1ST HORIZON

ECOLOGICAL - PROOF OF EVIDENCE

(REF: 8607-R13-PoE)

Client: **Home Office**

Project: **Haslar IRC, Gosport**

Date: **20/10/2026**

Contact Details

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Ecology Proof of Evidence	
Project	Haslar IRC, Gosport
For	Home Office
Reference	8607-R13
Date	20 October 2026
Author	[redacted] MSc, BSc (Hons), MCIEEM – Director of Ecology Enzygo Ltd
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1.0 PREFACE

1.1 My name is [redacted], Director of Ecology, Enzygo Ltd.

1.2 I have over twenty-two years' experience in the environmental consultancy sector, and have served as the Director of Ecology at Enzygo for the past eleven years. As a Full member of CIEEM, I am fully aware of all current guidance, wildlife legislation, and national/local planning policies. I am either Proficient or Authoritative under many of the CIEEM Technical and Transferable competencies, including: survey of protected species; Preliminary Ecological Appraisal; Ecological Impact Assessment; and Habitats Regulations Assessment. I have a vast experience with developing mitigation strategies and implementation of these where necessary, and hold both Natural England & Natural Resources Wales Licences for: Bats; Great Crested Newt; Dormouse; and Barn Owl, and have secured numerous site development licences under these. I have a particular interest in Natural Capital assets, having completed my MSc on Habitat Creation and Management, and regularly attend training events & seminars on Biodiversity Net Gain and Habitat Management & Monitoring Plans. I am also MoRPH River Condition Assessment accredited.

1.3 I have previously prepared expert evidence for public hearings and inquiries, and have represented parties at these proceedings in my capacity as a qualified ecologist.

1.4 I have produced this report as a specialist sub-consultant on behalf of 1st Horizon Surveying & Engineering Limited and The Home Office.

2.0 BACKGROUND

2.1 Our Understanding of Planning Status

2.1.1 The following provides an Ecology Proof of Evidence in support of the proposals at Haslar IRC Phase II, Dolphin Way, Haslar, Hampshire PO12 2AW.

2.1.2 Our understanding of planning status across the wider Haslar site is as follows.

- Phase I works, permitted development, currently ongoing.
- Energy Centre, full planning application 24/00382/FULL, construction phase currently ongoing.
- Temporary Carpark, permitted development, completed and in-use.

2.1.3 We provided ecological technical reports in support of the aforementioned applications/ permitted development works, the findings of which have been used to inform the baseline of the technical reports for the Phase II application where relevant.

2.1.4 The Phase II outline application (including permanent car-park) ref: 26/00216/CROWN Red Line Boundary (RLB) covers the following extent:

Figure 1 – Red Line Boundary



2.2 Supporting Ecological Technical Reports

2.2.1 Ecology technical reports submitted in support of outline application 26/00216/CROWN include the following, and it is our understanding that all of these have been reviewed and understood by all relevant parties:

- 8607-R13-IA REV I- Ecological Impact Assessment (EcIA) (1stH, 2026) **[CD3.6]**
- 8607-R13-BNG REV D- Biodiversity Net Gain (BNG) Metric (1stH, 2026). **[CD3.24]**
- 8607-R13-BNG-D REV A- Design Stage Report (DSR) (1stH, 2026). **[CD3.4]**
- 8607-R13-HRA-AA-P2- Habitats Regulations Assessment (1stH, 2026). **[CD3.11]**
- Habitat Management and Monitoring Plan (HMMP) for the Stubbington Brent Geese Reserve (Arbtech & Wild Capital, 2025), and Mitigation Project Plan/ Conservation Covenant Agreement/ Allocation Notice. **[CD3.26]**

2.3 Consultation Responses

Gosport Borough Council

2.3.1 Gosport Borough Council (GBC) Planning and Regeneration team provided a consultation response (dated 6th August 2026) **[CD11.6]** to application 26/00216/CROWN. This included comment from Hampshire County Council (HCC) Senior Ecologist, Maral Miri, which was subsequently discussed during a teams call on the 29th September 2026. Ecology reasons for objection included:

- Brent Geese sHRA to be agreed by competent authority.
- BNG Design Stage Report not accompanied by a BNG metric, and this needs to secure a net gain in biodiversity.
- Reptile survey out of date, with concerns regarding mitigation i.e. insufficient habitat retained.
- No bat activity surveys have been carried out, with concerns about lighting impacts to surrounding offsite habitats.
- How the conclusion of negligible potential for notable invertebrates has been reached.

