub and a pond. Scattered log and brash piles were present throughout. The receptor site is subject to minimum disturbance, although a number of informal paths were identified through the area. The proposed reptiles site is approximately 4.13 ha and is largely bounded by woodland (see Figure 1.2).

[22] Froglife, 1999. Reptile survey: an introduction to planning, conducting and interpreting surveys for snake and lizard conservation - Froglife Advice Sheet 10. Halesworth: Froglife.

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Figure 1.2: Site B - Proposed Reptile Receptor Site (basemap from Google, 2025)

7.15 To enhance the proposed receptor site, management will be altered slightly, subject to agreement, to encourage floral diversity and manage encroaching scrub, and through the provision of log piles and three reptile hibernacula (see Figure 1.3) in order to ensure it is suitable and increase the carrying capacity, basking, foraging and sheltering opportunities for reptiles. Log piles should be constructed using a variety of untreated timber and brash of different sizes, ideally placed partially in sun and partially shaded to create a range of thermal conditions. Where possible, logs should be placed directly on the ground or partially buried to retain moisture and promote decay, enhancing their value as sheltering and overwintering sites. The piles should be left undisturbed and incorporated into a long-term site management plan to ensure their continued suitability for wildlife use. An interpretation board will also be installed to inform users of the proposed reptile site, mainly walkers/dog walker on the presence of reptiles and to stay on designated paths and keep dogs on leads.

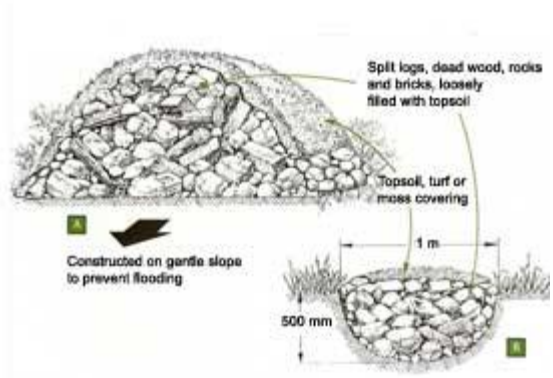

Figure 1.3: Reptile Hibernacula Design

7.16 HBIC returned no records for reptiles within the SINC, however there is connectivity between the proposed receptor site location and the records identified to the west of the site, over Fitwygram Way, the access road into Dunsbury Park. Although the specific location of the proposed receptor site will be 4.13 ha, there will be no barriers or fencing installed to contain the reptiles within this area only and therefore any population of reptile can continue to use the surrounding woodland and associated habitats. Connectivity to the north west of the proposed receptor site and to the north will also be retained which provides linkages and a corridor for wildlife movement to the north of the wider site. Although there may be a delay in the establishment of replacement habitats, future habitat enhancement and/or compensation measures are anticipated to provide additional opportunities for sheltering and foraging reptiles and enhance habitat connectivity.

7.17 It is anticipated that any reptiles translocated as part of plot 400 to the proposed receptor site would not return to the plot or the adjacent plot 600 – 601 in the short term due to the distance between the proposed receptor sites and the plots which would avoid double handling of any reptile population.

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Plot Level

7.18 At plot level, the retention and creation of habitats on each plot will include native species and species with a known wildlife benefit, including ground structural planting to provide opportunities for reptiles onsite. Where possible, the proposed habitats will connect to retained habitat, avoiding isolation and fragmentation of habitat.

Release for Development

7.19 A report summarising the findings of the translocation exercise for each plot will be issued to the Council before being released for development.

Aftercare

7.20 An Ecological Management Plan (EcMP) will control creation and management of reptile habitat on the proposed receptor site. The EcMP can be controlled through a planning condition and will include management prescriptions to maintain suitable habitat for reptiles and ensure favourable conditions to support the translocated population.

7.21 Provided that the reptile mitigation strategy, as described above, can proceed in accordance with the above measures, it is considered that it would be compliant with legislation in respect of reptiles.

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Section 8: Other Fauna

8.1 Hedgehog *Erinaceus europaeus* and common toad *Bufo bufo* are a Species of Principal Importance (SOPI). Hedgehog is also a Local Biodiversity Action Plan (LBAP) species.

Methodology and Survey Results

8.2 The data search returned records of hedgehog and common toad within 2 km of the site, with the nearest recent hedgehog record (2020) located approximately 0.9 km away.

8.3 No specific surveys for hedgehog have been undertaken on the site; however, suitable habitat of potential use by hedgehog and common toad is present, namely areas of grassland, scrub and woodland bases, meaning they are considered likely to be present and using the site for foraging and commuting.

