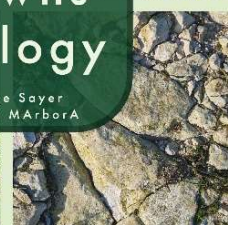
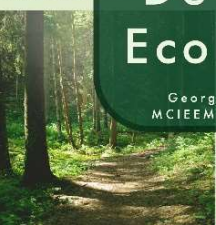
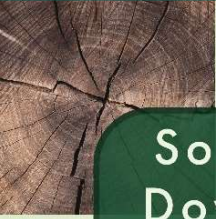




Great Crested Newt Response

Land at Swains
Farm, Henfield



South
Downs
Ecology

George Sayer
MCIEEM MARBORA

Great Crested Newt Response

Land at Swains Farm, Henfield, West Sussex

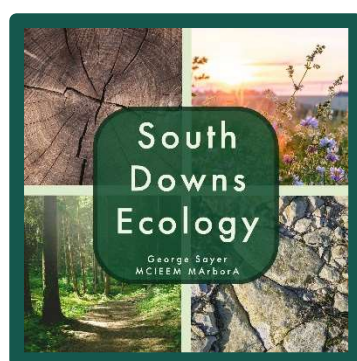
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VERSION 1 – 18th September 2026

Produced by George Sayer MCIEEM MArborA, South Downs Ecology

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1.0 Introduction

- 1.1 Manorwood Ltd, on behalf of the owners of Land at Swains Farm, Henfield, have engaged South Downs Ecology to respond to the great crested newt (hereafter GCN) comments made by NatureSpace Partnership on application DC/26/1003 (consultation response dated 7th September 2026).
- 1.2 The following commentary has been completed by George Sayer (MCIEEM) Director of South Downs Ecology. I have worked full-time in Ecology since 2016 and have undertaken a wide range of ecological, Arboricultural and landscape projects in this time, including numerous residential projects. I hold a Natural England GCN class survey licence.
- 1.3 This note should be read alongside the Ecological Impact Assessment v3 (South Downs Ecology, 7th May 2026) and the Great Crested Newt HSI Survey and Site Risk Assessment (Sylvatica Ecology, 27th November 2023) appended to it. The relevant comments from NatureSpace are summarised first, followed by our response.

2.0 Comments from Naturespace

Naturespace – 7th September 2026

- 2.1 **Summary:** NatureSpace note that the site falls within the amber impact risk zone for GCN, that there are 12 ponds within 500 m (the closest being on site), that there are a few recent GCN records within 500 m, and that there is direct connectivity between the site and surrounding features in the landscape.
- 2.2 **Conclusion:** NatureSpace note that on the previous application the on-site pond (P1) was not holding water and so could not be subject to eDNA survey. They state that the pond has now been confirmed to hold water, that clearance has reduced shading and “improved suitability”, and that positive GCN records from 2023 to the west of the site have direct connectivity to P1. They consider that suitable terrestrial habitat and hibernacula remain on site and that, with the barn to be demolished close to a pond holding water, the risk from the development has increased since the previous scheme.
- 2.3 **Options:** The applicant is asked to either (a) submit a NatureSpace Report or Certificate to enter Horsham District Council’s District Licence; (b) provide survey information on the on-site pond in line with Natural England’s Standing Advice; or (c) where no suitable habitat is impacted and the likelihood of GCN is very low, provide a precautionary Reasonable Avoidance Measures (RAMs) / Non-Licensed Method Statement (NLMS) prepared by a suitably qualified ecologist.

3.0 Response to Comments

Suitability of the On-site Pond (P1)

