

Arun District Council, Civic Centre, Maltravers Rd  
Littlehampton, West Sussex, BN17 5LF  
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**From:** Frances Young [REDACTED]  
**Sent:** 17 October 2024 14:36  
**To:** Kathryn Welch <Kathryn.Welch@arun.gov.uk>

**Subject:** Toddington Lane Scheme (Application ref. LU/246/24/PL) – Response to comments on Ecology and Biodiversity

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Good afternoon Kathryn

**Toddington Lane Scheme (Application ref. LU/246/24/PL) – Response to comments on Ecology and Biodiversity**

I am writing in response to the comments made by Jonathan Best, dated 11 October 2024 in regard to ecology and biodiversity net gain.

In response to the suggestion that options should be explored to see if the BNG shortfall can be achieved on site in the first instance, Ecology Co Op has advised that this would not be possible with the current scheme, as irrespective of the 10% net gain, the site would fail trading rules in regard to the creation of scrub on site. To achieve a BNG increase, the scrub on site needs to be either completely retained or increased. Ecology Co Op has advised that scrub is difficult to create in this type of residential scheme, as it can very quickly and quite often become areas of grassland or low shrub depending upon management.

The existing areas of scrub are shown in the attached diagram.

To be classified as a scrub it needs to be less than 5m in height but also cannot form a linear feature that could be considered a hedgerow, so should be a minimum of 25m<sup>2</sup> which again, would be difficult to create within the current scheme without significantly reducing the dwelling numbers or converting all proposed habitats into scrub (posing further management risks/concerns).

In regard to the suggestion of extending the hedge along the western boundary, whilst this would improve the biodiversity value of the site, this would not be in relation to habitat areas under BNG, it would come under hedgerow, which wouldn't count towards the current BNG shortfall highlighted. Moreover, there is not currently enough space to create a scrub habitat in this area.

Could Jonathan please clarify what is required for the draft BNG gain plan, as we have already provided a BNG metric and report, which includes details of existing and proposed habitats.

We will look to provide the additional four universal nesting bricks on the houses, as requested, along with the 6 bee bricks facing south, that have been suggested.

Could you please clarify the requirements set out in the proposed conditions – BNG1, ECOBNG4, PCREP1 and ECOLIGHT2.

