

Daniel.Holmes

From: Laura Downs <Laura.Downs@naturespaceuk.com>
Sent: 15 September 2026 16:00
To: Daniel.Holmes
Subject: Re: CONFIDENTIAL- DC/25/2114 | Land at 519396 111237 Church Farm Walk Upper Beeding West Sussex

Hi Daniel,

Thank you for re-consulting us on the above application. The applicant has provided an ecological addendum in the form of - *NatureSpace Consultation on application DC/25/2114, The Ecology Co-op, 18th August 2026*, which states:

- *"The location of Pond A is within the wet ditch network connected to the River Adur, which was explained in my letter dated the 14th August to act as a barrier to movement and through its connection to the Adur makes it a highly unlikely breeding location due to fish predation"*
- *"It is presently a small feature with a dense cover of duckweed *Lemna minor* and bordering common reed *Phragmites australis*. The size of this part of the ditch holding water has undoubtedly reached its smallest size following the prolonged drought observed this summer.*
- *"The location of Pond B was explored extensively, despite challenging scrub growth. Figure 2 below identified the location explored with respect to the illustrated location of Pond B. A search of this area failed to identify any waterbodies, or any natural topography that might lead to the formation of a pond"*
- *"As we have maintained, there are no ponds identified within close proximity to this site and the ponds identified within my letter dated the 14th August remain to be the only ponds identified from the desktop assessment, site surveys and now this wider search following public objection."*

Within the above letter, pond A has been identified as a waterbody forming part of the wet ditch network which is connected to the River Adur. Whilst we would agree that the river Adur itself does form a significant barrier to movement for GCN, pond A does not appear to be a flowing waterbody, and looking at aerial imagery it does appear that waterbody A still has direct connectivity to the development site. We would also like to highlight that an assumption of fish presence and cover of duckweed alone would not be considered sufficient to rule this waterbody as unsuitable for GCN. When the ecologist re-visited the site, they were unable to locate pond B and as such further information could not be collected regarding suitability. The ecologist has therefore in their professional opinion determined that GCN are not a constraint to this development.

Given the scale of this development and the isolated nature of the development site due the River Adur and other offshoots, we do not believe that it would be proportionate to require that GCN surveys are undertaken. However, as the development plans will require the removal of suitable terrestrial habitat, we

feel that a precautionary approach would be the most sensible option here, and therefore we would recommend that a non-licensed method statement is written for GCN by a suitably qualified ecologist and secured via a compliance condition. This statement should include material storage measures and the steps to be taken should GCN be discovered onsite.

Best wishes,

Laura Downs (*she/her*)

District Licensing Officer (Great Crested Newts) – West Sussex

NatureSpace Partnership

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From: Daniel.Holmes <Daniel.Holmes@horsham.gov.uk>

Sent: 19 August 2026 09:10

To: Laura Downs <Laura.Downs@naturespaceuk.com>

Subject: FW: CONFIDENTIAL- DC/25/2114 | Land at 519396 111237 Church Farm Walk Upper Beeding West Sussex

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Hi Laura,