

Date:
27/10/2025

Attention:
Portsmouth City Council

Issue no.
01

Our Reference:
11539 - Dunsbury Park Plot 100 - BNG Exemption Statement - 2510-27ks

To whom it may concern,

This Biodiversity Net Gain Exemption Statement has been prepared by Eight Versa and is submitted in support of a full planning application for an area of land known as Plot 100, Dunsbury Park, Portsmouth, Hampshire, PO9 4EE, hereafter referred to as 'the site'.

A hybrid outline planning permission for the phased development of Dunsbury Hill Farm into a business park named Dunsbury Park (hereafter referred to as the Wider Site) was granted by Havant Borough Council in 2014 (Reference APP/12/00338). Plot 100 forms part of the Wider Site application boundary. To inform the hybrid outline planning permission for the Wider Site and subsequent applications for the individual plots, a number of ecological surveys and reporting were undertaken (see the Preliminary Ecological Appraisal¹ for further information).

The proposed development for the site comprises the construction of a new unit of similar construction to the adjacent units with associated service yard and parking with access in the north west of the site.

The purpose of this Biodiversity Net Gain Exemption Statement is to confirm that the proposals for the site are not subject to the mandatory Biodiversity Net Gain requirements introduced under the Environment Act 2021, as the outline planning permission for the wider Canada Water Masterplan was granted prior to the implementation of Schedule 7A of the Town and Country Planning Act 1990. This document therefore sets out the legislative context and provides supporting information to demonstrate that a statutory Biodiversity Gain Plan is not required for the full planning application.

Paragraph 13 of Schedule 7A of the Town and Country Planning Act 1990 sets out that every planning permission granted for the development of land in England shall be deemed to have been granted subject to the 'biodiversity gain condition' requiring development to achieve a net gain of 10% of biodiversity value.

There are specific exemptions from biodiversity net gain for certain types of development. The exemptions are set out in paragraph 17 of Schedule 7A of the Town and Country Planning Act 1990 and the Biodiversity Gain Requirements (Exemptions) Regulations 2024.

Eight Versa completed a UK Habitat Classification survey in July 2025¹. The survey was conducted by Kalia Symeonidou, a Senior Ecologist and Biodiversity Net Gain Consultant and full member of Chartered Institute of Ecology and Environmental Management (CIEEM) and Sara Curtis, an Ecology Advisor and full member of CIEEM. Following the survey and having reviewed the drawings, aerial photos and the site's red line boundary, we can confirm the site artificial unvegetated; unsealed surface with no vegetation onsite. None of the habitats present onsite are considered priority habitats. Furthermore, based on aerial imagery (Google Earth, 2025), the site was initially cleared in 2016 (under the historic planning permission; reference: APP/12/00338) and has been regularly maintained/cleared thereafter. This has prevented succession and limited vegetation establishment, with only sparse, scattered ruderal vegetation now present in parts of the site.

The site therefore falls under the 'de-minimis' exemption.

Regulation 4 of the Biodiversity Gain Requirements (Exemptions) Regulations 2024 states:

'De minimis exemption

4.– (1) The biodiversity gain planning condition does not apply in relation to planning permission for development which meets the first and second conditions.

(2) The first condition is that the development does not impact an onsite priority habitat.

(3) The second condition is that the development impacts–

(a) less than 25 square metres of onsite habitat that has biodiversity value greater than zero; and

(b) less than 5 metres in length of onsite linear habitat.

(4) For the purposes of this regulation–

(a) "priority habitat" means a habitat specified in a list published under section 41 of the Natural Environment and Rural Communities Act 2006;

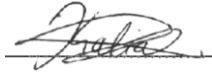
¹ Eight Versa (2025) Preliminary Ecological Appraisal: Plot 100 – Dunsbury Park, Havant. Report reference: DP-EV-100-XX-RP-Z

(b) a habitat is impacted where the habitat is lost or degraded such that there is a decrease in the biodiversity value of that habitat;
(c) "linear habitat" means the types of hedgerow habitat or watercourse habitat identified for the purposes of the biodiversity metric (which are measured by length (expressed in kilometres) rather than area).'

Both the first and second condition in relation to de minimis exemptions are applicable for this site. It is therefore considered that if planning permission is granted for the development to which this application relates, the biodiversity gain condition would not apply.

Please do not hesitate to contact me if you have any further queries.

Yours sincerely,



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