



**REASONABLE AVOIDANCE MEASURES
METHOD STATEMENT
(RAMS)
FOR GREAT CRESTED NEWT**

TELBRIDGE PROPERTIES

TWINEHAM COURT FARM
BOB LANE, TWINEHAM
WEST SUSSEX
RH17 5NH

01ST JULY 2026

REF: 22076

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1. INTRODUCTION

Rationale

- 1.1 CT Ecology Limited was commissioned by Telbridge Properties to compile a Reasonable Avoidance Measures (RAMs) document for great crested newt (*Triturus cristatus*) to guide renovation works to the existing farmhouse together with works to convert an existing storage building within land at Twineham Court Farm in the Mid Sussex District of West Sussex (hereafter referred to as “the site”).
- 1.2 As part of the works, the following elements will impact semi-natural habitats in proximity to the buildings subject to the current proposals:
 - 1) provision of a patio adjacent to the southern elevation of the farmhouse, impacting an area of modified grassland;
 - 2) extension to an existing path leading from the eastern elevation of the farmhouse, impacting an area of modified grassland; and
 - 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.
- 1.3 The requirement for a RAMs document has been conditioned as part of the associated planning consent in place for the site (Planning Reference: DM/23/2386). Condition 8 states:

‘Prior to the works commencing a precautionary working method statement provided by a suitably qualified ecologist shall be submitted to and approved by the Planning Authority.’
- 1.4 This document has been informed by a Preliminary Ecological Appraisal undertaken at the site in 2023 (CT Ecology 2023) together with a series of great crested newt surveys (CT Ecology 2024).
- 1.5 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. Based on the distribution of great crested newts, it can be assumed that the ponds support the same metapopulation, with individuals passing through on-site terrestrial habitat between these two ponds including areas of scrub and grassland. Scattered rubble piles within the wider farm estate may also provide hibernaculum for this species at certain times of the year.

- 1.6 Although the farm pond has been confirmed as supporting a low population of great crested newt, due to an absence of individuals in surveyed ponds within 250m to the north-east, the distribution of newts is considered likely to be concentrated between the farm pond and the network of ponds to the south-west of the site.
- 1.7 The site is not subject to any statutory or non-statutory designations. 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.
- 1.8 The evaluation was undertaken by Carly Teague a suitably qualified and experience ecologist with over 18 years' experience, including extensive experience in great crested newt survey, evaluation, licensing and mitigation for both large and small-scale development projects.
- 1.9 Carly Teague has held a number of Natural England European Protected Species Mitigation Licences in respect to great crested newt and currently holds a Natural England Class 1 Survey Licence 2025-82153-SCI-CL08.
- 1.10 The methods and mitigation applied at the site have been compiled to ensure that great crested newts will not be adversely affected by the proposed works.
- 1.11 The method statement applies solely to the works associated with farmhouse and annexe building, as indicated on the proposed site layout plan provided by the client which is appended to this document (Figure 1).

Development Proposals

- 1.12 Proposals are for the conversion of a storage building for residential use, located wholly within hardstanding together with alterations to the existing farmhouse, to include provision of a patio adjacent to the southern elevation; extension to an existing path leading from the eastern elevation; and installation of a below ground LPG tank, and gas pipe within grassland to the south of the farmhouse, together with routing an outflow pipe to the pond in the wider farm estate to the east. Works will result in the permanent loss of 13m² modified grassland (patio and pathway and inspection chambers); and the temporary loss of 45m² modified grassland (LPG tank, gas pipe, discharge pipe) and the temporary loss of 10m² ruderal vegetation (earth mound) and 5m² scrub (drainage pipe). No other semi-natural habitats will be impacted.

Site Description

- 1.13 The site is within a rural location within the north-western extent of Twineham, in the Mid Sussex District of West Sussex at National Grid Reference TQ245 208. Twineham Court Farm extends over approximately 3 hectares (ha) and is dominated by a series of former farm buildings with associated fields, boundary features and a pond. Vehicular access is via an unmade track extending from Bob Lane to the south.
- 1.14 Semi-natural habitats subject to the proposed works comprises approximately 75m² comprising modified grassland, ruderal vegetation and scrub.
- 1.15 Twineham Court Farm is bounded by a combination of grazed fields and a large electricity substation to the north, grazed fields to the east and west and south beyond Bob Lane. A woodland block is also to the west. In the wider surrounds, a combination of pasture and arable fields are located in all directions together with areas of woodland and residential properties. The town of Burgess Hill is approximately 5km to the south-east.

