

Sam.Whitehouse

From: Laura Downs <Laura.Downs@naturespaceuk.com>
Sent: 27 November 2025 15:29
To: Sam.Whitehouse
Subject: Re: DC/25/0523 - Land North of East Street.

Good afternoon Sam,

Thank you for reconsulting us on the above application in regards to the applicant's most recent GCN technical response (*Technical response - planning ref DC/25/0523, Land North of East Street Rusper West Sussex, Ecology Partnership, November 2025*). Within this statement it states:

- *"The proposed works will retain the majority of optimal habitat on site , with the only c.0.03 ha of this habitat lost during construction. The majority of loss of habitat being the central grassland which comprises short-sward sheep-grazed grassland, a sub-optimal habitat for GCN (See Figure 1 below)."*
- *"Figure 2 overleaf shows the confirmed un-surveyed ponds with direct connectivity to the site with a 50m buffer (green) and 100m buffer zone (yellow). The construction area is entirely outside the 100m buffer zones, with the closest point being c.120m from the nearest pond, and the more optimal habitat c.175m."*
- *"Taking this into consideration, it is considered that no further surveys are necessary so long as Reasonable Avoidance Measures (RAMS) are carried out when undertaking ground works on site."*

The above report has ruled out ponds within the landscape in part due to the absent result recorded within one pond, however it is important to note that GCN often inhabit pond clusters and move between waterbodies with varying frequency, and as it stands there is a recently positive pond within the landscape. Although generally we would request surveys up to 500m (dependent on factors), due to the small proportion of optimal habitat which is due to be impacted in this case, we would consider that Reasonable Avoidance measures could be appropriate here. We do feel it important to mention however that there is still a risk associated with this option due to the pile of broken rubble and scrub to be removed, and due to the presence of unsurveyed ponds with connectivity to the site.

Therefore, we would suggest that the applicant has two options:

- **Precautionary Working Methods Statement** - If the applicant does not wish to take the district licensing route, a precautionary approach would be acceptable due to the low scale of impacts. If this option is taken, we would recommend that the measures included within the submitted technical statement are secured via a compliance condition.
- **District Licensing Scheme** – Potential impacts to great crested newts can be dealt with through Horsham District Council's District Licence. In order to take this route a NatureSpace Report or Certificate must be submitted prior to determination. This option provides certainty and avoids potential delays should great crested newts be encountered

Best wishes,