



# 1ST HORIZON

STAGE 01 HABITAT REGULATIONS ASSESSMENT & STAGE 02  
APPROPRIATE ASSESSMENT (REF: 8607-R13-HRA-AA-P2) REV H

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Client: **Home Office**

Project: **Haslar IRC, Gosport**

Date: **21/05/2026**



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## 1.0 INTRODUCTION AND APPROACH

### 1.1 Commission

**1.1.1** In January 2024, 1st Horizon were commissioned to provide information in support of a Stage 1 Habitat Regulations Assessment (“HRA”) Screening Report, and Stage 2 Appropriate Assessment (“AA”) of the outline planning application for the expansion of Haslar Immigration Removal Centre (“IRC”) located at Dolphin Way, Haslar, Hampshire PO12 2AW (Central Grid Reference: SZ 61595 98368), located within the Gosport Borough Council planning authority (“Proposed Development”). This appraisal will inform proposals for the Proposed Development only.

**1.1.2** The purpose of this document is to provide information to the Secretary of State to enable the undertaking of the process of HRA in accordance with the Conservation of Habitats and Species Regulations 2017.

**1.1.3** Natural England subsequently provided a consultation response on the initial HRA submission (email dated 11 March 2024), and all comments have now been addressed. Following iterative development of the description of the Proposed Development and the proposed mitigation and off-setting measures, the Habitats Regulations Assessment (“HRA Report”) has been updated, with the most recent revision completed in May 2026.

**1.1.4 Note:** 1st Horizon are not considered to act as a Principal Designer for any mitigation/enhancement strategies identified *within this document in accordance with the Construction (Design and Management) Regulations 2015* (CITB, 2016).

### 1.2 Development Details

**1.2.1** The outline planning application area, as shown in **Appendix A**, comprises access along Dolphin Way, through the existing site, and in majority includes the previous exercise field to the south, and a carparking area off Fort Road. The Proposed Development is an expansion of the existing IRC.

**1.2.2** The proposal comprises the erection of new buildings for accommodation and dining facilities, refurbishment/replacement of 5.2-metre-high perimeter fences, erection of internal zonal fencing, vehicular and pedestrian gates, new site entrance gates and barrier, creation of internal road, car parking (new car parking and resurfacing of existing car park area) and hard surfacing [REDACTED], installation of lighting columns, installation of roof top solar PV panels, creation of recreational space for residents, biodiversity enhancements and landscaping and visual barrier together with [REDACTED] garden and pedestrian public access. Improvement is proposed of the coastal path through the existing car park land.

**1.2.3** The study will inform proposals for development of the site, and the HRA specifically covers proposed works throughout the south-west of the site. Refer to **Appendix A** for the indicative layout.

**1.2.4** The Proposed Development may give rise to the following impacts that are considered in this report:

- Clearance of vegetation during the construction phase (currently overgrown grassland with tall ruderal and scrub), resulting in permanent loss of approximately 3.6Ha of grassland habitat to development.
- Indirect impacts resulting from noise, lighting, visual disturbance i.e. from workers/ machinery & crane during the construction phase. Anticipated to progress at all times of the year, including Wintering period.
- Dust/air pollution during the construction phase (no significant effects expected during site operation as outlined in the Air Quality Assessment that forms part of the outline planning application submission).
- Indirect impacts from noise, lighting and the like during the site operation, which are not expected to be materially greater than historic use of the site as an IRC, although there will be additional residents (no increase in recreational pressure to off-site areas as will be a secure IRC).
- Visual disturbance from overlooking buildings, increased disturbance events from additional human presence, and recreational disturbance to on-site retained areas of grassland during site operation. Though it is expected that these parts of the site will be much less used during the winter months when it is colder & wetter, reducing the significance of impact.
- Aquatic silt/pollution runoff during the construction period.
- Increase in hydrological nutrient discharge during site operation.
- Resurfacing of an existing carpark area and expansion of this into disused land (former bare ground carpark circa 2007, currently colonised by weeds and scrub) immediately to the south-west (0.9Ha land parcel).

**1.2.5** The application site boundary includes areas that have previously been developed under existing permissions, for the purposes of the technical assessments. This includes areas such as the access track to site which was developed as part of previous works, and the Energy Centre area which was dealt with within a separate application. As these previous works have been dealt with in separate reports and applications, impacts from these works are not assessed within this report.

**1.2.6** This HRA Report assumes that the Proposed Development will result in no piling activities/vibrational effects; and no works/direct impacts to the coastal edge, flood defences, or marine habitats. All waste will discharge into public sewers and there will be no outfall to the coast or impacts from this. Refer to Appendix A for details of the proposed works. Additionally, there will be no increased recreational pressure upon European sites as the site will function as a secure IRC with no movement of residents into surrounding areas).

## 1.3 The HRA Process

**1.3.1** The Conservation of Habitats and Species Regulations 2017 protect European sites, which are following designated areas:

- Special Areas of Conservation (SACs)
- Special Protection Areas (SPAs)

**1.3.2** SACs and SPAs form the UK's national site network.

**1.3.3** As a matter of government policy, the following sites are to be treated as though they are European sites:

- Proposed SACs
- Potential SPAs
- Ramsar sites – wetlands of international importance (listed and proposed)
- Areas secured as sites compensating for damage to a European site

**1.3.4** For ease of reference, all sites are called European sites for the purposes of this HRA Report.

**1.3.5** Before planning permission can be granted, the decision-maker (the 'competent authority') must undertake an assessment to test whether a plan or proposal that is not connected with the management of a European site could have a significant effect on a European site. The process can have up to four stages, depending on the outcome of the preceding stage. The stages are:

- **Stage 1: Screening:** The competent authority must check whether a proposal is likely to have a significant effect on a European site, either alone or in combination with other plans and projects. It must not include consideration of any mitigation measures that have been proposed protect the European site. If it is not possible to rule out the risk of such impact then the competent authority must process to stage 2.
- **Stage 2: Appropriate Assessment.** The competent authority must consider the impacts of the proposal on the integrity of the European site, either alone or in combination with other plans and projects, taking into account the European site's structure and function and its conservation objectives. If there may be adverse impacts, the competent authority will undertake an assessment of mitigation options to determine whether there may be an adverse effect on the integrity of a European site with the mitigation in place. If it is not possible to rule out an adverse impact on the basis of all reasonable scientific doubt then planning permission can only be given if stages 3 and 4 are followed. Stages 3 and 4 together are known as derogation.
- **Stage 3: Assessment of Alternative Solutions.** The competent authority must consider whether there are any feasible alternative solutions that would be less damaging or avoid damage to a European site.
- **Stage 4: Imperative Reasons of Overriding Public Interest (IROPI).** If there are no feasible alternative solutions, the competent authority must consider whether the development is necessary for IROPI. If there are IRPOI then the competent authority must be satisfied that

compensatory measures can be secured that will fully offset any damage that will or could be caused to a European site.

**1.3.6** If derogation is required to be considered, the competent authority can only grant planning permission if the requirements of both Stages 3 and 4 are satisfied.

**1.3.7** Government advice on the HRA process has been taken into account in this HRA Report, including:

- **Habitats Regulations Assessments:** protecting a European site: How a competent authority must decide if a plan or project proposal that affects a European site can go ahead.
- **Guidance: Appropriate Assessment:** Guidance on the use of Habitats Regulations Assessment

**1.3.8** A number of court judgements are relevant to the interpretation of the Habitats Regulations and have been considered in this HRA Report.

**1.3.9** The Secretary of State is the competent authority for the purposes of the planning application for permission for the Proposed Development and will consult Natural England for advice.

## **1.4 Identification of Likely Significant Effects**

**1.4.1** This HRA Report considers whether there are any 'likely significant effects' of the Proposed Development upon European sites.

**1.4.2** Consultation has been undertaken with Hampshire County Council (HCC) and Gosport Borough Council (GBC) to identify any other plans or projects that may have significant impacts on the same European sites as the Proposed Development. The Daedalus application 23/00061/OUT (for mixed-use development) is one that could result in potential impacts to European sites within this locality, and mitigation options are currently being considered. As such, this will be included within the assessment for any significant potential in-combination impacts. The Daedalus application is expected to result in mainly recreational impacts during site operation, whilst the Proposed Development concerns direct loss of Functionally Linked Land (FLL), (which is an area of land or sea that lies outside a European site but is considered to be necessary for the ecological or behavioural functions of a qualifying feature for which a European site has been designated) with no associated recreation impacts to off-site areas.

**1.4.3** Further ongoing/pending applications in the immediate locality which have been considered include the following. These have been identified from a check of HCC and GBC planning portals:

- 24/00001/EIASCR Former Debenhams Site and Car Park, Commercial Road. Proposed 569 apartments, retail, and indoor recreation.

- 22/00002/EIASCO Hope Street and Church Street. Proposed 2,300 residential units, retail and offices, road improvements, and landscaping.
- 23/00108/FULL Piggeries Land north of Mabey Close, Haslar Road. 60 dwellings.
- 22/00232/FULL Royal Hospital Haslar Road. Change from Hospital to 74 residential units, with leisure.

**1.4.4** All of the above will result in additional recreational impacts, and additional nutrient neutrality impacts during site operation. All of these applications are located on land which does not have any SWBGS bird information available from Hampshire Biodiversity Information Centre (HBIC), and which will not result in direct impacts to any FLL.

## 1.5 Aims and Objectives

**1.5.1** This report provides information to assist the Secretary of State in undertaking Stage 1 of the HRA process. As it was not possible to exclude the possibility of likely significant effects on European sites as a result of the Proposed Development, alone and in combination with other plans and projects, information is also provided to enable the Secretary of State to undertake a Stage 2 Appropriate Assessment. The HRA Report considers whether there is a requirement for the derogation process, comprising Stages 3 and 4 of the HRA process, to be followed.

**1.5.2** To determine whether there will be 'likely significant effects' the objectives of this assessment are to:

- Identify all European Sites with the potential to be affected by the Proposed Development, by establishing a potential zone of influence considering the scale and nature of the proposals;
- Review each European site within this potential zone of influence, including outlining the features for which the site is designated, the current conservation status and objectives of the site, and details of threats to these features;
- Consider any other projects or plans in the surrounding area which may result in in-combination impacts on the designated sites; and
- Where potential impacts are identified, consider suitable mitigation measures to avoid/mitigate/compensate potential impacts.

**1.5.3** The judgement of the European Court of Justice in CJEU C-323/17 People Over Wind and Peter Sweetman vs Coillte Teoranta has been considered. In summary, this states that measures within a plan or project that are intended to avoid or reduce harmful effects on a European site must not be taken into account when considering the Stage 1 screening test for 'likely significant effects'. A distinction is drawn between these measures and other measures that may incidentally

provide some mitigation but which are intrinsic or essential parts of the plan or project itself rather than included to protect the European site. Other measures typically include design, location, layout or standard conditions (for example, construction practices).