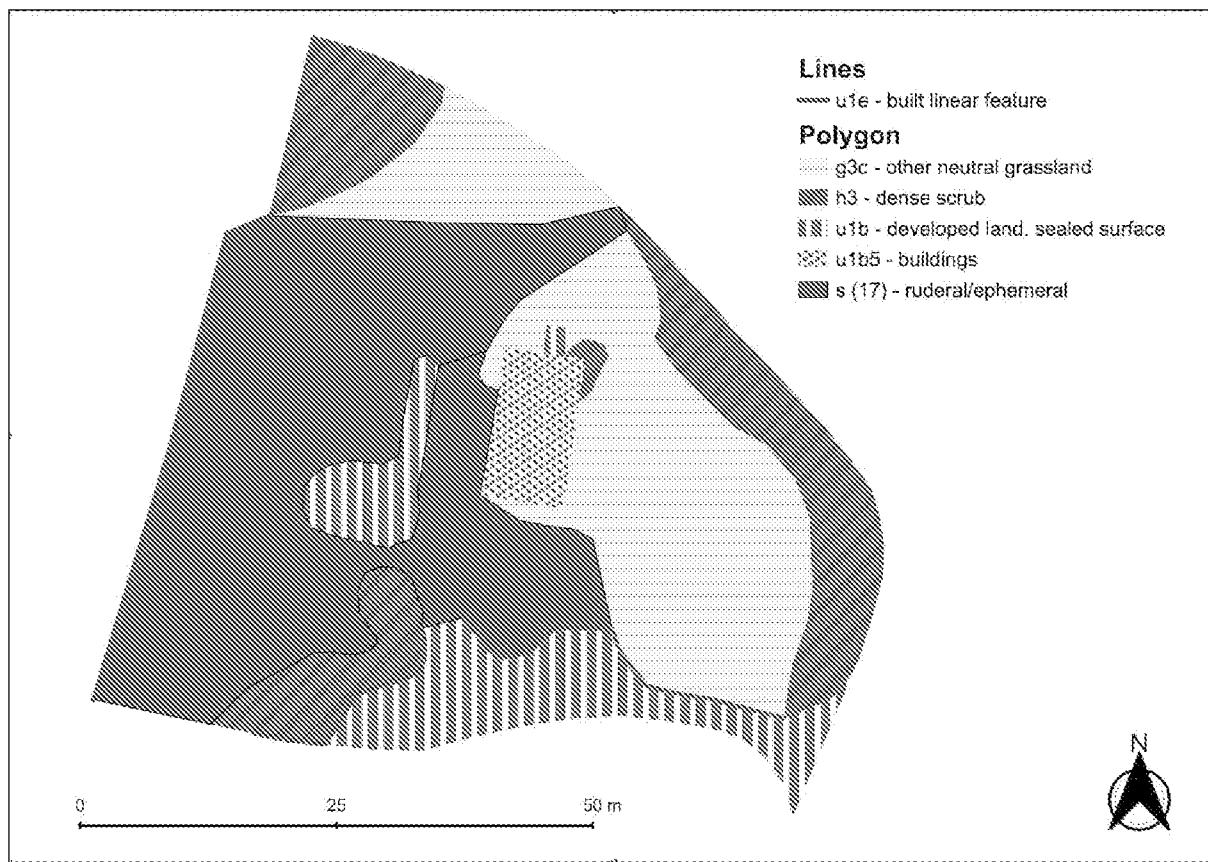
Many thanks

Regards

Frances

**Frances Young BSc(Hons) MPhil MA(UD) MRTPI CIHCM**

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N20 9HR



Toddington Lane – Existing area of scrub



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**From:** Jonathan Best [REDACTED]  
**Sent:** 11 October 2024 15:06  
**To:** Planning.Responses <[Planning.Responses@arun.gov.uk](mailto:Planning.Responses@arun.gov.uk)>  
**Cc:** Kathryn Welch <[Kathryn.Welch@arun.gov.uk](mailto:Kathryn.Welch@arun.gov.uk)>  
**Subject:** LU/246/24/PL

Land at Toddington Lane Littlehampton BN17 7PN.

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

Recommendation: approval of the application with conditions.

The BNG metric calculates that the onsite gain is 3.97%. This falls short of the minimum 10% gain required. The report has proposed buying offsite units as the method of making up for the shortfall of 6.03%.

Currently no onsite habitat is being retained. Options should be explored to see if the shortfall can be achieved on site first. This is consistent with the principle of considering biodiversity from the beginning of the development process. The proposed reptile translocation highlights this as the requirement to translocate the reptiles could be mitigated onsite by retaining some of the suitable habitat.  
The hedge could be extended to run along the western boundary.

The post development habitat creation onsite is not large enough to be considered significant, so, this can be secured through condition rather than a S106 agreement.

A draft BNG gain plan is required prior to determination.

The PEA and reptile survey are fine. The reptile survey was undertaken in 2022. The report found that reptiles (slowworm and Common Lizard) were present. A reptile mitigation strategy comprising of translocation is proposed. This will be secured through condition.  
Impacts to other species is negligible but commuting and foraging bats will benefit from an ecologically sensitive lighting scheme and extended hedge planting.

Ecological enhancements are proposed for nesting bird with four nest bricks being proposed.  
I recommend another 4 universal nesting bricks are installed on the houses alongside 6 bee bricks facing south.

Recommended Conditions:

**BNG1**  
**ECOBNG2**  
**PCREP1**  
**ECOLIGHT2**

Regards,

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



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