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Project: Dunsbury Park Plot 600-601
Report: Preliminary Ecological Appraisal

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1.0 EXECUTIVE SUMMARY

Greengage Environmental Limited (Greengage) was commissioned by Portsmouth City Council to undertake a Preliminary Ecological Appraisal (PEA) of an area of land known as Plot 600-601 of the Dunsbury Park development in Portsmouth, hereafter referred to as 'the site'.

This document is a report of the PEA and has been produced to inform a planning application for the site which seeks the construction of Plot 600 and Plot 601 of the Dunsbury Park development, which comprises two new industrial units with associated parking, service yards and landscaping, hereafter referred to as 'the development'.

This PEA aims to establish the presence of, or potential for, designated sites and legally protected/priority habitats and species at the site or within the zone of influence i.e. the ecological constraints, assess likely impacts based on design stage proposals/assumptions and subsequently to provide recommendations for additional targeted surveys and/or appropriate mitigation measures in accordance with the mitigation hierarchy, where applicable. Ecological enhancement recommendations have also been provided.

The site extends to approximately 3.14 hectares (ha) and comprised modified grassland, bramble scrub and an individual tree.

Ecological Constraints and Additional Surveys/Mitigation Recommendations

The below designated sites/habitats/species have been confirmed to be present or have potential to be present due to suitable habitats on the site and/or habitat connectivity with the wider landscape. Sections 4.0 and 5.0 of the PEA report should be referred to for full details.

Table 1.1 Ecological Constraints and Recommendations

Ecological Constraint	Level of Suitability/Confirmed Presence	Additional Surveys/Mitigation Recommendations (Summary)
Non-statutory designated sites	100m from the site	Proposals should adhere to best practice pollution prevention to not adversely impact on the SINC's 100m away. Measures to include but not be limited to dust suppression and traffic management, outlined within a Construction Environmental Management Plan (CEMP) to be secured by planning condition
Habitats - deciduous woodland	100m from the site	Proposals should adhere to best practice pollution prevention measures and outlined within a CEMP to include sympathetic lighting, avoid habitat loss, prevention of surface run off and measures to mitigate spill of hazardous liquids.
Bats (foraging/commuting)	Low	Additional survey recommended due to out of date survey data. Night-time Bat Walkovers (NBW) should be carried out seasonally i.e. one during spring, one during summer and one during autumn, to assess the level of use of the site by foraging and commuting bats. Single static monitoring device to also be deployed seasonally i.e. x3 occasions during month groupings above and left recording for five consecutive nights each time.

Ecological Constraint	Level of Suitability/Confirmed Presence	Additional Surveys/Mitigation Recommendations (Summary)
		Sympathetic lighting should be implemented during construction and the operational phases of the development.
Birds - nesting	Confirmed presence	Breeding bird surveys have been undertaken. For full details, refer to the breeding bird survey report (ref: 553134ohAug25FV01_BBS).
Dormouse	Confirmed presence offsite	As a hedgerow is to be impacted which has confirmed presence of dormouse, a European Protected Species Mitigation (EPSM) Licence application should be submitted to and accepted by Natural England prior to any clearance.
Reptiles (widespread species)	Confirmed presence	An updated suite of reptile surveys has been undertaken. For full details, refer to the reptile survey report (ref: 553134dpAug25FV01_Reptiles).
Other priority/notable species	Low	Clearance of the bramble scrub habitat should be cleared under ecological supervision, following a fingertip search of any potential log/refugia piles, and dismantled by hand. Should any animals including hedgehog <i>Erinaceus europaeus</i> be encountered they should be moved outside of the works area with a gloved hand.

Ecological Enhancements

Table 1.2 Ecological Enhancement Recommendations

Ecological Feature	Recommendations
Hedgerows	New hedgerows to favour native species and be species-rich (more than five species) where possible. Where a single species is more appropriate, a single native species such as hazel <i>Corylus avellana</i> beech <i>Fagus sylvatica</i> or hornbeam <i>Carpinus betulus</i> should ideally be favoured.
Biodiverse green roof	Installation of a biodiverse green roof (size maximised as far as feasible), with invertebrate habitat features (e.g. log piles, stone/sand piles and rope coils) and ephemeral water features.
Night-scented planting	The landscape planting scheme should also incorporate species to encourage night-flying insects.
Woodland buffer planting	Woodland edge habitats should be protected through scrub planting as a buffer, this should seek to create a transition from grassland through scrub to woodland.
Green walls	Incorporate green walls (either ground-based or façade-bound) onto the buildings which can incorporate small bee houses and be of value to bats by planting night scented species.

Ecological Feature	Recommendations
Shrub and tree planting	Shrub and tree planting, including the use of native berry-producing species and species listed on the Royal Horticultural Society (RHS) Plants for Pollinators guide ²⁰ .
Bat boxes	Incorporation of bat boxes into the design of the buildings and fixed onto suitable mature trees within the local area.
Bird boxes	Installation of swift bricks, sparrow terraces and black redstart boxes on buildings around the new development.
Invertebrate features	<ul style="list-style-type: none"> Enhanced wildflower-friendly landscaping, including the use of native wildflower seed mix. Species could include those listed on the RHS Plants for Pollinators guide²⁰; Integrate bee bricks into the fabric of the new buildings to provide additional sheltering opportunities for solitary bees and other invertebrates; and Installation of invertebrate features, such as insect hotels and bee posts, as part of green roofs and/or soft landscaping.

General Recommendations

In accordance with the Environment Act²⁴, 2021, National Planning Policy Framework³⁷ (NPPF) 2024, and local policy drivers, unless a site is exempt, development proposals are required to provide a measurable net gain in biodiversity. The development must deliver a minimum of 10% Biodiversity Net Gain (BNG), which should be evidenced through a Biodiversity Net Gain Assessment (BNGA) using the Statutory Biodiversity Metric¹⁷ (SBM).

A CEMP providing greater detail on the above mitigation recommendations and in accordance with British Standard 42020: 2013 Biodiversity⁷, should be produced and implemented for the site and secured through planning condition.

N.B. For guidance on the validity of reports/surveys, the CIEEM Advice Note 'On The Ecological Lifespan Of Ecological Reports and Surveys' should be referred to. In summary, most reports/surveys are likely to be considered valid within 12 months of their undertaking. Within 12-18 months, also still likely to be valid but with some exceptions (refer to CIEEM Advice Note for details). Reports/surveys that are between 18 months and 3 years old are likely to require updating and reports/surveys that are more than 3 years old are unlikely to be considered valid and will need to be updated (subject to an assessment by a professional ecologist). This report/survey has been undertaken in April 2025.

2.0 INTRODUCTION

Greengage Environmental Limited (Greengage) was commissioned by Portsmouth City Council to undertake a Preliminary Ecological Appraisal (PEA) of an area of land known as Plot 600-601 of the Dunsbury Park development in Portsmouth, hereafter referred to as 'the site'.

This document is a report of the PEA and has been produced to inform a planning application for the site which seeks the construction of Plot 600 and Plot 601 of the Dunsbury Park development, which comprises two new industrial units with associated parking, service yards and landscaping, hereafter referred to as 'the development'.

This PEA aims to establish the presence of, or potential for, designated sites and legally protected/priority habitats and species at the site or within the zone of influence i.e. the ecological constraints. It assesses likely impacts on the ecological constraints based on design stage proposals/assumptions and subsequently provides recommendations for additional targeted surveys and/or appropriate mitigation measures in accordance with the mitigation hierarchy, where applicable. Ecological enhancement recommendations have also been provided.

2.1 SITE DESCRIPTION

The site extends to approximately 3.14 hectares (ha) and is centred on Ordnance Survey National Grid Reference (OS NGR): SU701094, OS Co-ordinates 470170, 109474.

The site comprised an unmanaged field (modified grassland) with an area of bramble scrub surrounding an oak tree.

The site is located approximately 4km from the south coast at Bridge Lake, 2.5km north-west of the centre of Havant and approximately 320m east of the main carriageway of the A3(M). It is located within a field within the consented Dunsbury Park development, between the conurbations of Waterloo and Leigh Park.

The site is situated in a mixed context, with residential developments, industrial developments and an extensive semi-natural habitat network all present in the close vicinity. The semi-natural habitat comprises woodland, scrub, grassland and parkland which are present in the immediate vicinity to the north, east and south of the site.

2.2 ECOLOGY BACKGROUND

A suite of surveys were undertaken in 2010/2011 which included bat surveys, bird survey, hazel dormouse surveys and reptile surveys. During these surveys, presence of hazel dormouse *Muscardinus avellanarius* was recorded within the hedgerow on the eastern boundary and within the Beech Wood East, situated to the west of the site. Skylark *Alauda arvensis*, dunnoek *Prunella modularis*, common whitethroat *Curruca communis*, and yellowhammer *Emberiza citrinella* were observed within the masterplan area, indicating the site's value for farmland and scrub-associated bird species. Common lizard *Zootoca vivipara* and slow worm *Anguis fragilis*, were found on site. Several bat species were recorded including common pipistrelle *Pipistrellus pipistrellus*, soprano pipistrelle *Pipistrellus pygmaeus*, serotine *Eptesicus serotinus*, and western barbastelle *Barbastella barbastellus*.

