

GCN Site Assessment Update Letter

Location: Land at Oak Tree Caravan,
Bishopstone Lane, Haywards Heath

On Behalf of: Murray Planning Associates Ltd

Produced By: Mr William Mills

Consultant Ecologist

ACIEEM

MSci (Hons)



WM Ecology Ltd

Revision: 02

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This cover letter is to accompany the updated EclA report (WME2508-Ecological Impact Assessment-Rev-01) for the proposals at Land at Oak Tree Caravan, Bishopstone Lane, Haywards Heath. These updates were made to address the comments from NatureSpace which were warmly received.

1.0 NatureSpace Conclusions

The above ecological report states that despite the onsite pond and further ponds located 13m and 19m away from the development boundary, GCN concerns can be mitigated for via Reasonable Avoidance Measures. This is because the habitat to be impacted is stated to only be grassland and hardstanding, and that woodland, pond and scrub will be retained under proposals. However, the habitat map provided depicts an area of scrub around the pond which is present partially on the proposed footprint for the new building and hardstanding. Additionally, site photos suggest that there are areas of overgrown hibernacula surrounding the buildings which are to be demolished. If the onsite pond, or the ponds either side of the development were positive, removing suitable habitat would be a very high risk activity and could result in an offence being committed. Although the development site is small and there are larger areas of grassland being impacted, due to the presence and location of the ponds, it is considered at the very least that GCN would be commuting across the site and would be impacted by the development should the waterbodies be in use by GCN. It is not believed that RAMS could overcome this risk or that the applicant has adequately demonstrated that there will be no impact to GCN and/or their habitat. And so, further information is required on the ponds in order to rule out this risk.

2.0 NatureSpace Recommendations

Therefore, in line with the guidance from Natural England (Great crested newts: District Level Licensing for development projects, Natural England, March 2021), there is a reasonable likelihood that great crested newts will be impacted by the development proposals and therefore, the applicant must either:

- Submit a NatureSpace Report or Certificate to demonstrate that the impacts of the proposed development can be addressed through Mid Sussex District Council's District Licence. This method of licensing often removes the need for survey work and onsite mitigation for great crested newts as it provides compensation habitats off site.

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Relationship between NatureSpace and Mid Sussex District Council Mid Sussex District Council holds a Great Crested Newt Organisational (or “District”) Licence granted by Natural England. This is administered by NatureSpace Partnership through their District Licensing Scheme as the council’s delivery partner. A dedicated ‘District Licensing Officer’ is employed by NatureSpace to provide impartial advice to the council and help guide them and planning applicants through the process. All services and arrangements are facilitated in an unbiased, independent and transparent manner. You can find out more at www.naturespaceuk.com

- Provide further information (information on the ponds with ecological connectivity to the site), in line with Natural England’s Standing Advice, to rule out impacts to great crested newts, or demonstrate how any impacts can be addressed through appropriate mitigation/compensation proposals**; or*

- If it is determined that there is no suitable habitat impacted on site and the likelihood of great crested newts is very low, then a precautionary working statement in the form of Reasonable Avoidance Measures (RAMs)/Non-Licensed Method Statement (NLMS) strategy documents completed by a suitably qualified ecologist may be acceptable for the development.

3.0 Response

- 3.1 After a thorough review of the site and the proposals it has been decided that the concerns relating to GCN from NatureSpace are to be addressed via their third recommendation highlighted in bold above.
- 3.2 To ensure accuracy, an updated site walk over was undertaken on the 10th of April 2026 by a suitably qualified ecologist (William Mills, ACIEEM, MSci (Hons)). This aims of this site visit were to identify the exact location of the proposed building and assess the habitat within and directly adjacent to this area to its suitability for Great Crested Newts (GCN). The results of this survey resulted in an updated site habitat map which can be found within appendix A of this letter.
- 3.3 The corners of the proposed building were accurately placed prior to the visit (with the exception of the north-west post as this would be located within the existing garage building which is to be demolished).
- 3.4 The area directly within the footprint of the proposed building consisted of modified grassland currently managed as a lawn with a very short sward height of <5cm.



Photo 1: A view across the proposed building area depicted within the 3 wooden posts, looking from the south towards the north-west.

- 3.5 Within the proposed construction zone, along the southern aspect of the existing building exists 4 individual tussocks of rush. These are separated from the pond by the short lawn but still have the potential to provide shelter to GCN and other amphibians.
- 3.6 The previous site habitat plan was found to be inaccurate in relation to the extent of the bramble scrub coverage around the existing building and has now been updated within appendix A.
- 3.7 Adjacent to the existing building on the eastern aspect exists a brash pile TN01 which has the potential to provide shelter to GCN and other amphibians.
- 3.8 The adjacent pond underwent a HSI assessment for its suitability to support GCN, the results of which are below:

Table 1: HSI assessment of the pond on site.