**1.5.4** In addition, the High Court judgement “R (on the Application of Preston) v Cumbria County Council [2019] EWCA 1362” has also been considered. In summary this judgement confirms that the competent authority carrying out an HRA for a project must undertake its own appropriate assessment on matters even if they are separately assessed or controlled by another competent authority (e.g. Natural England or the Environment Agency). The Competent Authority must satisfy their own HRA duties in conducting their own assessment and providing their own judgement (albeit informed where appropriate by other bodies, such as Natural England or the Environment Agency).

**1.5.5** In accordance with standing guidance (Planning Inspectorate, 2023) at Stage 1 of the HRA, for each European Site considered it will be concluded from the baseline information and consultation responses received that either:

- There are no likely significant effects on the European site(s), either alone or in combination with other plans or projects and therefore no further assessment is required; or
- It is not possible to exclude the risk of likely significant effects on the European site(s) exist, alone or in combination with other plans or projects, therefore requiring an appropriate assessment by the competent authority.

**1.5.6** Additionally, nationally designated sites have also been considered where they form an integral part of a wider European designation.

**1.5.7** In accordance with standing guidance (Planning Inspectorate, 2023) at Stage 2 of AA, for each identified likely significant effect upon a European Site it will be concluded from the baseline information and consultation responses received whether:

- Sufficient avoidance, mitigation, and/or off-setting measures can be incorporated to negate impacts; or
- Whether residual impacts will still be present which would subsequently require an assessment of alternative solutions and an assessment of imperative reasons of overriding public interest.

**1.5.8** This report has been produced with reference to the Nature England Habitat Regulations Assessment Standard (Natural England, 2017).

## **1.6 Site Context**

**1.6.1** The site is approximately 4.55Ha in size, including approximately 2.6Ha of overgrown playing fields and comprises a former Immigration Removal Centre (IRC) with the Haslar Sea Wall Car Park

in the south west of site, backing onto an overgrown grass and scrub area in the south. The site extends to the north and west, with grassland & estuarine habitats on all other aspects extending along the coast.

**Figure 1 – Survey Area**



Image courtesy of Google Image Pro 7.3.2.5491, [Grid Ref: SZ 05693 95882]. Imagery date March 2024.

## 2.0 BASELINE INFORMATION

### 2.1 Identification of European Sites

**2.1.1** The European Sites which are within an expected zone of influence of the Proposed Development have been identified through the EclA process (1st Horizon, 2025a). Considering the scale and nature of the proposals, it has been determined the assessment is to include all European sites for nature conservation within a 5km radius of the development boundary. Consideration has also been given to identifying relevant FLL and, as part of this, other nature conservation designations have been considered including nationally designated nature conservation sites. Terrestrial SPAs in England are also designated as Sites of Special Scientific Interest under the Wildlife and Countryside Act 1982. No nature conservation sites outside of this radius have been considered.

**2.1.2** When undertaking an appropriate assessment of impacts at a site, all features of European importance (both primary and non-primary) need to be considered.

**2.1.3** Under the Habitats Regulations, it is the duty of the statutory nature conservation body to provide conservation objectives for a European designated site to the relevant competent authority responsible for that's site, including details and advice on any operations which may cause deterioration of the features for which that site is designated.

**2.1.4** As a result, in this case, conservation objectives are set by Natural England when a site is designated as a SAC or a SPA to ensure that the obligations of the Habitats Regulations are met, particularly to ensure that there should be no deterioration or significant disturbance of the qualifying features from their condition at the time the status of the site was formally identified. The conservation objectives are also essential in determining whether the effects of a plan or project are likely to have a significant effect on the qualifying interests of the site.

**2.1.5** Information on the conservation objectives and sensitives of the identified sites have been gathered through reviewing the relevant Joint Nature Conservation Committee data sheets (JNCC, 2023) and available information through the Natural England website (Natural England, 2023). Where necessary to inform the assessment of likely significant impacts the detailed Supplementary Advice on the Conservation Objectives as available through the Natural England website (Natural England, 2023) have been reviewed in detail.

### 2.2 Identifying Proportionate Mitigation Measures

**2.2.1** The mitigation hierarchy has been explored in accordance with BS42020:2013 (BSI, 2013). This seeks as a preference to avoid impacts, then to mitigate unavoidable impacts, and as a last resort, to compensate for unavoidable residual impacts that remain after avoidance and mitigation measures. Justification has been provided where the mitigation hierarchy cannot be followed, or for example where off-setting is a preferred approach where the competent authority has adopted a County wide strategy. Additional information has also been provided where the applicant wishes to demonstrate exceptional circumstances or where they wish to

pursue alternative strategies. Any residual impacts following mitigation measures etc are then identified.

**2.2.2** All mitigation measures follow habitat/species specific current best practice guidance, and the source has been identified accordingly. Deviation from guidance has been explained by the ecologist and is proportionate to the predicted degree of risk to biodiversity and to the nature and scale of the proposed works.

## **2.3 Supporting Technical Information/Evidence**

**2.3.1** Supporting technical information and evidence consulted/ used to inform the assessment includes the following:

- Ecological Impact Assessment (1st Horizon, 2025a).
- Natural England Discretionary Advice Service (DAS) request form, site meeting with Natural England representatives on the 7<sup>th</sup> August 2023, and follow up emails/teams meetings during the period of August 2023 to January 2024.
- Natural England consultation response dated 11<sup>th</sup> March 2024.
- Emails/teams meetings with HCC & GBC during the period of August 2023 to January 2024.
- HCC consultation response dated 5<sup>th</sup> April 2024.
- Historic consultation between MOJ Ecologist (██████████) and with Natural England Thames Solent Advisor (██████████), to discuss a historic mitigation approach to allow development of this site. Verbal only, no official documentation of this.
- Solent Waders and Brent Goose Strategy (SWBGS) Guidance on Mitigation and Off-setting Requirements (Hampshire County Council, 2018).
- Daedalus Application (23/00061/OUT) supporting documents and consultation responses.
- Daedalus Supplementary Planning Document (SPD) and Habitat Regulation Assessment (HRA) (Gosport Borough Council, 2011).
- Air Quality Assessment (1st Horizon, 2025b).
- Hydrological Technical Assessments i.e. Flood Risk Assessment, Drainage Strategy, Flood Modelling Report, and Flood Evacuation Management Plan (1st Horizon, 2025c).
- Hydrological Nutrient Neutrality Assessment (NNA) (1st Horizon, 2025d).

- Stubbington Habitat Management and Monitoring Plan (HMMP) (1st Horizon, 2024a) and referenced technical documents including: The status of UK SPAs in the 2000s (Stroud et al, on behalf of the UK SPA & Ramsar Scientific Working Group, 2016).
- Stubbington Nutrient Neutrality (NN) Assessment (1st Horizon, 2024b).
- Wild Capital Stubbington Brent Goose Mitigation Plan (Wild Capital, 2025)
- Wild Capital Conservation Covenant Agreement, Solent Waders, and Brent Goose Strategy Mitigation Site (Wild Capital, 2025a)
- [REDACTED] Legal Agreement between Wild Capital and Secretary of State for the Home Department [REDACTED]
- Haslar development Construction Environmental Management Plan (CEMP).
- Haslar development Landscape and Ecological Management Plan (LEMP).

### 3.0 DESIGNATED SITE DETAILS

**Table 1 – Designated Sites and Qualifying Features**

Designated Site	Qualifying Features	Conservation Objectives	Existing Threats and Pressures with Negative Impacts
<b>Solent &amp; Southampton Water Ramsar</b> , 0.5km SW & 4.2km S	<p><b>Ramsar criterion 1:</b> The site is one of the few major sheltered channels between a substantial island and mainland in European waters, exhibiting an unusual strong double tidal flow and has long periods of slack water at high and low tide. It includes many wetland habitats characteristic of the biogeographic region: saline lagoons, saltmarshes, estuaries, intertidal flats, shallow coastal waters, grazing marshes, reedbeds, coastal woodland and rocky boulder reefs.</p> <p><b>Ramsar criterion 2:</b> The site supports an important assemblage of rare plants and invertebrates. At least 33 British Red Data Book invertebrates and at least eight British Red Data Book plants are represented on site.</p> <p><b>Ramsar criterion 5:</b> Assemblages of international importance: Species with peak counts in winter: 51343 waterfowl (5-year peak mean 1998/99-2002/2003).</p> <p><b>Ramsar criterion 6:</b> species/populations occurring at levels of international importance. Qualifying Species/populations (as identified at designation): Species with peak counts in spring/autumn: Ringed plover <i>Charadrius hiaticula</i>. Species with peak counts in winter: Dark-bellied brent goose <i>Branta bernicla bernicla</i>, Eurasian teal <i>Anas crecca</i>, Black-tailed godwit <i>Limosa limosa islandica</i>.</p>	No information available.	Erosion (Coastal Defence Strategies)
<b>Portsmouth Harbour Ramsar</b> , 0.4km N	<p><b>Ramsar criterion 3:</b> The intertidal mudflat areas possess extensive beds of eelgrass <i>Zostera angustifolia</i> and <i>Zostera noltei</i> which support the grazing dark-bellied brent geese populations. The mud-snail <i>Hydrobia ulvae</i> is found at extremely high densities, which helps to support the wading bird interest of the site. Common cord-grass <i>Spartina anglica</i> dominates large areas of the saltmarsh and there are also extensive areas of green algae <i>Enteromorpha spp.</i> and sea lettuce <i>Ulva lactuca</i>. More locally the saltmarsh is dominated by sea purslane <i>Halimione portulacoides</i> which gradates to more varied communities at the higher shore levels. The site also includes a number of saline lagoons hosting nationally important species.</p>	No information available.	Eutrophication. Unspecified development: urban use (disturbance & land-take pressures on and off-site from urban & industrial development). Coastal engineering e.g. construction of sea defences for coastal protection.

