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From: Jonathan Best <Jonathan.Best@arun.gov.uk>
Sent: 23 June 2026 15:59
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Hebe Smith <Hebe.Smith@arun.gov.uk>
Subject: FP/55/26/PL

6 Ormesby Crescent Felpham PO22 8EN.

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 the trees in the BNG baseline.

The Arboricultural Report notes that 3 small trees are being removed to facilitate the development and also notes that the trees should not be recorded as individual trees in the private garden in line with the guidance.

However, the Small Sites Metric user guide states;

Trees recorded as individual trees that will be removed for any purpose, including development, disease, or safety must be recorded in your baseline and recorded as lost.

Do not otherwise record individual trees if they occur within a habitat type characterised by the presence of trees, unless specified within the section on 'recording individual trees at baseline', which covers:

- *trees within private gardens*
- *removal of trees within hedgerows*
- *removal of trees within rural lines of trees*

So, my understanding is that all trees being removed including small trees must be counted in the BNG baseline and shown as lost.

Therefore, the BNG baseline should be revised to reflect the trees that have been lost.

The BNG assessment shows a loss of 53.33% in habitat units. Offsite units are required to meet the mandatory requirement.

Ecological enhancement of the building is recommended in the biodiversity enhancement statement through inclusion of bat and bird boxes.

Regards,

Jonathan Best MCIEEM
Ecology Officer, Planning Policy

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