

12144: Land West of King Business Centre, Reeds Lane, Sayers Common (DM/25/3067)

Consultation Response: NatureSpace GCN comments

Signed,

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Introduction

- 1.1.1. Ecology Solutions was commissioned in April 2024 to undertake an Ecological Assessment of Land West of King Business Centre, Reeds Lane, Sayers Common (Planning Ref = DM/25/3067), hereafter referred to within this technical note as the 'Application Site'.
- 1.1.2. The Development Proposals at the Application Site are for the erection of 80 new residential dwellings (Use Class C3), including affordable housing units, vehicular pedestrian and cycle access (including new footpath links to the east and west of the site along Reeds Lane), landscaping and open space, parking, sustainable drainage and other related works.
- 1.1.3. Following Submission of the Ecological Assessment (12144.EcologicalAssessment.vf, dated November 2025) and other supporting documents as part of the planning application, consultation comments were received from NatureSpace on 22nd December 2025.
- 1.1.4. These comments were addressed by Ecology Solutions within a technical note dated April 2026, detailing the multiple years of surveys completed at the Application Site and the adjacent development site to the west. All of which have found no evidence that GCN are present. Further reasoning for the likely absence of GCN within these ponds was presented within the note, including the fact that grassland surrounding the offsite AV Trade waterbodies is regularly mown short for amenity value which would make it sub-optimal for GCN, reducing connectivity between the AV Trade waterbodies and other waterbodies in the local area.
- 1.1.5. This technical note has been prepared by Ecology Solutions to respond to a further consultation response from NatureSpace, dated 14th May 2026. The note will provide additional evidence to support the conclusion that GCN are unlikely to be present within the Application Site. This note will also discuss how the Development Proposals provide an enhancement for amphibians. Finally, this response will detail how a Precautionary Working Method Statement (PWMS) secured via suitably worded condition would provide sufficient certainty that amphibians will be protected during the construction period to allow planning permission to be granted.

Statement of Competency

- 1.1.6. This technical note has been prepared by Alex Banner. Alex Banner is an Associate at Ecology Solutions and has over 7 years' experience in ecological consultancy. He holds Natural England class licences for bats (all species) and Great Crested Newts. Alex has been involved in a wide variety of projects including for large residential applications (>350 homes) and infrastructure projects, including solar farms and Liquid Natural Gas (LNG) storage. Alex has authored Preliminary Ecological Appraisals (PEA), Ecological Impact Assessments (EcIA), Biodiversity Net Gain (BNG) Assessments and ecology ES chapters within Environmental Impact Assessments (EIA). He is in the process of upgrading his CIEEM membership to Full.
- 1.1.7. This technical note has been reviewed and approved by Daniel Wood. Daniel Wood is a Director at Ecology Solutions and has 17 years' experience in ecological consultancy. He holds Natural England class licences for bats (all species), Hazel Dormice, Great Crested Newts, and Barn Owl and is a Registered Consultant on

the Badger Class Licence and has co-authored published research on badgers. Daniel is also a Registered Consultant on the Bat Mitigation Class Licence, the Level 4 bat class licence, and Named Ecologist on several regionally significant bat mitigation licences, including rare species such as Barbastelle and Lesser Horseshoe. Daniel is qualified in River Condition Assessment and have worked in collaboration with the South East Rivers Trust, Bristol Avon Rivers Trust, and Environment Agency on river restoration projects. Daniel has acted as an Expert Witness at Public Inquiry and has attended planning appeal hearings. He is also a Full Member of the Chartered Institute of Ecology and Environmental Management (MCIEEM).

Further Justification – Great Crested Newts

Surveys at the Application Site

- 1.1.8. As discussed within the previous technical note, the position of Ecology Solutions is that GCN are unlikely to be present based on the survey results completed at the Application Site and the adjacent development site (Planning Ref = DM/22/0640) to the east. Ecology Solutions has completed eDNA survey of three waterbodies (P1, P8 and P9) on three separate occasions (2016, 2020 and 2024), with negative results for GCN returned on all three occasions (see Appendix 1).
- 1.1.9. In addition to the eDNA surveys, reptile surveys have been completed of all suitable habitat within the Application Site in 2024 (see Appendix 2 for tin locations). GCN are known to find refuge under reptile tins¹, making reptile surveys a useful secondary survey method for GCN. Reptile surveys were also completed at the adjacent development site in 2017 and 2022. No GCN were recorded during any of the combined 21 reptile survey visits completed by Ecology Solutions across the two sites.