Designated Site	Qualifying Features	Conservation Objectives	Existing Threats and Pressures with Negative Impacts
	<b>Ramsar criterion 6:</b> species/populations occurring at levels of international importance. Qualifying Species/populations (as identified at designation): Species with peak counts in winter: Dark-bellied brent goose, <i>Branta bernicla bernicla</i> .		
<b>Solent &amp; Isle of Wight Lagoons Special Area of Conservation (SAC),</b> 0.5km SW	Annex I Habitats that are a primary reason for selection of this site: <b>Coastal Lagoons.</b>	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; The extent and distribution of qualifying natural habitats The structure and function (including typical species) of qualifying natural habitats, and The supporting processes on which qualifying natural habitats rely.	Soil pollution and solid waste (excluding discharges). Invasive non-native species. Human induced changes in hydraulic conditions. Interspecific faunal relations. Changes in abiotic conditions.
<b>Solent &amp; Southampton Water Special Protection Area (SPA),</b> 4.2km S  <i>Identified within initial report, however, not apparent on through Magic maps Invalid source specified. during update in 2025.</i>	Qualifying features: Black-tailed godwit ( <i>Limosa limosa islandica</i> ), Non-breeding; Common tern ( <i>Sterna hirundo</i> ), Breeding; Dark-bellied brent goose ( <i>Branta bernicla bernicla</i> ), Non-breeding; Little tern ( <i>Sternula albifrons</i> ), Breeding; Mediterranean gull ( <i>Ichthyaetus melanocephalus</i> ), Breeding; Ringed plover ( <i>Charadrius hiaticula</i> ), Non-breeding; Roseate tern ( <i>Sterna dougallii</i> ), Breeding; Sandwich tern ( <i>Thalasseus sandvicensis</i> ), Breeding; Teal ( <i>Anas crecca</i> ), Non-breeding; Waterbird assemblage, Non-breeding.	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring; The extent and distribution of the habitats of the qualifying features The structure and function of the habitats of the qualifying features The supporting processes on which the habitats of the qualifying features rely.  The population of each of the qualifying features, and, The distribution of the qualifying features within the site.	Outdoor sports and leisure activities, recreational activities. Changes in abiotic conditions. Changes in biotic conditions. Fishing and harvesting aquatic resources. Pollution to groundwater (point sources and diffuse sources).

Designated Site	Qualifying Features	Conservation Objectives	Existing Threats and Pressures with Negative Impacts
<b>Portsmouth Harbour SPA (&amp; SSSI component), 0.4km N</b>	<p>Qualifying features: Black-tailed godwit (<i>Limosa limosa islandica</i>), Non-breeding; Dark-bellied brent goose (<i>Branta bernicla bernicla</i>), Non-breeding; Dunlin (<i>Calidris alpina alpina</i>), Non-breeding; Red-breasted merganser (<i>Mergus serrator</i>), Non-breeding.</p> <p>Tidal basin supporting intertidal lagoons, mudflats, and streams. Support an abundant fauna of benthic marine animals (main food sources for shorebirds).</p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;</p> <p>The extent and distribution of the habitats of the qualifying features</p> <p>The structure and function of the habitats of the qualifying features</p> <p>The supporting processes on which the habitats of the qualifying features rely</p> <p>The population of each of the qualifying features, and,</p> <p>The distribution of the qualifying features within the site.</p>	<p>Fishing and harvesting aquatic resources.</p> <p>Pollution to groundwater (point sources and diffuse sources).</p> <p>Changes in abiotic conditions.</p> <p>Outdoor sports and leisure activities, recreational activities.</p> <p>Changes in biotic conditions.</p>
<b>Solent and Dorset Coast SPA, 0.05km SE</b>  <i>Identified within initial report, however, not apparent on through Magic maps during update in 2025.</i>	<p>Regularly supports more than 1% of the Great Britain breeding populations of Annex I of the Birds Directive species: Sandwich Tern <i>Sterna sandvicensis</i>, Common Tern <i>Sterna hirundo</i>, Little Tern <i>Sternula albifrons</i>.</p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;</p> <p>The extent and distribution of the habitats of the qualifying features</p> <p>The structure and function of the habitats of the qualifying features</p> <p>The supporting processes on which the habitats of the qualifying features rely.</p> <p>The population of each of the qualifying features, and,</p> <p>The distribution of the qualifying features within the site.</p>	<p>Military use and civil unrest.</p> <p>Exploration and extraction of oil or gas.</p> <p>Shipping lanes, ports, marine constructions.</p> <p>Urbanised areas, human habitation.</p> <p>Fishing and harvesting aquatic resources.</p> <p>Outdoor sports and leisure activities, recreational activities.</p> <p>Renewable abiotic energy use.</p> <p>Discharges.</p>

## 4.0 SCREENING OF LIKELY SIGNIFICANT EFFECTS DURING CONSTRUCTION AND OPERATION

**Table 2 – Screening Assessment of Likely Significant Effects (Stage 1 HRA)**

Designated Site	Qualifying Feature	Identification of potential Impacts/ Effect to Qualifying Feature	Summary/Assessment of Supporting Evidence	Risk of Likely Significant Effect
Solent & Southampton Water Ramsar	Criterion 1: Wetland habitats.	Erosion (Coastal Defence Strategies)	Application will not result in this type of effect.	No
		Dust/Air Pollution resulting in changes to biotic conditions & reduced plant growth, which in turn would reduce feeding by dependant species.	<b>[A]</b> Air Pollution Information System (APIS) does not specifically identify dust as a significant pollutant source to this habitat type. Air Quality Assessment (1st Horizon, 2025b) confirms no significant residual impact for dust/air pollution, given appropriate standard control measures i.e. dust suppression during construction, to be detailed within a Construction Environmental Management Plan (CEMP).	No
		Aquatic silt/pollution runoff during the construction period, resulting in changes to biotic conditions & reduced plant growth, which in turn would reduce feeding by dependant species.	<b>[B]</b> Hydrological technical assessments (1st Horizon, 2025c) conclude no significant residual impact from aquatic silt/pollution runoff during the construction period, given appropriate standard control measures i.e. drainage & flood measures/evacuation etc, to be detailed within final construction design/site layout and CEMP.	No
		Hydrological nutrient discharge during site operation, resulting in changes to biotic conditions & reduced plant growth, which in turn would reduce feeding by dependant species.	<b>[C]</b> Located within Solent Nutrient Impact Area. Hydrological NNA (1st Horizon, 2025d) assess Nitrogen (N) and Phosphorus (P) loadings from the Proposed Development. Options for mitigation/compensation are listed.	Yes
		In-combination effects with all other local applications and associated nutrient discharge during operation, resulting in changes to biotic conditions & reduced plant growth, which in turn would reduce feeding by dependant species.	Assessment as per point <b>[C]</b> .	Yes
	Criterion 2: Rare plants and invertebrates	Erosion (Coastal Defence Strategies)	Application will not result in this type of effect.	No
		Dust/Air Pollution resulting in changes to biotic conditions & reduced plant growth, which in turn would reduce feeding by dependant species.	Assessment as per point <b>[A]</b> .	No

Designated Site	Qualifying Feature	Identification of potential Impacts/ Effect to Qualifying Feature	Summary/Assessment of Supporting Evidence	Risk of Likely Significant Effect
		Aquatic silt/pollution runoff during the construction period, resulting in changes to biotic conditions & reduced plant growth, which in turn would reduce feeding by dependant species.	Assessment as per point <b>[B]</b> .	No
		Hydrological nutrient discharge during site operation, resulting in changes to biotic conditions & reduced plant growth, which in turn would reduce feeding by dependant species.	Assessment as per point <b>[C]</b> .	Yes
		In-combination effects with all other local application and associated nutrient discharge during operation, resulting in changes to biotic conditions & reduced plant growth, which in turn would reduce feeding by dependant species.	Assessment as per point <b>[C]</b> .	Yes
		Erosion (Coastal Defence Strategies)	Application will not result in this type of effect.	No

Designated Site	Qualifying Feature	Identification of potential Impacts/ Effect to Qualifying Feature	Summary/Assessment of Supporting Evidence	Risk of Likely Significant Effect
	Criterion 5: Wintering Waterfowl	Proposed works. Permanent loss (to new building & hardstand footprint) of 1.37Ha of secondary habitat/ FLL, which is designated as a core area within the SWBGS, resulting in displacement and disturbance of the wintering bird population and reduction in core foraging grounds used during the winter.	<p><b>[D]</b> Data search identified that all habitats throughout the south-west of the site qualify as a Core Non-statutory site (several other areas throughout wider locality), which are Functionally Linked Land (FLL). Solent Wader and Brent Goose Strategy Core Area (parcel G63) i.e. network value and/or have max count of bird use of 1000 or more and/or max score in 3 metrics (GB importance, SPA importance, SPA assemblage). Natural England have indicated that this is used mainly by Oystercatcher, with one possible record of Geese. Use extends across all habitats throughout south-west of site. Functionally Linked Land (FLL) associated with statutory designated sites detailed within EclA (1st Horizon, 2025a). Negative records/no use demonstrated across built footprint of rest of site and carpark to the west (parcel G61). Brent Geese in particular show a high degree of site fidelity, with Brent Geese favouring seagrasses, new improved pasture, and winter cereals, within 5km of a roost site to feed on (Hampshire County Council, 2018).</p> <p>No Wetland Bird Survey (WeBS) data has been obtained, and no specific site-based wintering bird surveys are perceived necessary/ are proportionate, given that the habitats are already classified as a Core Non-statutory site.</p>	Yes
		Proposed works. Temporary disturbance (clearance of playing field habitats) of 1.37Ha of secondary habitat/ FLL, which is designated as a core area within the SWBGS, with permanent loss of this also from surrounding development disturbance, resulting in displacement and disturbance of the wintering bird population and reduction in core foraging grounds used during the winter.	Assessment as per point <b>[D]</b> .	Yes

Designated Site	Qualifying Feature	Identification of potential Impacts/ Effect to Qualifying Feature	Summary/Assessment of Supporting Evidence	Risk of Likely Significant Effect
		Proposed works. Permanent loss (to carpark) of 0.9Ha not FLL habitat.	Assessment as per point <b>[D]</b> .	No
		Noise, lighting, and visual disturbance during the construction phase, resulting in the disturbance and displacement of wintering birds i.e. increased bird take-off alongside work, deterred from roosting & feeding in this location.	<b>[E]</b> Standard construction practices will apply, but located immediately adjacent to coastal habitats with increased vehicle movement, construction activities, and associated noise etc. Disturbance/ displacement levels would be species specific. No further details given on individual bird species but high levels expected given proximity to designated sites (Hampshire County Council, 2018).	Yes
		Noise, lighting, and visual disturbance during site operation (i.e. from new buildings and detainees) upon retained site habitats, resulting in the further disturbance and displacement of wintering birds i.e. increased bird take-off alongside site, deterred from roosting & feeding in this location.	<b>[F]</b> New playing fields & retained habitats could be subject to disturbance during use by detainees. Levels of use & disturbance events are expected to be lower during the Winter period when weather conditions would be wet/dark/windy (in comparison to Spring/Summer months). Overlooking buildings, lighting, noise, and personnel walking along adjacent paths etc would also result in disturbance events. Disturbance/ displacement levels would be species specific. No further details given on individual bird species but high levels expected given proximity to designated sites (Hampshire County Council, 2018).	Yes
		In-combination effects with all other local applications, loss of secondary habitat/FLL and associated nutrient discharge during operation, resulting in changes to biotic conditions & reduced plant growth, which in turn would reduce feeding by dependant species.	Assessment as per point <b>[C] and [D]</b> .	Yes
		Erosion (Coastal Defence Strategies)	Application will not result in this type of effect.	No
	Criterion 6: Migratory Ringed Plover, Wintering Dark-bellied Brent Goose,	Proposed works. Permanent loss (to new building & hardstand footprint) of 1.37Ha of secondary habitat/ Functionally Linked Land (FLL), resulting in displacement and disturbance of the wintering bird population and reduction in core foraging grounds used during the winter.	Assessment as per point <b>[D]</b> .	Yes

