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Arun District Council, Civic Centre, Maltravers Rd, Littlehampton, West Sussex, BN17 5LF
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From: Jonathan Best <Jonathan.Best@arun.gov.uk>
Sent: 24 September 2026 14:01
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Hannah Kersley <Hannah.Kersley@arun.gov.uk>
Subject: LU/252/25/RES

Hampton Park Littlehampton.

I have reviewed this application with regards to ecology.

Recommendation: No objection.

The site is within the Arun Valley SPA Impact Risk Zone 2. An appropriate assessment is required.

The Shadow Habitats Regulations Assessment concluded that there would be **no Likely Significant Effect** on the Arun Valley SPA.

The site is within the Climping to Houghton Biodiversity Opportunity Area. Policy ENV DM3 Biodiversity Opportunity Areas applies to this application.

About half the existing grassland habitat is being retained as open space. This is welcomed as it will ensure resident biodiversity is conserved.

The Ecological Impact Assessment (EclA) by ECOSA Ltd dated 25th November 2025 surveyed the site for impacts to protected species.

Further surveys may be required if development does not commence within 18 months of the date of the most recent relevant survey.

Bats

The Bat surveys stated that the transect surveys recorded low levels of bat activity during the three surveys.

The automated bat surveys results presented quite a different picture. The automated bat detector survey results recorded a total of 29,241 bat registrations of at least 10 species. This included Barbastelle (251 passes), long eared bat species (164 passes) and possibly Bechstein's. All are rare bats in Arun and the UK and sensitive to lighting.

Para 5.5.1 of the EclA '*Potential Impacts and Effects*'

States that 'the proposals will result in the loss of foraging and commuting habitats for bats. New external lighting may cause disturbance to foraging and commuting bats'. The scheme should seek to conform with the recommendations of the Institution of Lighting Professionals (ILP) "Guidance Notes for the Reduction of Obtrusive Light" (GN01:2011) and. "Bats and Artificial Lighting at Night" (GN08 2023).

Enhancements for bats are set out in the ECIA for LU/249/25/RES and propose installing bat Tubes on 25% of the new dwellings. No enhancements for bats are proposed for this application. Retained trees could potentially support bats boxes where applicable.

Reptiles

Para 5.9.5 of the EclA states that five hibernacula will be created within the proposed receptor area to provide additional habitats for reptiles and improve the carrying capacity of the site. This is not shown in the Landscape Management and Maintenance Plan (LMMP), but has been identified in maps within the EclA submitted for application LU/249/25/RES. There are concerns regarding the location and design of the reptile hibernacula.

The proposed hibernacula are located in flood zones 2 and 3. This is not acceptable an alternative location not prone to flooding should be identified. Confirmation as to when these hibernacula will be constructed is required.

Given the presence of an exceptional population of slow-worm and a good population of common lizard within the site. Reptile translocation is proposed. The principal of the translocation of reptiles is acceptable. A reptile mitigation strategy is required to ensure adequate protection and mitigation. Further clarification on the reptile translocation is required.

Water Voles

The water vole survey did not find evidence of water voles being present. American Mink was recoded as being present which is the likely reason why Water voles were not recoded. Previous surveys by WYG environmental in 2008 found widespread presence of water vole across the site. Removal of the mink is proposed. This is acceptable.

Planting

The planting of the Scrapes - Flood & Drought Marginal planting have all used the same 8 plants. To benefit ecology and to mitigate the impacts of climate change it would be good to increase the plant diversity and mix up the species composition.

The Wetland Edge mix includes *Phragmites australis* and *Typha latifolia* both are vigorous spreading plants. They may outcompete other species so should be planted judiciously.

Consideration of including the following plant species to increase diversity and enhance the site for invertebrates.

Flowering rush (*Butomus umbellatus*)

Marsh marigold (*Caltha palustris*)
Hemp agrimony (*Eupatorium cannabinum*)

The Elm 'New Horizon' would be a good addition to the tree planting species list because it supports the rare White letter hairstreak butterfly.

The Soft Landscape Management & Maintenance plan is good and sets out clear management prescriptions for the ecological habitats.

Regards,

Jonathan Best MCIEEM
Ecology Officer, Planning Policy

T: 01903 737579

E: jonathan.best@arun.gov.uk

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