A suite of surveys were undertaken in 2021 for bats¹, reptiles², and dormouse³. These confirmed bat activity on site was very limited, with activity present within the boundary habitats adjacent outside of the site boundary, with species consistent to those recorded during the 2010 surveys.

The presence of adder *Vipera berus*, slow worm and common lizard were confirmed on site, with most reptiles found at the site boundaries. Only two slow worms found in the centre of the site. No dormouse were recorded during the survey.

A PEA⁴ was undertaken of the site in July 2023 which identified 46 Sites of Importance for Nature Conservation (SINCs) within 2km of the site, with three identified approximately 100m from the site. The site was found to comprise modified grassland (a formerly grazed pasture field) with an oak tree in the centre of the field. The site was recorded with moderate suitability for foraging badger, negligible suitability for foraging bats, negligible suitability for roosting bats, confirmed presence of reptiles, negligible suitability on site for dormouse, with confirmed presence within the hedgerow and woodland just off site, moderate suitability for breeding birds, low suitability for invertebrates and low suitability for hedgehog *Erinaceus europaeus*.

3.0 METHODOLOGY

The PEA was undertaken in accordance with guidance in the UK Habitat Classification System (UKHab)⁵ Version 2 and the Chartered Institute of Ecological and Environmental Management (CIEEM) (2017) Guidelines for Preliminary Ecological Appraisal⁶, in accordance with British Standard (BS) 2020:2013: Biodiversity⁷. The overall assessment consisted of:

- A desk study to collate site specific biological information gained from statutory and non-statutory consultation; and,
- A site walkover comprising a UKHab survey and scoping assessment to record and assess protected/priority habitats and species.

3.1 DESK STUDY

Environmental Databases

A review of readily available ecological information and other relevant environmental databases (including the Multi-Agency Geographic Information for the Countryside (MAGIC) website⁸) was undertaken for the site and a radius of 2 kilometres (km) from the site boundary, to search for statutory designated sites at the local to international level.

A review of the MAGIC website was also undertaken to check for records of European Protected Species (EPS) licences for Great Crested Newt (GCN) *Triturus cristatus* and bat species within 2km of the site. EPS licences dated within the past 10 years are considered to be most relevant.

Where the site is identified to be located within the Impact Risk Zone (IRZ) for a statutory designated site (e.g. Special Protection Area (SPA)/Special Area of Conservation (SAC)/Ramsar or Site of Special Scientific Interest (SSSI)) the features for which the designated site is notified and the types of proposed development which could potentially have adverse impacts (and trigger the requirement for further assessment, e.g. Habitat Regulations Assessment (HRA) or SSSI Impact Assessment) have also been reviewed.

Great Crested Newt Risk Zones

The Nature Space Partnership GCN Impact Risk Maps dataset⁹ was consulted to give an understanding of the potential presence of GCN in the local area and therefore the likelihood of the species being found to be present on the site. This dataset identifies areas where the distribution of GCN has been categorised into five distinct zones relating to GCN occurrence and the level of impact development is likely to have on this species. These zones are split into Black, Red, Amber, Green and White. They are also used to inform the Nature Space Partnership GCN District Level Licensing (DLL) scheme approach and are described as follows:

- Black zones – Nationally important sites with statutory protection for GCN. DLL is not available as a licensing procedure in these areas.
- Red zones – Contain suitable habitat and most important areas for GCN.
- Amber zones – Contain suitable habitat and GCN are likely to be present.
- Green zones – Moderate habitat suitability mean GCN may be present.
- White zones – Low probability of GCN presence (but cannot be ruled out).

Biodiversity Action Plans/Priority Habitats and Species

UK Biodiversity Action Plans (BAPs) set priorities for nationally important habitats and species. To support the BAPs, Habitat/Species Statements (otherwise known as Habitat Action Plans (HAPs) and Species Action Plans (SAPs)) were produced to provide an overview of the status of the habitats/species and set out the broad policies that can be developed to conserve them. A list of priority habitats and species of conservation importance was also developed.

The UK BAP was succeeded in 2012 by the UK-Post 2012 Biodiversity Framework which informed the creation of the Biodiversity 2020 strategy; England's contribution towards the UK's commitments under the United Nations Convention of Biological Diversity. Subsequently, this has been replaced by the Kunming-Montreal Global Biodiversity Framework¹⁰ to 2030.

Despite this, the UK BAP priority species lists and conservation objectives still remain valid through integration with local BAPs (which remain valid), and in the form of the Habitats and Species of Principal Importance list (as required under Section 41 of the Natural Environment and Rural Communities (NERC) Act, 2006)¹¹.

Local Biodiversity Action Plans (LBAPs) ensure that national action plans (the UK BAP/Biodiversity 2020) are translated into effective action at the local level and establish targets and actions for locally characteristic species and habitats.

- The desk study reviewed UKBAP and LBAP habitats and species with consideration as to which habitats/species are of relevance to the site and/or proposed development.

Local Environmental Records Centre

A data consultation with the Local Environmental Records Centre (LERC), Hampshire Biodiversity Information Centre (HBIC), for a 2km search radius around the site was also undertaken and the data received was reviewed to identify the location and citations of any local non-statutory designated sites and the presence of any protected/priority species.

A summary of the records received from HBIC is discussed under 'Species Records' in Section 4.1. The records discussed under each relevant subheading have been included based on their relevance to the site e.g. there are suitable habitat types present on site to support the species, there is habitat connectivity between the site and record location and/or the record is in proximity of the site. Records dated within the past 10 years have also been favoured. Accurate locations in relation to badger sett records have not been included to avoid potential persecution.

The combination of actions described above provided the overall ecological context for the site, to better inform the site walkover and the subsequent assessment.

3.2 SITE WALKOVER

Habitats

The extent, distribution, type and categories of the different habitats on site were identified and mapped according to the standard UKHab methodology, using the UKHab primary codes, and UKHab secondary codes in square brackets to provide supplementary information where appropriate. Mandatory codes for habitat mosaics, priority and Annex 1 habitats that occur in multiple primary habitats have also been applied where appropriate. Any features of interest were

recorded using Target Notes (TN). Any protected plant species and/or invasive non-native species (INNS) present were also noted.

The abundance of plant species recorded was classified according to the DAFOR rating scale. The standardised terms are: D – Dominant, A – Abundant, F – Frequent, O – Occasional and R – Rare.

Species

The site walkover included assessments to identify the potential value for legally protected or priority species at the site. This involved identifying potential habitats which support opportunities for refuge, breeding and foraging in the context of species known to be present locally and regionally.

The likelihood of occurrence is ranked as follows:

- Negligible - While presence cannot be absolutely discounted, the site includes very limited or poor-quality habitat for a particular species. The site may also be outside the known national range for a species;
- Low - On-site habitat is poor to moderate quality for a given species, with few or no information about their presence from the desk study. However, presence cannot be discounted due to the national distribution of the species or the nature of on-site and surrounding habitats;
- Moderate - The on-site habitats are of moderate quality, providing most or all of the key requirements for a species. Several factors may limit the likelihood of occurrence, habitat severance, habitat disturbance and small habitat area;
- High - On-site habitat of high quality for given species. Site is within a regional or national stronghold for that particular species with good quality surroundings and good connectivity; and,
- Present - Presence confirmed from the site walkover itself or recent, confirmed records from information gathered through the desk study.

The species considered potentially relevant to the site and therefore taken into consideration included:

Amphibians

Great Crested Newt

The site walkover assessed the habitats on site for their suitability to support GCN and/or other native amphibians, e.g. common toad *Bufo bufo*, common frog *Rana temporaria*. The aquatic and terrestrial habitats required generally include still waterbodies suitable for breeding and woodland, scrub or grassland habitat where there is optimal invertebrate prey potential and/or shelter.

Where waterbodies were identified on site or within 250m of the site ahead of, or during the site walkover, and public access was possible, a Habitat Suitability Index (HSI) assessment¹² was also undertaken for each waterbody to ascertain the level of suitability for supporting GCN.

The suitability of a given waterbody for GCN is based on several parameters that are assessed as part of the HSI e.g. pond size, location, fish and wildfowl presence, shading and macrophyte cover, presence of suitable surrounding terrestrial habitat. The presence of fish and/or waterfowl, heavy

shading and lack of submerged vegetation are likely to reduce the suitability of a waterbody and therefore limit the likelihood of GCN presence, as is a lack of suitable terrestrial habitat within 500m of the waterbody (representing the typical upper dispersal limit of the species). The HSI assessment provides a numerical value (ranging from 0 to 1) that indicates the suitability of the habitat at a waterbody to support GCN (ranging from Poor to Excellent). The higher the HSI score, the more suitable (or closer to optimum habitat conditions) the waterbody may be considered for GCN increasing the likelihood of GCN presence.

The HSI scores (expressed as values between 0 and 1) are used to calculate the HSI of each waterbody using the following equation: $HSI = (SI1 * SI2 * SI3 * SI4 * SI5 * SI6 * SI7 * SI8 * SI9 * SI10) / 10$. The result of this calculation is a number between 0 and 1. A score of 0 represents a waterbody considered to be unsuitable for GCN and a score of 1 represents ideal habitat for GCN.

A suitability category was assigned to each standing waterbody based on the HSI score as shown in Table 3.1:

Table 3.1 HSI Categories

HSI Score	Suitability Category
> 0.80	Excellent
0.70 – 0.79	Good
0.60 – 0.69	Average
0.50 – 0.59	Below Average
< 0.50	Poor

The HSI score is not a reliable indicator of GCN presence or absence and therefore waterbodies were not screened out of further survey based on HSI score alone.

