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**From:** Jonathan Best <Jonathan.Best@arun.gov.uk>  
**Sent:** 11 September 2026 11:13  
**To:** Planning.Responses <Planning.Responses@arun.gov.uk>  
**Cc:** Amber Willard <Amber.Willard@arun.gov.uk>  
**Subject:** WA/85/26/DOC

Land on the West side of Yapton Lane Walberton.

I have reviewed the approval of details reserved by condition imposed under WA/2/22/OUT relating to condition 16-Biodiversity Net Gain Stage Report.

Recommendation: I recommend holding this application until further details are provided on the current baseline habitat, a supporting BNG metric and the implementation and management of the habitats being retained and created.

A Biodiversity Net Gain Design Stage Report, in line with Table 2 of CIEEM Biodiversity Net Gain report and audit templates (July 2021), shall be submitted to and approved in writing by the local planning authority which provides a minimum of 10% measurable biodiversity net gain, using the DEFRA Biodiversity Metric 3.1 or any successor. The content of the Biodiversity Net Gain Design Stage Report should include the following:

- a. Baseline data collection and assessment of current conditions on site;
- b. A commitment to measures in line with the Mitigation Hierarchy and evidence of how BNG Principles have been applied to maximise benefits to biodiversity;
- c. Provision of the full BNG calculations, with plans for pre- and post- development and detailed justifications for the choice of habitat types, distinctiveness and condition, connectivity and ecological functionality;
- d. Details of the implementation measures and management of proposals;
- e. Details of any off-site provision to be secured by a planning obligation;

f. Details of the monitoring and auditing measures.

The proposed enhancement measures shall be implemented in accordance with the approved details and shall be retained in that manner thereafter.

I have the following comments.

The species listed for the habitat creation

The baseline assessment of current conditions on site appears to differ from the 2022 assessment as the site shown in figure 1 does not appear to show arable habitat.

Clarification of the current baseline habitat is required.

The provision of the full BNG calculations have not been provided. A full BNG metric is required so we can assess the pre and post BNG. It is noted that this application was submitted before BNG became mandatory. So, a gain of 10% is unenforceable. However, Policy ENVDM5 does seek ecological gain from developments.

The details of the implementation measures and management of proposals are not sufficient to be confident of the delivery of the BNG habitats.

The post development map should be supported by the BNG metric showing which habitat parcels are which.

There are no management details for the Other woodland; broadleaved, to be enhanced in table 2 and table 3 or elsewhere. So, it is not clear how the woodland enhancement from poor to moderate condition will be delivered, managed or maintained.

The original submission proposed creation of 0.5ha of ONG. The report provided here shows only 0.093ha of ONG being created.

The details for the creation of the Other Neutral Grassland makes no mention of the soil requirements, this applies to the mixed scrub as well. The land was previously arable so is likely to be nutrient rich. This would be unsuitable for the creation of ONG and mixed scrub of moderate condition. Some of the areas of ONG are quite small (80mSq) and may not be viable. Also, one of the areas of mixed scrub is only 20mSq and may not be viable.

Native hedgerow creation contains no details of the planting specification or management.

A detailed specification of the pond being created is required. The pond has a species list including Flag Iris. This plant can rapidly colonise ponds so an alternative marginal species may be better.

There are no details of offsite BNG. Is offsite BNG being provided?

The details of the monitoring and auditing measures are acceptable.

Clarification on these points raised are required before I can recommend discharge of this condition.

Regards,

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

T: 01903 737579

E: [jonathan.best@arun.gov.uk](mailto:jonathan.best@arun.gov.uk)

Arun District Council, Civic Centre, Maltravers Rd  
Littlehampton, West Sussex, BN17 5LF

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