2.3.2 The response to this is detailed within this ecology proof of evidence. Additionally, an addendum letter is to be provided at the end of October 2026 following the completion of updates species surveys.

Natural England

2.3.3 Natural England (NE) provided a consultation response (dated 10th July 2024) **[CD11.7]** on the proposed Phase II works (as part of consultation for works across the wider Haslar IRC). This followed several calls and in person discussions on site in 2024. Ecology reasons for objection raised included:

- sHRA lacks a full in-combination assessment.
- Additional comments are also provided (but not a reason for objection).

2.3.4 Subsequently NE provided further consultation responses (dated 10th & 18th August 2026) **[CD11.8]**. This followed revisions to the HRA document, and provision of unredacted reports. This stipulated: *"No objection – Subject to appropriate mitigation being secured."*

2.3.5 No response was required.

Concerned Third Parties

2.3.6 DCC Town Planning provided a letter of objection (dated 4th August 2026) **[CD11.9]**. Ecology reasons for objection raised included:

- Badger and Reptile surveys are out of date.
- sHRA undertaken on out of date information.
- HRA scopes out lighting impacts.

2.3.7 The response to this is detailed within this ecology proof of evidence. Additionally, an addendum letter is to be provided at the end of October 2026 following the completion of updates species surveys.

3.0 ECOLOGY STRATEGY

3.1 Ecological Features within Zone of Influence

3.1.1 Ecological features of interest identified within the Zone of Influence (ZoI) as part of the ecological technical assessment includes the following (refer to specific technical reports for full details):

- Solent & Southampton Water Ramsar, SAC, SPA (adjacent coast, designated for: wetland habitats; rare plants and invertebrates; and wintering waterfowl).
- Portsmouth Harbour Ramsar, SPA, SSSI (adjacent coast, designated for: estuarine habitats supporting Dark-bellied Brent Geese).
- Range of SINC (throughout locality, Grassland parcels supporting Brent Geese).
- Deciduous Woodland HPI (adjacent site).
- Green Infrastructure (stepping stone through site, connecting surrounding landscape).
- Blue infrastructure (coastal edge).
- Solent Waders Brent Goose Strategy (SWBGS) Core Area, parcel G63 (FLL associated with designated sites, throughout Phase II of Haslar IRC).
- Native Hedgerow with Trees (southern boundary).
- Trees with Potential Roosting Features (PRFs). Survey October 2025, remains in date (T19 & T20 Negligible, T34 & T36 PRF-I. T22 also PRF-I (following endoscope investigation). *Note no buildings with bat roost potential, but adjacent Phase I area (and wider locality) supports buildings with suitable features including Day Roosts of Common Pipistrelle within Dormitory B & Multi-Faith Centre (licence 2023-66427-EPS-MIT obtained from Natural England)).
- Bat foraging/commuting (habitats moderate suitability (Collins, 2023). Common species/typical assemblage (i.e. Common Pipistrelle) at expected levels along coast). Incidental observations during dusk emergence surveys of buildings throughout Phase I Summer 2023. No specific Bat Activity of Phase II area.
- Badger. Survey October 2025, remains in date (records/ activity in locality, no setts recorded on site but Fox den).
- Breeding Birds (limited opportunities for a restricted range of common species).
- Wintering and Migratory Birds (as above statutory designated sites/FLL).
- Common Reptiles. Survey Summer/Autumn 2023, out of date in accordance with CIEEM advice note on lifespan of ecological surveys (CIEEM, 2019) (small population of Common Lizard individuals/peak 2 adults, with Slow Worm records in wider locality).
- Marine species (as above statutory designated sites).
- Priority Species (limited opportunities for individuals i.e. common mammals, common amphibians, flora & inverts on wider coastal grassland).

