

From: Megan Smith [REDACTED]
Sent: 21 May 2025 15:27
To: Simon Davis <Simon.Davis@arun.gov.uk>
Cc: Chris Barker [REDACTED]
Subject: RE: Wick, Littlehampton - LU/72/25/OUT

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Dear Simon,

Further to the attached, our Ecologist has provided the following comments. Please can you pass this along to the Ecology Officer for their comment, I have included questions of clarification in bold as the nature of some parts of the objection is not clear:

HRA:

- Impacts to supporting habitat to the Arun Valley SPA (e.g. to the risk impact zone) were screened out within the HRA Screening note provided (see Table 2b); with the site not being considered to represent suitable foraging habitat for Bewick Swan. It is for the LPA (i.e. the Competent Authority) to undertake the HRA; and screen out impacts to this designated site prior to the Appropriate Assessment (AA) stage. **Please can you confirm that you agree that this is the process required?**

BNG:

- With regards to the BNG Hierarchy, the Ecology Consultant has set out how they have followed the hierarchy below:
 - Avoid Adverse Effects; First priority is reduced impacts to on-site habitats; particularly those of medium distinctiveness and above. Whilst the scheme will impact habitats of medium distinctiveness (e.g. the majority of other neutral grassland within Ph2); the scheme has also been adapted to retain medium distinctiveness habitat (e.g. other woodland, scrub and some grassland) at the margins of the site; as well as minimising hedgerow loss (as set out within para 5.2 of the BNGA). Granted the majority of other neutral grassland is being lost; but this can only be addressed through change to the scheme design to retain more of the existing habitat. At present the scheme results in 16.24 units lost (in the absence of on-site habitat creation / enhancement)
 - Mitigate Unavoidable Effects; due to space constraints under the current layout, the scheme does not afford much scope for 'mitigation' of impacts to other neutral grassland to be lost. However – where possible opportunities to enhance retained habitat and create new habitats of value to biodiversity have been taken (see below).

- Enhance On-site Habitats: retained habitats of 'low' & 'medium' distinctiveness and poor condition will be enhanced through supplementary planting and appropriate management. Habitat enhancement measures will deliver 2.84 habitat units.
- Create New On-site Habitats: creation of 'medium' distinctiveness habitats in 'poor' to 'moderate' condition (taking precautionary approach) will deliver 2.51 habitat units.
- Secure Off-site Units: A total of 15.03 habitat units will be required to mitigate the residual impact of the scheme and deliver a 10% net gain

As such, the nature of the objection from the consultee is not clear:

- **Does the consultee consider that the hierarchy has not been followed as impacts have not effectively been avoided to medium distinctiveness habitats? If this is the case then a reduction in impact is only possible if the quantum of development is reduced, therefore this will need to be weighed up in the planning balance. Or;**
- **Does the consultee not consider that the final part of the hierarchy has been followed as no off-site provider for BNG units has been identified at this stage?**

Please can we get clarity from the Ecology Officer, as this is unclear within the objection response.

Protected Species:

- Bats – no objection – just to note that update surveys will be required prior to the RM for Ph2 and that a Bat Sensitive Lighting Scheme is required (which can be secured by condition.)
- Reptiles – RMS proposed to be secured as part of the S106.
 - **Does the Ecology Consultee want to see the RMS at this stage?**
- Birds – Loss of breeding bird habitat. There will be some loss of whitethroat (and other species) territories; but we do identify that the provision of new scrub / thicket planting will provide some compensation for this. The only way to provide further mitigation is to reduce the footprint of the development and retain more scrub. Again, this will need to be weighed up in the planning balance.

Trees:

- 'AIA lacks information on tree removal in Phase 2': However – this is set out within para 7.5 onwards of the AIA.
- 'The whole site is subject to a TPO': as set out within the AIA (para 5.1 onwards) the extent to which the TPO cover the site is unclear. During the pre-app the tree officer has raised no concerns with the approach taken – we will await the Tree Officer's formal comments on the application.

If you need further information from me, please let me know.

Kind Regards

Megan Smith MRTPI (she/her)
Senior Planner

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