Great Crested Newt Background Information, Evaluation & Population Data

- 1.16 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. There are a further 11 ponds within 500m of the site. In addition to the on-site pond, a total of seven further ponds within 250m of the site were subject to targeted great crested newt surveys in 2023. A low population of great crested newts were found within the pond subject to the current works in addition to a pond approximately 95m to the south-west of the proposed working area at its closest point.
- 1.17 A total of five PSML's returned within a 1km radius of the site related to great crested newt; from 2014, 2015, 2016, 2017 and 2018, all of which are located between 150m and 550m to the north-west.
- 1.18 A total of 24 licence returns in respect to great crested newt have also been returned within 1km of the site.
- 1.19 The data search returned 61 recent (post 2011) records for great crested newt within 2km of the site. No records were returned from within the site. The closest record was from a woodland pond approximately 60m to the west of the proposed working area, where a small population of great crested newt were recorded in 2019. A low population has also been returned from a network of three ponds between 95m and 135m to the south-west of the proposed working area, one of which supported the low population of great crested newts during the 2023 pond survey.

1.20 Semi-natural habitats subject to the works comprise modified grassland together with a discrete area of ruderal vegetation which has colonised an earth mound together with an area of scrub at the pond edge. The grassland showed signs of being subject to intensive management over a prolonged period. The sward was dominated by a small number of coarse grassland species which were indicative of regular, long-term management and included Yorkshire fog (*Holcus lanatus*), cock's-foot (*Dactylis glomerata*) and perennial ryegrass (*Lolium perenne*). Forbs were restricted within the sward and included creeping buttercup (*Ranunculus repens*), daisy (*Bellis perennis*), and toothed medic (*Medicago polymorpha*). The scrub comprised a mix of willow (*Salix* sp.) and hawthorn (*Crataegus monogyna*) with bramble (*Rubus fruticosus* agg.). These habitats are considered to provide potentially suitable terrestrial habitat for amphibians during their terrestrial phase, providing connectivity to terrestrial habitats in all directions together with ponds to the east and south-west however due to the managed nature of the grassland, cover opportunities are limited throughout the majority of the proposed working area, with sheltering opportunities limited to approximately 10m² of ruderal vegetation which had colonised an earth mound to the south-east of the barn.

1.21 A RAMs is considered appropriate and sufficient to guide the proposed works based on the reasons outlined below.

- * Impacts to the on-site pond will be minimal and impacts to great crested newts can be suitably mitigated for through careful timing of the works;
- * the closest breeding pond is over 90m from the works;
- * semi-natural habitats to be impacted by the works are discrete in nature, restricted to approximately 75m²;
- * the proposed working area is dominated by managed grassland with limited sheltering opportunities for great crested newts;
- * works impacting semi-natural habitats will be of short duration; completed within one week;
- * works will not serve to negatively impact the dispersal ability of great crested newts, with 45m² grassland, 10m² ruderal vegetation and 5m² scrub being reinstated after works and the patio, pathway and inspection chamber areas being small (13m²) and located adjacent to the existing farmhouse building or immediately adjacent to the existing access track. Newts will be able to continue to pass between terrestrial habitats in the wider landscape;
- * the habitats affected by the proposal have limited value to foraging or overwintering newts; and
- * the site preparation and construction phases can be managed whereby any likely negative effects on great crested newt can be effectively removed.

- 1.22 Based on the above information, Reasonable Avoidance Measures (RAMs) are the appropriate course of action in respect of great crested newt at the site.
- 1.23 The RAMs evaluation is based upon Natural England guidance and the ecologist's expert knowledge of the species and its requirements. In this instance it is considered that the proposals are not licensable and potential impacts can be effectively removed by the implementation of RAMs, with works unlikely to have any detrimental effect on the conservation status of this species.
- 1.24 Applying Natural England's Risk Assessment tool to the site with the implantation of reasonable avoidance measures, provides a result of "Green: offence highly unlikely". This indicates that the proposed activities are of such a type, scale and location that it is highly unlikely any offence would be committed should the works proceed. Therefore, no licence is required providing that a series of non-licensed avoidance measures are adopted in order to fully safeguard this species.
- 1.25 The current advice provided by Natural England is as follows¹:

'Licensable activities should ideally be designed out of developments during the early planning stages. This should result in avoiding harm to great crested newt populations, and can save developers the time and expense of licensed mitigation measures. Many potentially licensable activities can in fact be avoided by careful planning of the development combined with simple precautionary measures. In many cases, adopting such an approach may mean that no licence is required (as no offence would be committed). Even when a licence is applied for because you decide an offence is likely, such measures can still be employed to reduce the level of harm to newt populations. This application tool helps you to plan non-licensed avoidance measures for common development scenarios. You may also use them in licensed projects to reduce impacts.'