3.2 Assessment of Impacts & Mitigation Strategy Summary

Solent & Southampton Water Ramsar, SAC, SPA; Portsmouth Harbour Ramsar, SPA, SSSI (including Brent Geese); SINC; Blue Infrastructure; SWBGS Core Area (Parcel G63); Wintering/Migratory Birds; and Marine species

3.2.1 Refer to Habitats Regulations Assessment & Natural England approval. Use of Stubbington land as compensation in accordance with SWBGS which in summary includes:

- Conversion of approximately 12.78ha of current arable farmland into an area of Perennial Rye-grassland, with a sward between 5-12cm all year round. This will provide a food source for overwintering birds including Brent Geese. It will be secured from public disturbance by fencing.

3.2.2 Additionally, control measures to be incorporated into a Construction Environmental Management Plan (CEMP) in accordance with BS42020:2013 to avoid further impacts to wintering birds and coastal habitats during the construction phase and operation of the site.

Deciduous Woodland HPI; Green Infrastructure; Native Hedgerow

3.2.3 Protection of features in accordance with BS5837:2012, with appropriate buffers.

Trees with bat PRFs

3.2.4 Pre-felling check, and replacement of roosting features.

Bat foraging/commuting

3.2.5 As above, retention of green infrastructure habitats & coastal edge to provide continued connectivity across the site, particularly coastal grassland habitats to the west and historic buildings to the east.

3.2.6 Additionally, sensitive lighting strategy in accordance with current guidance (ILP, 2023) to avoid light spill onto surrounding habitats.

Badger

3.2.7 Pre-clearance checks, and best practice methods during the construction phase.

Breeding Birds

3.2.8 Clearance of habitats outside of the nesting bird period, or sensitive clearance under the supervision of an Ecological Clerk of Works (ECoW).

Common Reptiles; Priority Species

3.2.9 As above, sensitive clearance of habitats under the supervision of an ECoW. Relocation of any individual common reptiles or priority species to retained green infrastructure habitats. Only individuals of species involved, so securing a receptor site is not proportionate.

4.0 LOCAL AND NATIONAL POLICY COMPLIANCE

4.1 Local Policy

POLICY LP41: GREEN INFRASTRUCTURE

"Planning permission will be granted for development proposals provided that where appropriate they:

***a)** maintain and enhance the Borough's green infrastructure network including the provision of sufficient on-site green infrastructure and where necessary secure off-site green infrastructure;*

***b)** secure a net gain of on-site biodiversity;*

***c)** use sustainable drainage systems (SuDS); and*

***d)** accord with the latest South Hampshire Green Infrastructure Strategy, Borough Council's strategies and evidence relating to green infrastructure issues.*

Proposals will not be permitted that compromise the integrity of the overall green infrastructure network including internationally important sites and other habitats supporting important species (see policies LP42-LP44 for further details)."

4.1.1 This has been met through the retention of identified Green Infrastructure features. It is understood that the Home Office (HO) is currently undertaking a formal procurement exercise to secure the required offsite BNG units.

POLICY LP42: INTERNATIONALLY AND NATIONALLY IMPORTANT HABITATS

"Planning permission will not be granted for development which will affect the integrity of internationally important sites. Such sites will be subject to the highest level of protection as set out in the relevant international and national regulations.

All new residential development will be required to avoid or mitigate likely significant 'alone' and 'in-combination' effects on internationally important habitats caused by recreational disturbance.

Planning permission will not normally be granted for development if it directly or indirectly harms a Site of Special Scientific Interest (SSSI). Development that affects a SSSI will only be permitted where it has been demonstrated that:

> ***a)*** *the objectives of the designated area and overall integrity would not be compromised; or*
>
> ***b)*** *any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by social and economic benefits of national importance.*
>
> *In the exceptional circumstances where development that affects a SSSI is permitted the Borough Council will use conditions or planning obligations to ensure the protection of the site's nature conservation interest and that any adverse impacts are appropriately mitigated for, with compensatory measures only used as a last resort."*

4.1.2 This has been met through the provision of compensation land at Stubbington in accordance with the SWBGS, and as agreed by Natural England.