SI Description	SI Value
Geographic location	1
Pond area	0.6
Pond permanence	0.9
Water quality	0.33
Shade	0.5
Water fowl effect	0.01
Fish presence	0.67
Pond Density	1
Terrestrial habitat	0.67
Macrophyte cover	0.35
HIS Score	0.41
Pond Suitability	POOR



Photo 2: A view across the pond on site from the east towards the west, displaying the duck house.

4.0 Conclusions and Recommendations

- 4.1 The grassland habitat within and surrounding the proposed construction zone is considered unsuitable for the provision of shelter or foraging recourse for GCN due to its short sward height. However, there is the possibility that GCN may commute across this area to reach more suitable habitat.
- 4.2 As there exists a very small amount of suitable terrestrial GCN habitat to be removed in the form of the 4 individual rush tussocks along the southern aspect of the existing garage building, the Natural England Rapid assessment tool has been used to determine the likelihood of an offence occurring, the results of which are below:

Component	Likely effect (select one for each component; select the most harmful option if more than one is likely; lists are in order of harm, top to bottom)	Notional offence probability score
Great crested newt breeding pond(s)	No effect	0
Land within 100m of any breeding pond(s)	0.001 - 0.01 ha lost or damaged	0.05
Land 100-250m from any breeding pond(s)	No effect	0
Land >250m from any breeding pond(s)	No effect	0
Individual great crested newts	No effect	0
Maximum:		0.05
Rapid risk assessment result:		GREEN: OFFENCE HIGHLY UNLIKELY

- 4.3 The effects upon individual GCN within the rapid assessment was considered to be no effect due to the HSI assessment results of the adjacent pond, the very small amount of affected habitat and the lack of recent records of GCN within 1km of the site as stated within the EcIA report (WM Ecology 2025), which though not conclusive, collectively, these factors indicate that the presence of GCN on site are unlikely. Therefore, the following updated GCN working methods devised with input from NatureSpace, shall be undertaken to further reduce the risk of any potential harm or impacts to GCN from the proposed development:

- The grassland within and immediately surrounding the proposed construction area shall continue to be maintained to a height of <5cm;
- The brash pile and very small areas of suitable habitat (the rushes along the southern aspect of the existing building) shall be removed though the use of hand tools only under the direct supervision of a suitably qualified ecologist. **In the highly unlikely event that any GCN are found all works shall cease and a district level licence obtained from NatureSpace;**
- The removal of the grassland habitat within the proposed construction zone and all trench and footings work shall be undertaken within the winter months to minimise the potential presence of commuting GCN moving across the site and becoming

trapped within footings. Should any trenches, pits or exposed pipework be remain outside of this period, they shall be covered overnight and checked daily for the presence of GCN and other animals prior to works continuing. In the highly unlikely event that GCN are found, all works shall cease whilst a suitably qualified ecologist is consulted for advise;

- As a precautionary measure, to prevent the damage or degradation of adjacent suitable terrestrial GCN habitat around the two buildings to be demolished, the buildings shall be demolished in a sensitive manor whereby the structures shall be made to fall towards the centre of the buildings footprint. Additionally to prevent run off entering the pond, once demolished and rubble removed, the existing caravan area shall be seeded and re-vegetated at the earliest opportunity.
- As a precautionary measure to ensure that the adjacent pond is not impacted by the proposals from pollution events from dust emissions and run off the following measures shall be put in place;
 - A haras fence barrier shall be set up around the pond adorned with a dust protective mesh. The fence shall be placed between 5-10m from the pond where practicable. Where this is not practicable due to construction constraints, the fence shall be located as far away from the pond as possible.
 - The pond protective fencing shall have sand bags lain as the base to prevent any possible run off from entering the pond. In areas where the fence is within 5m of the pond, the sandbags shall be lain 2 bags high to provide extra protection.
 - During the demolition phase of the existing buildings, the buildings shall be watered / hosed down to prevent possible dust emissions.
 - During the construction phase, standard best practices in regards to dust and emissions shall be adhered to including reducing the tipping height of any loads together with watering or hosing down of any loose materials such as gravel/sand.
 - All re-fuelling and fuel storage shall take place in a dedicated space within a bunded area as far away from the pond as possible with dedicated spill kits.

I do hope that the contents of this letter and the changes made to the documents described have adequately satisfied any ecological concerns about the proposed development. However, should more detail or other concerns arise I welcome the opportunity to work with the local planning authority and other stake holders to ensure any appropriate resolutions are made.

