

Planning Department,
Arun District Council,
Arun Civic Centre,
1 Maltravers Rd,
Littlehampton
BN17 5LF

16 December 2025

Dear Sir / Madam,

Pagham Phase 4 Road Reserved Matters - Biodiversity Net Gain - Covering Statement

This covering statement is submitted in support of the Biodiversity Net Gain (BNG) information accompanying the Reserved Matters application for the Phase 4 access road, pursuant to the approved outline planning permission.

The outline consent relates to a phased development, and the approach to BNG has therefore been prepared in accordance with Schedule 7A of the Town and Country Planning Act 1990 (as amended), the Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) (England) Regulations 2024, and the associated Planning Practice Guidance (PPG) for phased development.

In line with this statutory framework, an Overall Biodiversity Gain Plan (including HMMP) has been prepared to establish a clear, site-wide strategy demonstrating how the mandatory minimum 10% biodiversity net gain is expected to be achieved across the development as a whole. The Overall Plan sets out the baseline position, anticipated post-development outcomes, and the overarching principles for habitat creation, enhancement, management and monitoring.

Given the phased nature of the development and the absence of detailed proposals for later phases at this stage, the Overall Biodiversity Gain Plan necessarily utilises reasonable assumptions informed by the approved parameter plans and illustrative masterplan. This approach is consistent with the PPG, which recognises that, for phased developments, detailed habitat proposals may not be finalised at the outset and allows for assumptions to be used to establish expectations, with refinement to occur through subsequent Phase Biodiversity Gain Plans.

To support the current Reserved Matters submission, a Phase-specific HMMP has also been prepared. This document relates solely to the Phase 4 access road works and sets out appropriate mitigation and enhancement measures associated with this element of development. The HMMP does not seek to fix or pre-determine the detailed BNG delivery for future residential phases, thereby retaining appropriate flexibility for later Reserved Matters submissions.

As future phases of development come forward, individual Phase Biodiversity Gain Plans will be prepared and submitted for approval prior to commencement of each phase, in accordance with the statutory requirements. These will provide detailed habitat proposals, updated metric calculations, and confirmation of progress towards achieving the overall biodiversity gain objective for the development.

This staged approach ensures compliance with the BNG legislative framework while allowing sufficient flexibility to respond to evolving design and layout proposals as the development progresses.

Yours sincerely

Izabel



Izabel Phillips

Principal Ecologist / Company Director