Habitats at the Application Site

- 1.1.10. The Application Site mainly comprises grassland, which is subject to regular mowing / grazing and as such is sub-optimal habitat for GCN. Habitat of greatest value for GCN and other amphibians within the Application Site are the boundary hedgerows / treelines and woodland to the north that provide connectivity to offsite habitats of greater suitability. Impacts to these habitats on account of the Development Proposals will be negligible. This is discussed in further detail in the Development Proposals section below.

AV Trade Global Headquarters Waterbodies

- 1.1.11. As discussed within the previous technical note, access was requested to complete eDNA sampling of the waterbodies within AV Trade ownership, however access was denied. Each waterbody is discussed in further detail below.

Pond P2

- 1.1.12. Pond P2 is located 30m from the Application Site and is a relatively small waterbody that has been present since at least 2010. The pond is detailed within

¹ (2001), *Great crested newt mitigation guidelines*. English Nature, Peterborough:

an Ecological Surveys & Impact Assessments report produced by Envirotech in support of a planning application in 2010 (Planning Ref = 10/03253/OUT). Within this report the pond is described as a "small eutrophic pond" with "100% macrophytes cover" that was "shaded by profuse growth of bankside vegetation and trees", a Habitat Suitability Index (HSI) score for this pond was 0.66, resulting in an average suitability for GCN and no amphibians were recorded during a search of refugia or during a torch survey of this shallow pond, albeit detailed survey was not completed.

- 1.1.13. Extensive macrophyte coverage is a negative indicator for GCN as detailed within the GCN conservation handbook, as it blocks out sunlight through shading. This is reflected in the HSI assessment.
- 1.1.14. Envirotech state that the pond "has low water quality and is largely surrounded by sub-optimal habitat" concluding that GCN were not likely to be present.
- 1.1.15. Planning permission was subsequently granted, sub-optimal habitat surrounding the pond was cleared, buildings were demolished and a large warehouse was constructed.
- 1.1.16. It is accepted that if GCN are present within P2 then they would likely utilise boundary habitats within the Application Site as this is within the 50m immediate terrestrial¹, or "core" habitat. However, given the description above the pond is not optimal for GCN. Furthermore P1; a ditch running along the western boundary of the Application Site is present between the AV Trade waterbodies and the main body of the Application Site and is approximately 30m from P2. It is Ecology Solutions' position that if GCN were present within pond P2 then they would also have been detected within P1 on account of the proximity, yet P1 has been negative for GCN during surveys completed in 2016, 2020 and 2024. It is also likely given the proximity that GCN would have been recorded during reptile surveys under reptile tins placed within the 50m "core" habitat. However, no GCN were recorded.
- 1.1.17. In NatureSpace's most recent comments, dated 14th May 2026, they state that "In situations where access has not been granted as is the case here, GCN presence must be assumed within these waterbodies" This approach focuses purely on the results of surveys and does not take into account background evidence including results for nearby waterbodies, suitability of available habitat within a site, offsite records for the species and GCN ecology. GCN are known to exist in metapopulations (groups of associated populations) with some interchange between ponds, especially for juvenile newts that will disperse from a successful breeding pond to colonise new ponds². This has not occurred since 2017 in any of the waterbodies tested by Ecology Solutions.
- 1.1.18. For these reasons it is considered that GCN are not present within P2.

Other Ponds within AV Trade ownership

² Langton, T.E.S., Beckett, C.L., and Foster, J.P. (2001), *Great Crested Newt Conservation Handbook*, Froglife, Halesworth.