Designated Site	Qualifying Feature	Identification of potential Impacts/ Effect to Qualifying Feature	Summary/Assessment of Supporting Evidence	Risk of Likely Significant Effect
	Eurasian Teal, Black-tailed Godwit	Proposed works. Temporary disturbance (clearance of playing field habitats) of 1.37Ha of secondary habitat/ FLL, with permanent loss of this also from surrounding development disturbance, resulting in displacement and disturbance of the wintering bird population and reduction in core foraging grounds used during the winter.	Assessment as per point <b>[D]</b> .	Yes
		Proposed works. Permanent loss (to carpark) of 0.9Ha not FLL habitat.	Assessment as per point <b>[D]</b> .	No
		Noise, lighting, and visual disturbance during the construction phase, resulting in the disturbance and displacement of wintering birds i.e. increased bird take-off alongside work, deterred from roosting & feeding in this location.	Assessment as per point <b>[E]</b> .	Yes
		Noise, lighting, and visual disturbance during site operation (i.e. from new buildings and detainees) upon retained site habitats, resulting in the further disturbance and displacement of wintering birds i.e. increased bird take-off alongside site, deterred from roosting & feeding in this location.	Assessment as per point <b>[F]</b> .	Yes
		In-combination effects with all other local applications, loss of secondary habitat/FLL and associated nutrient discharge during operation, resulting in changes to biotic conditions & reduced plant growth, which in turn would reduce feeding by dependant species.	Assessment as per point <b>[C] and [D]</b> .	Yes
		Eutrophication, resulting in changes to biotic conditions & reduced plant growth, which in turn would reduce feeding by dependant species.	Assessment as per point <b>[C]</b> .	Yes

Designated Site	Qualifying Feature	Identification of potential Impacts/ Effect to Qualifying Feature	Summary/Assessment of Supporting Evidence	Risk of Likely Significant Effect
Portsmouth Harbour Ramsar	Criterion 3: Habitats which support grazing Dark-bellied Brent Geese.	Unspecified development: urban use (disturbance & land-take pressures on and off-site from urban & industrial development). Proposed works. Permanent loss (to new building & hardstand footprint) of 1.37Ha of secondary habitat/ Functionally Linked Land (FLL), resulting in displacement and disturbance of the wintering bird population and reduction in core foraging grounds used during the winter.	Assessment as per point <b>[D]</b> .	Yes
		Unspecified development: urban use (disturbance & land-take pressures on and off-site from urban & industrial development). Proposed works. Temporary disturbance (clearance of playing field habitats) of 1.37Ha of secondary habitat/ FLL, with permanent loss of this also from surrounding development disturbance, resulting in displacement and disturbance of the wintering bird population and reduction in core foraging grounds used during the winter.	Assessment as per point <b>[D]</b> .	Yes
		Unspecified development: urban use (disturbance & land-take pressures on and off-site from urban & industrial development). Proposed works. Permanent loss (to carpark) of 0.9Ha not FLL habitat.	Assessment as per point <b>[D]</b> .	No
		Coastal engineering e.g. construction of sea defences for coastal protection.	Application will not result in this type of effect.	No
		Noise, lighting, and visual disturbance during the construction phase, resulting in the disturbance and displacement of wintering birds i.e. increased bird take-off alongside work, deterred from roosting & feeding in this location.	Assessment as per point <b>[E]</b> .	Yes
		Noise, lighting, and visual disturbance during site operation (i.e. from new buildings and detainees) upon retained site habitats, resulting in the further disturbance and displacement of wintering birds i.e.	Assessment as per point <b>[F]</b> .	Yes

Designated Site	Qualifying Feature	Identification of potential Impacts/ Effect to Qualifying Feature	Summary/Assessment of Supporting Evidence	Risk of Likely Significant Effect
		increased bird take-off alongside site, deterred from roosting & feeding in this location.		
		In-combination effects with all other local applications, loss of secondary habitat/FLL and associated nutrient discharge during operation, resulting in changes to biotic conditions & reduced plant growth, which in turn would reduce feeding by dependant species.	Assessment as per point <b>[C]</b> and <b>[D]</b> .	Yes
		Eutrophication, resulting in changes to biotic conditions & reduced plant growth, which in turn would reduce feeding by dependant species.	Assessment as per point <b>[C]</b> .	Yes
	Criterion 6: Wintering Dark-bellied Brent Goose	Unspecified development: urban use (disturbance & land-take pressures on and off-site from urban & industrial development). Proposed works. Permanent loss (to new building & hardstand footprint) of 1.37Ha of secondary habitat/ Functionally Linked Land (FLL), resulting in displacement and disturbance of the wintering bird population and reduction in core foraging grounds used during the winter.	Assessment as per point <b>[D]</b> .	Yes
		Unspecified development: urban use (disturbance & land-take pressures on and off-site from urban & industrial development). Proposed works. Temporary disturbance (clearance of playing field habitats) of 1.37Ha of secondary habitat/ FLL, with permanent loss of this also from surrounding development disturbance, resulting in displacement and disturbance of the wintering bird population and reduction in core foraging grounds used during the winter.	Assessment as per point <b>[D]</b> .	Yes

Designated Site	Qualifying Feature	Identification of potential Impacts/ Effect to Qualifying Feature	Summary/Assessment of Supporting Evidence	Risk of Likely Significant Effect
		Unspecified development: urban use (disturbance & land-take pressures on and off-site from urban & industrial development). Proposed works. Permanent loss (to carpark) of 0.9Ha not FLL habitat.	Assessment as per point <b>[D]</b> .	No
		Coastal engineering e.g. construction of sea defences for coastal protection.	Application will not result in this type of effect.	No
		Noise, lighting, and visual disturbance during the construction phase, resulting in the disturbance and displacement of wintering birds i.e. increased bird take-off alongside work, deterred from roosting & feeding in this location.	Assessment as per point <b>[E]</b> .	Yes
		Noise, lighting, and visual disturbance during site operation (i.e. from new buildings and detainees) upon retained site habitats, resulting in the further disturbance and displacement of wintering birds i.e. increased bird take-off alongside site, deterred from roosting & feeding in this location.	Assessment as per point <b>[F]</b> .	Yes
		In-combination effects with all other local applications, loss of secondary habitat/FLL and associated nutrient discharge during operation, resulting in changes to biotic conditions & reduced plant growth, which in turn would reduce feeding by dependant species.	Assessment as per point <b>[C] and [D]</b> .	Yes
		Soil pollution and solid waste (excluding discharges).	Application will not result in this type of effect.	No
Solent & Isle of Wight Lagoons SAC	Coastal Lagoons	Invasive non-native species	Application will not result in this type of effect.	No
		Human induced changes in hydraulic conditions. Aquatic silt/pollution runoff during the construction period, resulting in changes to biotic conditions & reduced plant growth, which in turn would reduce feeding by dependant species.	Assessment as per point <b>[B]</b> .	No
		Human induced changes in hydraulic conditions. Hydrological nutrient discharge during site operation, resulting in changes to biotic conditions & reduced plant growth, which in turn would reduce feeding by dependant species.	Assessment as per point <b>[C]</b> .	Yes

Designated Site	Qualifying Feature	Identification of potential Impacts/ Effect to Qualifying Feature	Summary/Assessment of Supporting Evidence	Risk of Likely Significant Effect
		Interspecific faunal relations	Application will not result in this type of effect.	No
		Changes in abiotic conditions	Application will not result in this type of effect.	No
		In-combination effects with all other local applications and associated nutrient discharge during operation, resulting in changes to biotic conditions & reduced plant growth, which in turn would reduce feeding by dependant species.	Assessment as per point <b>[C]</b> .	Yes
		Outdoor sports and leisure activities, recreational activities	Application will not result in this type of effect.	No
Solent & Southampton Water SPA	Waterbird assemblage breeding & non-breeding.	Changes in abiotic conditions	Application will not result in this type of effect.	No
		Changes in biotic conditions	Application will not result in this type of effect.	No
		Fishing and harvesting aquatic resources	Application will not result in this type of effect.	No
		Pollution to groundwater (point sources and diffuse sources. Aquatic silt/pollution runoff during the construction period, resulting in changes to biotic conditions & reduced plant growth, which in turn would reduce feeding by dependant species.	Assessment as per point <b>[B]</b> .	No
		Pollution to groundwater (point sources and diffuse sources. Hydrological nutrient discharge during site operation, resulting in changes to biotic conditions & reduced plant growth, which in turn would reduce feeding by dependant species.	Assessment as per point <b>[C]</b> .	Yes
		In-combination effects with all other local applications and associated nutrient discharge during operation, resulting in changes to biotic conditions & reduced plant growth, which in turn would reduce feeding by dependant species.	Assessment as per point <b>[C]</b> .	Yes
		Fishing and harvesting aquatic resources	Application will not result in this type of effect.	No
Portsmouth Harbour SPA (& SSSI component)	Waterbird assemblage non-breeding	Pollution to groundwater (point sources and diffuse sources. Aquatic silt/pollution runoff during the construction period, resulting in changes to biotic conditions & reduced plant growth, which in turn would reduce feeding by dependant species.	Assessment as per point <b>[B]</b> .	No

Designated Site	Qualifying Feature	Identification of potential Impacts/ Effect to Qualifying Feature	Summary/Assessment of Supporting Evidence	Risk of Likely Significant Effect
		Pollution to groundwater (point sources and diffuse sources. Hydrological nutrient discharge during site operation, resulting in changes to biotic conditions & reduced plant growth, which in turn would reduce feeding by dependant species.	Assessment as per point [C].	Yes
		Changes in abiotic conditions	Application will not result in this type of effect.	No
		Outdoor sports and leisure activities, recreational activities	Application will not result in this type of effect.	No
		Changes in biotic conditions	Application will not result in this type of effect.	No
		In-combination effects with all other local applications and associated nutrient discharge during operation, resulting in changes to biotic conditions & reduced plant growth, which in turn would reduce feeding by dependant species.	Assessment as per point [C].	Yes
		Military use and civil unrest	Application will not result in this type of effect.	No
Solent and Dorset Coast SPA	Waterbird assemblage breeding	Exploration and extraction of oil or gas.	Application will not result in this type of effect.	No
		Shipping lanes, ports, marine constructions	Application will not result in this type of effect.	No
		Urbanised areas, human habitation	Application will not result in this type of effect.	No
		Fishing and harvesting aquatic resources	Application will not result in this type of effect.	No
		Outdoor sports and leisure activities, recreational activities	Application will not result in this type of effect.	No
		Renewable abiotic energy use	Application will not result in this type of effect.	No
		Discharges. Aquatic silt/pollution runoff during the construction period, resulting in changes to biotic conditions & reduced plant growth, which in turn would reduce feeding by dependant species.	Assessment as per point [B].	No
		Discharges. Hydrological nutrient discharge during site operation, resulting in changes to biotic conditions & reduced plant growth, which in turn would reduce feeding by dependant species.	Assessment as per point [C].	Yes
		In-combination effects with all other local applications and associated nutrient discharge during operation, resulting in changes to biotic conditions &	Assessment as per point [C].	Yes

Designated Site	Qualifying Feature	Identification of potential Impacts/ Effect to Qualifying Feature	Summary/Assessment of Supporting Evidence	Risk of Likely Significant Effect
		reduced plant growth, which in turn would reduce feeding by dependant species.		