POLICY LP43: LOCALLY DESIGNATED NATURE CONSERVATION SITES

"Locally designated sites such as Sites of Importance for Nature Conservation (SINCs) and Local Nature Reserves will be appropriately protected and opportunities will be taken to enhance

Planning permission will not be granted on locally designated sites unless it can be clearly demonstrated that the benefits of the proposal outweigh the need to protect the nature conservation value of the site.

In exceptional circumstances where development is permitted the Local Planning Authority will ensure that any adverse impacts are appropriately mitigated for, with compensatory measures only used as a last resort."

4.1.3 This has been met as any potential impacts to SINCs will be avoided, and as above compensation land at Stubbington is to be provided.

POLICY LP44: PROTECTING SPECIES AND OTHER FEATURES OF NATURE CONSERVATION IMPORTANCE

"Planning permission will not be granted on a site that would have an adverse impact on a protected species or its habitat unless it can be clearly demonstrated that there is an overriding need for the development that outweighs the significance of the nature conservation feature. In such instances, the planning authority will impose conditions on the planning permission or require a planning obligation to:

***a)** facilitate the survival of individual members of the species;*

***b)** reduce disturbance to a minimum;*

***c)** provide alternative habitats to sustain at least the current levels of population of the species; and*

***d)** take opportunities to enhance their habitat.*

Development proposals should ensure that habitats and species on the UK List of Priority Habitats and Species and included within Hampshire Biodiversity Action Plans are protected and populations strengthened.

Planning permission will not be granted for development which would adversely affect, directly or indirectly, features of nature conservation importance unless it can be demonstrated that the justification for the development outweighs their importance for nature conservation or amenity value.

Appropriate management of these features will be secured by the position of planning conditions and by entering management agreements with landowners where appropriate. Where such features are lost as part of a development proposal, the Borough Council will use conditions and/or planning obligations to ensure no net loss of biodiversity."

4.1.4 This has been met as detailed in section 3.2 proportionate mitigation measures are to be incorporated during the construction phase and into the site design.

4.2 Local Nature Recovery Strategy

4.2.1 In December 2025, the Hampshire Local Nature Recovery Strategy (LNRS) was published. This includes the following suggested measures for this area:

- **C4:** Management and restoration of coastal floodplain grazing marsh for priority species and other features.
- **C7:** Managing public access and dogs.
- **WB1:** Creation and management of wet grassland for breeding waders and wintering waders and wildfowl.

- **F4:** Management of grassland for target features.

4.3 NPPF

4.3.1 The National Planning Policy Framework (NPPF) (2026) sets out the Government's planning policies for England and how these are expected to be applied. The NPPF should be read as a whole and in conjunction with other relevant national planning policy and legislation.

4.3.2 Chapter 19 of the NPPF, 'Conserving and enhancing the natural environment', sets out the national planning policy approach to the protection and enhancement of the natural environment, including biodiversity, ecological networks, green infrastructure and nature recovery.

4.3.3 **Policy N1**, *'Identifying environmental opportunities and safeguards'*, requires development plans to safeguard and enhance the natural environment and reflect the wider benefits from natural capital and ecosystem services. Development plans should use relevant environmental evidence, including Local Nature Recovery Strategies, to:

- set out the hierarchy of international, national and locally designated sites and areas of importance for their landscape, geological or biodiversity value, and identify other features which require particular consideration due to their environmental value;
- identify opportunities for the conservation, enhancement and recovery of landscapes, sensitive waterbodies, habitats and species of principal importance, including through habitat restoration, nature-based solutions, and the creation and strengthening of ecological networks that are more resilient to current and future pressures;
- steer the location of development towards land of least environmental value, where consistent with other policies in the NPPF, including by avoiding and minimising harm to designated sites of importance for nature; and
- set standards for green infrastructure provision.

4.3.4 Policy N1 also states that development plans should only set local standards for biodiversity net gain which exceed the statutory net gain requirement where these relate to specific site allocations and are fully justified and deliverable.

4.3.5 **Policy N2**, *'Improving the natural environment'*, sets out the principal requirements for development proposals in relation to biodiversity and the natural environment. The policy requires consideration to be given to the environmental qualities of land proposed for development, including existing natural features and landscape character, and requires development to contribute positively to the natural environment.