- 1.1.19. P3 is located 85m from the Application Site boundary and is a large waterbody with a total area of approximately 1700m². Aerial imagery shows that creation of this waterbody commenced in 2013 and was finished by September 2015.
- 1.1.20. P4 is located 220m from the Application Site boundary; to the west of P3, on the other side of the main access road for AV Trade Global Headquarters. P4 has a total area of approximately 1050m². The access road is 15.5m wide with raised kerbs at both sides and would act as a barrier to dispersal for GCN. This pond is understood to have been present prior to 2010 but was extended in 2015 based on aerial imagery.
- 1.1.21. P5 is located 260m from the Application Site boundary; to the west of P4 and has a total area of approximately 2150m². P5 was created between 2013 and 2015 based on aerial imagery.
- 1.1.22. P6 is located 315m from the Application Site boundary; to the north of P5 and has a total area of approximately 900m². P6 was created between August and October 2018 based on aerial imagery
- 1.1.23. P7 is located 360m from the Application Site boundary; to the west of P6 and has a total area of approximately 250m². P7 was created between August and October 2018 based on aerial imagery.
- 1.1.24. P3, P4, P5, P6 and P7 are all surrounded by sub-optimal habitat for GCN in the form of regularly managed grassland, kept short for amenity purposes reducing the likelihood that colonisation would have occurred from a nearby population, of which the location is unknown based on all searches completed. All waterbodies, with the exception of P3, are located on the other side of the main vehicle access to AV Trade Global Headquarters, this would act as a barrier to dispersal for GCN to the Application Site.
- 1.1.25. As detailed within the GCN conservation handbook², GCN prefer small to medium sized ponds around 50m - 250m². GCN tend to be unsuccessful in larger waterbodies partly due to increased likelihood of fish presence and use by waterfowl which are both known to adversely affect GCN breeding via predation of eggs, accidentally in the case of waterfowl, and competition for food.
- 1.1.26. P3, P4, P5 and P6 are all well in excess of 250m² and as such are not considered suitable breeding ponds for GCN.
- 1.1.27. For the reasons listed above it is considered that GCN are unlikely to be present within these ponds and as such would not commute from these ponds in order to utilise terrestrial habitat within the Application Site. Furthermore, P1 which is present on the western boundary of the Application Site has been subject to eDNA survey on three occasions and has returned negative results for the presence of GCN.

Other Waterbodies within 500m

- 1.1.28. P10 is located 440m from the Application Site boundary and separated by regularly managed grassland and two access roads including the AV Trade Global Headquarters main access road which would act as barriers to dispersal for GCN. Given the distance and barriers to dispersal this waterbody can be scoped out of consideration as GCN would not commute to the sub-optimal habitats found within the Application Site if they were present in P10.

- 1.1.29. P11 is located 240m from the Application Site boundary to the north-east of P9. P11 is an attenuation basin for the adjacent development and was created between 2020 and 2022 based on aerial imagery. This is a relatively new pond and would require an existing population of GCN to have colonised it in the short time since it has been present. As P8 and P9 are both in close proximity to P11 and do not support GCN but are suitable for the species, it can be assumed that P11 also does not support GCN. Furthermore, given the distance from the Application Site and suitable terrestrial habitat in close proximity to P11 it is not considered likely that GCN would commute to the sub-optimal habitats found within the Application Site if they were present.
- 1.1.30. For the avoidance of doubt, GCN surveys completed by ACD Environmental in support of the planning application for this site (Planning Ref = 12/01540/OUT) found no evidence of GCN in waterbodies subject to survey.
- 1.1.31. P12 is located 450m from the Application Site boundary and is separated from the Application Site by built development. Given the distance, presence of built development between P12 and the Application Site and suitable habitat in close proximity to P12 (woodland, rough grassland) this waterbody can be scoped out of consideration.
- 1.1.32. P13 is located 260m from the Application Site boundary and is separated from the Application Site by built development and roads which would constitute significant barriers to dispersal westward from this waterbody.
- 1.1.33. P14 is located 495m from the Application Site boundary and is separated from the Application Site by Reeds Lane. This waterbody has been scoped out of consideration for the same reason as P12.
- 1.1.34. P15 is located 175m from the Application Site boundary. P15 is in close proximity to woodland which would offer suitable habitat for GCN in the event that they are present within this pond. It is not considered that GCN would utilise the Application Site from P15.
- 1.1.35. P16 – P24 are all in excess of 280m from the Application Site boundary. As discussed within the previous technical note, research conducted on GCN (Cresswell *et al*, 2004³ & Jehle 2020⁴) has found that the vast majority of GCN are found within 50m of a breeding pond and that “few animals were captured at distances greater than 100m” (Jehle 2020³). It is therefore considered unlikely that even if GCN are present within these ponds they would commute to the Application Site.