**4.1** To summarise, potential impacts on qualifying features of the identified European Sites include the following (references are given for relevant technical assessments):

- A.** Dust/Air Pollution during construction resulting in changes to biotic conditions & reduced plant growth, which in turn would reduce feeding by dependant species (1st Horizon, 2025b).
- B.** Aquatic silt/pollution runoff during the construction period, resulting in changes to biotic conditions & reduced plant growth, which in turn would reduce feeding by dependant species (1st Horizon, 2025c).
- C.** Hydrological nutrient discharge during site operation, resulting in changes to biotic conditions & reduced plant growth, which in turn would reduce feeding by dependant species (1st Horizon, 2025d).
- D.** Proposed works: Permanent loss (to new building & hardstand footprint) of 1.37Ha of secondary habitat/ FLL, and Temporary disturbance (clearance of playing field habitats) of 1.37Ha of secondary habitat/ FLL and eventual loss of this habitat also from surrounding development disturbance, resulting in displacement and disturbance of the wintering bird population and reduction in core foraging grounds used during the winter (1st Horizon, 2025a) & (Hampshire County Council, 2018). Note: Proposed works. Permanent loss (to carpark) of 0.9Ha not FLL habitat.
- E.** Noise, lighting, and visual disturbance during the construction phase, resulting in the disturbance and displacement of wintering birds i.e. increased bird take-off alongside work, deterred from roosting & feeding in this location.
- F.** Noise, lighting, and visual disturbance during site operation (i.e. from new buildings and detainees) upon retained site habitats, resulting in the further disturbance and displacement of wintering birds i.e. increased bird take-off alongside site, deterred from roosting & feeding in this location.

## 5.0 APPROPRIATE ASSESSMENT OF EFFECTS DURING CONSTRUCTION AND OPERATION

**Table 3 – Appropriate Assessment of Significant Effects and Mitigation Measures (Stage 2 AA)**

Designated Site	Qualifying Feature	Potential Impacts/Effect to Qualifying Feature	Mitigation (Including Off-Setting) Measures	Residual Effect	
Solent & Southampton Water Ramsar	Criterion 1: Wetland habitats.	[A] Dust/air pollution during construction	Standard construction practices in accordance with Pollution Prevention Guidelines (PPG)6: Working at construction and demolition sites. For example: damp down sites/road/stockpiles, traffic management plan, and cover trenches & exposed soil piles. To be detailed in CEMP.	No	
		[B] Aquatic silt/pollution runoff during construction	Standard construction practices in accordance with PPG5: Works and maintenance in or near water. For example: prevention/control of silt, using pump sumps, discharge into drains/sewer, minimise exposed ground, wheel/plant washing in designated areas at least 10m from water source/drain, re-fuelling in specific locations away from water source, use of spill kits, store chemicals on hard surfaces away from water, and brushing roads. To be detailed in CEMP.	No	
		[C] Hydrological nutrient discharge during operation, including in-combination	For new development with overnight accommodation Reg 63 of the Conservation of Habitats and Species Regulations 2017 must be applied. LPA to refer to Natural England’s Solent Nutrient Neutrality Advice Note June 2019. Nutrient Neutrality (NN) strategy has been confirmed and will include: <ul style="list-style-type: none"> <li>Inclusion of credits from Stubbington Brent Geese Reserve scheme. Refer to Stubbington Nutrient Neutrality Assessment (1st Horizon, 2024b) for full details.</li> </ul>	No	
	Criterion 2: Rare plants and invertebrates	Potential impact and avoidance measures as per point A, B and C.			
		Potential impact and avoidance measures as per point C.			

	<p>Criterion 5: Wintering Waterfowl</p>	<p>[D] Proposed works. Permanent loss 1.37Ha FLL &amp; Temporary loss of a further 1.37Ha FLL with permanent loss of this also from surrounding development disturbance.</p>	<p>Solent Wader and Brent Goose Strategy: Guidance on Mitigation and Off-setting Requirements (Hampshire County Council, 2018) will be implemented. A strategy has been agreed which will include:</p> <ul style="list-style-type: none"> <li>• Creation of Stubbington Brent Geese Reserve. Refer to Stubbington Habitat Management and Monitoring Plan (1st Horizon, 2024a) for full details. This will be an area of Perennial Rye-grassland approximately 12.6Ha which will provide adequate compensation for loss of land throughout the entire application footprint (parcel G63). For loss of 2.75Ha parcel G63, a total of 5.5Ha mitigation credits will be utilised (2x multiplier of what is to be lost). It will provide a grassland sward between 5-12cm all year round and provide a food source for overwintering birds including Brent Geese. It will be secured from public disturbance by fencing.</li> </ul>	<p>No</p>
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Designated Site	Qualifying Feature	Potential Impacts/Effect to Qualifying Feature	Mitigation (Including Off-Setting) Measures	Residual Effect
		[E] Noise, lighting, and visual disturbance during construction	Standard construction practices in accordance with PPG6: Working at construction and demolition sites. For example: installation of wooden hoarding along the site boundary which faces the coast to screen works, restriction of working hours/days, and sensitive lighting strategy/no night working. To be detailed in CEMP. Works with heavy machinery (i.e. plant resulting in a noise level in excess of 69dbAmax – measured at the sensitive receptor) will be avoided during the bird overwintering period (i.e. October to March inclusive). Equipment, positioning, calibration, weather parameters, and qualification of operators shall be as per BS4142:2014. Use of crane restricted to periods outside of the wintering bird season.	No
		[F] Noise, lighting, and visual disturbance during operation	Existing buildings with windows and lighting already overlook the coast in this location, therefore Natural England have stipulated that additional windows/lighting would unlikely have a major impact. Solid boarding & vegetation screening along paths to hide public use. Restriction on playing field use during the winter period i.e. no entry onto.	No
	Criterion 6: Migratory Ringed Plover, Wintering Dark-bellied Brent Goose, Eurasian Teal, Black-tailed Godwit	Potential impact and avoidance measures as per point C, D, E, and F.		
Portsmouth Harbour Ramsar	Criterion 3: Habitats which support grazing Dark-bellied Brent Geese.	Potential impact and avoidance measures as per point C, D, E, and F.		
	Criterion 6: Wintering Dark-bellied Brent Goose	Potential impact and avoidance measures as per point C, D, E, and F.		

Designated Site	Qualifying Feature	Potential Impacts/Effect to Qualifying Feature	Mitigation (Including Off-Setting) Measures	Residual Effect
Solent & Isle of Wight Lagoons SAC	Coastal Lagoons	Potential impact and avoidance measures as per point B and C.		
Solent & Southampton Water SPA	Waterbird assemblage breeding & non-breeding.	Potential impact and avoidance measures as per point B and C.		
Portsmouth Harbour SPA (& SSSI component)	Waterbird assemblage non-breeding	Potential impact and avoidance measures as per point B and C.		
Solent and Dorset Coast SPA	Waterbird assemblage breeding	Potential impact and avoidance measures as per point B and C.		

## 6.0 CONCLUSION

- 6.1** A total of six European Sites have been identified within the zone of influence. All qualifying features associated with these have been assessed. Through Stage 1 HRA assessment of the information available, a number of likely significant effects have been identified both during the construction phase and operation of the site. Potential in-combination effects with all other local applications have also been identified. Loss of Functionally Linked Land [FLL] utilised by wintering birds has been identified, alongside potential hydrological Nutrient Neutrality effects.
- 6.2** The subsequent Stage 2 AA has detailed avoidance/mitigation (including off-setting) measures that will result in no residual effect. This is on the basis that: any hydrological impacts during site operation will be off-set through implementation of Natural England's Solent Nutrient Neutrality Advice (use of Stubbington Reserve); and that loss of FLL utilised by wintering birds, will be off-set through the implementation of the Solent Wader and Brent Goose Strategy (SWBGS): Guidance on Mitigation and Off-setting Requirements (also use of Stubbington Reserve).
- 6.3** This HRA Report demonstrates that the requirements of the Habitats Regulations have been fully considered and will allow the competent authority to undertake an HRA comprising Stage 1 screening exercise and Stage 2 AA and reach the same conclusion as detailed within this HRA Report. There will be no adverse effects on the integrity of the identified European Sites, taking into account their structure and function, associated FLL and their conservation objectives. As there is no reasonable scientific doubt that adverse effects on integrity can be ruled out, there is no need to consider the derogation part of the HRA process that comprises Stages 3 and 4.

## 7.0 REFERENCES

- 1st Horizon. (2024a). *Habitat Management & Monitoring Plan*.
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- Wild Capital. (2025a). *Conservation Covenant Agreement - Solent Waders and Brent Goose Strategy*.

