



From: Nicola Spencer on behalf of Planning.Responses
Sent: 19 June 2026 22:07
To: Planning Scanning
Subject: FW: Y/31/26/PL
Attachments: Screenshot 2026-06-19 143122.jpg; Screenshot 2026-06-19 101156.jpg

PL Consultation Ecology Response
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From: Jonathan Best <Jonathan.Best@arun.gov.uk>
Sent: 19 June 2026 14:43
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Hebe Smith <Hebe.Smith@arun.gov.uk>
Subject: Y/31/26/PL

2 Downview Road Yapton BN18 0HS.

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 BNG report shows an increase of 10.22% in habitat units.

The BNG report shows an increase of 24.17% in hedgerow units.

There were individual trees and a line of native trees that have been felled and removed from the garden. Street view imagery from 2019 shows that there were more than 5 trees and that the trees were quite mature. I counted 14 trees most of which were beech. The stem diameter is unverified, so it is unclear if they are small or medium sized trees.

The BNG report stated that there were 5 small trees onsite and the trees should not be recorded as individual trees in the private garden in line with the guidance.

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.

Regards,

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◆ AI Overview

Yes, small individual trees do count in the baseline if they are being removed. Any tree that will be removed for development (regardless of its size) must be recorded in your baseline as "lost" to prevent a penalty to your site's [Statutory Biodiversity Metric](#) calculation.  bngai

How to Account for Small Trees

- **Baseline Impact:** Even small individual trees inside private gardens must be recorded as "lost" in the baseline. Failing to record removed trees will artificially inflate your baseline score, which requires you to create significantly more habitat elsewhere to achieve your statutory 10% net gain target.  bngai +2