Badger

The potential for badger *Meles meles* to inhabit or forage/commute within the site was assessed during the site walkover. Evidence of badger activity includes the identification of setts (a system of underground tunnels and nest chambers), grubbed up grassland (caused by the animals digging for earthworms, slugs, beetles etc.), badger hairs, paths, latrines/dung pits and paw prints.

Bats

The PEA considers foraging/commuting bats and roosting bats (summer/transitional and winter hibernation).

Habitats such as woodland, meadows and waterbodies can provide important foraging resources and linear features such as tree lines, hedgerows, railway and river corridors are often considered valuable for commuting bats. The site walkover included recording the presence/assessing the suitability of the habitats and features present on the site, in combination with habitat connectivity associated with the wider landscape.

Consideration was given to the presence of features and habitats both within and adjacent the site.

In accordance with the Bat Conservation Trust's (BCT) Good Practice Guidelines¹³ and methods given in the CIEEM Bat Mitigation Guidelines¹⁴ consideration was given to:

- The presence, location, type and suitability of PRFs; and

- Signs of bat activity or presence including bat sightings, audible bat chattering, droppings, stains (including grease marks and urine spatter), scratch marks, and moth/butterfly wings.

Guidance from BCT ranks bat roosting and foraging suitability on a scale through None, Negligible, Low, Moderate and High. The parameters for each of these are as follows:

- None - Relates to a site with 'no habitat features suitable for bats';
- Negligible - Relates to a site with no 'obvious habitat features likely to be used by bats';
- Low - Relates to a site with only a few roost sites that could be used by individual bats 'opportunistically', and foraging and commuting habitat which is 'not very well connected' and only suitable to support small numbers of bats;
- Moderate - Relates to a site with potential roosting features that could be used regularly by bats but not for roosts of high conservation status, and foraging and commuting habitat which is 'continuous' and 'connected to the wider landscape'; and,
- High - Relates to a site with one or more potential roost sites that could support 'larger numbers of bats on a more regular basis' and also have suitability to support high conservation status roosts, e.g. maternity roosts. High suitability foraging and commuting habitat is well connected and likely to be used regularly by bats for flight paths e.g. rivers, valleys etc and could even be connected to a roost site(s).
- PRFs can include buildings, bridges, tunnels and caves with cracks or gaps leading into voids or crevices, or trees with holes, crevices or splits of sufficient size and depth. Based on the number, location and type of PRF(s) the buildings/structures were categorised based on the categorisations provided above.

Trees were categorised either individually or as a group using the following BCT grading system; None (same as above), Further Assessment Required (FAR), PRF-I (where PRFs are only suitable for individual bats or very small numbers of bats either due to size or lack of suitable surrounding habitats), or PRF-M (where PRFs are suitable for multiple bats and may therefore be used by a maternity colony).

Birds

During the site walkover, the potential for the site to support breeding and/or non-breeding bird species was assessed. This included recording the presence/absence of areas of trees, scrub, heathland, arable and wetland habitat that could support nests or provide foraging resources for common or notable species. Consideration was also given to the presence/absence of features on-site that may support Wildlife and Countryside Act 1981 (as amended) Schedule 1 species, e.g. barn owl *Tyto alba*, black redstart *Phoenicurus ochruros*, and kingfisher *Althedo atthis*.

The potential for the site to support foraging barn owls was also assessed with the grassland categorised into the following¹⁵:

Type 1 Habitat: Type 1 Habitats are those which provide optimum habitat to field voles *Microtus agrestis* (for breeding, foraging and shelter) and are of the highest value to barn owls. This habitat type is usually permanent, unimproved or semi-improved grassland, rank and heterogeneous in appearance, often of mixed height, with fully or partly collapsed dead grass stems (straw) often dominating the leaf sward. The grassland possesses a high abundance of raised tussocks per unit area (typically 4-40m²) coupled with a compacted basal litter layer or 'thatch' of straw, at least 30mm deep (Shawyer 1998). Type 1 Habitats usually receive no real management or anything other than periodic light grazing by farm animals. Long-term set-aside grassland and unmanaged

fields, wasteland, ditches, riverbanks, field margins and road verges are the most common examples of this habitat type. When viewed in the wider landscape, Type 1 Habitats can usually be recognised, particularly in the autumn, winter and early spring, by their golden or green/brown appearance, and are sometimes described as 'white grassland'.

Type 2 Habitat: Type 2 Habitats are sub-optimal to field voles and are of intermediate and often transient value to barn owls. This type of improved or semi-improved grassland is characterised by having a homogeneous, more even-height sward, sometimes displaying some lush and emerging tussock structure but little sign of a litter layer or 'thatch'. It can sometimes constitute a mature clover/grass ley and usually receives some level of farm management such as occasional fertilization, annual topping or light grazing. When seen in the wider landscape Type 2 Habitats normally have a more uniform, dark green appearance, than Type 1 Habitats.

Type 3 Habitats: Type 3 Habitats offer very poor habitat for field voles and most other small mammals and as such are of low value to barn owls. These improved grasslands are characterised by having a homogeneous sward, which is often kept short throughout much of the year, no tussock structure and are devoid of any litter layer at their base. They are usually mown closely for hay or silage, heavily grazed by sheep, horses or cattle or used for public amenity. They normally display a uniform bright green appearance when viewed in the wider landscape. Acid grasslands and those overgrown with scrub which can restrict barn owls from hunting, also fall into this habitat category. Type 3 Habitat is not normally illustrated on the final survey map because of its poor suitability to barn owls.

Other Habitats: Non-grassland habitats, such as arable fields and mature woodland are generally of little or no value as a permanent foraging resource to barn owls. Arable fields containing cereals, rapeseed, or other food crops do not provide suitable habitat for field voles, although at certain times of the year, such as during harvest, they can, for short periods, expose wood mice *Apodemus sylvaticus* and temporarily attract barn owls. Prior to harvest, however, arable crops are largely impenetrable to foraging barn owls because of the stiff nature of the crop and high density of planting. For the purpose of the survey, arable fields without grass margins and woodlands (except those possessing wide grass rides or young plantations) are, therefore, considered unsuitable for barn owls and are not illustrated on the eventual survey map.

A re-assessment of Birds of Conservation Concern¹⁶ (version 5) (BoCC5) defined rare and threatened bird species on two lists (Red and Amber) describing the level of threat to each species of concern.

'Red' is the highest conservation priority, with species needing urgent action due to either a historical decline in breeding population, severe (>50%) decline in breeding or non-breeding population, or severe decline in breeding range over 50 years or more. 'Amber' is the next most critical group, with species qualifying for this status as a result of either recovery from red list criterion, being classed as rare breeders in the UK, moderate (>25%) decline in breeding or non-breeding population or moderate decline in breeding range over 25 years or more. These categories are followed by 'Green', which indicates a species is relatively unthreatened.

Dormouse

During the site walkover the potential for dormouse *Muscardinus avellanarius* to be present on site was assessed. This included observations for suitable habitat such as well-layered woodland, scrub and linking hedgerows, particularly those comprised of species offering suitable food sources such as honeysuckle *Lonicera periclymenum* and hazel *Corylus avellana*, in addition to

direct evidence such as nests or characteristically gnawed hazelnuts, chewed ash keys and honeysuckle flowers.

Invertebrates

As part of the site walkover the quality of invertebrate habitat and the potential for the site to support notable terrestrial and aquatic invertebrate species was considered. There is a wide variety of habitats that are suitable for invertebrates including wetland, heathland, areas of bare sandy soil, ephemeral brownfield vegetation and meadows. The diversity of the habitat structures and features present is important along with food sources for supporting specific needs/life stages/population numbers.

Species of particular interest included, but were not limited to, stag beetle *Lucanus cervus*, roman snail *Helix pomatia*, glow worm *Lampyrus noctiluca* and notable butterfly species for the region.

Reptiles

The potential for widespread reptile species to use the site was assessed during the site walkover. Possible species include adder *Vipera berus*, grass snake *Natrix helvetica*, slow worm *Anguis fragilis* and common lizard *Zootoca vivipara*. These native reptile species generally require open areas with low, mixed-height vegetation, such as heathland, rough grassland, and open scrub or, in the case of grass snake, waterbody margins. Suitable well drained areas and frost-free features for hibernation are needed to survive the winter.

Other Priority/Notable Species

Where desk study data indicates the potential for presence of BAP priority species or other notable/rare species not protected by statute, effort was made to establish the potential for the site habitats to support these species during the site walkover.

Species of particular consideration included, but were not limited to, hedgehog *Erinaceus europaeus*, brown hare *Lepus europaeus*, harvest mouse *Micromys minutus*, polecat *Mustela putorius*, pine martin *Martes martes*.

Protected/Priority Plant Species

During the site walkover, presence of plant species protected under the Wildlife and Countryside Act 1981 (as amended) Schedule 8 or NERC Act 2006 Section 41 were searched for (seasonal timing allowing).