## APPENDIX A: Indicative Layout

NOTE: THIS IS A CONCEPT DESIGN ONLY

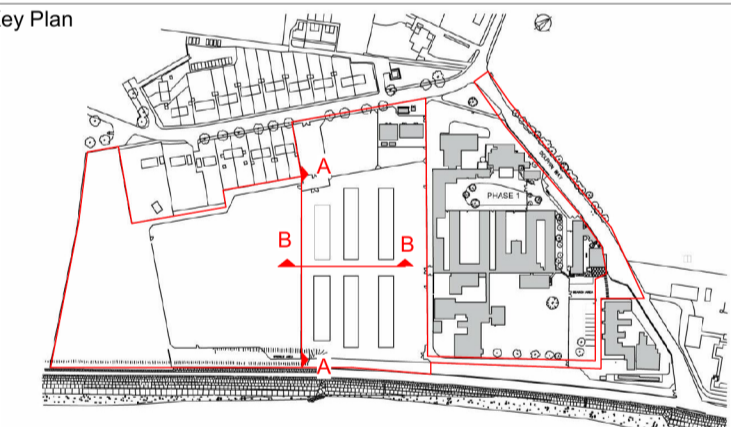
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Notes

**LEGEND**

- Site Application Boundary
- Existing Fence
- New Fence
- Existing Fence to be removed
- ▲ Main Entrance to the Units
- 3-Storey Accommodation Units
- 1-Storey Units

Rev	Issued by	Issued to	Date	Description
P08	ATR		02/04/2026	For information
P07	ATR		18/03/2026	Car park updated
P06	ATR		08/12/2025	Trees updated as for Arboicultural survey
P05	ATR		29/09/2025	Trees removed
P04	ATR		13/03/2025	Phase 2 Revised Design Final Submission - BPRN updated
P03	ATR		07/02/2025	Car Parking amended
P02	ATR		29/11/2024	Revised Stage 2 packages
P01	ATK	MoJ	29/09/2023	Phase 2 RIBA Stage 2 Final Submission



**Project Status**  
 Outline Planning Application

**Client** **Project** Haslar IRC  
**Ministry of Justice**  
 Ministry of Justice, 102 Petty France, London, SW1H 9AJ

**Project Description / Site**

**Indicative New Buildings**  
**Project Address**  
 Dolphin Way,  
 Gosport,  
 Hampshire  
 PO12 2AW

**Building Type**  
 SITE PLAN

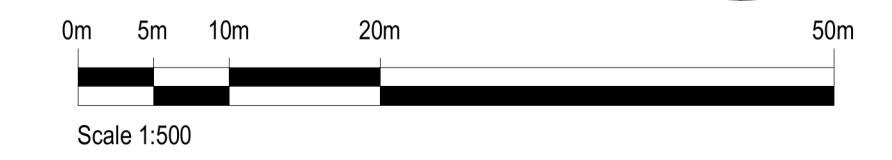
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 INDICATIVE PROPOSED SITE PLAN

<b>Originator Logo</b>	Drawn By: MG
	Checked By: AP
	Approved By: TC

**Drawing Number**  
 323319-15207-ATR-000-GF-DR-A-0250-S2-D0100

Sheet No.	Scale	Orig. Sheet Size	Rev.
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**Data Security Classification**  
 OFFICIAL XXXXXXXXXX **Suitability**  
 S2