- 3.1 P1 is a very small pond of approximately 22 m² on the fringe of the woodland in the south-east corner of the site. It was assessed by Sylvatica Ecology in November 2023, scoring 0.38 on the Habitat Suitability Index (HSI; Oldham et al., 2000), placing it in the 'poor' category. The pond was scored as 100% shaded, of poor water quality, with no macrophyte cover and as drying annually.
- 3.2 Our own survey of 24th April 2024 concurred with this. The pond was heavily shaded, relatively full of leaf litter and displayed both algae and surface scum, with no aquatic macrophytes. By 21st June 2024 the pond was effectively dry.
- 3.3 NatureSpace state that the pond is now holding water, and therefore does so in some years. The observation in question was made on 27th April 2026. Late April is when small, rain-fed ponds are often at their fullest, and in April 2024 P1 also held water, only to dry out by late June. Holding water in spring is therefore not new information. The significance to GCN is whether water is retained long enough for larvae to complete development; GCN larvae do not typically metamorphose until late summer (August to September). A pond that dries by mid to late June, as P1 did in 2024, cannot support successful GCN breeding even if eggs are laid.
- 3.4 The clearance around the pond has increased sunlight and will reduce leaf litter, which will benefit the pond over time. However, on 27th April 2026 the water was turbid and brown-green, suggesting nutrient enrichment, and there were still no aquatic macrophytes. GCN lay their eggs individually, wrapped in the leaves of submerged and emergent plants, so the pond currently lacks suitable egg-laying substrate other than leaf litter, and the turbidity would make male displays impossible.
- 3.5 If the 2023 HSI is recalculated with the shading factor set to 0% (i.e. treating the clearance as removing all shade), the score rises only to approximately 0.45, which remains within the 'poor' category. The pond's suitability is limited mainly by its very small size, its tendency to dry out, its water quality and its lack of vegetation, not by shading alone.

Timing of the Clearance and Likelihood of Colonisation

- 3.6 The clearance around P1 was undertaken by the landowner at some point between the 2024 surveys (the last visit being in June 2024) and the update visit on 27th April 2026. At the time of the update visit the clearance appeared recent, with bare ground and early ruderal regrowth, mainly nettle.
- 3.7 This means that at most one breeding season (spring 2026) has passed since the pond was opened up. During that season, at the time of our visit in late April, the pond remained turbid and lacked any vegetation. GCN show strong fidelity to their breeding ponds, with adults typically returning to the same pond each year. New or restored ponds are usually colonised gradually, mainly by juveniles dispersing from a nearby source population, and this generally takes several breeding seasons. It is therefore very unlikely that GCN have colonised P1 in the short time since the clearance, particularly given that the pond still lacks good egg-laying substrate and is unlikely to hold water through the summer.
- 3.8 The clearance does not therefore represent a material increase in the likelihood of GCN breeding in P1. In the longer term, the pond enhancements proposed in the EclA (de-silting, and planting and seeding of native macrophytes, within an ecological enhancement zone kept outside private gardens) are more likely to improve the pond for amphibians than the clearance alone. These enhancements are proposed as a benefit of the scheme and would be carried out under the method statement described below.

Surrounding Ponds and GCN Records

- 3.9 NatureSpace refer to positive GCN records from 2023 to the west of the site. These were not in the Sussex Biodiversity Records Centre (SxBRC) data search obtained for the EclA. The nearest Natural England licence returns are c.1.6 km south-west and 2.0 km west. We therefore accept Naturespace's position that GCN may be present in the wider landscape to the west.
- 3.10 This assumption was already allowed for in the Sylvatica assessment. The rapid risk assessment in that report assumed that the nearest off-site pond (Pond 2, c.215 m away, HSI 0.54 'below average') could theoretically be a GCN breeding pond. On that basis the development, which is c.0.127 ha in total and lies more than 100 m from any off-site pond, gave a result of 'Green: offence highly unlikely'. The presence of GCN in off-site ponds to the west does not therefore change the conclusion, provided that P1 itself is not a breeding pond. For the reasons set out above, it is not considered to be a breeding pond. The Rapid Risk Assessment tool has not altered in the intervening years and no new ponds or records have been noted.
- 3.11 Sylvatica identified five ponds within 500 m, compared with the 12 cited by NatureSpace. The additional features are likely to include ditches and ephemeral or garden features. In any case, P1 is the only pond within 100 m of the development. NatureSpace's impact risk zones are derived from modelling that predicts likely presence rather than from records of GCN on or near the site. The amber zone therefore reflects habitat in the wider landscape, rather than evidence that GCN use this site.