Invasive Non-native Species

During the site walkover, presence of plant and animal species listed as invasive under the Wildlife and Countryside Act 1981 (as amended) Schedule 9 were searched for. As and where appropriate to the site habitats present, these included but were not necessarily limited to, Japanese knotweed *Reynoutria japonica*, Himalayan balsam *Impatiens glandulifera*, wall cotoneaster *Cotoneaster horizontalis*, Japanese rose *Rosa rugosa*, Australian swamp stonecrop *Crassula helmsii*, signal crayfish *Pacifastacus leniusculus*, American mink *Neovison vison*, Chinese mitten crab *Eriocheir sinensis*, midwife toad *Alytes obstetricans*, alpine newt *Ichthyosaura alpestris* and Italian newt *Lissotriton italicus*.

In addition, where species that are not Wildlife and Countryside Act 1981 (as amended) Schedule 9 listed species, i.e. INNS, but which are considered to have 'invasive tendencies' were encountered,

these were also recorded e.g buddleia *Buddleja davidii*, snowberry *Symphoricarpos alba*, common horsetail *Equisetum arvense* (list not exhaustive).

3.3 SURVEYORS/COMPETENCIES

Luke Measey BSc (Hons) MCIEEM, is an ecologist with over seven years of experience and has an undergraduate degree in Ecology and Environmental Management BSc (Hons). He holds a Natural England Level 1 Class Survey Licence for Great Crested Newt, Natural England Level 2 Class Survey Licence for bats and is a certified tree climber.

Daniel Perlaki has an undergraduate degree in Ecology (BSc Hons), a Master's degree in Conservation Science and Policy and is a Graduate member of CIEEM. Dan has over 8 years' experience in ecology survey and consultancy.

This report was prepared by Luke Measey, reviewed by Daniel Perlaki and authorised by XX, who confirms that the report is in line with the following:

- Represents sound industry practice;
- Reports and recommends correctly, truthfully and objectively;
- Is appropriate given the local site conditions and scope of works proposed; and
- Avoids invalid, biased and exaggerated statements.

3.4 CONSTRAINTS

No limitations were associated with the survey.

4.0 RESULTS

4.1 DESK STUDY

Environmental Databases

Designated Sites

The desk study has identified no statutory designated sites within 2km of the site.

Forty non-statutory designated Sites of Importance for Nature Conservation (SINCs) were returned within 2km of the site. Table 4.1 below gives the locations and descriptions of the closest non-statutory designated sites in order of their proximity to the site within 1km. A full list of designated sites (statutory and non-statutory) is provided as Appendix C.

Table 4.1 Statutory and Non-Statutory Designated Sites identified within 2km Search Radius

Site Name and Designation	Approximate Location and Direction from the Site	Description/Citation
Non-statutory (SINCs)		
Dunsbury Hill Wood	0.34 Northeast	Lowland mixed deciduous woodland.
The Warren, Havant	0.36 Southeast	Lowland mixed deciduous woodland
Beech Wood East	0.39 West	Lowland mixed deciduous woodland
Meadow by Bells Copse	0.49 Northeast	Ancient semi-natural woodland site
Dunsbury Hill Grassland 2	0.49 Northeast	A grassland bound by woodland on all sides
Cabbagefield Row	0.52 East	A grassland bound by woodland on all sides.
Dunsbury Hill - Areas 5 & 6	0.54 North	
Cherry Tree Row	0.68 Southwest	
Outhurst/Inhurst/Beech Woods	0.69 West	Presence of rough hawksbeard <i>Crepis biennis</i>
Bell's Copse	0.71 Northeast	No citation available
Dunsbury Hill - Area 1	0.72 North	No citation available
Hurst Wood, Havant	0.84 West	No citation available
Neville's Park Areas 2 & 3	0.95 Southwest	No citation available

The review of MAGIC identified two European Protected Species Mitigation (EPSM) Licences for bats, three for hazel dormouse and one for GCN within 2km of the site boundary. The closest EPSM Licence for each species was 1.48km, 0.33km and 1.91km respectively.

Great Crested Newt Risk Zones

It is unclear which risk zone the site is located within, based on information received from Naturespace.

Biodiversity Action Plans/Priority Habitats and Species

The following UK BAP priority habitats/species were present within 2km of the site boundary:

- One hundred and ten parcels of deciduous woodland, with the closest parcel 0.09km east of the site;
- Thirty parcels of ancient woodland comprising ANSW and ancient replanted woodland, the closest parcel 0.30km northeast;
- Three parcels of lowland dry acid grassland, 0.96km north;
- One parcel of woodpasture and parkland, 1.18km east;
- Two parcels of coastal and floodplain grazing marsh, 1.23km southeast of the site.
- Three parcels of traditional orchards, the closest being 1.30km west; and
- Two parcels of lowland meadows, 1.52km southwest.

Review of the Hampshire LBAP HAPs have identified the following to be of relevance to the site:

Ancient semi-natural woodland HAP; and

Ancient hedgerows HAP.

Local Environmental Records Centre

Species Records

The data consultation with Hampshire Biodiversity Information Centre (HBIC) returned records of relevance to the site relating to birds, bats, invertebrates, mammals and reptiles within 2km of the site.

Amphibians

No records of amphibians were returned within the desk study.

Badger

No records of badger were returned within the desk study

Bats

Six species of bat, one unidentified family and one identified genus of bat were returned within the desk study

Table 4.2 Summary of most relevant bat records within 2km of the site

Common Name	Scientific Name	Distance From Site (km)	Notes
Serotine	Eptesicus serotinus	1.90	From 2017
Myotis species	Myotis sp.	0.95	From 2020

Common Name	Scientific Name	Distance From Site (km)	Notes
Brandt's bat	Myotis brandtii	1.90	From 2020
Noctule	Nyctalus noctula	1.80	From 2017
Pipistrelle bat	Pipistrellus sp.	1.80	From 2015
Common pipistrelle	Pipistrellus pipistrellus	0.95	From 2020
Soprano pipistrelle	Pipistrellus pygmaeus	1.30	From 2017
Brown long-eared bat	Plecotus auritus	0.95	From 2020

Birds

A total of 26 bird species were returned within the desk study which included Wildlife and Countryside Act 1981 (as amended) Schedule 1 bird species, BoCC16 Red listed species. Table 4.3 below provides the summary list of bird species of relevance to the site. Table 4.3 below does not include specific location and direction information.

Table 4.3 Summary of most relevant bird species recorded within 2km of the Site.

Common Name	Scientific Name	WCA/BoCC5 Status
Northern Goshawk	Accipiter gentilis	Sch 1
Common Kingfisher	Alcedo atthis	Sch 1
Cetti's Warbler	Cettia cetti	Sch 1 Red list
Harrier (genus level)	Circus	Sch 1
Hen Harrier	Circus cyaneus	Sch 1
Common Quail	Coturnix coturnix	Sch 1
Peregrine Falcon	Falco peregrinus	Sch 1
Eurasian Hobby	Falco subbuteo	Sch 1
Mediterranean Gull	Ichthyaetus melanocephalus	Sch 1
Red Kite	Milvus milvus	Sch 1
Fieldfare	Turdus pilaris	Sch 1 Red list
Lesser Redpoll	Acanthis cabaret	Red list
Eurasian Skylark	Alauda arvensis	Red list
Grey Heron	Ardea cinerea	
European Nightjar	Caprimulgus europaeus	
White Stork	Ciconia ciconia	

Common Name	Scientific Name	WCA/BoCC5 Status
Little Egret	Egretta garzetta	
Yellowhammer	Emberiza citrinella	Red list
Common Linnet	Linaria cannabina	Red list
Common Nightingale	Luscinia megarhynchos	Red list
Grey Wagtail	Motacilla cinerea	Red list
House Sparrow	Passer domesticus	Red list
Marsh Tit	Poecile palustris	Red list
Eurasian Siskin	Spinus spinus	
Common Starling	Sturnus vulgaris	Red list
Song Thrush	Turdus philomelos	Red list

Hazel Dormouse

Table 4.4 Summary of dormouse records within 2km of the site

Common Name	Scientific Name	Distance From Site (km)	Notes
Hazel dormouse	Muscardinus avellanarius	0.10	From 2015

Invertebrates

Seven species of invertebrates were returned within the desk study.

Table 4.5 Summary of most relevant invertebrate records within 2km of the site

Common Name	Scientific Name	Distance From Site (km)	Notes
Purple Emperor	Apatura iris	1.14	From 2015
Silver-washed Fritillary	Argynnis paphia	1.14	From 2019
Small Heath	Coenonympha pamphilus	0.45	From 2019
White Admiral	Limenitis camilla	1.14	From 2019
Stag Beetle	Lucanus cervus	0.80	From 2018
Dark Green Fritillary	Speyeria aglaja	1.14	From 2019
Common Darter	Sympetrum striolatum	1.42	From 2019

Reptiles

One species of reptile was returned within the desk study.

Table 4.6 Summary of most relevant reptile records within 2km of the site

Common Name	Scientific Name	Distance From Site (km)	Notes
Slow worm	Anguis fragilis	1.59	From 2016

Protected/Notable Plant Species

No records of protected plant species were returned within the desk study.

Invasive Non-native Species

No records of INNS were returned within the desk study.

Other Priority/Notable Species

Records of hedgehog were returned within the desk study.