Development Proposals

- 1.1.36. As discussed above, suitable habitats within the Application Site are currently limited to the boundaries. The Development Proposals include provision of species-rich grassland, scrub and tree planting, creation of a wetland area including both permanent and seasonally inundated sections, marginal

³ Cresswell, W., Cresswell, W. and Whitworth, R., 2004. *An assessment of the efficiency of capture techniques and the value of different habitats for the great crested newt Triturus cristatus*. English Nature.

⁴ Jehle, R., 2000. The terrestrial summer habitat of radio-tracked great crested newts (*Triturus cristatus*) and marbled newts (*T. marmoratus*). *Herpetological Journal*, 10(4), pp.137-142.

vegetation and wet tolerant grassland. Swales are also proposed adjacent to several of the proposed roads.

- 1.1.37. Losses to suitable habitat are minimal, with a small area of secondary woodland lost to the northern boundary (0.03ha), and a section of hedgerow (6 metres) and single tree to be lost to accommodate the vehicular access.
- 1.1.38. Overall, the Development Proposals will result in a significant increase in opportunities for amphibians over the baseline situation.

Recommended Condition

- 1.1.39. Notwithstanding the above, it is proposed that in order to provide absolute certainty that amphibians including GCN will be safeguarded during the construction phase of the development a Preliminary Working Method Statement (PWMS) is included as a condition of the permission. The use of such a condition has widespread precedence including for Land South of Warren Lane, Hurst Green, Surrey (Tandridge District Council, Planning Ref = 2025/613), where in a very similar scenario, with some ponds subject to eDNA (with negative results) but not all, including one in relatively close proximity to the site, NatureSpace recommended the inclusion of such a condition within a consultation response. The inclusion of this condition was accepted by the applicant.
- 1.1.40. Measures detailed within the PWMS would include:
- Provision of a toolbox talk prior to commencing site works.
 - Safe storage of materials
 - Covering of excavations overnight
 - Fingertip search of vegetation to be cleared, where necessary (i.e., in close proximity to P2)
 - Detail of what will occur in the unlikely event that GCN are recorded within the Application Site during construction works.

Summary

- 1.1.41. The Application Site is of limited value to Great Crested Newts (GCN) on account of the majority of the Application Site comprising sub-optimal grassland. Suitable habitats within the Application Site are to be mainly retained, with minimal losses to occur to the southern hedgerow (for access provision) and the northern secondary woodland.
- 1.1.42. The Development Proposals will provide an increase in opportunities for amphibians, including GCN through creation of species-rich grassland, scrub and wetland areas, including permanent and seasonally inundated sections, marginal vegetation and wet tolerant grassland.
- 1.1.43. Ecology Solutions has provided further information as to the justification for scoping out a number of ponds within 500m of the Application Site, mainly on account of the distance of these from the Application Site and barriers to dispersal including existing built form and roads. Where necessary reference has been made to surveys completed in support of other planning applications, none of which provide any evidence of GCN being present within ponds located within 500m of the Application Site.

- 1.1.44. Notwithstanding the above, Ecology Solutions recommend that a Precautionary Working Method Statement (PWMS) for GCN is secured via appropriately worded condition to provide certainty that amphibians, including GCN will be safeguarded throughout the construction phase of the development.

