

30A Tenby Street
Birmingham
B1 3EE
26th April 2025

Dear Harry

We wish to share with you our thoughts on the Biodiversity Net Gain proposals on the land adjacent to 18 Queens Lane, Arundel BN18 9JN.

You will have seen the results of the ecology survey conducted by Urban Edge Environmental Consulting which stated the site as: "poor condition scrub and no other habitat of any ecological value".

We requested Urban Edge to work up a 10% Biodiversity Net Gain proposal. However, they repeatedly questioned why we wished to undertake this as the proposal, being a single dwelling self-build, is exempt as defined by DEFRA. The plot is <0.3 acre and in our discussions with Urban Edge we were advised that through the restrictive interpretations of BNG we would need to dedicate at least 120m² to hostile thorn bearing scrub in the form of bramble, blackthorn and hawthorn and that this area would need to be fenced off and remain untouched for at least 30 years. The Birch trees we proposed to screen the BT exchange on the Northwest boundary would also need to be fenced off.

We are committed to improving the biodiversity of the site from its poor base by tree planting, meadow grasses and vegetables. However, fencing off much of the land planted to thorny species and effectively being unable to enter it for our lifetimes feels like a step too far. We still intend to retain and enhance the scrub along the ordinary watercourse with our boundaries to the BT exchange and Arundel allotments.

The ordinary watercourse is currently lined with corrugated metal sheeting. Urban Edge advise that removing this and sloping the banks will achieve 10% net gain for this feature so we will undertake this work. Urban Edge also advise that the privet hedge on the boundary with Number 18 is not on their list for BNG and recommend other native species. We propose to replace this accordingly, in consultation with the neighbours. We also intend to plant sedums around the footprint of the building to attract pollinators and manage water run-off.

We are confident that we can enhance the wildlife on the site and be trusted custodians outside the narrow parameters of BNG. Through careful design, working alongside ecologists and horticulturists, we aim to enrich the site allowing the native planting to mature and respond to a changing climate. We hope you recognise the ecological enhancement we intend for the site and understand why we feel unable to proceed with commissioning a formal 10% BNG.

Kind Regards

Kate and Guy