

Precautionary Working Methods Statement (PWMS): Reasonable Avoidance Measures for Great Crested Newts

Development: One New Build House

HDC Planning Reference: Application No. DC/23/1442

Location: Land Adjacent to Coombe Cottage, Mannings Heath, West Sussex,
United Kingdom RH13 6JE

Client: Mr & Mrs Equi

Date: November 2025

Introduction

This Precautionary Working Methods Statement (PWMS) has been prepared to support the proposed development of a single residential dwelling in Mannings Heath, West Sussex. The site lies within an area where Great Crested Newts (GCN) *Triturus cristatus* are known to occur, and there is a need to demonstrate compliance with relevant legislation protecting this European Protected Species (EPS).

This PWMS outlines the context, relevant legal obligations, and the precautionary measures that will be adopted to avoid any potential harm to GCN during the construction process. It also includes optional biodiversity enhancements to support amphibians and other native wildlife in the long term.

1. Context and Objectives

The proposed development site is located on previously unmanaged or semi-natural land within a semi-rural village setting. The Local Planning Authority (LPA) has concluded that there is potential for GCN to be present in the surrounding landscape. While no ponds were found directly on-site, ponds and suitable terrestrial habitats exist within 250–500 metres — a range known to be within the dispersal distance of GCN.

Although a full EPS mitigation licence is not required, reasonable avoidance measures (RAMs) must be put in place to ensure compliance with wildlife law. This document has the following key objectives:

- To ensure the development avoids committing an offence under the Conservation of Habitats and Species Regulations 2017.
- To set out precautionary working practices that minimise the risk of killing or injuring Great Crested Newts.
- To support the Local Planning Authority (LPA) and statutory consultees in assessing the ecological risks and proposed mitigation.

- To suggest optional biodiversity enhancements that support the aims of the Environment Act 2021 in delivering Biodiversity Net Gain (BNG).
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2. Legislation

Great Crested Newts and their habitats are protected under the following key pieces of legislation:

- **The Conservation of Habitats and Species Regulations 2017 (as amended):**
It is an offence to:
 - Deliberately capture, injure or kill a GCN.
 - Deliberately disturb GCN in such a way that is likely to impair their ability to survive, breed, reproduce, or rear young.
 - Damage or destroy a breeding site or resting place.
- **The Wildlife and Countryside Act 1981 (as amended):**
Provides additional protection against intentional or reckless disturbance and damage to habitats.
- **Environment Act 2021:**
Introduces statutory Biodiversity Net Gain (BNG) requirements and a broader duty on public bodies to conserve biodiversity.

Given the strict legal protection, even small-scale developments must ensure that appropriate measures are taken to avoid harming this species.

3. Great Crested Newt Identification

GCNs are the largest of the UK's native newt species and can be identified by the following characteristics:

- **Size:** Adults typically measure 12–16 cm.
- **Colour:** Dark brown to black, warty skin with white-tipped warts.
- **Belly:** Bright orange or yellow with irregular black blotches.
- **Males:** Possess a jagged crest along the back and tail during the breeding season (spring).
- **Tail:** Long and laterally flattened, with a silver or white flash on the lower edge in males.
- **Adults:** Are easily distinguished from the two other native newt species, the smooth and palmate newts, by size and colouring; these two smaller species reach a maximum of around 100mm.
- **The skin** of adult crested newts is granular in appearance. It has a black or dark brown background colour with darker spots that in males extend onto the crest. It has very fine white spots on the lower flanks.
- **Juveniles:** On leaving water, great crested newt juveniles are similar in appearance to adults, apart from lacking the black spots/patterns that develop on the orange belly as they grow. The pattern becomes 'fixed' as the adults approach maximum size.



- The male (above) has a jagged crest along the back that dips at the rear of the abdomen, and a smoother edged crest above and below the tail. The crest decreases in size outside the breeding season. There is a white, silver or grey stripe running from the tail tip along the central, fleshy section of the tail that fades as it approaches the abdomen.