8.4 The desk study also returned records of notable terrestrial invertebrates including stag beetle *Lucanus cervus*, small heath *Coenonympha pamphilus* and purple emperor *Apatura iris* within 2 km of the site. The Open Mosaic Habitat on Previously Developed Land (OMHPDL), together with scrub and woodland margins, provides good structural diversity, bare ground and nectar resources that can support a wide assemblage of terrestrial invertebrates.

Impacts and Mitigation

Impacts

8.5 Clearance of suitable habitat across the site, including plots 400 and 600 – 601, could kill, injure or disturb hedgehog, common toad or invertebrates if present. Loss of OMHPDL will reduce the availability of bare-ground and nectar-rich habitat used by invertebrates.

Mitigation

8.6 Prior to works commencing on each plot, a toolbox talk will be provided by a suitably qualified and experienced ecologist to all contractors working on the site. This will inform contractors of all ecological constraints and considerations relevant to the construction works, including the presence of badger, amphibians, reptiles, birds, hedgehog and terrestrial invertebrates. The talk will include identification of these species/groups, their legal protection and the necessary mitigation measures, including what to do if any are encountered during works.

8.7 Works that could potentially affect hedgehog – such as the removal of vegetation where they may seek shelter – will be undertaken outside their hibernation season (October to March/April inclusive, dependent on weather conditions). This will reduce the risk of death or injury to hibernating animals. Particularly sensitive areas, such as brash piles or scrub bases, will be carefully cleared by hand before commencement of site works.

8.8 Any hedgehog found during clearance will be moved carefully, by gloved hand, out of harm's way to retained habitat such as the northern or western boundaries of plot 400 or the northern, eastern or southern boundaries of Plot 600 – 601, which connect to wider areas of suitable habitat. Hedgehogs are anticipated to disperse into adjacent woodland and grassland and may recolonise created habitats post-development. These measures can be combined with methods for any required reptile translocation.

8.9 To protect both hedgehog and common toad, construction materials will be stored off-ground on pallets or otherwise kept so that they cannot be used as refugia or hibernation sites; if individuals are discovered they will be relocated to nearby suitable habitat.

8.10 Deadwood and brash arising from any tree, scrub and woodland removal or pruning will be retained in shaded log-pile areas away from high-disturbance zones to provide continuing invertebrate shelter and foraging opportunities, as well as refuge for amphibians and hedgehogs. Post-construction landscaping will include additional log and brash piles, insect nesting boxes (e.g. bug hotels or Schwegler insect aids), standing deadwood where safe, and nectar- and pollen-rich native planting. Grassland within green spaces will be managed under a relaxed mowing regime to extend flowering periods for pollinators.

8.11 Hedgehog highways will be incorporated into any new or existing boundary fencing, using 130 × 130 mm apertures at the base to maintain movement corridors. Guidance on creating hedgehog highways can be found on the Hedgehog Street website.

Where a new road is created (e.g. between Plots 400 and 600 – 601) it will include dropped kerbs on both sides to prevent entrapment of hedgehogs and other fauna, and lighting will be minimised to help maintain a dark corridor.

8.12 Hedgehog and common toad are anticipated to continue to use the site following completion of each plot, particularly along retained woodland edges and within newly created planting. Hedgerow, woodland and scrub management within the LEMP will maximise structural diversity, flowering and fruiting to provide improved shelter and foraging resources. Future habitat enhancement and/or compensation measures may provide additional habitat opportunities for these species and terrestrial invertebrates within the site and surrounding landscape.

8.13 Provided the above mitigation measures for hedgehog, common toad and terrestrial invertebrates are implemented in full, the development is considered compliant with relevant wildlife legislation and capable of maintaining the site's ecological functionality for these species groups post-development.

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Section 9: Roles and Responsibilities

Responsible Persons

The responsibility for ensuring construction works proceed in accordance with this Strategy will lie with the appointed contractor for the works. Overall control will be held by the contractor's site manager or a suitable delegate within the contractor's company.

Lines of Communication

The site manager or foreman of the contractor, the landowner and the ECoW will communicate directly over implementation of the mitigation measures and any issues that arise during the works.

In the unlikely event that protected or notable species are encountered unexpectedly during site works, works should cease, and the ECoW should be contacted immediately to provide advice on how best to proceed.

Ecological Clerk of Works

An ECoW will be appointed by the landowner to liaise with the contractor. The ECoW's responsibilities will be to:

- Provide ongoing guidance for the site team in dealing with ecological matters and interpreting this Strategy. Commencing with a tool box talk to inform all site contractors of the ecological constraints and protection measures detailed in this Strategy;
- Provide onsite supervision of works that require it, as detailed in Sections 2 - 8 of this report; and
- Develop any additional method statements and/or site protocols as required.

