

**From:** Simon Davis  
**Sent:** 04 April 2025 12:37  
**To:** [REDACTED]  
**Subject:** FW: WA/17/25/PL

Dear Sue,

Please see below Ecology objections. Should you wish to respond, please do so by 22/04 so that I then have time to re-consult.

Kind Regards

Simon

**Simon Davis MRTPI**  
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**From:** Jonathan Best <[Jonathan.Best@arun.gov.uk](mailto:Jonathan.Best@arun.gov.uk)>  
**Sent:** 04 April 2025 11:29  
**To:** Planning.Responses <[Planning.Responses@arun.gov.uk](mailto:Planning.Responses@arun.gov.uk)>  
**Cc:** Simon Davis <[Simon.Davis@arun.gov.uk](mailto:Simon.Davis@arun.gov.uk)>  
**Subject:** WA/17/25/PL

Land to the North of Lake Lane Barnham PO22 0AJ.

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

Recommendation: I recommend refusing this application due to lack of details for the BNG watercourse habitat.

### **BNG**

The BNG report and Statutory Metric shows a gain of 1.75% in habitat units.  
This falls short of the mandatory 10% therefore offsite provision of BNG units is required.

The assessment has recorded watercourse habitat within the Statutory Metric.  
The BNG report shows an increase of 54.08% in watercourse units. This exceeds the mandatory 10% required.  
However, no condition assessment for the watercourse has been provided.

### **Defra Guidance on Watercourse condition states.**

*Once habitat type is determined, you should split a watercourse into sections of consistent type and condition. Watercourse habitat types use different methodologies to assess condition, for:*

- culverts – you do not need a condition assessment*
- ditches – you should use biodiversity metric condition sheets*
- all other watercourses (including canals) – you should conduct a river condition assessment (RCA)*

*You should be trained and accredited to conduct a river condition assessment*

*If you need to conduct an RCA, you should:*

- survey at least one point for each section*
- survey a length at least 20% of the total length of the watercourse assessed*
- survey at points of known positive and negative impacts*

There are no details of the competency of the surveyor of the watercourse.  
There is no evidence provided on how the enhancement of the watercourse will be delivered.  
An assessment of the watercourse by an RCA qualified assessor is required.

### **Habitats and Species**

The PEA was undertaken on the 22/11/2023 and is just out of date also it was undertaken at a sub optimal time. I recommend an updated habitat survey is provided.  
The PEA makes a number of recommendations including wildlife planting of hedgerows and native trees, retaining boundary habitats, introducing deadwood habitats, nest boxes and bat boxes.

The Bat survey is comprehensive, no further surveys are required.

10 species of bat were recorded using the site including Barbastelle and long eared species. both of these are sensitive to lighting.

A bat friendly lighting plan is required.

The reptile survey identified a small breeding population of grass snake present.

Reptile mitigation is required and is proposed through creation of log piles, 2 compost heaps and habitat management of scrub encroachment and a sympathetic grassland management scheme for reptiles. This is acceptable and will be secured through conditions.

No trees are proposed for removal under the submitted plans.

I advise the following conditions:

BNG1

ECOBNG2 to include the recommendations set out in the PEA by CT Ecology dated 22<sup>nd</sup> November 2023. 7 swift bricks and 7 bat brick/tubes, 2 log piles and 2 compost heaps. Creation of hedgehog gaps in fences is recommended.

PCREP1

ECOLIGHT2

PCECOCON1P - PC - Construct Ecological Management Plan for Biodiversity

Regards,

**Jonathan Best MCIEEM**  
Ecology Officer, Planning Policy

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