

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

Consultation Response: NatureSpace GCN comments

Signed,

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- 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 22<sup>nd</sup> December 2025.
- 1.1.4. The comments are summarised as follows:
- The development falls within a red impact zone for Great Crested Newt (GCN)
  - There are 24 ponds within 500m, 21 of which have not been subject to eDNA survey.
- 1.1.5. Regarding the 21 ponds located within 500m and NatureSpace's assertion that Natural England (NE) Standing Advice guidance advises that surveys on ponds up to 500m from development sites should be requested, the actual wording of the standing advice is as follows:
- "Surveys of water bodies within 250m of the development are usually sufficient. Developers may need to increase this to 500m if there are no obvious barriers to GCN dispersing into the wider environment."*<sup>1</sup>
- 1.1.6. Indeed, research conducted on GCN (Cresswell *et al*, 2004<sup>2</sup> & Jehle 2020<sup>3</sup>) 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 2020<sup>3</sup>). Whilst relating to trapping efficiencies at certain distances from breeding ponds, this research is considered to be relevant to scoping in / out ponds based on distance and reinforces the NE guidance provided above.
- 1.1.7. All ponds to the east of the Application Site that were not subject to eDNA survey are at distances of at least 250m (>400m in most cases) from the Application Site and separated by residential development and roads which would act as a barrier to dispersal. Those to the north-east but within 250m of the Application Site are in close proximity to ponds that were subject to eDNA testing (P8 and P9) in 2020 and 2024 and are of good suitability for GCN (see photo A below). It is considered highly likely that should GCN be present in this / these ponds that they would

<sup>1</sup> <https://www.gov.uk/guidance/great-crested-newts-advice-for-making-planning-decisions>

<sup>2</sup> 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.

<sup>3</sup> 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.

also be found in P8 and P9. However as discussed in the Ecological Assessment, both ponds returned negative results for the presence of GCN.



**Photo A – Pond P9**

- 1.1.8. Since submission of the Ecological Assessment for the Application Site, a planning application has been submitted to the north (REF = DM/26/0238). Within the ecology reporting produced by Aspect Ecology Limited in support of this application, detail on surveys of several ponds to the north / north-east of the Application Site are included. All ponds surveyed by Aspect Ecology in 2024 returned negative results for the presence of GCN. Aspect Ecology do refer to a single GCN being recorded during reptile surveys in 2024, however the location of the GCN as shown within Plan 6836 / ECO9 of the Ecological Assessment produced by Aspect Ecology is in excess of 500m from the boundary of the Application Site and separated by existing residential development and regularly managed gardens which would form a barrier to dispersal.
- 1.1.9. As demonstrated by the Aspect Ecology surveys, GCN are known to use artificial reptile refugia. Reptile surveys therefore act as a secondary survey method for GCN. Reptile surveys completed by Ecology Solutions at the Application Site in 2024 and on the adjacent development site (to the east) in 2017 and 2022 recorded no presence of GCN.
- 1.1.10. Regarding the ponds to the west associated with AV Trade headquarters, access was requested to survey these ponds in 2024, however access was denied. The closest of these ponds as stated by NatureSpace is located approximately 30m from the western site boundary and the ditch that is present along this boundary. This ditch (P1) was subject to eDNA testing by Ecology Solutions in 2024 and previously in 2020 in support of the adjacent development site. On both occasions the ditch returned a negative result for GCN. Furthermore, the surrounding vegetation around the offsite ponds to the west is not optimal for GCN, appearing to be regularly mown for amenity value. The ditch and ponds to the north east (P8 and P9) were also subject to bottle trapping and torching surveys completed by

Ecology Solutions in 2016, no presence of GCN was detected during these surveys either.

- 1.1.11. Furthermore, a check of MAGIC for GCN survey records and licences found that the closest licence for GCN was approximately 1.9km to the north of the Application Site. The closest record of GCN provided via class survey licence returns (as shown on MAGIC) was located 1.8km to the north of the Application Site beyond Herrings Stream, which would act as a barrier to dispersal.
- 1.1.12. It is considered that the justification provided above is sufficient to scope out the presence of GCN within the Application Site. Taking into consideration the comments provided by Place Services at Essex Country Council and the justification provided above, it is considered that there is no ecology reason why planning permission could not be granted.