Sincerely

Mr William Mills

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Consultant Ecologist

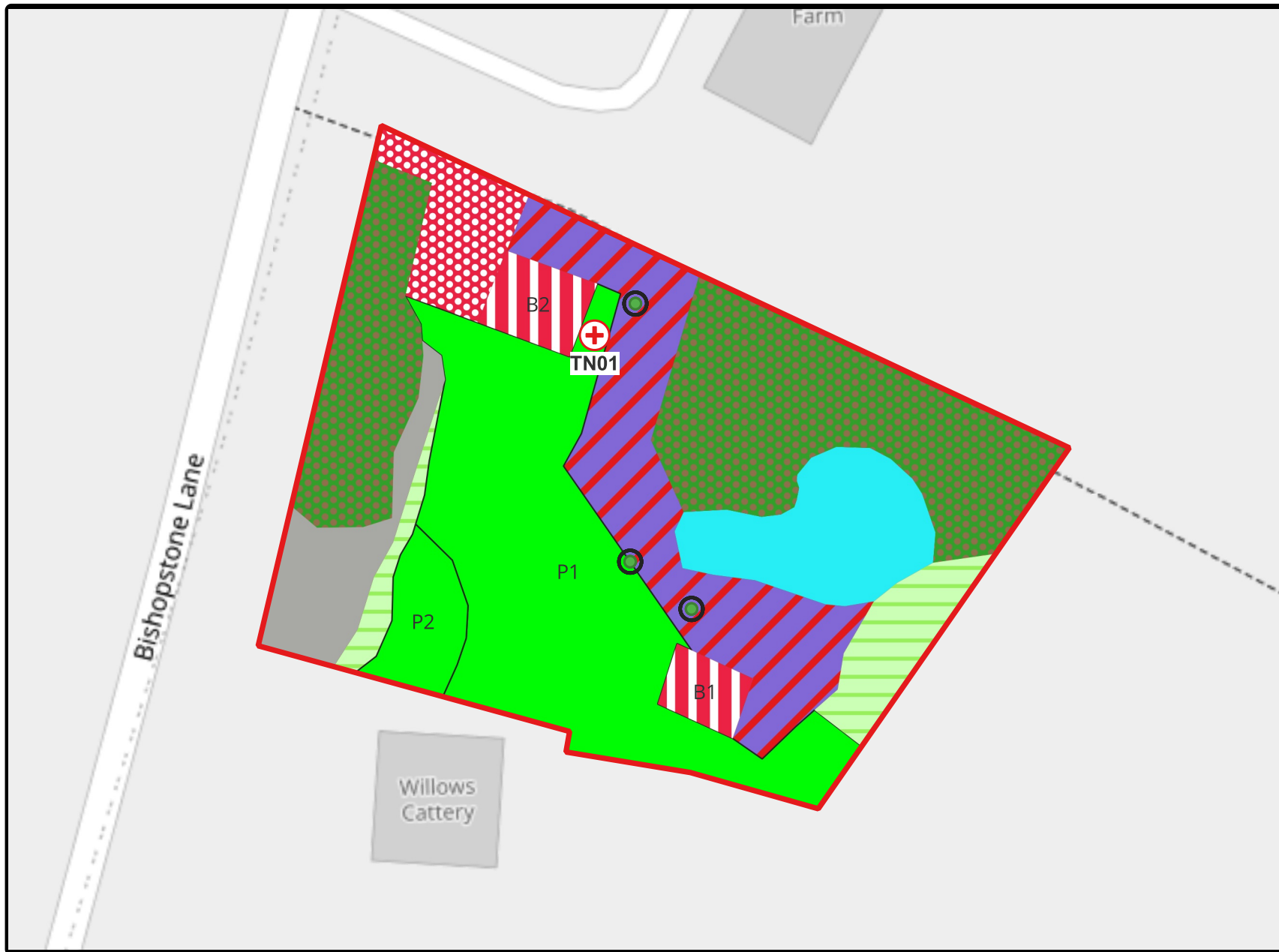
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Appendix A



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Figure No. 01 - Site Habitat Plan

Legend

-  Red Line Boundary
-  Existing Large Rural Tree
-  Existing Medium Rural Tree
-  Artificial unvegetated, unsealed surface
-  Bramble scrub
-  Developed land; sealed surface
-  Modified grassland
-  Other neutral grassland
-  Other woodland; broadleaved
-  Ponds (priority habitat)
-  Ruderal/Ephemeral
-  Target Notes

Client

Murray Planning Associates Ltd

Project Title & Location

Oakwood Caravan,
Bishopstone Lane,
Haywards Heath



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Drawn by	Revision	Date
W M	01	11/04/2026