

## Written submission for OFH2 on 24 March 2026

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IP [REDACTED]

I am a resident of Walberswick and a professional ecologist.

It seems astonishing that we find ourselves a month away from the conclusion of this examination and are discussing major changes to the proposal. There are also many other unresolved issues, not least the case for the need for this project, which obviously underpins everything else.

But I will focus instead on a few of the key ecological issues outstanding, which are also largely relevant to some of the proposed changes being discussed today:

Firstly, there are still no adequate baseline surveys for the Pegwell Bay hoverport. Without knowing what cracks and fissures and vegetation are present, there is no way of assessing or addressing potential impacts on legally protected reptile and invertebrate species.

Secondly, bats. Despite 9 species being recorded and amassing 22 points in the standard species assemblage evaluation methods, which correlates to National importance for species assemblage, which correlates to National importance for species assemblage, the applicant has downgraded this value to Regional, citing the relatively low bat encounter rates. But this assessment method should not incorporate encounter rates, only the number of species recorded. Therefore, this downgrading is flawed.

The applicant's own surveys and assessment acknowledge there is likely to be a barbastelle bat roost near to the Friston substation, yet they did not utilise the standard tracking surveys to find the location and status of this roost. Instead, they have largely ignored this issue.

Nearby hedgerow sections, which could form important dispersal corridors for the roost, are to be removed. [REDACTED], and any disruption to a [REDACTED] would be an impact at the National, or possibly, International level. The improvised mitigation currently proposed - introducing fake hedgelines to fill gaps created during the works - would surely need to be upgraded to minimise potential impacts if found to be a [REDACTED] y [REDACTED]. The applicant is employing obfuscation here - hiding behind their inadequate survey methods to brush the issue aside, as, without surveys, there are no data to prove them wrong.

Thirdly, there have been no dedicated marsh harrier surveys. The Order Limits have suitable foraging habitat for the species, well within their foraging home range from two SPAs for which marsh harrier is a qualifying species. The species also nests in the SSSI within the Order Limits. I believe the applicant is likely to have overlooked functionally linked land for marsh harrier in their HRA.

I also maintain my view from January's OFH that the applicant has not undertaken the most appropriate surveys for nightjars, with no acoustic recorder surveys carried out. Since a paper published over 10 years ago (Zwart et al 2013), it has been demonstrated that acoustic surveys are much more effective than traditional observer surveys, and I believe the surveys are therefore insufficient, given nightjar is a key Qualifying species of the adjacent Sandlings SPA, and are known to forage on grassland habitats across a wider area.

Lastly, there remains disagreement over the issue of red-throated diver disturbance impacts, and for good reason. The Outer Thames Estuary supports 16% of the European wintering population, more than any other site in Europe. Statutory and non-statutory NGOs all say the offshore works will result in significant disturbance, but this has been continually refuted by the applicant. Is it not time for them to acknowledge there is too much uncertainty in this case, and to apply for a Derogation Order for this predicted residual impact?

In conclusion, the applicant needs to acknowledge the limitations of their ecological surveys, assessments and proposed mitigation. It is clear an underprepared, insufficient DCO application has been submitted, and we urge the Examiners to recognise this and continue to press the applicant on the above points, amongst others.

Thank you