

Technical Note GCN01

Project: New Place Farm, Pulborough

Planning Ref: DC/24/1676

Date: 12/12/2025

Response to NatureSpace comments

1 Introduction

- 1.1.1 Aspect Ecology is advising the applicant in regard to ecological matters in respect of the above application. In this regard we have been passed a consultation response from NatureSpace (dated 07th October 2025) which relates to Great Crested Newts. Within this consultation response, further information is requested to provide confidence that Great Crested Newts are likely absent from the permitted development site.
- 1.1.2 By way of an overview, the application site is dominated by sub-optimal habitat for Great Crested Newts, and only two ponds are present within the site/250m of the site, both of which have previously been confirmed to not support Great Crested Newts.
- 1.1.3 In addition to the information already set out within Aspect Ecology's reporting, further context and information is provided below with regard to Great Crested Newts in order to fully respond to the comments raised.

1.2 Previous survey work

- 1.2.1 Aspect Ecology's Ecological Appraisal (Ref: 4404 EcoAp vf3/JoC/DM, dated 22/12/2021) identified a single pond within the site, and a single pond within 250m of the site (with these waterbodies referred to as P1 and P2 respectively on the enclosed Plan 4404/ECO3). Environmental DNA surveys were completed of these waterbodies in June 2021, which confirmed absence of Great Crested Newts. As such, given the absence of other nearby waterbodies, it was concluded that Great Crested Newts are absent from the site and do not form a constraint to the proposals.

1.3 Update survey work 2024

- 1.3.1 In 2024, the opportunity was taken to update the eDNA survey work. At the time, survey work was only possible of the onsite pond P2. This update eDNA survey work confirmed the continued absence of Great Crested Newts from the onsite pond (results appended), further confirming that Great Crested Newts pose no constraints to the permitted development.

1.4 Geographical limits of survey

- 1.4.1 NatureSpace state that all offsite ponds within 500m should be considered. However, this is not the case for this application. Natural England set out within their Great Crested Newt licensing Method Statement¹ that;

¹ Template for Method Statement to support application for licence under Regulation 55(2)(e) of The Conservation of Habitats and Species Regulations 2017 (as amended) in respect of great crested newts *Triturus cristatus*. Form WML-A14-2 (Version April 2020)

In keeping with a proportionate and risk-based approach, surveys need reasonable boundaries. The Great crested newt mitigation guidelines explain that surveys of ponds up to around 500m from the development might need to be surveyed. The decision on whether to survey depends primarily on how likely it is that the development would affect newts using those ponds. For developments resulting in permanent or temporary habitat loss at distances over 250m from the nearest pond, carefully consider whether a survey is appropriate. Surveys of land at this distance from ponds are normally appropriate when all of the following conditions are met: (a) maps, aerial photos, walk-over surveys or other data indicate that the pond(s) has potential to support a large great crested newt population, (b) the footprint contains particularly favourable habitat, especially if it constitutes the majority available locally, (c) the development would have a substantial negative effect on that habitat, and (d) there is an absence of dispersal barriers.

- 1.4.2 With regard to the application site, condition 'b' is not met (which makes condition 'c' non applicable). As such, as all of the four conditions have not been met to necessitate survey work of all ponds within 500m of a site, there is clear guidance that consideration of potential offsite breeding ponds should be limited to 250m from the site boundaries.

1.5 Current site conditions

- 1.5.1 The site is a former nursery. As part of site preparation works, ground sheeting present within the former glasshouses has been removed (and during this process no Great Crested Newts were identified), with the result that the site is now dominated by sand (see below aerial image). This is a sub optimal habitat for amphibians, such that that the permitted construction footprint is no longer of any elevated value for GCN. As such, this is further evidence that Great Crested Newts are absent from the site and do not form a constraint to the permitted development.