4.3.6 Policy N2 states that development proposals should:

- take suitable opportunities to connect to and strengthen ecological networks extending beyond the site;
- conserve and enhance existing natural features of biodiversity value;
- use green infrastructure and nature-based solutions where appropriate;
- minimise impacts on biodiversity;
- incorporate features which support priority or threatened species; and
- provide improvements for nature through measures including biodiversity net gain, actions identified through Local Nature Recovery Strategies, green infrastructure, nature-based solutions and features for wildlife.

4.3.7 Policy N2 requires the mitigation hierarchy to be applied to significant biodiversity impacts. In particular: "If significant harm to biodiversity resulting from 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.

4.3.8 The mitigation hierarchy therefore requires consideration to be given first to avoidance of significant biodiversity harm, followed by appropriate mitigation and, where necessary, compensation for residual effects.

4.3.9 Policy N2 also supports development whose primary objective is to conserve or enhance biodiversity and requires opportunities to improve biodiversity in and around development to be integrated as part of its design. The policy specifically identifies the incorporation of features for wildlife, including swift bricks, within appropriate development.

4.3.10 **Policy N6**, 'Areas of particular importance for biodiversity', sets out the approach to development affecting internationally, nationally and locally designated sites and irreplaceable habitats.

4.3.11 Policy N6 identifies the hierarchy of protection applicable to areas of particular importance for biodiversity, including:

- sites of international importance;
- sites of national importance, including Sites of Special Scientific Interest (SSSIs);
- sites of local importance, including Local Wildlife Sites; and
- irreplaceable habitats.

4.3.12 The NPPF requires the relevant level of protection to be applied having regard to the importance and statutory status of the ecological feature concerned and the potential effects of development.

4.3.13 Policy N6 provides protection for SSSIs and states that development proposals affecting such sites should only be supported where the relevant policy requirements

are satisfied. The policy also provides for consideration of the wider benefits of development and the likely impact on the features which make the site important for nature conservation.

4.3.14 Development resulting in the loss or deterioration of irreplaceable habitats is subject to the highest level of protection. Irreplaceable habitats include ancient woodland and ancient or veteran trees, together with other habitats identified as irreplaceable in the relevant national policy and guidance.

4.3.15 Where irreplaceable habitats may be affected, the requirements of Policy N6 should be considered alongside the relevant statutory protection and the principles of avoidance, mitigation and compensation.

4.3.16 The NPPF recognises the importance of locally designated sites in contributing to wider ecological networks and biodiversity. Local Wildlife Sites and other locally identified areas of biodiversity importance should therefore be taken into account when considering the potential effects of development.

4.3.17 The NPPF also places importance on Local Nature Recovery Strategies (LNRSs). LNRSs provide a spatial framework for identifying areas of particular importance for biodiversity and opportunities for nature recovery, including opportunities to restore, enhance, create and connect habitats.

Habitats Sites

4.3.18 Policy N6 provides specific protection for internationally important sites. The following sites are given the same protection as habitats sites:

- potential Special Protection Areas (pSPAs) and possible Special Areas of Conservation (pSACs);
- listed or proposed Ramsar sites; and
- sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.

4.3.19 The statutory protection afforded to habitats sites operates alongside the NPPF. The Conservation of Habitats and Species Regulations 2017, as amended, require consideration of the potential effects of plans or projects on European sites.

4.3.20 Where a plan or project is likely to have a significant effect on a habitats site, either alone or in combination with other plans or projects, an appropriate assessment is required in accordance with the Conservation of Hbitats and Species Regulations 2017 (Habitats Regulations), unless the relevant statutory provisions provide otherwise.

Biodiversity Net Gain

4.3.21 The NPPF supports the achievement of measurable net gains for biodiversity and should be read alongside the statutory Biodiversity [Net] Gain (BNG) framework established under the Environment Act 2021 and associated legislation.

4.3.22 Subject to the relevant statutory exemptions and transitional provisions, development in England is required to achieve a minimum 10% increase in biodiversity value.

4.3.23 The statutory BNG requirements operate alongside, and do not replace, the mitigation hierarchy. The achievement of a biodiversity net gain does not remove the requirement to avoid, mitigate or compensate for significant biodiversity effects, nor does it override the protection afforded to designated sites, protected species or irreplaceable habitats.

