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From: Elaine Walby on behalf of Planning.Responses
Sent: 18 August 2026 17:46
To: Planning Scanning
Subject: FW: LU/173/26/OUT

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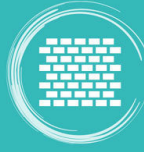
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Arun District Council, Civic Centre, Maltravers Rd
Littlehampton, West Sussex, BN17 5LF
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 Improving the wellbeing of Arun	 Delivering the right homes in the right places	 Supporting our environment to support us	 Fulfilling Arun's economic potential	 Our core foundations	 
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From: Jonathan Best <Jonathan.Best@arun.gov.uk>
Sent: 14 August 2026 15:23
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Hannah Kersley <Hannah.Kersley@arun.gov.uk>
Subject: LU/173/26/OUT

Westholme Nursery Toddington Lane Littlehampton BN17 7PP.

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 date and author of the statutory BNG metric.

The Biodiversity Metric spreadsheet violates the statutory minimum validation requirements. The date of the BNG metric is missing. The name of the Author is also missing. This is required to establish and baseline habitat date at validation and the qualifications of the person completing the metric.

The BNG report and Statutory Metric shows a loss of 41.97% in habitat units. Provision of Offsite BNG units is required.

The BNG report shows an increase of 137.10% in hedgerow units. This exceeds the mandatory 10% required.

The majority of habitat loss is Other Neutral Grassland (ONG) 0.35ha. small areas of mixed and bramble scrub will be lost.

ONG, mixed scrub and urban trees will be created. There are medium distinctiveness habitats.

The Biodiversity Net Gain (BNG) Assessment by the Ecology Partnership dated May 2026. Shows a baseline habitat plan with ONG dominating the site and present post development in the north of the site. The metric states that no ONG is being retained but the assessment suggests that ONG will be created in the same place there is existing ONG. Clarity on what habitat will be retained and created this is sought. This can be addressed at reserved matters stage.

The updated Preliminary Ecological Appraisal has assessed the proposals for impacts to protected species. the results are reliant of previous survey efforts. The species surveys for bats and reptiles were undertaken in 2024. No evidence of bat roosts or reptiles were recorded on site. Two of the buildings have since been demolished.
This is acceptable.

Further surveys are unlikely to be required unless the site habitat changes significantly between the updated ecological assessment date and commencement. This will be reviewed at reserved matters stage. A walkover ecological assessment to support the reserved matters is advised.

On review of the BNG Metric and BNG assessment the development proposes to provide significant onsite BNG habitat gains. Guidance states these habitats are required to be secured for 30 years through a S106 agreement and be supported by a Habitat Management and Monitoring Plan (HMMP).

A bat sensitive lighting scheme is required.

Integral Bat and swift bricks should be installed on the new dwellings at a ratio of 1:1.

I advise the following conditions:

BNG1

PCBNGMON1

ECOLIGHT2

ECOBNG2 – Integral bat and Swift Bricks.

Regards,

Jonathan Best MCIEEM
Ecology Officer, Planning Policy

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