The ECoW will comprise a suitably qualified and experienced ecologist, and holder of the relevant EPS licence, if applicable for the species.

Should anyone involved in the construction period on site have any queries regarding this Strategy please contact the ECoW.

Monitoring

A Landscape and Ecological Management Plan (LEMP) will be produced for each subsequent plot on the site. As part of the LEMP, habitats and measures for protected and priority species following the construction period would be monitored for 10 years.

Overall Mitigation Strategy
Dunsbury Park, Havant

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Validation

Report produced by Sara Curtis:	
Ecologist's Qualifications:	MSc – Environmental Consultancy
	BSc – Environmental Science (Biodiversity and Conservation)
Evidence of practicing Ecologist	Eight Versa – Principal Ecologist and Sustainability Consultant specialising in Ecology (2022 to present date), Senior Ecologist (2018 – 2021), Ecologist (2013 – 2018)
Professional Membership	Full member of the Chartered Institute of Ecological and Environmental Management (CIEEM)

Report Validated by Kalia Symeonidou:	
Ecologist's Qualifications:	MSc – Ecology and Evolutionary Biology
	BSc – Biological Sciences
Evidence of practicing Ecologist	Eight Versa – Senior Ecology and Biodiversity Net Gain Consultant (April 2024 - present), Senior Ecologist (Temple, 2022 – 2024), Ecologist (Temple, 2020 – 2022), Assistant Ecologist (Temple, 2019 – 2020 & Thomson Environmental Consultants, 2018 – 2019)
Professional Membership	Associate member of the Chartered Institute of Ecological and Environmental Management (CIEEM)

Validation	
I confirm the information provided in this document is truthful and accurate at the time of completion.	
Suitably Qualified Ecologist	Sara Curtis
Signature of Ecologist	SNC
Date	18/05/2026

Overall Mitigation Strategy

Dunsbury Park, Havant

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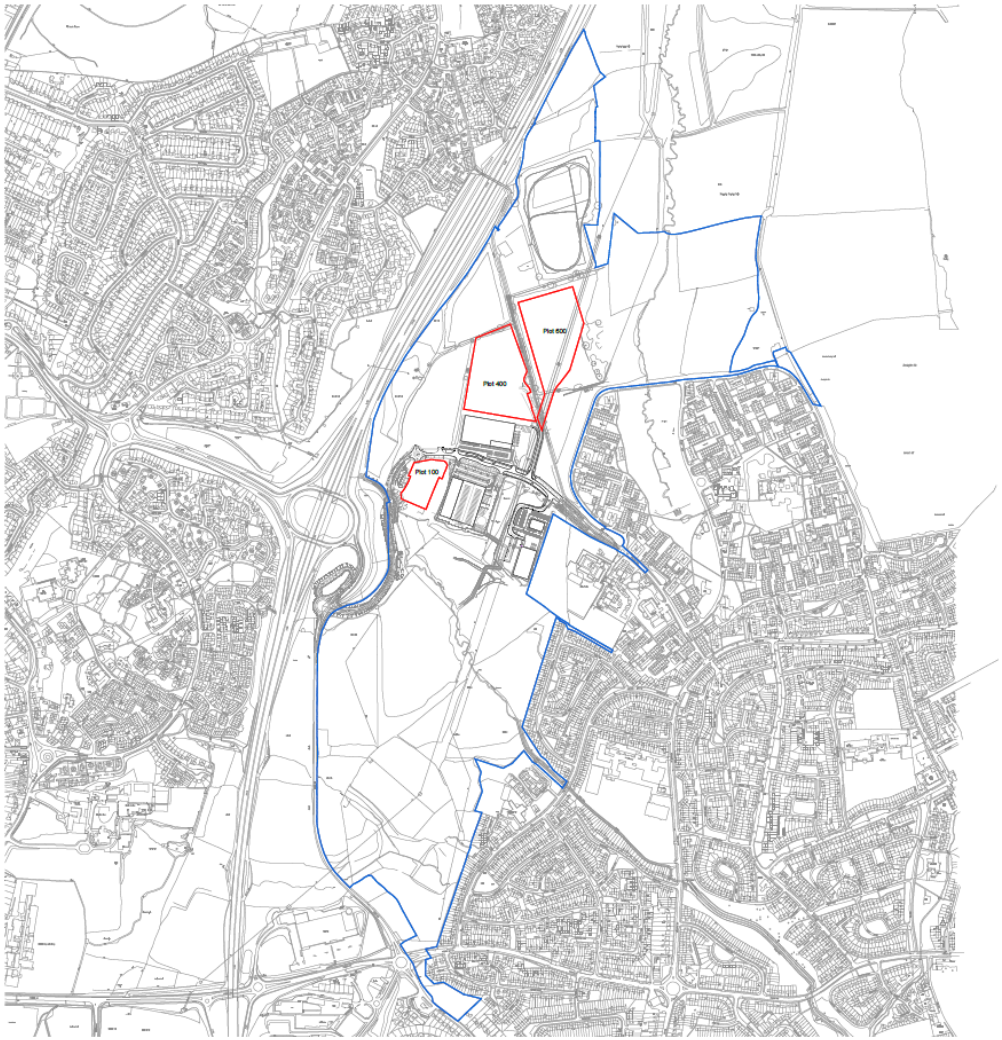
Appendix A – Site Masterplan (DP-UMC-XXXX-SI-DR-A-0501)