Table 4.7 Summary of most relevant other priority/notable species records within 2km of the site

Common Name	Scientific Name	Distance/Direction From Site	Notes
West European hedgehog	Erinaceus europaeus	0.75	From 2019

The species referred to in the Species section are primarily those known to be in the area that may be impacted by any proposals at the site, or that stand to benefit as a consequence of potential ecological enhancements at the site and inform site-specific mitigation and enhancement recommendations described in Section 5.

4.2 SITE WALKOVER

The site walkover was carried out on 22nd April 2025 by Luke Measey, during sunny and warm conditions.

The site extents and habitats are shown at Figure A.1 with site photographs presented at Appendix B.

Habitats

The habitats present across the site consisted of the following UKHab categories, as mapped in Figure A.1

g4 - Modified grassland [10 128- scattered scrub, tall or tussocky sward]

A formerly grazing pasture field that is tussocky and dominated by Yorkshire fog *Holcus lanatus* with stands of gorse *Ulex europaeus* shrub present and oak saplings *Quercus robur*. The grassland comprised dominant Yorkshire fog, abundant tansy *Tanacetum vulgare*, occasional creeping bent *Agrostis stolonifera*, cock's-foot *Dactylis glomerata*, white clover *Trifolium repens*, meadow fescue *Festuca pratensis*, annual meadow grass *Poa annua*, red

fescue *Festuca rubra* and rare instances of dandelion *Taraxacum officinale*, creeping buttercup *Ranunculus repens*, common vetch *Vicia sativa*, cut-leaved crane's-bill *Geranium dissectum*, greater bird's-foot trefoil *Lotus pedunculatus*, curled dock *Rumex crispus*, fescue species *Festuca spp.*, creeping thistle *Cirsium arvense*, speedwell species *Veronica spp.*, bramble *Rubus fruticosus*, hogweed *Heracleum sphondylium*, crosswort *Cruciata laevipes*, pedunculate oak, gorse and broad-leaved dock *Rumex obtusifolius*.

h3d - Bramble scrub [32 - scattered trees]

An area of bramble scrub is situated within the centre of the field that has engulfed a semi-mature/mature oak, with presence of elder *Sambucus nigra*. The bramble is very dense and approximately 6m in height.

Species

Amphibians

Great Crested Newt

No records of GCN were returned within the desk study.

No waterbodies are present on site. It appears from MAGIC that two waterbodies are situated within 250m of the site boundary, approximately 80m north and 220m northwest of the site boundary separated by hedgerows, modified grassland and hedgerows with no barriers to dispersal, however from aerial imagery that these are no longer waterbodies. The site comprises suitable terrestrial habitat in the form of tussocky grassland however lacks refugia in the form of scrub and woody/stone refugia piles with only a small area of bramble scrub in the centre of the site.

Therefore, in the absence of suitable waterbodies within 250m of the site the site has been assessed with negligible suitability for GCN.

Native Amphibians

No records of amphibians were returned within the desk study. For the reasons listed above, the site provides negligible suitability for common amphibians.

Badger

No records of badger were returned within the desk study.

The site comprises a flat tussocky grassland with a small area of very dense bramble scrub in the centre of the field. No badger setts or signs of badger were recorded during the walkover.

The grassland provides optimal foraging habitat for badger, however as it is flat and open it is less suitable for sett creation. Therefore, the site has been assessed as being of negligible suitability for badger. Woodland immediately offsite is likely to support badgers which are likely to use the site for foraging.

Bats

Foraging/Commuting

The desk study returned records for bats, with two EPSM licences within the past 10 years within 2km of the site.

The habitats beyond the site boundary were previously recorded in 2021 to provide high levels of commuting and foraging bat activity. The site conditions have remained consistent with the 2023 PEA survey, with the grassland sward still offering low floristic diversity and in turn, likely to offer low suitability for foraging bats due to its close proximity to woodlands just offsite, and lack of artificial lighting present.

The habitats beyond the site boundary are considered to have high suitability for commuting and foraging bats.

Roosting

Summer/Transitional

A single oak tree is present on site that is engulfed by dense bramble that is approximately 6m in height. Due to this, it could not be fully inspected for its suitability for roosting bats, which in turn reduces the suitability of the tree for roosting bats due to an absence of a drop zone below any potential roosting features (RPFs) and a very cluttered environment with no direct flight routes to the tree. The tree is therefore considered to be of negligible suitability for roosting bats.

Birds

The desk study returned records for 26 species of protected and priority species of birds.

The site is entirely comprised of tussocky grassland that was formerly used as grazing pasture, with a small area of bramble surrounding a single oak tree. At the time of the survey, the grassland sward was not tall enough to provide suitable coverage for ground nesting birds such as skylark, however as it is unmanaged, it is likely to become suitable for ground nesting birds. The scrub on site is very limited in size and therefore is unlikely to provide a suitable area for a great range of birds, however the hedgerows and woodland habitats off site are suitable for yellowhammer, dunnock, common whitethroat, song thrush, common linnet and common nightingale.

Therefore, the site has been assessed as being of moderate suitability for nesting birds.

Dormouse

Dormouse were recorded within the desk study and their presence has been identified within the woodland and hedgerows directly offsite.

The site comprises tussocky grassland with a small area of isolated bramble scrub which is unsuitable for dormouse, therefore the site has been considered to be of negligible suitability.

Invertebrates

Seven species of invertebrates were recorded within the desk study, with cinnabar moth larvae feeding on ragwort found on site during the 2023 PEA survey.

The site comprises modified grassland with limited species diversity, however fescue and bent species were recorded on site which provide suitable host plants for small heath. Bramble, thistle and hogweed are present on site that provide suitable nectar plants for adult silver-washed fritillary. Additionally, ragwort was still present on site suitable for cinnabar moth larvae.

Therefore, the site has low suitability for invertebrates, however confirmed presence of cinnabar moth larvae was recorded on site.

Reptiles

One species of reptile was recorded within the desk study, with confirmed presence of adder, slow worm and common lizard on site during the 2021 surveys.

Site conditions have remained consistent with the 2021 surveys and 2023 PEA, therefore the site remains suitable for these species. Additionally, slow worm were recorded during the site walkover.

Protected/Notable Plant Species

No protected plant species were recorded within the site walkover.

Invasive Non-native Species

No invasive non-native species were recorded during the site walkover.

Other Priority/Notable Species

Hedgehog

Records of hedgehog were returned within the desk study.

The small area of bramble on site provides suitable refuge for hedgehog, however, is very limited in extent. The tussocky grassland provides suitable foraging habitat for hedgehog.

Due to the lack of suitable refugia on site, the site has been assessed with low suitability for hedgehog.

5.0 EVALUATION

5.1 PROPOSALS

The proposed development is expected to comprise two new industrial units, with associated parking, service yards and landscaping.

5.2 DISCUSSION AND RECOMMENDATIONS

The discussion is provided below on the key ecological receptors that stand to be impacted by and/or could benefit through careful design of, the proposed development. High level commentary on the recommendation for additional targeted survey, appropriate mitigation, compensation and enhancement actions is provided.

Designated Sites

Non-statutory

Two non-statutory designated SINC's are present within 100m of the site. The proposals have the potential to indirectly impact on these sites during construction through dust and emissions. Therefore, the proposals should adhere to pollution prevention best practice measures which should be outlined within a Construction Environmental Management Plan (CEMP), which should include but not be limited to dust suppression measures, traffic management plans to mitigate the impact of dust and emissions.

Habitats

The site is situated 90m from an area of deciduous woodland priority habitat and is situated adjacent to woodland habitat and hedgerows. The proposals should adhere to the measures outlined for non-statutory designated sites above and include measures for sympathetic lighting to not adversely impact on wildlife present within the adjacent woodland, prevention of surface run-off, use of designated fuelling areas, spill kits under machinery and designated areas for storage of hazardous liquids and chemicals. Additionally, fencing should be implemented around the adjacent retained woodlands and hedgerows outside of the site boundary as to not adversely impact on these habitats from habitat loss and protection of tree root protection areas.

In accordance with the Environment Act, 2021, National Planning Policy Framework (NPPF) 2024, and local policy drivers, development proposals are required to provide a measurable net gain in biodiversity. Where a site is not exempt, the development must deliver a minimum of 10% BNG, which should be evidenced through a Biodiversity Net Gain Assessment (BNGA) using the Statutory Biodiversity Metric¹⁷ (SBM). The BNGA should be provided within a separate report.

Species

Bats

Foraging/Commuting

The proposed development will not result in the loss of any high suitability foraging habitat for roosting bats due to the site being consistent with conditions in 2021.

As this survey data is now out of date, updated night-time bat walkovers (NBW) should be undertaken to identify how bats are using the site. This should be undertaken in line with best practice¹³ with one survey visit in spring (April/May), one in summer (June-August) and one in autumn (September/October). The NBWs should be supplemented with automated static bat monitoring in each habitat on site each season and left recording for five consecutive nights each time.

The proposals however have potential to increase light spill onto adjacent woodland and hedgerows which are considered of high value for foraging and commuting bats.