Terrestrial Habitat and Demolition of the Barn

- 3.12 The development footprint is mainly the existing agricultural barn and surrounding hardstanding and bare ground, which offer low suitability for GCN. Much of the former scrub, grassland and tall forbs has been cut to ground level. The terrestrial habitat that remains (remaining scrub to the south, ruderal vegetation, and any debris or material stored around the barn) covers a small area and could be inspected and cleared safely under ecological supervision.
- 3.13 P1 and its margins are retained and will not be directly affected. The nearest built development is c.8 m from the pond. The garden curtilages have been reduced compared to the previous scheme, allowing a larger ecological enhancement zone around the pond. This zone will include new grassland and scrub, log piles and a hibernaculum, and will be managed communally rather than as private garden.
- 3.14 The only realistic risk to GCN from the proposals is therefore of harm to an individual animal sheltering in the barn, debris or remaining vegetation during clearance and demolition. That risk can be avoided through standard precautionary working methods. The development would not result in the loss of any breeding pond, and the small loss of low-suitability terrestrial habitat is outweighed by the enhancement zone.

4.0 Proposed Resolution

4.1 Taking the evidence together, we consider that the likelihood of GCN being present on site and affected by the development is very low:

- P1 is a very small, 'poor' suitability pond that appears to dry out by midsummer, currently lacks any high-quality egg-laying vegetation, is very turbid, and would remain 'poor' even with all shading removed;
- the clearance around P1 is recent, and GCN are very unlikely to have colonised the pond in the single breeding season since;
- the Sylvatica rapid risk assessment already assumed GCN potentially breeding in the nearest off-site pond, and gave a result of 'offence highly unlikely'; and
- P1 is retained, the development footprint is mainly the existing barn, hardstanding and bare ground, and the area around the pond will be enhanced.

4.2 This falls within the third option set out by NatureSpace. We do not consider that entry into the District Licensing scheme or further survey is necessary or proportionate. Instead, the applicant proposes a GCN Non-Licensed Method Statement (NLMS), prepared by a GCN licence holder. This can be submitted before determination or secured by a pre-commencement condition, whichever the Council prefers. It would include:

- timing of stump, root and turf layer clearance and demolition for the period when any newts would most likely be in water (March to May), or otherwise during mild conditions in the active season, avoiding the hibernation period (November to February);
- a toolbox talk to all contractors by a licensed ecologist before works start, with scaled reference photographs of GCN kept on site;
- creation of the hibernaculum, log piles and refuges in the enhancement zone before clearance, so that any amphibians found can be moved to safe habitat;
- a two-stage vegetation cut (first to no lower than 150 mm, then to ground level after 24 hours), with a fingertip search by the ecologist, and hand-searching of debris, stored materials and the base of the barn before demolition;
- fencing off P1 and a 5 m buffer during construction, with no storage of materials, fuels or spoil within it;
- covering excavations overnight or fitting escape ramps, and storing materials on pallets or existing hardstanding;
- carrying out the pond enhancement works (de-silting and planting) in autumn (September to October), when the pond is dry or at its lowest and outside the breeding season, under ecological supervision; and
- if a GCN is found at any stage, stopping work immediately in that area and not resuming until a NatureSpace District Licence certificate or a Natural England mitigation licence has been obtained.

- 4.3 We do not consider further survey necessary. However, should the Council require additional certainty, the applicant would accept a condition requiring an eDNA survey of P1 by a GCN licensed ecologist between 15th April and 30th June 2027, before any site clearance (manual cutting of trees and scrub to no lower than 200mm would be permitted, to ensure birds were not subsequently disturbed during works in summer). If the result were positive, no clearance would take place until a NatureSpace District Licence certificate or Natural England mitigation licence had been obtained. If the pond is dry during the survey window, this would itself confirm that it is unsuitable as a breeding pond.
- 4.4 The applicant notes paragraph 99 of ODPM Circular 06/2005. In this case, surveys are not being left to condition in place of assessment. The evidence above indicates that GCN are not reasonably likely to be present and affected, and the NLMS (and, if the Council wishes, the eDNA condition) is proposed as a proportionate safeguard. We trust that this allows NatureSpace to remove their request for further information.

5.0 References

Natural England (2025) Great crested newts: advice for making planning decisions. GOV.UK.

ODPM (2005) Circular 06/2005: Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System.

Oldham, R.S., Keeble, J., Swan, M.J.S. and Jeffcote, M. (2000) Evaluating the suitability of habitat for the great crested newt (*Triturus cristatus*). *Herpetological Journal* 10: 143–155.

South Downs Ecology (2026) Ecological Impact Assessment, Land at Swains Farm, Henfield. Version 3, 7th May 2026.

Sylvatica Ecology (2023) Swaines Farm, Brighton Road, Henfield – Great Crested Newt HSI Survey and Site Risk Assessment. 27th November 2023.