UMC ARCHITECTS.

Dunsbury Park, Havant, Portsmouth

Site Boundary Plan

DP - UMC - XXXX - SI - DR - A - 0501

P02

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Appendix B – Relevant Legislation

Bats

All species of bat are fully protected under the Conservation of Habitats and Species Regulations 2017 (as amended). It is illegal to injure, kill, capture or disturb a bat. It is also illegal to damage, destroy or obstruct trees, buildings or other places used for roosting, even if bats are not present.

Most development and maintenance work affecting bats and / or roosts e.g. bridge / tree maintenance works, demolition, barn conversions etc., therefore require a Habitats Regulations License for work to take place legally.

All bat species are also protected under the Wildlife and Countryside Act 1981 (as amended). This means they are additionally protected from intentional or reckless disturbance, intentional or reckless obstruction of access to any place of shelter or protection; and/or, selling, offering or exposing for sale, possession or transporting for purpose of sale.

Wild Birds

The Wildlife and Countryside Act 1981 (as amended) is domestic legislation for Great Britain. The Act includes the UK's domestic implementation of the species protection of the European Directive on the Conservation of Wild Birds (79/409).

- Under the Wildlife and Countryside Act 1981 all birds, their nests and eggs are protected by law, and it is thus an offence, with certain exceptions to intentionally:
- Kill, injure or take any wild bird.
- Take, damage or destroy the nest of any wild bird while it is in use or being built.
- Take or destroy the egg of any wild bird.
- Have in one's possession or control any wild bird (dead or alive) or any part of a wild bird that has been taken in contravention of the Act or the Protection of Birds Act 1954.
- Have in one's possession or control any egg or part of an egg that has been taken in contravention to the Act. This includes items taken or killed before the passing of the Act.
- Have in one's possession or control any live bird of prey of any species in the world (with the exception of vultures and condors) unless it is registered and ringed in accordance with the Secretary of State's regulations.
- Have in one's possession or control any bird of a species occurring on Schedule 4 of the Act unless registered (and in some cases ringed) in accordance with the Secretary of State's regulations.
- Disturb any wild bird listed on Schedule 1 while it is nest building, or at a nest containing eggs or young, or disturb the dependent young of such a bird.

Hazel Dormouse

Hazel dormouse is fully protected under the Conservation of Habitats and Species Regulations 2017 (as amended). It is illegal to injure, kill, capture or disturb a dormouse. It is also illegal to damage, destroy or obstruct access to their resting, breeding or sheltering places.

Most development and maintenance work affecting great crested newt and / or their habitat therefore require a Habitats Regulations License for work to take place legally.

Hazel dormouse is also protected under the Wildlife and Countryside Act 1981 (as amended). This means they are additionally protected from intentional or reckless disturbance, intentional or reckless obstruction of access to any place of shelter or protection; and/or, selling, offering or exposing for sale, possession or transporting for purpose of sale.

Reptiles

Slow worm, common lizard, adder and grass snake are protected under the Wildlife and Countryside Act 1981). It is an offence to:

- Intentionally kill or injure a reptile (Section 9(1));
- Intentionally trade or transport reptiles for sale (Section 9(5)).

Although the habitats of reptile species are not protected, disturbing or destroying reptile habitat during the course of development activities while reptiles are present is likely to lead to an offence.

Sand lizards *Lacerta agilis* and smooth snakes *Coronella austriaca* are European protected species and are afforded full protection under Section 9 of the Wildlife and Countryside Act 1981 and Regulation 39 of the Habitats Regulations 1994. However, these species are rare and highly localised and will not occur at this site.