Bats are a highly photosensitive species. Artificial lighting can cause disturbance to bat species' roosting, foraging and commuting activity. Proposals should therefore impose measures to limit additional light disturbance at site during construction and following development and outlined within the above-mentioned CEMP. Bat-sensitive lighting should be incorporated into the scheme to minimise any potential impacts of increased lighting levels on foraging, commuting and socialising bats. Lighting design should follow guidance provided by the Institution of Lighting Professionals (ILP)¹⁸ and BCT, specifically:

- Works should be restricted to daylight hours whenever possible. Ensure lighting is task orientated and switched off when not in use (i.e. through the use of motion activated lights and/or timers);
- Will avoid use of metal halide and fluorescent light sources;
- Warmth of luminaires. Any external areas will incorporate light at a <2700K where possible, with peak wavelengths higher than 550nm;
- Use of screens/hoods to make any external lighting as directional as possible, avoiding light spill on any natural features;
- Where possible, external lights will be as low to the ground as possible and use of bollard lighting should be avoided;
- Only luminaires with a negligible or zero upward light ratio, and with good optical control, should be considered. Luminaires should always be mounted horizontally, with no light output above 90° and/or no upward tilt;
- Lighting controls in place where appropriate to minimise the duration lights are illuminated, this could be for example instated through motion sensor lighting or subject to curfews. Lighting associated with the adjacent woodland and hedgerows surrounding the site should be prohibited during the active bat season (April-October, inclusive);
- Dark corridors will be created with no light levels over the adjacent woodland and hedgerows surrounding the site;
- Measures should be taken in internal light placement to reduce risk of light spill from windows;
- Lighting at site should be modelled to confirm predicted intensity and spill which should be reviewed by a Suitably Qualified Ecologist (SQE).

Birds

Breeding bird surveys are currently being undertaken to determine the status of breeding birds on site.

Clearance of the site is likely to occur during the nesting bird season (mid-February to August inclusive). The grassland and bramble on site should therefore be cleared following a nesting bird check by a suitably experienced ecologist no more than 48 hours prior to vegetation clearance. If an active nest is discovered, a suitably sized buffer (3-8m species dependent) should be enacted until the young have fledged or the nest is no longer active.

Further mitigation measures will be outlined in the breeding bird survey report.

Dormouse

The proposed development requires a gap to be cut within a hedgerow adjacent to the site which is known to support hazel dormouse from the previous survey effort. Removal of this hedgerow is likely to result in the potential killing or injury of dormouse and habitat loss. Therefore, no clearance of this hedgerow should be undertaken until a European Protected Species Mitigation Licence is submitted to and accepted by Natural England which will outline the mitigation approach required.

Invertebrates

Suitable host plants in the form of ragwort, fescues and bent species should be replaced in the proposed soft landscaping.

Reptiles

Reptiles have been recorded on site during the 2023 surveys and during the site walkover. As this survey data is now out of date, an updated suite of reptile surveys is being undertaken, following good practice guidelines¹⁹.

The mitigation strategy is likely to require the capture and translocation of reptiles recorded on site to a suitable receptor site, preferably on or close to the site. Detail of this will be provided within the reptile survey report.

Other Priority/Notable Species

Hedgehog

Clearance of the bramble scrub habitat should be cleared under ecological supervision, following a fingertip searched with any potential log/refugia piles dismantled by hand. If any animals are encountered, they should be moved with a gloved hand to suitable habitat outside of the works area during suitable conditions (above 5°C). If clearance works are undertaken in unsuitable conditions when hedgehog may be hibernating, the animal may need to be taken into care and released when conditions are suitable.

Ecological Enhancements

Where feasible, it is recommended that the following ecological enhancements could and should be incorporated within the site design going forward (list is not exhaustive):

Habitats

- New hedgerows should be species-rich where possible (including more than five native species) and to favour native species. Where a single species is more appropriate, a single native species such as hazel, beech *Fagus sylvatica* or hornbeam *Carpinus betulus* should ideally be favoured;

- The landscape planting scheme should also incorporate species to encourage night-flying insects, such as evening primrose *Oenothera biennis*, night-scented stock *Matthiola longipetula*, white jasmine *Jasminum polyanthum*, honeysuckle *Lonicera* sp., lavender *Lavandula* sp., sweet rocket *Hesperis matronalis* and night-flowering catchfly *Silene noctiflora*;
- Introduce biodiverse green roofs on appropriate roof structures (for example flat roofs that can withstand the weight of a green roof), with invertebrate habitat features (e.g. log piles, stone/sand piles and rope coils) and ephemeral water features. Living roof depths must be a minimum of 120mm, varying to 200mm, with an average depth of 150mm;
- Incorporate green walls (either ground-based or façade-bound) onto the buildings which can incorporate small bee houses and be of value to bats by planting night scented species. Some green walls can also act as edible walls by planting fruits and herbs;
- Woodland edge habitats should be protected through scrub planting as a buffer, this should seek to create a transition from grassland through scrub, to the climax woodland community. The scrub should feature a scalloped edge to improve microclimate diversity and habitat heterogeneity; and
- Shrub and tree planting, including the use of native berry-producing species and species listed on the Royal Horticultural Society (RHS) Plants for Pollinators guide²⁰.

Species

Bats

Most species of bats will use bat boxes at various times of year but in particular they are more broadly occupied by pipistrelles, Leisler's, noctule, brown long eared and *Myotis* species²¹.

It is recommended that bat boxes are incorporated into the proposed development, either integrated into the new proposed level or mounted on the existing building structure and mounted on suitable mature trees adjacent to the site.

Summer bat boxes should be positioned in sunny locations, most suitably on the southern and western façades, with hibernation boxes situated on northern aspects. Bat boxes should be placed away from doors, windows and street lighting, ideally at 3-5m from ground level, with the entrance free from obstruction. The behaviour of bats varies between species however, generally they will use a number of different roosts of varying climate conditions. Therefore, it is advisable to integrate several boxes with varying locations and aspects across the site.

Boxes should comprise a mixture of:

- Integrated Habitat Bat Box 003 (or similar), suitable for pipistrelle and *Myotis* species, such as Natterer's *Myotis nattereri*, Whiskered *Myotis mystacinus* and Brandt's *Myotis brandti* bats;
- Schwegler 2FE (or similar) or wall mounted bat shelter, suitable for summer or winter hibernation roosts suitable for pipistrelle, whiskered and barbastelle;
- Tree mounted bat boxes; Schwegler 2FS and Schwegler 1FW (or similar) suitable for maternity colonies and hibernation; and
- Schwegler 2FN (or similar) suitable for noctule and Bechstein's *Myotis bechsteinii*.

Birds

Integrate swift bricks at the site to provide additional nesting habitat for birds in line with the measures outlined in the British Standard "Integral nest boxes. Selection and installation for new developments. Specification" (BS 42021:2022).

Suitable boxes include the Ibstock Swift Eco Habitat²², or similar alternative brand.

Swift bricks should be integrated into the fabric of the new buildings during construction. Boxes should be positioned close together (0.6-1.0m between bricks) as swifts prefer to nest gregariously.

The boxes should be placed at least 5m above ground level under the eaves of the buildings, on north or east elevations, where they will be sheltered from prevailing wind, rain and strong sunlight. To be suitable for swifts, the bricks require an open aspect with no trees or large shrubs potentially obstructing the birds' flight path up to 5m from the brick.

Swift bricks are a universal nest brick for small bird species, including red-listed species such as common swift, house sparrow and starling.

Additionally, the integration of sparrow terraces and black restart boxes on buildings around the new development will help to target nesting provision towards these species. Suitable nest boxes include Vivara Pro WoodStone House Sparrow Nest Box and Build in Woodstone Half Open Nest Box, respectively. Sparrow terraces can be installed in close proximity to one another, as they are also a gregarious nesting species. Black redstart boxes should be limited to one per building, as this species can be territorial during the nesting season. All boxes should be located in close proximity to the roof line, as described above.

Invertebrates

Enhanced wildflower-friendly landscaping, including the use of native wildflower seed mix. Species could include those listed on the RHS Plants for Pollinators guide²⁰;

Integrate bee bricks into the fabric of the new buildings to provide additional sheltering opportunities for solitary bees and other invertebrates; and

Installation of invertebrate features, such as insect hotels and bee posts, as part of green roofs and/or soft landscaping.

General Recommendations

It is recommended that a CEMP should be produced and implemented for the site, providing greater detail on the mitigation measures set out above, which should be secured through planning condition in accordance with BS 42020: 2013 Biodiversity.

N.B. For guidance on the validity of reports/surveys, the CIEEM Advice Note 'On The Ecological Lifespan Of Ecological Reports and Surveys'²³ should be referred to. In summary, most reports/surveys are likely to be considered valid within 12 months of their undertaking. Within 12-18 months, also still likely to be valid but with some exceptions (refer to CIEEM Advice Note for details). Reports/surveys that are between 18 months and 3 years old are likely to require updating and reports/surveys that are more than 3 years old are unlikely to be considered valid and will need to be updated (subject to an assessment by a professional ecologist). This survey was undertaken in April 2025 and is considered valid for 24 months.

6.0 CONCLUSION

Greengage was commissioned by Portsmouth City Council to undertake a PEA for the site known as Plot 600-601 of the Dunsbury Park development in Portsmouth, in order to establish the ecological value of the site and its potential to support protected/priority habitats and species.

The PEA identified the following ecological constraints associated with the site:

- Confirmed presence of reptiles;
- Confirmed presence of cinnabar moth larvae and low suitability for invertebrates;
- Confirmed presence of dormouse within adjacent woodlands and hedgerows, with negligible suitability on site;
- Moderate suitability for nesting birds;
- Low suitability for foraging bats; and
- Low suitability for hedgehog.

