

Arun District Council, Civic Centre, Maltravers Rd, Littlehampton, West Sussex, BN17 5LF
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From: Jonathan Best <Jonathan.Best@arun.gov.uk>
Sent: 10 June 2026 15:54
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Amber Willard <Amber.Willard@arun.gov.uk>
Subject: BN/64/26/PL

Hill View Eastergate Lane Eastergate PO20 3SJ.

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

Recommendation: Hold for further information on protected species, bats and reptiles and BNG.

The site is within the Singleton and Cocking SAC 1200m HRA buffer. An appropriate assessment may be required.

BNG

The metric indicates a loss of -1.56 area units equivalent to -17.29% based on current plans. Offsite BNG units will be required.

For Hedgerows there is a gain of 11.24%. This is acceptable.

The BNG Assessment by Arbtech dated 31/03/2025 has not been updated to include the revised post development habitat plans.

The BNG Metric may also be inconsistent with the revised development plans and the retention of orchard.

The post development plans do not show what habitats that will be present. There is no indication as to what areas are private gardens or other habitats is provided. It is impossible to fully assess and determine if the BNG information is accurate at this time. Clarification on the post development BNG is required.

Net loss of high distinctiveness habitat is not permitted under the BNG trading rules. to meet the BNG trading rules the loss of high distinctiveness habitats must be replaced by a habitat of the same high distinctiveness, in other words like for like. Compliance with the trading rules has not been evidenced at this time.

The number of new trees has not been provided. This is required in the metric.

The time to target condition for traditional orchard should be set at 30 years, not 15 because this is a high distinctiveness habitat that takes a long time to develop and reach moderate condition.

On review of the BNG Metric and landscape plans the development proposes to provide significant onsite BNG habitats. These habitats need to be secured for 30 years through a S106 agreement and a Habitat Management and Monitoring Plan (HMMP).

The CEMP lacks details of who wrote it and when. It does not address protection of species adequately. Revision of this document is advised to ensure protection for protected species. The CEMP can be conditioned.

Species

Bats

The bat emergence and re-entry survey report dated 18/09/2024 is out of date as the cover states it is valid for 18 months. New bat emergence and re-entry surveys are required prior to determination of this application.

The survey recorded bat activity from 6 species. Common pipistrel was the largest number of calls recorded. The report suggests there may be common pipistrel roosting onsite. Bat roosts for brown long eared bats have previously been recorded in buildings B3a and B3b. A Bat Mitigation Class Licence (BMCL) is required.

Dormice

The PEA states that the site is too small for an effective dormouse survey using standard methodology. They recommend a precautionary approach and habitat enhancement for dormice. This is acceptable and must be secured by condition.

Reptiles

Reptiles have not been surveyed.

The photos in the PEA suggest that the site has suitable habitat areas for reptiles. The PEA also notes that the site is suitable for reptiles and the site may support a small population without any evidence to support this statement. No evidence of a data search for reptiles has been included in the report. Surveys of the site to the southwest identified a large population of slow worm. As the site is connected to this site with suitable reptile habitat further surveys of reptiles are required. The loss of habitat onsite means that any reptiles present may need to be relocated.

Nesting birds

The PEA states a survey for nesting birds was undertaken but provides no information on the date or time of the survey or methods used to identify nesting birds.
The proposed mitigation of nest boxes will not compensate for loss of nesting habitats loss through development.

Conditions will be advised following receipt of further information requested within these comments.

Regards,

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