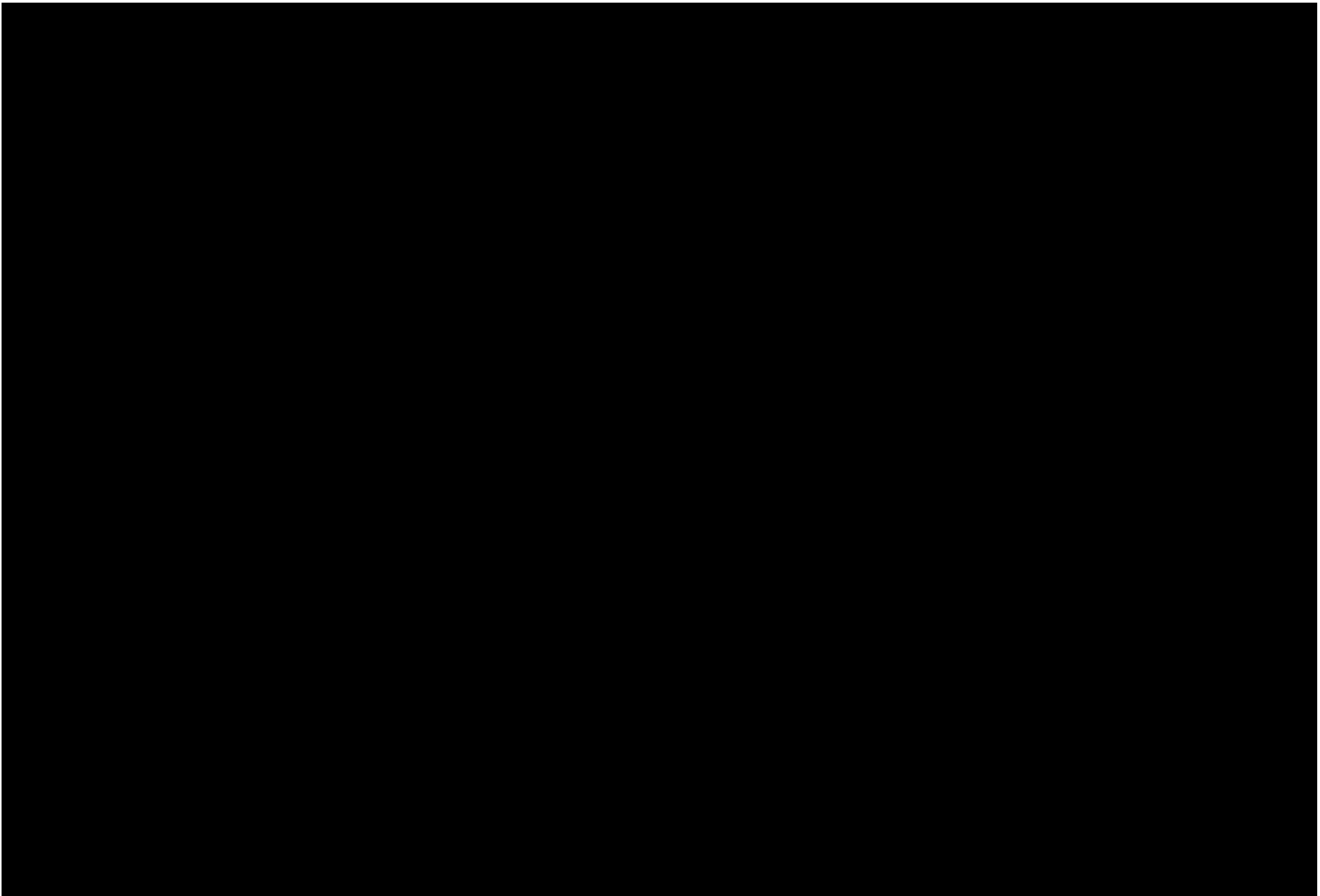


## APPENDIX B: Statutory Designated Site Map



## APPENDIX C: Stubbington Brent Geese Reserve HMMP

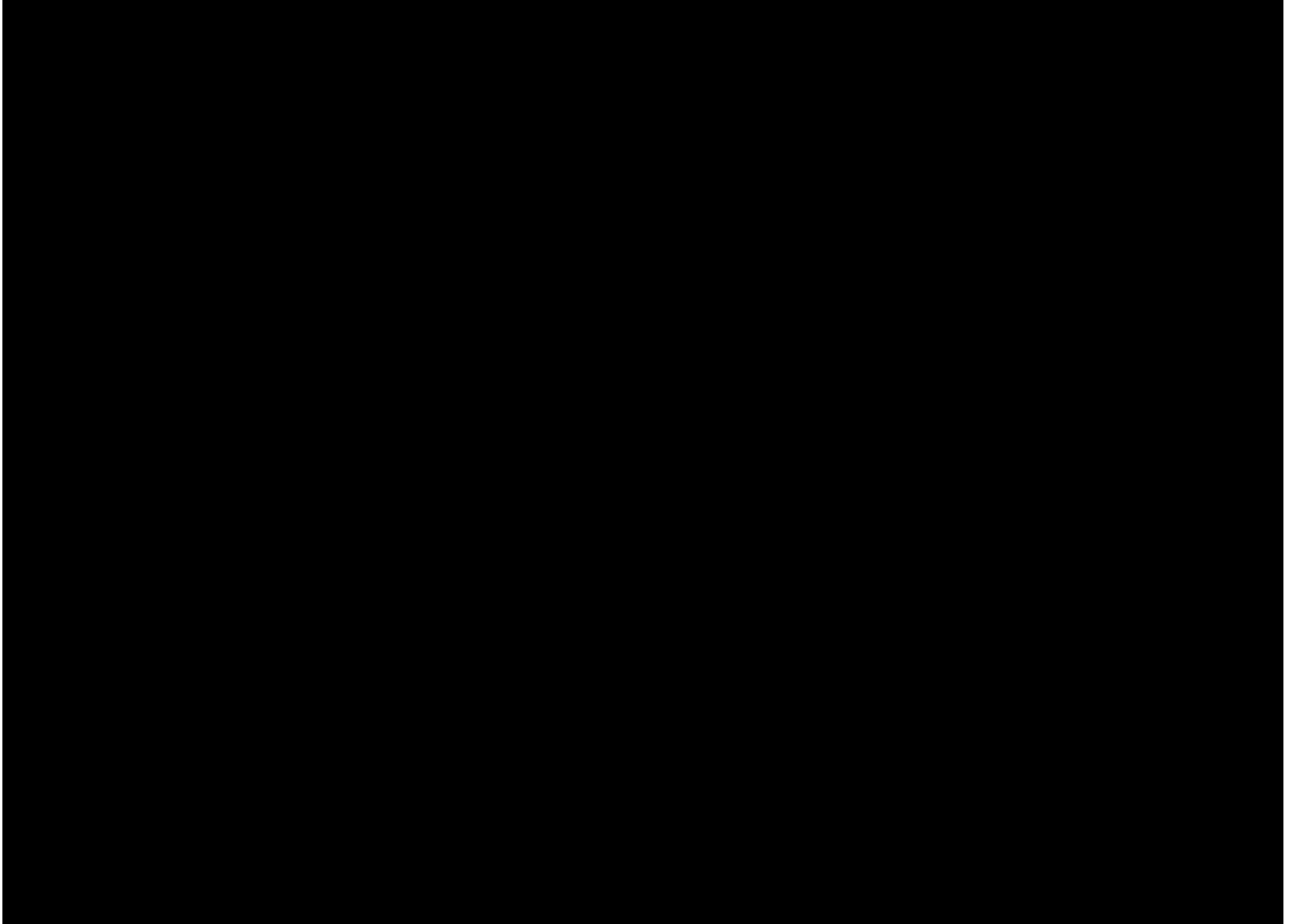


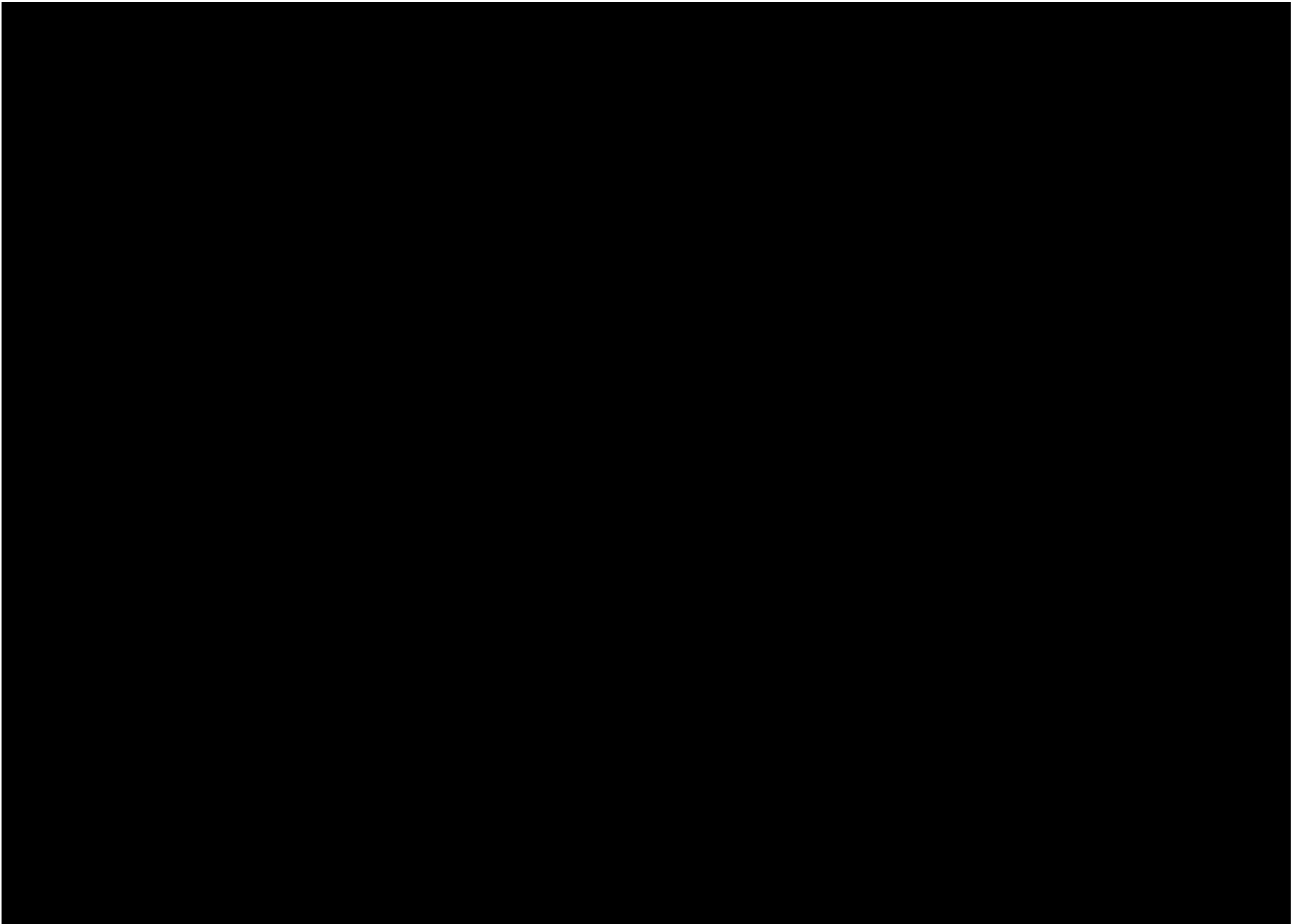
















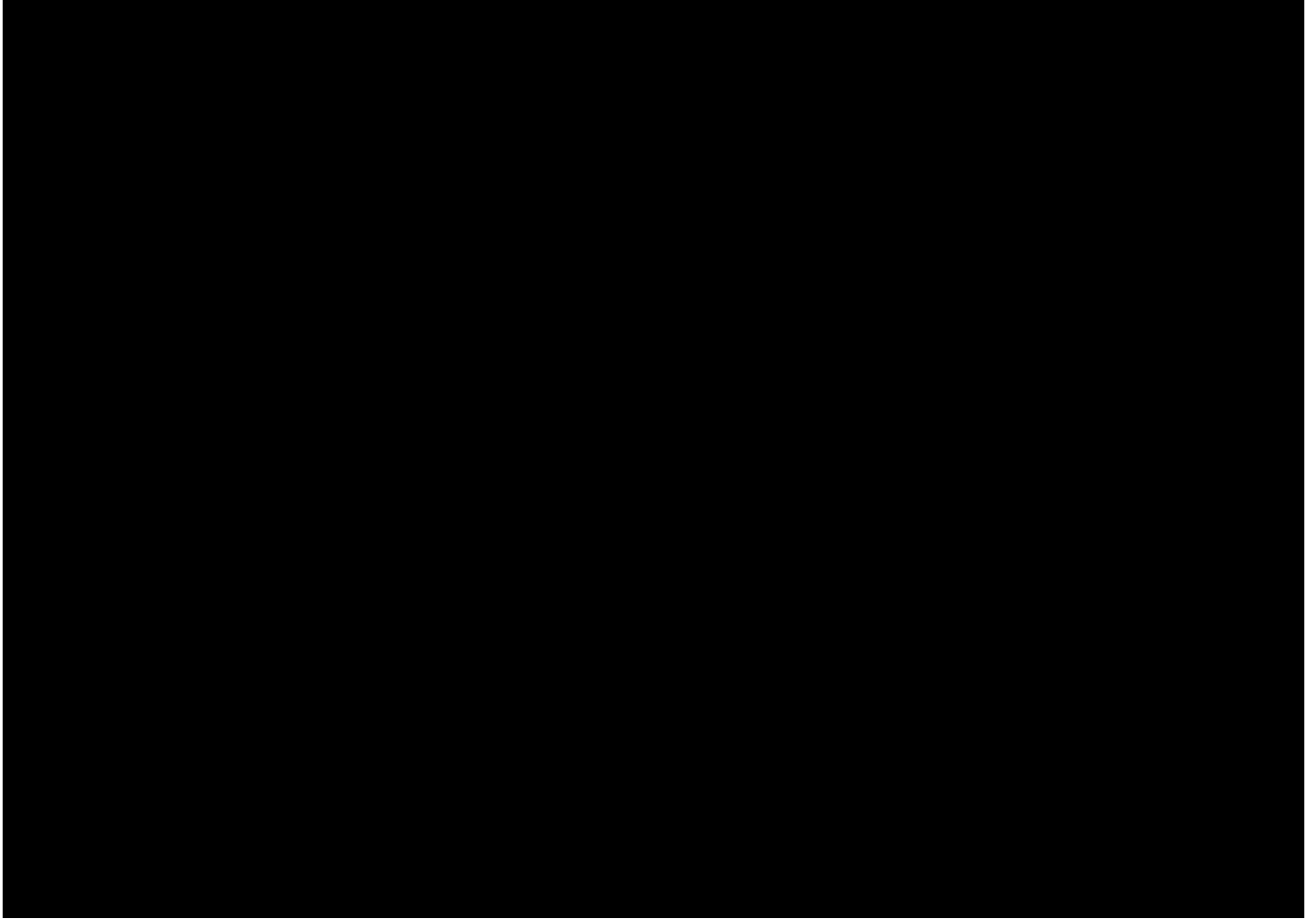