Updated bat activity and reptile surveys should be undertaken. A reptile mitigation strategy and translocation and dormouse licence from Natural England be accepted prior to clearance on site.

Key mitigation, compensation and enhancement actions have been recommended to enable legislative and policy compliance (see context at Appendix C).

Key actions as mentioned above should be included within CEMP and EMP documents for the site, which could be secured through planning condition.

Recommendation has been made for a BNGA report, using the Statutory Biodiversity Metric (SBM) in accordance with the Environment Act, 2021, NPPF 2024, and local policy drivers.

N.B. For guidance on the validity of reports/surveys, the CIEEM Advice Note 'On The Ecological Lifespan Of Ecological Reports and Surveys' should be referred to. In summary, most reports/surveys are likely to be considered valid within 12 months of their undertaking. Within 12-18 months, also still likely to be valid but with some exceptions (refer to CIEEM Advice Note for details). Reports/surveys that are between 18 months and 3 years old are likely to require updating and reports/surveys that are more than 3 years old are unlikely to be considered valid and will need to be updated (subject to an assessment by a professional ecologist). This report/survey has been undertaken in April 2025, with this report considered to be valid for 24 months.

APPENDIX A SURVEY FIGURES

Figure A.1 UKHab Survey Results

DUNSBURY PARK PLOT 600-601

 Red Line Boundary

Hedgerows

 Native hedgerow with trees
Lost

Habitats

 Bramble scrub
 Modified grassland

Google Satellite

Title: Dunsbury Park Plot 600-601

Drawn by: AR
Date: 21/04/2026

Reviewed by: DP
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Project number: 553134
Sources: Google Satellite



APPENDIX B SITE PHOTOGRAPHS

Plate B.1 Modified grassland



Plate B.2 Bramble Scrub



Plate B.3 Presence of slow worm on site



APPENDIX C NON-STATUTORY DESIGNATED SITES

Site Name and Designation	Approximate Location and Direction from the Site	Description/Citation
Dunsbury Hill Wood	0.34 NE	
The Warren, Havant	0.36 SE	
Beech Wood East	0.39 W	
Meadow by Bells Copse	0.49 NE	
Dunsbury Hill Grassland 2	0.49 NE	
Cabbagefield Row	0.52 E	
Dunsbury Hill - Areas 5 & 6	0.54 N	Crepis biennis
Cherry Tree Row	0.68 SW	
Outhurst/Inhurst/Beech Woods	0.69 W	
Bell's Copse	0.71 NE	
Dunsbury Hill - Area 1	0.72 N	
Hurst Wood, Havant	0.84 W	
Neville's Park Areas 2 & 3	0.95 SW	
Middle Clearing	1.07 E	
Stakes Coppice Remnant 7	1.10 SW	
Bushy Lease	1.10 S	
Neville's Park East Wood	1.13 SW	
Neville's Park West Wood	1.25 SW	Plecotus auritus
Havant Thicket (South-West Corner)	1.32 NE	
Blendworth Common (South)	1.34 NE	
Stakes Coppice Remnant 4	1.35 SW	
The Queen's Inclosure	1.36 NW	Bromus commutatus
Stakes Coppice Remnant 5	1.39 SW	
Neville's Park Areas 4-10	1.42 S	

Site Name and Designation	Approximate Location and Direction from the Site	Description/Citation
Stakes Coppice Remnant 6	1.44 SW	
Thicket Lawn	1.49 E	
Frank's Coppice	1.53 W	
Waterlooville Golf Course	1.54 N	
Hulbert Road Meadow	1.62 SW	
Blendworth Common (North)	1.65 N	
Stakes Coppice Remnant 2	1.67 SW	
Havant Thicket	1.67 NE	Myotis bechsteinii, Moma alpium, Argynnis paphia, Muscardinus avellanarius, Juncus effusus x conglomeratus = J. x kern-reichgeltii, Apatura iris
Thicket Bottom Woods & Lake	1.72 E	Muscardinus avellanarius
Thicket Bottom	1.77 E	
High Lawn	1.81 E	Muscardinus avellanarius
Johnston's Coppice	1.90 SW	
Park Wood, Havant	1.93 NW	
Meadow Adjacent to Johnston's Copse	1.93 SW	
Great Copse, Havant	1.93 SE	
Waterlooville Golf Course (North)	1.94 N	

APPENDIX D RELEVANT LEGISLATION AND POLICY

D.1 LEGISLATION

Current key legislation relating to ecology includes the Environment Act 2021²⁴, Wildlife and Countryside Act 1981 (as amended)²⁵; The Conservation of Habitats and Species Regulations 2019 ('Habitats & Species Regulations')²⁶, The Countryside and Rights of Way Act 2000 (CRoW Act)²⁷, and The Natural Environment and Rural Communities Act, 2006²⁸.

The Environment Act, 2021

Under the Environment Act²⁴, 2021, as of 12th February 2024 and 2nd April 2024, it is mandatory in England for new developments (with a small number of exceptions) to deliver a minimum 10% biodiversity net gain (BNG), as measured by the Statutory Biodiversity Metric or Small Sites Metric (SSM) respectively, secured through planning condition as standard (as per schedule 14 of the Act). Approach to the delivery of BNG must follow the mitigation hierarchy, with avoidance of impact and on-site compensation/gains prioritised, ahead of the use of off-site compensation, or the purchase of statutory credits.

The Act introduces the condition that no development may begin unless a Biodiversity Gain Plan (BGP) has been submitted and approved by the LPA.

The Act also amends requirements of the NERC Act, 2006, adding the need to not just conserve, but enhance biodiversity through planning projects. Furthermore, it introduces the need for the LPA to have regard to relevant local nature recovery strategies and relevant species/protected site conservation strategies, when making their decision.

Under the Act, the enhancements must be maintained for at least 30 years.

The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019

The Conservation of Habitats & Species Regulations replace The Conservation (Natural Habitats, etc.) Regulations 1994 (as amended)²⁹, and transpose Council Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Fauna and Flora ('EU Habitats Directive')³⁰, and Council Directive 79/409/EEC on the Conservation of Wild Birds ('Birds Directive')³¹ into UK law (in conjunction with the Wildlife and Countryside Act).

Regulation 43 and 47 respectively of the Conservation of Habitats & Species Regulations makes it an offence (subject to exceptions) to deliberately capture, kill, disturb, or trade in the animals listed in Schedule 2 (European protected species of animals), or pick, collect, cut, uproot, destroy, or trade in the plants listed in Schedule 5 (European protected species of plant). Development that would contravene the protection afforded to European protected species requires a derogation (in the form of a licence) from the provisions of the Habitats Directive.

Regulation 63 (1) states: 'A competent authority, before deciding to undertake, or give any consent, permission or other authorisation for, a plan or project which —

(a) is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects); and

(b) is not directly connected with or necessary to the management of that site;

must make an appropriate assessment of the implications for that site in view of that site's conservation objectives.'

Wildlife and Countryside Act 1981 (as amended)

The Wildlife and Countryside Act 1981 (as amended) is the principal mechanism for the legislative protection of wildlife in Great Britain. This legislation is the means by which the Convention on the Conservation of European Wildlife and Natural Habitats³² (the 'Bern Convention') and the Birds Directive and EU Habitats Directive are implemented in Great Britain.

The Countryside and Rights of Way Act 2000

The Wildlife and Countryside Act has been updated by the CROW Act. The CROW Act amends the law relating to nature conservation and protection of wildlife. In relation to threatened species it strengthens the legal protection and adds the word 'reckless' to the offences of damaging, disturbing, or obstructing access to any structure or place a protected species uses for shelter or protection, and disturbing any protected species whilst it is occupying a structure or place it uses for shelter or protection.

The Natural Environment and Rural Communities Act 2006

The Natural Environment and Rural Communities Act 2006 states that every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity. Biodiversity Action Plans provide a framework for prioritising conservation actions for biodiversity.

Section 41 of the Natural Environment and Rural Communities Act requires the Secretary of State to publish a list of species of flora and fauna and habitats considered to be of principal importance for the purpose of conserving biodiversity. The list, a result of the most comprehensive analysis ever undertaken in the UK, currently contains 1,149 species, including for example, hedgehog (*Erinaceus europaeus*), and 65 habitats that were listed as priorities for conservation action under the now defunct UK Biodiversity Action Plan³³ (UK BAP). Despite the devolution of the UK BAP and succession of the UK Post-2010 Biodiversity Framework³⁴ (and Biodiversity 2020 strategy³⁵ in England), as a response to the Convention on Biological Diversity's (CBD's) Strategic Plan for Biodiversity 2011-2020 and EU Biodiversity Strategy (EUBS)³⁶, this list (now referred to as the list of Species and Habitats of Principal Importance in England) will be used to guide decision-makers such as public bodies, including local and regional authorities, in implementing their duty under section 41 of the Natural Environment and Rural Communities Act 2006 'to have regard' to the conservation of biodiversity in England, when carrying out their normal functions.

Biodiversity Action Plans

Non-statutory Biodiversity Action Plans (BAPs) have been prepared on a local and regional scale throughout the UK over the past 15 years. Such plans provide a mechanism for implementing the government's broad strategy for conserving and enhancing the most endangered ('priority') habitats and species in the UK for the next 20 years. As described above the UK BAP was succeeded in England by Biodiversity 2020 although the list of priority habitats and species remains valid as the list of Species of Principal Importance for Nature Conservation.