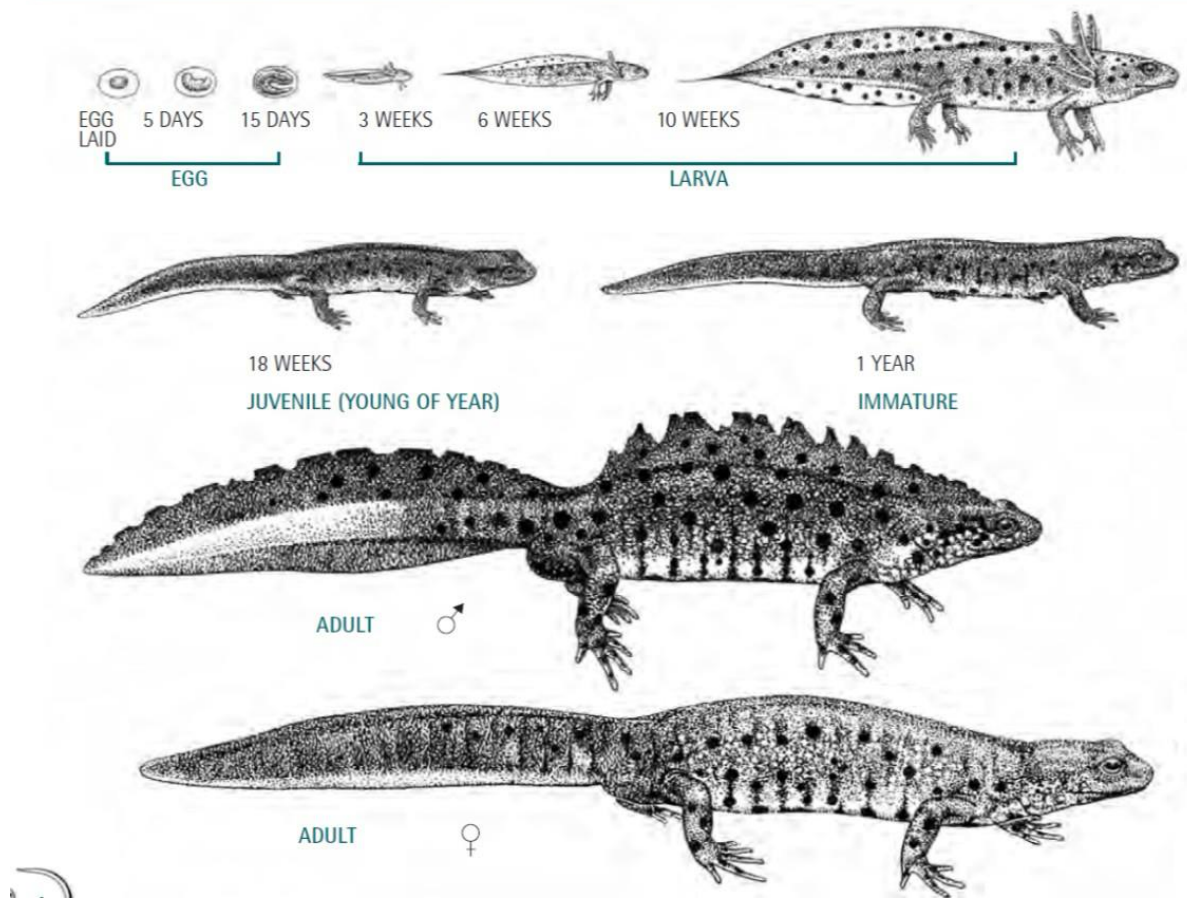


- Females (above) lack a crest and white tail stripe, but have a yellow-orange stripe running along the bottom edge of the tail. Both sexes have a vivid orange or yellow belly with an irregular pattern of dark black spots or blotches.



- Comparison (above): Great Crested Newt (darker) & Smooth Newt. Distinguishing GCNs from smooth and palmate newts is important, and only trained ecologists should handle or identify GCNs during surveys.

Fig. 1 Typical growth and development of great crested newt shown at approximately life size



4. Where Amphibians Might Be Found When Not Breeding in Ponds

GCNs spend a significant portion of their life in terrestrial habitats, especially outside the breeding season (typically March to June). They can travel several hundred metres from their breeding ponds.

