

From: Laura Downs <Laura.Downs@naturespaceuk.com>
Sent: 25 August 2026 18:00:00 UTC+01:00
To: "Rachel Richardson" <rachel.richardson@midsussex.gov.uk>
Subject: DM/26/1682 | Twineham Court Farm Bob Lane Twineham Haywards Heath

Good afternoon Rachel,

Thank you for consulting us on the above application. I have reviewed the applicant's Reasonable Avoidance Method Statement for Great Crested Newts (CT Ecology, 2026), which states that:

- *"As part of the works, the following elements will impact semi-natural habitats in proximity to the buildings subject to the current proposals: 3) installation of a below ground gas pipe, LPG tank, balancing tank and inspection chambers with associated pipework, including an outflow to the adjacent pond, with works impacting an area of modified grassland and scattered scrub."*
- *"Great crested newt surveys undertaken at the site in 2023 identified a low population of great crested newt within a pond within the wider Twineham Court estate, located approximately 20m to the east of the working area, and within a pond off-site approximately 95m to the south-west."*
- *"There are no water bodies within the main proposed working area however the drainage pipe will be installed to flow into the pond within the wider Twineham Court Farm estate; located approximately 20m to the east of the barn."*
- *"Given that a low non-breeding population of great crested newt have been identified within the pond in the wider site, the potential presence of great crested newt throughout terrestrial on-site habitats can be assumed, with the population safeguarded through the avoidance of impacts that may arise as a result of the works. This method statement includes a series of reasonable avoidance measures (RAMs) which will allow the works to proceed without impacting on protected species."*

The applicant has submitted the above application in support of the discharge of their RAMS condition in relation to GCN. We did not comment on the original application, however as highlighted within the report, the proposed works will be impacting grassland and ruderal habitat within close proximity of two GCN positive ponds. Additionally and more pertinently, whilst we do not believe it was mentioned within the original PEA, the Reasonable Avoidance Measures statement has explained that the proposed drainage system will require an outflow pipe to be installed within the GCN positive pond located 20m east of the site. Although the Natural England rapid risk assessment tool has been used as part of the justification for the use of RAMS here (with a "green: offence highly unlikely" result returned), this assessment has not included the impacts that will be required on potential breeding habitat, which would produce a "red: offence highly likely result".

As such, the works that have been proposed are highly likely to disturb both GCN and their aquatic and terrestrial habitats, therefore we are of the opinion that a licence would be required for these works. We recognise that Place Services have recommended the approval of this application, however in light of the above details we are unable to recommend the discharge of condition 8.

Best wishes,

Laura Downs (*she/her*)

District Licensing Officer (Great Crested Newts) – West Sussex

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