- 1.26 Based on the known population of great crested newts in ponds within 250m of the working area, without the implementation of RAMs, the possible effect on great crested newts would be moderate and impacts might include harm to individual newts crossing through the grassland during the works, becoming trapped in excavations and sheltering in any stored materials adjacent to the storage building, and therefore being disturbed during the on-site activities.

¹ Template for Method Statement to support application for licence under Regulation 55(2)(e) of The Conservation of Habitats and Species Regulations 2017 (as amended) in respect of great crested newts *Triturus cristatus*. Form WML-A14-2 (Version April 2020).

- 1.27 If RAMs are implemented, then these risks can be removed and the effect on great crested newts is predicted to be no effect-negligible.

2. REASONABLE AVOIDANCE MEASURES METHOD STATEMENT

Description of Habitats Affected Under the RAMs

- 2.1 Semi-natural habitats affected by the proposals comprise modified grassland to the south of the farmhouse and grassland/ruderal and scrub adjacent to the pond. All works associated with the storage building are within areas of hardstanding. Photographs showing the working area are provided below.



Photograph 1: A view south towards the storage building being converted. The building is situated in an existing yard comprising hardstanding which extends in all directions.



Photograph 2: A view east towards the storage building.



Photograph 3: Looking south towards the farmhouse. Drainage works will be in grassland to the south of the farmhouse.



Photograph 4: Looking north towards the farmhouse. The patio will extend along this elevation.



Photograph 5: Looking north-east towards the location of the drainage pipe to be routed to the pond, through an area of ruderal vegetation over an earth mound.



Photograph 6: Looking west across the pond to the east of the barn within which the drainage pipe will be routed. A small population of great crested newts have been identified within this pond.

Precautionary Working Practices

- 2.2 The following section outlines RAMs that will ensure that great crested newts are fully safeguarded during the site preparation and construction/installation phases of works.

Site Preparation

- * All grassland/ruderal and scrub within the working footprint must be managed at ground level in the lead-up to the works commencing;

- * Scrub must be cleared outside the nesting bird season and within the active period for great crested newts; with clearance works possible between **September and October** inclusive;
- * Immediately prior to commencing works, the top soil/surface material must be removed under an ecological watching brief using an excavator or similar. The ecologist will check the top soil for sheltering newts and any other debris that is exposed by the excavator. The section of the earth mound must also be removed at this time. This must be carried out in the active period for great crested newts, taken to extend between **March and October** inclusive;
- * if any newts are found during the site preparation works then all activities must cease immediately and the working methodology updated accordingly. This may include the need to obtain a suitable great crested newt licence; and
- * any other species found during the site preparation phase will be removed from the site and relocated to land within the wider estate.

Site Storage

- * All materials and machinery will be stored on existing areas of hardstanding within the centre of the farm estate. Migration by great crested newts is considered least likely through this central area which is already subject to regular disturbance and is isolated by hardstanding and associated buildings to the north, east and west;
- * no barrier effects are predicted and any great crested newts can travel freely through the area should they choose to do so;
- * in addition, all stored materials will be raised off the ground on pallets or skids to further remove any refuge potential for great crested newts; and
- * aggregates such as gravel and sand must be delivered in bulk bags and stored on pallets rather than piled on site to create potentially suitable 'refuge piles'.