1.6 Reptile Translocation

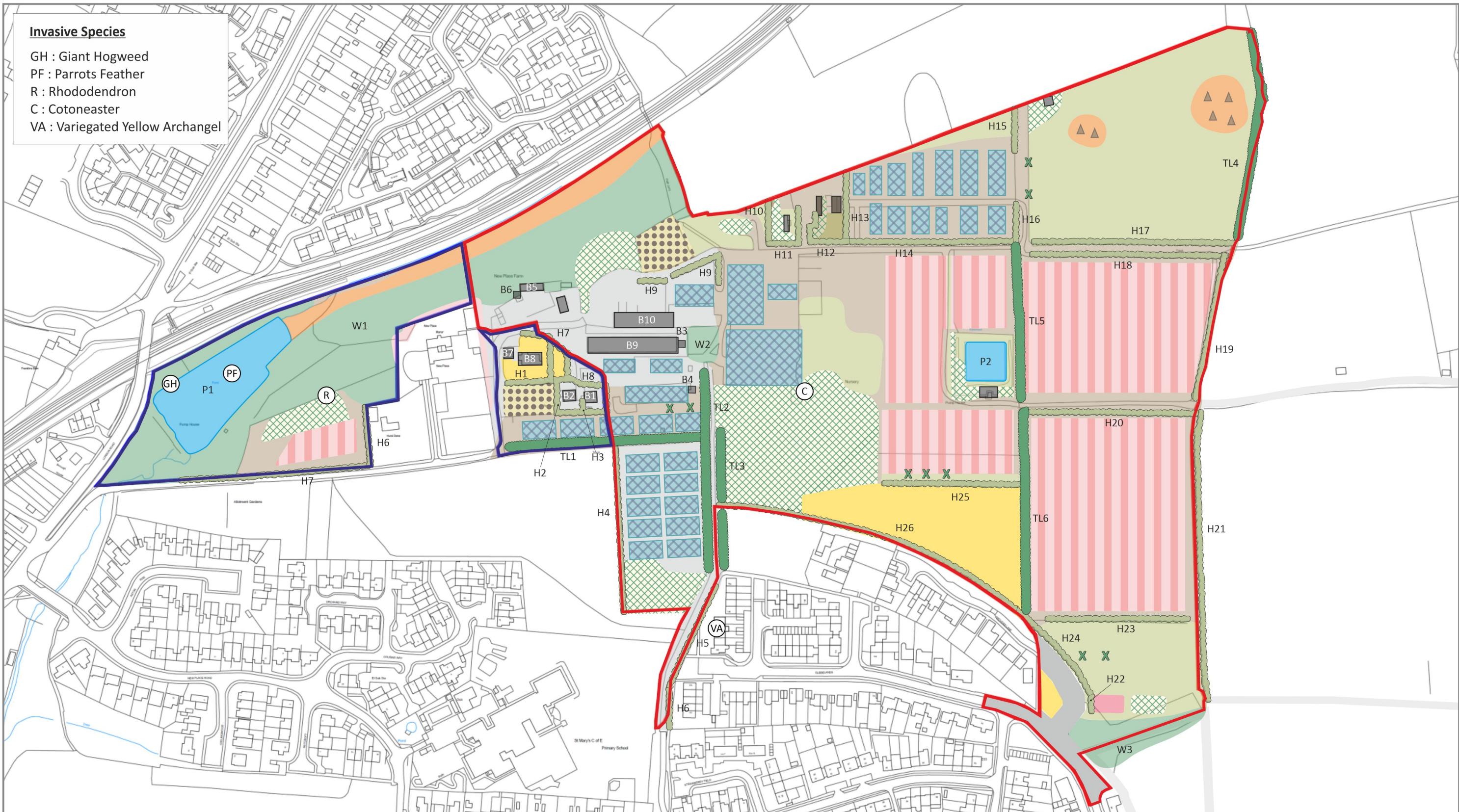
1.6.1 As part of the 2025 mitigation work to release the site for development, a reptile translocation was conducted within the site, which deployed 140 refugia within the site. This translocation exercise is targeted to capture and relocate reptiles, but can provide incidental results of amphibian presence. Across a 30 day translocation, the only amphibians recorded comprised six toads beneath the refugia. However, no Great Crested Newts were recorded throughout this survey work. As such, this is further supplementary information (effectively representing extensive terrestrial survey effort) assists with confirming the absence of Great Crested Newts from the site.