All reptiles are additionally classed as Species of Principal Importance for under S41 of the Natural Environment and Rural Communities (NERC) Act 2006.

Western European Hedgehog

The Western European Hedgehog is listed on schedule 6 of the Wildlife and Countryside Act (1981) which makes it illegal to kill or capture wild hedgehogs, with certain methods listed. They are also listed under the Wild Mammals Protection Act (1996), prohibiting cruel treatment of hedgehogs.

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Appendix C – National Biodiversity Policy

National Planning Policy Framework, 2025

Section 15 - Conserving and enhancing the natural environment

187. Planning policies and decisions should contribute to and enhance the natural and local environment by:

a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
b) b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
c) c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
d) d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs;
e) e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
f) f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

188. Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework[23]; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.

189. Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas and should be given great weight in National Parks and the Broads[24]. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.

190. When considering applications for development within National Parks, the Broads and National Landscapes, permission should be refused for major development[25] other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and
c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

191. Within areas defined as Heritage Coast (and that do not already fall within one of the designated areas mentioned in paragraph 189), planning policies and decisions should be consistent with the special character of the area and the importance of its conservation. Major development within a Heritage Coast is unlikely to be appropriate, unless it is compatible with its special character.

Habitats and Biodiversity

192. To protect and enhance biodiversity and geodiversity, plans should:

a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity[26]; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation[27]; and
b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

193. When determining planning applications, local planning authorities should apply the following principles:

[23] Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality

[24] English National Parks and the Broads: UK Government Vision and Circular 2010 provides further guidance and information about their statutory purposes, management and other matters

[25] For the purposes of paragraphs 190 and 191, whether a proposal is 'major development' is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined

[26] Circular 06/2005 provides further guidance in respect of statutory obligations for biodiversity and geological conservation and their impact within the planning system

[27] Where areas that are part of the Nature Recovery Network are identified in plans, it may be appropriate to specify the types of development that may be suitable within them

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1. 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 planning permission should be refused;
2. development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;
3. development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons[28] and a suitable compensation strategy exists; and
4. development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

194. The following should be given the same protection as habitats sites:
   a) potential Special Protection Areas and possible Special Areas of Conservation;
   b) listed or proposed Ramsar sites[29]; and
   c) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.

195. The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.

Environment Act 2021

This is an Act which was set out to make provision about targets, plans and policies for improving the natural environment; for statements and reports about environmental protection; for the Office for Environmental Protection; about waste and resource efficiency; about air quality; for the recall of products that fail to meet environmental standards; about water; about nature and biodiversity; for conservation covenants; about the regulation of chemicals; and for connected purposes.

Relevant to ecology, The Environment Act has introduced a requirement for Biodiversity Net Gain (BNG) as a condition of planning permission in England (Schedule 14). It is expected that the biodiversity value attributable to a given development will need to exceed the pre-development biodiversity value of the onsite habitat by at least 10%. The BNG condition is subject to a number of exemptions as set out within the Act.

Countryside and Rights of Way Act 2000

An Act to make new provision for public access to the countryside; to amend the law relating to public rights of way; to enable traffic regulation orders to be made for the purpose of conserving an area's natural beauty; to make provision with respect to the driving of mechanically propelled vehicles elsewhere than on roads; to amend the law relating to nature conservation and the protection of wildlife; to make further provision with respect to areas of outstanding natural beauty; and for connected purposes.

[28] For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat

[29] Potential Special Protection Areas, possible Special Areas of Conservation and proposed Ramsar sites are sites on which Government has initiated public consultation on the scientific case for designation as a Special Protection Area, candidate Special Area of Conservation or Ramsar site

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Appendix D – Local Planning Policy

Havant Borough Council, Havant Borough Core Strategy March 2011(Adopted 1 March 2011)
Relevant policies relating to nature conservation from Havant Borough Council are included below.

Policy CS13 Green Infrastructure
Development will be permitted that:

1. Maintains and manages the network of green infrastructure identified at the sub regional and local levels.
2. Incorporates, where appropriate, improvements to existing green infrastructure through the restoration, enhancement or creation of additional resources.
3. Does not undermine the functional integrity of the green infrastructure.
4. Creates, where appropriate, new green infrastructure (including access management measures) either through on site provision or financial contributions.

Development proposals that adversely affect green infrastructure will not be permitted unless superior alternative provision can be provided or where it is part of a service provider's plans to provide improved local services in equally accessible locations.

Green infrastructure sites will be allocated in the Development Delivery (Allocations) Plan.

Overall Mitigation Strategy

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Appendix E – Indicative Lighting Plans

Overall Mitigation Strategy

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