Construction/Installation Phase

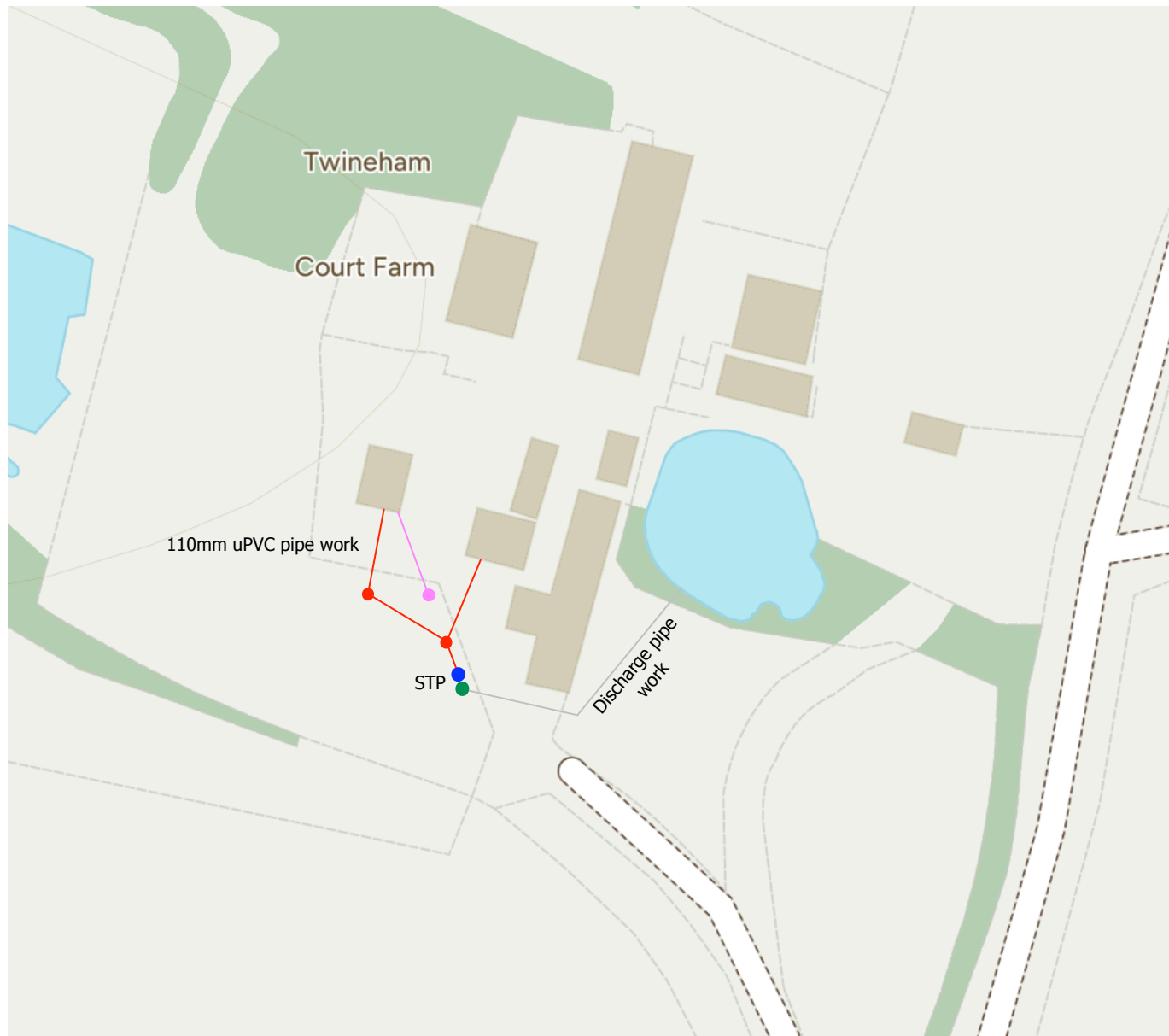
- * Any excavations must be back-filled overnight, if this isn't possible then earth ramps must be left in the trench(es) to allow animals, including great crested newts, to easily climb out;
- * the landowner/contractor must inspect any excavations each morning to check that great crested newts are not present prior to commencing works that day;
- * works must be completed as quickly as possible within a few days;

- * the pipe installation works into the bank of the pond must be completed under an ecological watching brief and using hand tools only. This must be undertaken when newts are less likely to be in the pond and outside of hibernation therefore works to install the pipe into the pond must be carried out between **September and October** inclusive;
- * if any newts are found during the construction phase, then all activities must cease immediately and the project ecologist contacted for advice. An appropriate working methodology will need to be devised and this may include the need to obtain an appropriate great crested newt licence to enable activities to continue; and
- * any other species found during the site preparation phase will be removed from the site and relocated to land off-site to the south within the wider farm estate.

3. REFERENCES

- * CT Ecology (2024) *Great Crested Newt, Bat and Reptile Survey Report for Land at Twineham Court Farm, West Sussex*. Unpublished report for Wilbury Planning Ltd. CT Ecology: East Sussex.
- * CT Ecology (2023) *Preliminary Ecological Appraisal for The Farmhouse, Twineham Court Farm, West Sussex*. Unpublished report for Wilbury Planning Ltd. CT Ecology: East Sussex.
- * Froglife (2001) *Great Crested Newt Conservation Handbook*. Froglife.
- * Joint Nature Conservation Committee, (1998) *Herpetofauna Workers' Manual*. JNCC, Peterborough.
- * Multi-Agency Geographic Information for the Countryside (2026) (MAGIC). *MAGIC* Natural England, Leeds. [on-line]. Available from: www.magic.gov.uk [Accessed on 12/05/2026].
- * Natural England (2020). *Template for Method Statement to support application for licence under Regulation 55(2)(e) of The Conservation of Habitats and Species Regulations 2017 (as amended) in respect of great crested newts Triturus cristatus*. Form WML-A14-2 (Version April 2020).
- * Natural England (2001) *Great Crested Newt Mitigation Guidelines*. Natural England.

Appendix A
Plan of Proposed Drainage Works



KEY

- SABRE
- Balancing tank
- Inspection Chamber
- 100mm uPVC
- 63mm mDPE
- LPG Tank
- Gas pipe