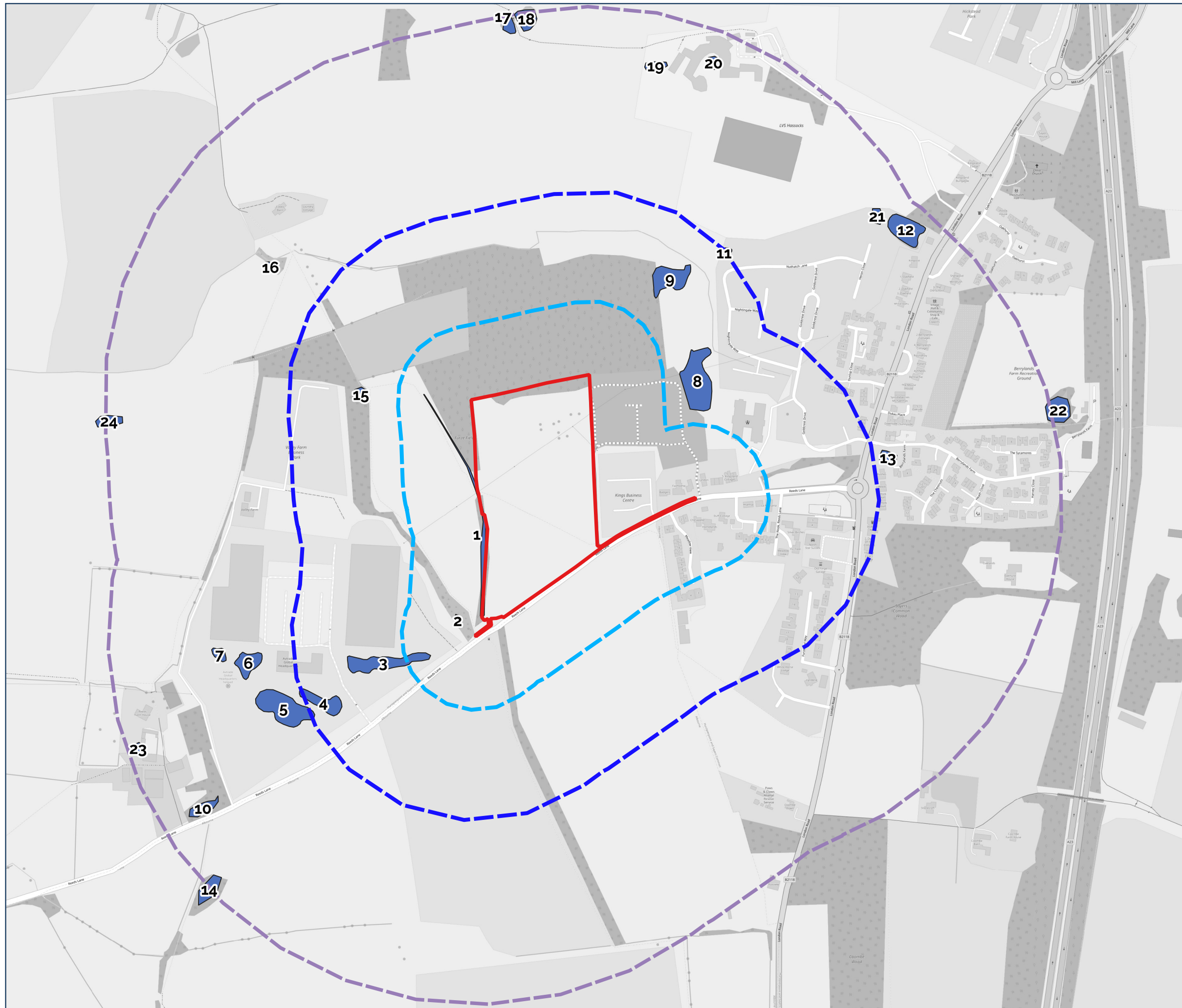
Appendix 1 – Ponds within 500m

Appendix 2 – Reptile survey plan (2024)

Appendices

APPENDIX 1

Waterbodies within 500m



KEY:

- Application Site Boundary
- 500m Buffer
- 250m Buffer
- 100m Buffer
- Waterbody



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Worcestershire, WR12 7LJ
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**12144: Land West of King Business
Centre, Reeds Lane, Sayers Common**

Waterbodies within 500m

Rev: A
July 2026

APPENDIX 2

Reptile Tin Plan



KEY:

- Application Site Boundary
- Reptile tins



Farncombe House, Farncombe Estate, Broadway, Worcestershire,
WR12 7LJ
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**12144: Land West of King Business Centre,
Reeds Lane, Sayers Common**

Reptile Tin Plan

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