

**From:** Nicola Oktay on behalf of Planning.Responses  
**Sent:** 06 October 2025 12:57  
**To:** Planning Scanning  
**Subject:** FW: AB/122/25/OUT

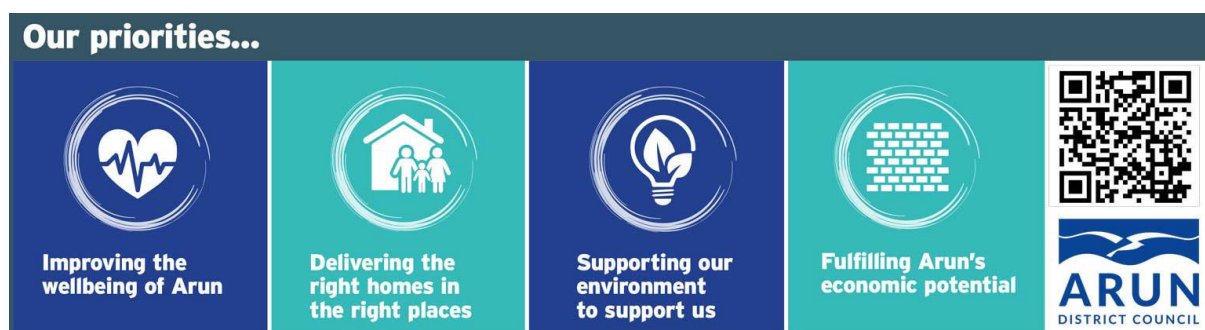
Ecology response

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**From:** Jonathan Best <Jonathan.Best@arun.gov.uk>  
**Sent:** 03 October 2025 16:44  
**To:** Planning.Responses <Planning.Responses@arun.gov.uk>  
**Cc:** Harry Chalk <Harry.Chalk@arun.gov.uk>  
**Subject:** AB/122/25/OUT

Land at London Road and Land West of and adjoining Anne Howard Gardens Arundel.

I have reviewed this application with regards to ecology and Biodiversity Net Gain.

Recommendation: I recommend holding this application until further details are provided on BNG.

The BNG report and Statutory Metric shows a loss of 100% in habitat units. Provision of offsite BNG units is required.

The BNG report and Statutory Metric shows a loss of 100% in Hedgerow units. Provision of offsite BNG units is required.

There are no post development BNG habitats identified in any plans or in the metric. Urban developed sealed surfaces and private gardens should be included. There is no condition assessment for the habitats present. These details are required for determination of this application.

There is a group of trees G3 that I think should be included as a distinct habitat not as part of the allotments. As set out in the Arboricultural report Group 3 is describes as, *G3 Various 6m Max 100mm 3m crown spread, Semi mature Indifferent Row of closely planted trees in allotment, adjacent to S site boundary; 4 flowering cherries and two birch; small ornamental trees; of moderate quality but currently of low value due to small size.*

Also, it would be helpful to have habitat reference numbers included in the metric.

The current layout in the DAS suggests a buffer will be created to the woodland adjacent to the site. This is welcomed and should be secured in any future plans for the site.

The Preliminary Ecological Appraisal has assessed the proposals for impacts to protected species. One juvenile slow worm was recorded on site. To avoid harm a reptile mitigation strategy is recommended.

The PEA by Greenlink ecology LTD dated 17/07/25 makes recommendations for ecological enhancements in section 5.3. In line with best practice the integrated bird boxes should be installed at a ratio of 1:1 and the integrated bat boxes 1:2.

I recommend the following conditions:

BNG1

ECOBNG2 - to include the enhancements identified in section 5.3 of the PEA.

ECOLIGHT2

PCREP1

Regards,

**Jonathan Best MCIEEM**  
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