Key terrestrial habitats used by GCNs include:

- Dense vegetation such as hedgerows, scrub, and tall grass
- Log piles, rubble piles, or compost heaps
- Disused mammal burrows
- Cracks and voids under paving slabs or building materials
- Leaf litter and woodland edges

During hibernation (usually November to February), GCNs seek frost-free refuges such as:

- Tree root systems
- Underground crevices
- Cellars or old foundations

- Beneath stones or deadwood

All these habitats may exist in or around the proposed development site and must be considered during site clearance and construction works.

5. Timing and Responsibility

Timing of Works:

- **Best practice clearance period:** March to October, thereby avoiding the hibernation period (November – February inclusive).
- **Avoidance of hibernation period:** Ground works should ideally not occur during November to February when GCNs may be hibernating and less able to move away from danger. Any ground works undertaken in this period should be undertaken in a phased manner and encompass a finger-tip search around all potential refugia being careful of any sheltering amphibians and/or any other potential species (e.g. reptiles). Duration of groundworks should be kept as short as possible and ideally during daylight hours only as GCNs are most active at night.

Responsibility:

- The **Principal Contractor** is responsible for ensuring site operatives follow this PWMS.
 - All operatives will receive a **toolbox talk** prior to works, outlining GCN identification and reporting procedures.
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6. Precautionary Working Methods

The following RAMs will be implemented:

Pre-Commencement Site Walkover

- Conducted prior to site clearance.
- Identifies any potential refuge features (e.g. logs, rubble, or dense vegetation).

Toolbox Talk

- All contractors to receive a talk about amphibians, legal protection, and procedures if a GCN is encountered.

Vegetation Clearance

- Undertaken in two phases:
 - **Phase 1:** Cut vegetation to 150 mm using strimmers.

- **Phase 2:** After 24 hours, cut to ground level.
- Carried out in a directional manner (e.g., toward adjacent retained habitats).

Hand Searches and Supervised Clearance

- Carried out in high-risk areas (e.g. under debris or structures).
- If refugia are discovered, they will be dismantled by hand and checked for GCN.

Storage of Materials

- No construction materials, soil, or rubble will be stored on vegetated ground.
- Designated areas will be used, ideally on existing hardstanding or laid ground protection (e.g. Terram).

Excavations and Trenches

- Covered overnight or fitted with escape ramps.
- Checked each morning for trapped wildlife.

Lighting and Disturbance

- Site lighting will be minimised and directed away from retained habitats.

Contingency Plan

- If a GCN is found during works, all activity must cease.
- Works may only resume once a suitable course of action has been agreed, possibly requiring a licence from Natural England.

7. Optional Biodiversity Enhancements

Although not legally required, the following enhancements are recommended to support amphibians and help deliver local biodiversity targets:

Creation of Terrestrial Refuge Features

- Install **hibernacula**: log piles, rubble heaps, or buried chambers filled with natural material.
- Location: Shaded areas near vegetation or hedgerows.

GCN-Friendly Landscaping

- Use native plant species to promote invertebrate populations (newt food source).
- Maintain connectivity between habitats using low fencing or open hedgerows.

Wildlife-Friendly Boundaries

- Permeable fencing (e.g. hedgehog gaps) allows amphibians to move freely between gardens and habitats.

Educational Signage or Homeowner Information

- Provide information to future residents about GCNs and how to maintain wildlife-friendly gardens.
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Conclusion

This PWMS demonstrates a robust, legally compliant approach to minimising the risk to Great Crested Newts during the construction of a single new dwelling in Mannings Heath, West Sussex. By adhering to the precautionary methods outlined above, the developer and contractors will significantly reduce the likelihood of causing harm to this protected species, thereby complying with national legislation and contributing positively to local biodiversity.

A site-specific version of this document should be kept on-site and referenced throughout the development process. All contractors should be made aware of its contents and their responsibilities.

End of Document

Prepared in accordance with Natural England guidance and CIEEM best practice.