4.3.24 The statutory Biodiversity Gain Hierarchy requires adverse effects on onsite habitats to be addressed in accordance with a defined order of preference. For major development, this includes first avoiding adverse effects on medium, high and very high distinctiveness onsite habitats and, where avoidance is not possible, mitigating those effects. For adversely affected onsite habitats, preference is then given to enhancement of existing onsite habitats, creation of new onsite habitats, registered offsite biodiversity gain and, as a final option, the purchase of statutory biodiversity credits.

4.3.25 The Biodiversity Gain Hierarchy is subject to specific provisions for non-major development and transitional arrangements. The statutory requirements, including exemptions and transitional provisions, should be considered in accordance with the legislation in force at the relevant time.

4.3.26 Biodiversity net gain should be considered alongside opportunities for habitat retention, enhancement, restoration and creation, and the strengthening of ecological networks.

Protected and Priority Species

4.3.27 The NPPF requires biodiversity impacts to be minimised and development to incorporate features which support priority or threatened species, where appropriate.

4.3.28 The protection afforded to species under separate legislation continues to apply. Relevant legislation includes the Wildlife and Countryside Act 1981, as amended, the Conservation of Habitats and Species Regulations 2017, as amended, and the Protection of Badgers Act 1992, as amended.

4.3.29 The presence or potential presence of protected or priority species should be taken into account in the planning process. Where development could affect protected species or their habitats, appropriate measures should be incorporated to avoid, minimise or compensate for potential impacts, as appropriate.

Ecological Networks and Nature Recovery

4.3.30 The NPPF places particular emphasis on the maintenance, restoration and strengthening of ecological networks.

4.3.31 Development plans should identify opportunities for the creation and strengthening of ecological networks which are resilient to current and future pressures. Development proposals should take suitable opportunities to connect to and strengthen ecological networks extending beyond individual development sites.

4.3.32 Ecological networks may include designated sites, priority habitats, wildlife corridors, stepping stones, areas identified through Local Nature Recovery Strategies and other habitats which contribute to ecological connectivity.

4.3.33 The NPPF supports the use of green infrastructure and nature-based solutions to deliver benefits for biodiversity and the wider environment. Opportunities for habitat creation, restoration and enhancement should be considered alongside the conservation of existing ecological features.

5.0 CONCERNS RAISED BY INTERESTED THIRD PARTIES

5.1 Protected & Priority Species

5.1.1 Concern raised by GBC and DCC Town Planning, relating to out of date surveys including Badger, Reptile and Bat, and concerns about lighting. Response is as follows.

5.1.2 Teams calls with HCC Senior Ecologist Maral Miri on the 4th & 10th November 2025, and subsequent email, allowed mitigation i.e. retention of boundary habitats, in lieu of Bat and Reptile surveys (there was also mention that mitigation would also be acceptable for notable invertebrates at this time). Whilst this specifically related to use of the temporary carpark, it was inferred that this approach was also suitable for the wider site.

5.1.3 Proportionate mitigation measures are to be incorporated during the construction phase and into the site design (as detailed in section 3.2) in accordance with BS42020:2013. Further survey was not proportionate or justified given the historic survey information obtained to date, and the limited potential for species presence. To clarify: Individual passes of common light tolerant bat species only along coast; no Badger setts identified on site; individuals of common lizard only recorded during survey; and limited opportunities for inverts within offsite coastal grassland and not specifically within the site footprint. There is no opportunity for additional protected or priority species to be present which has not already been fully assessed. Further survey would disproportionally incur additional cost, delay the project programme, and not yield any significant additional data which would alter the mitigation measures already proposed.

5.1.4 Additional species surveys ongoing including: Bat Activity April-Oct (can cover Aug-Oct 2026, rest in 2027); Reptile (can cover Sep/Oct 2026, remaining in Spring 2027); and Invertebrate (needed Spring/Summer 2027). Surveyors will also re-check habitats and any evidence of Badger whilst on site.

5.1.5 Addendum letter to be provided after 20th October 2026 detailing additional survey findings to date, and to explain why mitigation would be proportionate and justified in accordance with BS42020:2013 (following HCC discussion), with push to condition update surveys if absolutely necessary (rather than sit on determination until surveys are completed).

