



From: Elaine Walby on behalf of Planning.Responses
Sent: 07 April 2026 10:34
To: Planning Scanning
Subject: FW: Updated ecology comments

PL- Consultation- Updated Ecology response.

Y/5/26/PL

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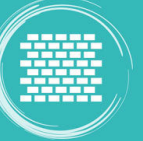
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From: Jonathan Best <Jonathan.Best@arun.gov.uk>
Sent: 02 April 2026 15:43
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Hebe Smith <Hebe.Smith@arun.gov.uk>
Subject: Updated ecology comments

2 Downview Road Yapton BN18 0HS.

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

Recommendation: No objection subject to conditions.

The revised metric has been completed by a competent person.

There are errors within the SSM calculations.

Ariel imagery shows the site had a line of mature trees present in 2024 on the southern boundary, but these have since been removed. Habitat present in January 2020 should be counted in the metric even if it is no longer present. This will change the baseline for habitats and may show a greater loss of biodiversity units. The baseline habitat value may be incorrect. Clarification on this is recommended.

The provision of hedge and tree planting is welcomed but cannot count towards biodiversity as they are located within a private garden.

The Small Sites user guide states:

‘The post-development private garden has no public access, and biodiversity net gains cannot be legally secured. As these gains cannot be secured you should only record created private gardens as either:

- *‘urban – vegetated garden’; or*
- *‘urban - unvegetated garden’*

You should not:

- *record the creation of any other new habitats within private gardens*
- *record enhancement of any habitat within private gardens’*

However, habitats which are recorded in the baseline and remain within a private garden may be recorded as retained. Guidance on retention should still be followed.

Therefore, the proposed gains recorded are incorrect for this application.

If the application is approved the errors with the baseline habitat and post development values will require rectification before we can discharge the biodiversity gain plan. Offsite habitat and hedge units are likely to be required to achieve the minimum 10% BNG.

Regards,

Jonathan Best MCIEEM
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