Regional and local BAPs are still valid however and continue to be updated and produced.

Detail on the relevant BAPs for this site are provided in the main text of this report.

Legislation Relating to Natura 2000 Sites and Habitats Directive Annex I/II Species

European Commission Council Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Fauna and Flora ('EU Habitats Directive'), and Council Directive 79/409/EEC on the Conservation of Wild Birds ('Birds Directive') form the cornerstones of nature conservation legislation across EU member states. Priority species requiring protection across Europe are listed in the Annexes of these Directives. Regulation 63(1) of the Conservation of Habitats and Species Regulations 2019 and Offshore Marine Conservation Regulations, 2007 (as amended) transpose these directives into UK law and set the basis for the designations of protected sites (known as Natura 2000 sites; Special Areas of Conservation under the Habitat Directive and Special Areas of Protection under the Birds Directive) that are of importance for habitats, species or assemblages listed on the directive Annexes. In the UK Ramsar sites are also offered the same level of protection as SPAs and SACs however the qualifying species for the designation may differ; Ramsar sites being designated specifically as important wetland habitats.

Under article 6(3) of the Habitats Directive, where projects stand to have likely significant effect (in accordance with the European Court of Justice ruling of C-127/02 Waddenzee cockle fishing) upon the integrity of conservation objectives (i.e. conservation status of the qualifying species or habitats) within the designated sites then the Competent Authority must undertake an Appropriate Assessment.

Legislation Relating to Amphibians i.e. Great Crested Newt

Great crested newts are given full protection under Schedule 5 of the Wildlife and Countryside Act 1981, as amended. Protection to the species is also afforded by Regulation 43 of the Conservation of Habitats and Species Regulations 2019, making the great crested newt a European Protected Species. These two pieces of legislation operate in parallel, although there are some small differences in scope and wording. Under the provisions of Section 9 of the Wildlife & Countryside Act, it is an offence to:

- Intentionally kill, injure or take a great crested newt;
- Possess or control and live or dead specimen or anything derived from a great crested newt (unless it can be shown to have been legally acquired);
- Intentionally or recklessly damage, destroy or obstruct access to any structure or place used for shelter or protection by a great crested newt; and
- Intentionally or recklessly disturb a great crested newt while it is occupying a structure or place which it uses for that purpose.

Regulation 43 of the Conservation of Habitats and Species Regulations 2019 makes it an offence to:

- Deliberately capture or kill a great crested newt;
- Deliberately disturb a great crested newt;
- Damage or destroy a breeding site or resting place of a great crested newt; and

- Keep transport, sell or exchange, or offer for sale or exchange a live or dead great crested newt or any part of a great crested newt.

Legislation Relating to Badger

Badgers and their setts are protected under the Protection of Badgers Act 1992, an Act which consolidated and strengthened previous legislation, including the Badgers (Further Protection) Act 1991, the Badgers Act 1991 and the Badgers Act 1973. In England and Wales, it is an offence to:

- Wilfully kill, injure or take a badger;
- Attempt to kill, injure or take a badger;
- Cruelly ill-treat a badger;
- Dig for a badger;
- Intentionally or recklessly damage or destroy a badger sett, or obstruct access to it;
- Cause a dog to enter a badger sett; or
- Disturb a badger when it is occupying a sett.

A licence may be obtained from the appropriate authority (Natural England or Natural Resources Wales) to carry out any activities prohibited by the Act, subject to the conditions of the licence being adhered to.

Legislation Relating to Bats

All UK bats and their roosts are protected by law. Since the first legislation was introduced in 1981, which gave strong legal protection to all bat species and their roosts in England, Scotland and Wales, additional legislation and amendments have been implemented throughout the UK.

Six of the 18 British species of bat have Biodiversity Action Plans (BAPs) assigned to them, which highlights the importance of specific habitats to species, details of the threats they face and proposes measures to aid in the reduction of population declines.

Although habitats that are important for bats are not legally protected, care should be taken when dealing with the modification or development of an area if aspects of it are deemed important to bats such as flight corridors and foraging areas.

The Wildlife & Countryside Act 1981 (WCA) was the first legislation to provide protection for all bats and their roosts in England, Scotland and Wales (earlier legislation gave protection to horseshoe bats only.)

All eighteen British bat species are listed in Schedule 5 of the Wildlife and Countryside Act, 1981 and under Annex IV of the Habitats Directive, 1992 as a European protected species. They are therefore fully protected under Section 9 of the 1981 Act and under Regulation 43 of the Conservation of Habitats and Species Regulations 2019, which transposes the Habitats Directive into UK law. Consequently, it is an offence to:

- Deliberately capture, injure or kill a bat;
- Intentionally or recklessly disturb a bat in its roost or deliberately disturb a group of bats;
- Damage or destroy a bat roosting place (even if bats are not occupying the roost at the time);
- Possess or advertise/sell/exchange a bat (dead or alive) or any part of a bat; and

- Intentionally or recklessly obstruct access to a bat roost.

Legislation Relating to Birds (Nesting)

Nesting birds, with certain exceptions, are protected from intentional killing, destruction of nests and destruction/taking of eggs under the Wildlife and Countryside Act 1981 (as amended) and the CROW Act. Any clearance of dense vegetation should therefore be undertaken outside of the nesting bird season, taken to run conservatively from March to August (inclusive), unless an ecologist confirms the absence of active nests prior to clearance.

Legislation Relating to Dormice

Dormice are given full protection under Schedule 5 of the Wildlife and Countryside Act 1981, as amended. Protection to the species is also afforded by Regulation 43 of the Conservation of Habitats and Species Regulations 2019, making the hazel dormouse a European Protected Species. These two pieces of legislation operate in parallel, although there are some small differences in scope and wording. Under the provisions of Section 9 of the Wildlife & Countryside Act, it is an offence to:

- Intentionally kill, injure or take a dormouse;
- Possess or control and live or dead specimen or anything derived from a dormouse (unless it can be shown to have been legally acquired);
- Intentionally or recklessly damage, destroy or obstruct access to any structure or place used for shelter or protection by a dormouse; and
- Intentionally or recklessly disturb a dormouse while it is occupying a structure or place which it uses for that purpose.

Regulation 43 of the Conservation of Habitats and Species Regulations 2019 makes it an offence to:

- Deliberately capture or kill a dormouse;
- Deliberately disturb a dormouse;
- Damage or destroy a breeding site or resting place of a dormouse; and
- Keep transport, sell or exchange, or offer for sale or exchange a live or dead dormouse or any part of a dormouse.

Legislation Relating to Reptiles

All species of reptile native to the UK are protected to some degree under national and/or international legislation, which provides mechanisms to protect the species, their habitats and sites occupied by the species.

Sand lizards and smooth snakes are European protected species and are afforded full protection under Section 9 of the Wildlife and Countryside Act 1981 and Regulation 43 of the Conservation of Habitats and Species Regulations 2019. However, these species are rare and highly localised. Their occurrence is not considered as relevant in this instance, as the ranges and specialist habitats of these species do not occur at this site.

The remaining widespread species of native reptiles (adder, grass snake, slow worm and viviparous lizard) are protected under part of Section 9(1) and all of Section 9(5) of the Wildlife and Countryside Act 1981. They are protected against intentional killing and injury and against sale, transporting for sale etc. The habitat of these species is not protected. However, in terms of development, disturbing or destroying reptile habitat during the course of development activities while reptiles are present is likely to lead to an offence under the Wildlife and Countryside Act 1981. It is therefore important to identify the presence of these species within a potential development site. If any of these species are confirmed, all reasonable measures must then be taken to ensure the species are removed to avoid the threat of injury or death associated with development activities.

Each species of native reptile has specific habitat requirements but general shared features include a structurally diverse habitat that provides for shelter, basking, foraging and hibernating.

All reptiles are BAP species and as such are also of material consideration in the planning process due to the NPPF.

D.2 PLANNING POLICY

National

National Planning Policy Framework

The National Planning Policy Framework (NPPF) 2024³⁷ sets out the Government's planning policies for England, including how plans and decisions are expected to apply a presumption in favour of sustainable development. Chapter 15 of the NPPF focuses on conservation and enhancement of the natural environment, stating plans should 'identify and pursue opportunities for securing measurable net gains for biodiversity'.

It goes on to state: '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'. Alongside this, it acknowledges that planning should be refused where irreplaceable habitats such as ancient woodland are lost.

Local

Havant Borough Core Strategy³⁸

DM8 Conservation, Protection and Enhancement of Existing Natural Features

Development will only be permitted where it protects and enhances local habitats and landscape distinctiveness and which addresses all of the relevant criteria as set out below:

1. Protects natural features of nature conservation and/or amenity importance on the site, for example trees, woodlands, hedgerows, soils, streams, stream corridors, springs, ditches or ponds from damage, destruction and a deterioration in quality.
2. Sympathetically incorporates existing features into the overall design of the scheme including measures taken to ensure their continued survival.
3. Provides new landscape works that integrate successfully with the local environment and existing natural features, using local materials and plant species and making provision for future maintenance of new landscape works associated with new developments.

4. Ensures sequences of greenspaces are maintained and protects the attractiveness and visual amenity of all green open spaces that contribute to the identity of the borough.

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