

From: Laura Downs <Laura.Downs@naturespaceuk.com>
Sent: 20 May 2026 18:00:00 UTC+01:00
To: "Andy Watt" <andy.watt@midsussex.gov.uk>
Subject: DM/26/0171 | Oak Tree Caravan Bishopstone Lane Ansty Haywards Heath

Good afternoon Andy,

Thank you for re-consulting us on the above application. I have reviewed the applicant's latest ecological information, *GCN Site Assessment Update Letter, Land at Oat Tree Caravan, Bishopstone Lane, Haywards Heath, WM Ecology, April 2026*, which states that:

- *"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."*
- *"Within the proposed construction zone, along the southern aspect of the existing building exists several clumps 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"*
- *"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."*
- *"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 EclA report (WM Ecology 2025), which though not conclusive, collectively, these factors indicate that the presence of GCN on site are unlikely."*
- An updated working method statement is then included which includes the point: *"In the highly unlikely event that any GCN are found they shall be placed within retained suitable habitat on site away from the proposed construction area"*

The updated habitat plan does now show a reduced area of scrub impacted by the development. As the above report has mentioned, there is an area of rush which is still to be impacted. Whilst we do agree that it will only be a small amount of highly suitable habitat removed to facilitate proposals, the number of unsurveyed ponds on and around the site greatly increase the risk to individual great crested newts should any of these waterbodies be positive. This has somewhat been acknowledged within the report, however hasn't been given as much weight as other factors for example HSI, for which it is important to note cannot replace GCN surveys as the system is not precise enough (e.g. there is considerable overlap in [HSI] scores for ponds with and without confirmed occupancy).

For this development, as mentioned, the risk would be especially high for individual newts. A measure which has been proposed in order to mitigate this risk is to relocate GCN to other suitable habitat should they be discovered. However this is a licensable activity, and doing so under a PWMS would therefore constitute an offence. If it is decided that a PWMS is

acceptable, should GCN be found on site, the development would need to stop immediately and professional advice/a licence sought.

Ultimately we would recommend that further survey work is undertaken here on the closest ponds at the very least, to determine the level of risk and required mitigation. If the LPA decide that a PWMS would be appropriate here, the current statement will need editing and strengthening.

Best wishes,

Laura Downs (*she/her*)

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