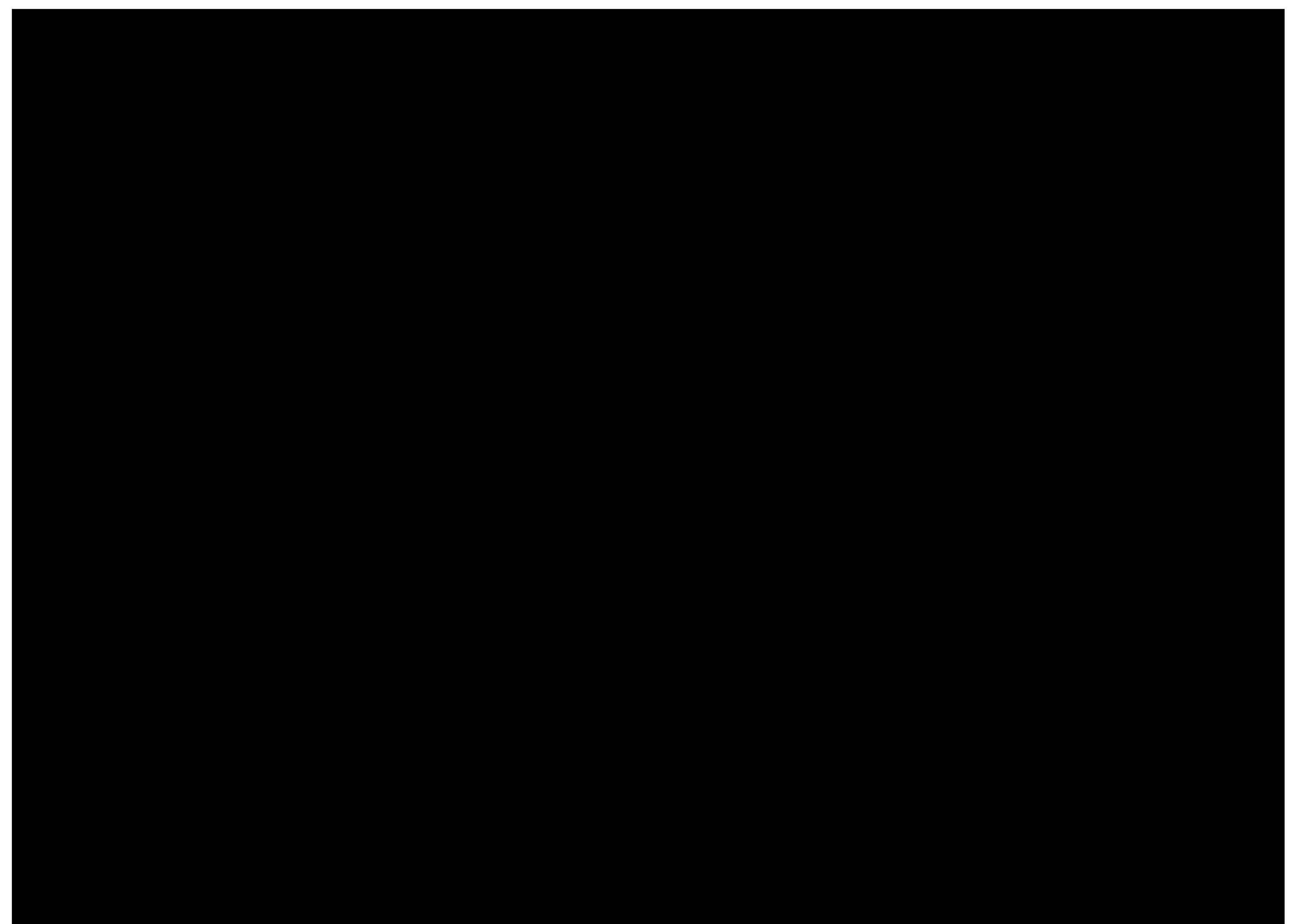






























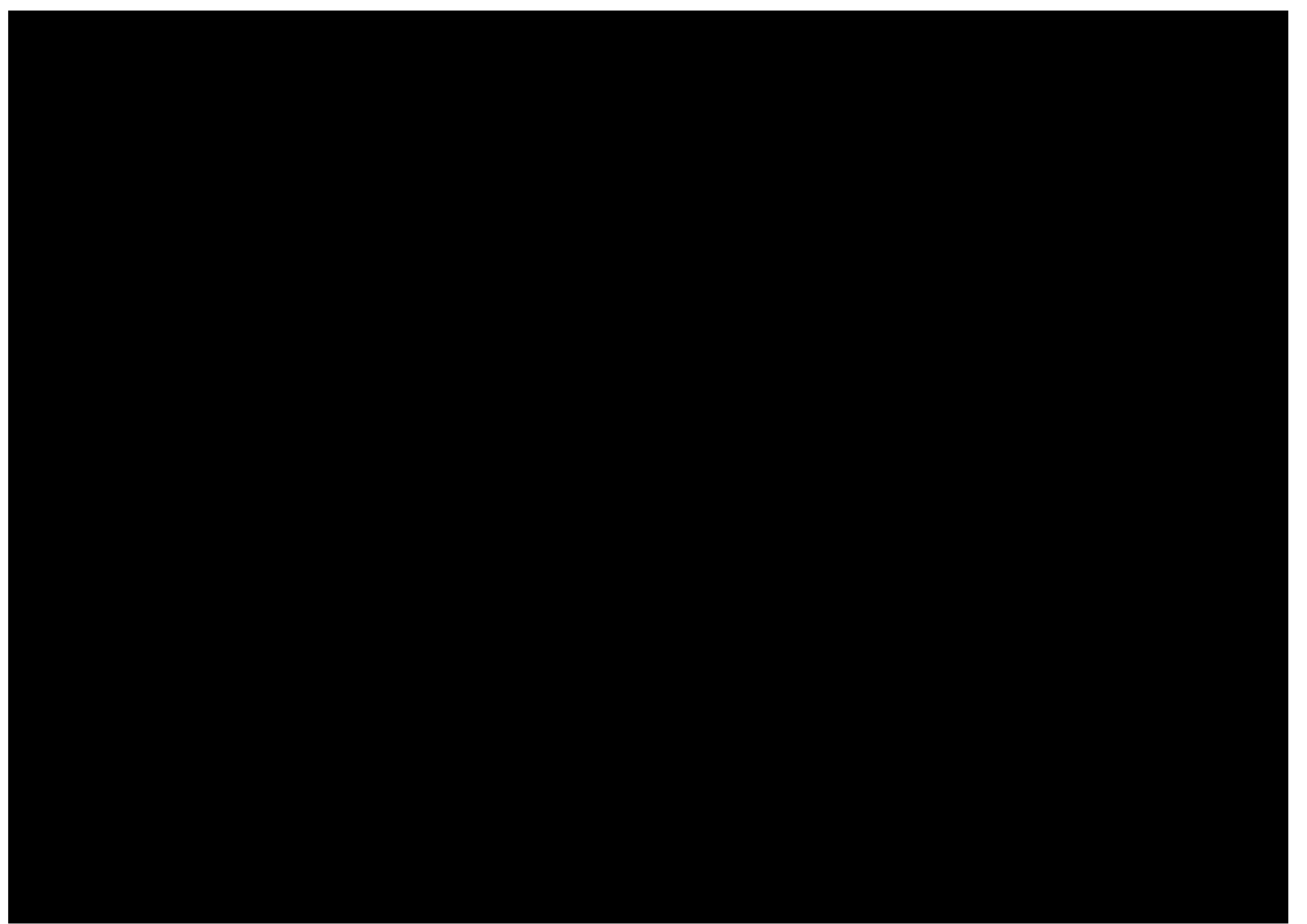














































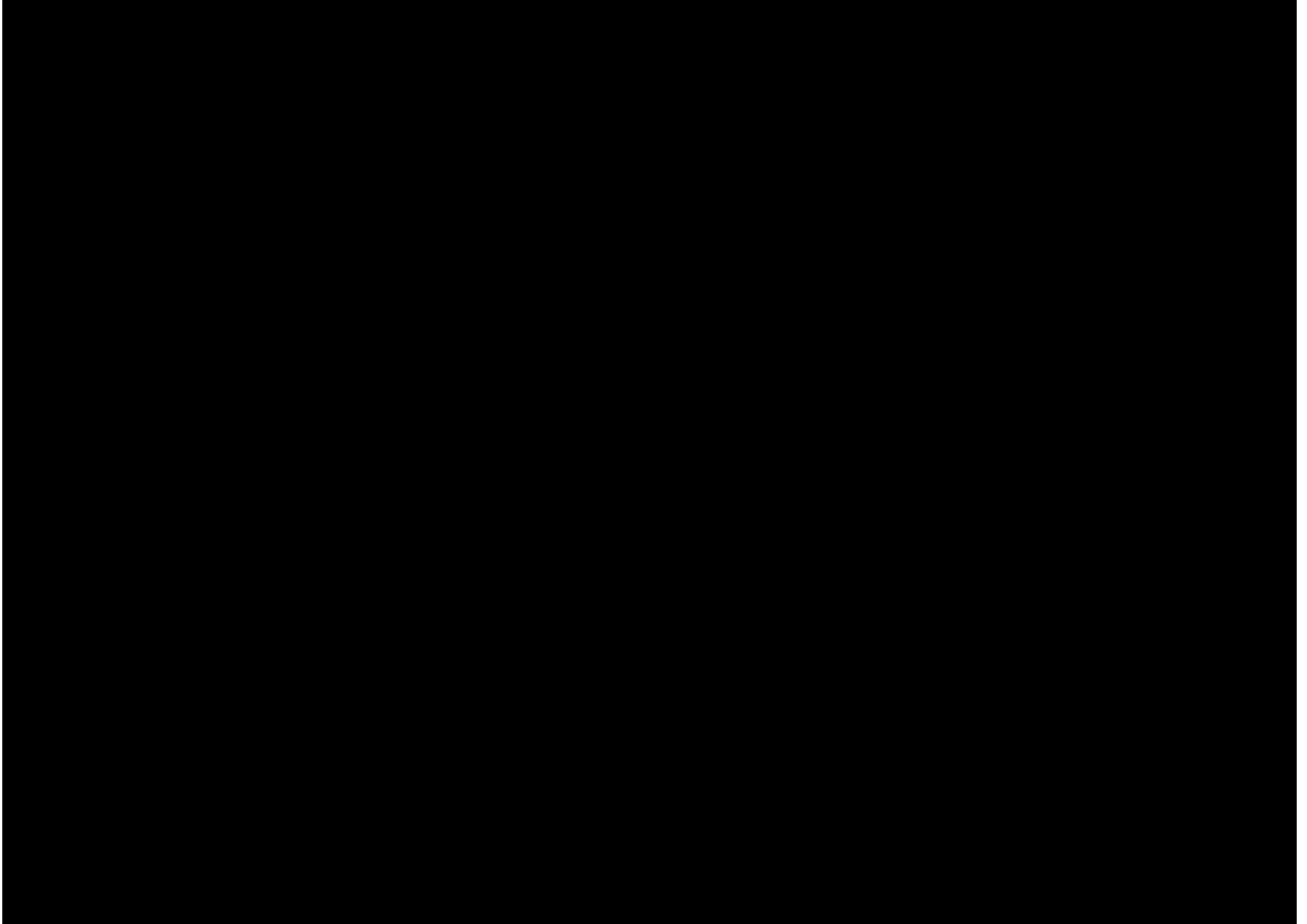




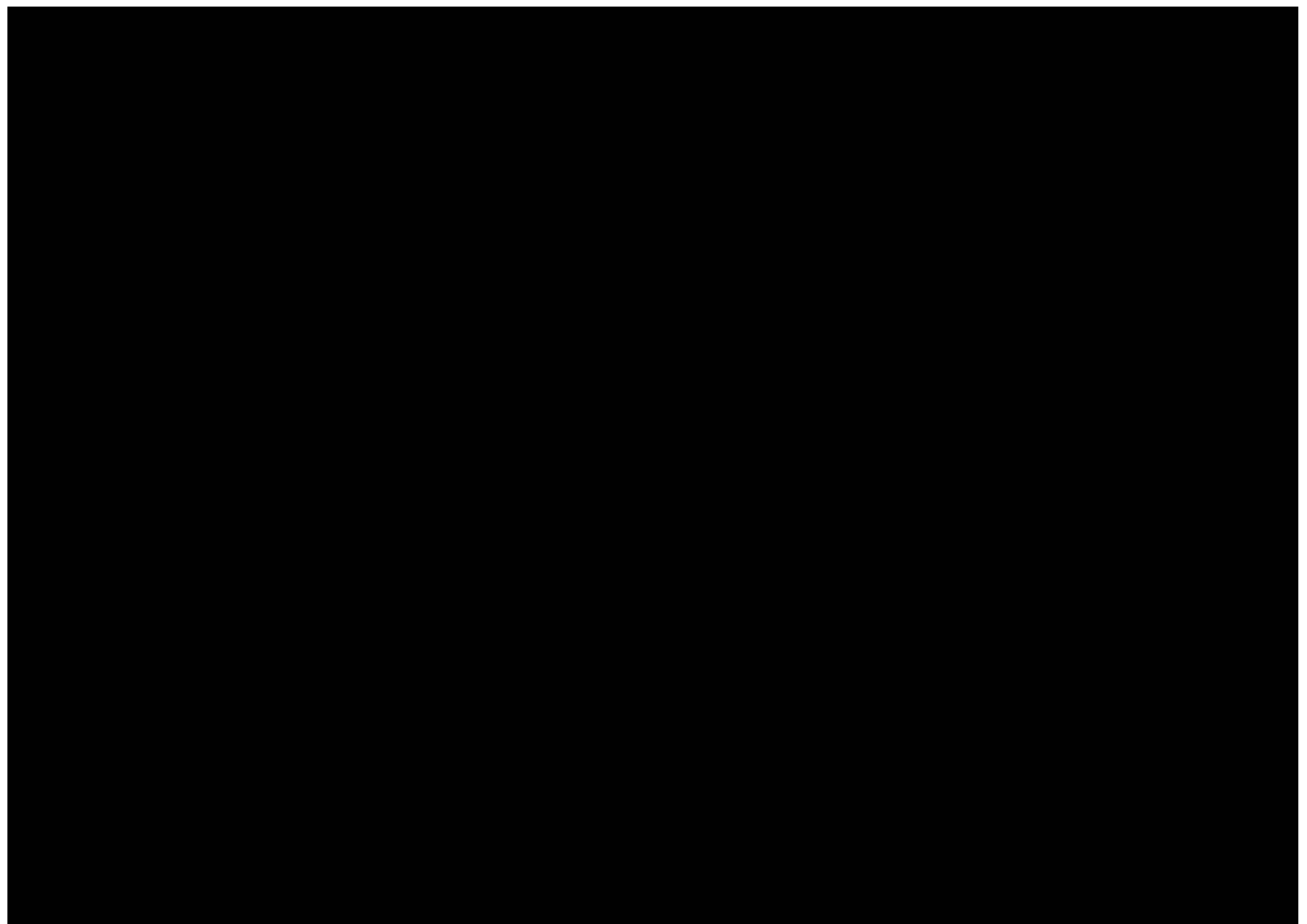














1ST HORIZON

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