5.1.6 Sensitive lighting strategy will be provided to avoid light spill onto surrounding habitats.

5.1.7 To clarify, under the Energy Centre full planning application 24/00382/FULL (Granted), the strategy proposed to mitigate impacts from the loss of 0.02Ha grassland within parcel G63 (Core site, Functionally Linked Land [FLL]), as detailed within document **8607-R13-M** – Solent Wader Brent Goose Strategy (SWBGS) Mitigation (1stH, 2025), included: "All remaining land throughout the south-west of the site which is within parcel G63, approximately 2.72ha, will be restored to habitats appropriate for use by wintering wildfowl." This is the Phase II application footprint, and was to include cutting back of all scrub and tall ruderal, then mowing of grassland etc. This habitat management has not yet proceeded and HCC is to confirm what can proceed to facilitate the site investigation works, in lieu of ongoing species surveys (as identified above).

5.1.8 Additionally, DCC Town Planning consultation response identified that: badger and reptile surveys are out of date. As above, this is being dealt with accordingly. They also stipulate that the HRA has been undertaken on out-of-date information, and scopes out lighting impacts. Comments regarding statutory designated sites are addressed below.

5.2 Statutory Designated Sites

5.2.1 Concern raised by GBC, Natural England and DCC Town Planning, relating to out of date surveys, lighting impacts, and mitigation to be agreed by competent authority. Response is as follows.

5.2.2 NE advice stipulates: *"sHRA lacks a full in-combination assessment. The document does refer to the potential in-combination impacts arising from the proposal and the 23/00061/OUT (Daedalus Waterfront) however this is likely not comprehensive."*

5.2.3 Except for the above: *"Other than the lack of in-combination assessment, Natural England broadly agrees with the conclusions of the* sHRA*."* It has been assumed that Natural England has accepted the Brent Goose Mitigation strategy for Phase II as offered by Wild Capital.

5.2.4 Following the provision of updated HRA documents, NE subsequently stipulated: *"No objection – Subject to appropriate mitigation being secured."*

5.3 BNG

5.3.1 Concerns raised by GBC, relating to absence of BNG Metric. Response is as follows.

5.3.2 The BNG Metric referred to was previously submitted in support of the application. It is our understanding that this may have failed to be uploaded to the planning portal by the planning officer, as it is in excel format, but was appended as a PDF to the BNG Design Stage Report. A copy was shared directly with GBC on the 29th September 2026.

4.1.5 BNG Phase II, Habitat unit deficit of 28.81, and Hedgerow unit deficit of 0.07. Require evidence of what was secured offsite. It is understood that the Home Office (HO) is currently undertaking a formal procurement exercise to secure the required offsite BNG units.

6.0 SUMMARY AND CONCLUSION

6.1.1 Suitable mitigation measures can be incorporated into the proposed application to avoid/ mitigate any potential impacts to ecological features during the construction phase and operation of the site, and to demonstrate 'no biodiversity net loss' in accordance with NPPF and local planning policy. As such, no residual impact/ likely significant effect can be expected which would prevent determination of a planning application or development of this site.

6.1.2 Specifically, Stubbington land is to be provided as compensation for the loss of FLL (Core area, parcel G63), associated with Statutory Designated Sites, which has been agreed with Natural England.

6.1.3 Offsite BNG units are to be secured to demonstrate at least +10% BNG in accordance with the Environment Act 2021 (and subsequent updates 2026).

6.1.4 It is our understanding that there are no additional ecological points which require clarification, or any further objections in this regard.

7.0 STATEMENT OF TRUTH

7.1.1 The evidence which I have prepared and provide in this written statement is true and has been prepared and is given in accordance with the guidance of my professional institution and I confirm that the opinions expressed are my true and professional opinions.

7.1.2 Artificial Intelligence ("AI") has not been used to draft or substantially rewrite text; produce a summary or analysis; generate or alter images or videos; or create content that goes beyond straightforward formatting or presentation.

Signature:



[redacted] **MSc, BSc (Hons), MCIEEM - Director of Ecology**

Date: 20th October 2026



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