2 Conclusion

2.1.1 A suite of survey and assessment work has been undertaken over the last four years, all of which has concluded that Great Crested Newts are likely absent from the site (with Horsham District Council reaching the same conclusions, as shown through grant of planning). The site has in the interim period become less suitable for Great Crested Newts and as such, in line with the above supplementary information, it is concluded that all evidence points to Great Crested Newts remaining absent from the site, and thereby posing no constraint to the proposed development.

Encl.

- Plan 4404/ECO3
- eDNA results (2024)



Key:

	Site Boundary
	Additional Survey Area
	Amenity Grassland
	Semi Improved Grassland
	Woodland
	Fruit Trees
	Amenity Planting
	Nursery Planting
	Tall Ruderal Vegetation
	Scattered Scrub
	Dense Scrub
	Polytunnels and Greenhouses
	Hedgerow
	Recently Cleared Ground
	Treeline
	Waterbody
	Building
	Bare Earth
	Hardstanding
	Spoil Heap

aspect ecology

Aspect Ecology Limited - West Court - Hardwick Business Park
Noral Way - Banbury - Oxfordshire - OX16 2AF
01295 279721 - info@aspect-ecology.com - www.aspect-ecology.com

Land at New Place Farm,
Pulborough

Habitats and Ecological Features

PROJECT
D
DRAWING NO.
REV.
DATE
4404/ECO3
September 2021

eDNA Technical Report



Ms. Laura Pratt
Aspect Ecology Ltd
 West Court
 Hardwick Business Park
 Noral Way
 Banbury

OX16 2AF

T: 01295279721

E: edna@aspect-ecology.com

Report Reference	R0000717
Report Date	15 Jul 2024
Reported By	mkwalker

Dispatch Order Reference		P0000515						
Site Name		P2						
Site Location		4404- Pullborough						
Barcode	Received Date	Sampled Date	Sample Check	Degradation Check	Inhibition Check	Result	Positive Replicates	
GCN009214	03/07/2024	26/06/2024	PASS	PASS	PASS	NEGATIVE	0 out of 12	

eDNA Technical Report



SUMMARY

The water samples listed in the tables above were submitted to Cellmark for environmental DNA (eDNA) testing for the presence of Great Crested Newt (GCN; *Triturus cristatus*) DNA. The laboratory testing was carried out in compliance with the guidelines described in [WC1067: Analytical and methodological development for improved surveillance of The Great Crested Newt \(version 1.1\)](#)

INTERPRETATION OF THE RESULTS

Barcode	Each kit is given a unique sample barcode. A kit and the six sample tubes contained within it are labelled with the same sample barcode. This allows Cellmark to track where each kit has been sent and to track the samples through the laboratory once they have been returned.
Site Name	The name of the sampling site.
OS Reference	Ordnance Survey grid reference: the location of the pond.
Sample Check	Upon receipt in the laboratory, the 6 sample tubes are scored for sample volume, leakage, damage and for the presence of sediment, algae and other debris within the sample tubes. They are scored as 'PASS' or 'FAIL'. Samples that fail at this stage may not be suitable for further processing.
Degradation Check	A control marker is spiked into the sample tubes during the kit manufacturing process. This marker is analysed for degradation and reported as 'DEGRADED' or 'PASS'.
Inhibition Check	Some substances (inhibitors) can cause the GCN assay to give a negative result despite the presence of GCN DNA. An assay is performed to determine whether inhibitors are present in the eDNA extract. If inhibition is detected, steps are taken to mitigate the effects on the GCN detection assay. The degradation assay is reported as 'INHIBITED' or 'PASS'.
Result	Results are reported as 'POSITIVE', 'NEGATIVE' or 'INCONCLUSIVE'. A positive result indicates that there is evidence that Great Crested Newts are present or have recently been present in the pond. If no GCN DNA is detected, a negative result is reported. The results are deemed inconclusive if we do not detect the presence of GCN DNA and there is an indication that something in the sample is interfering with the analysis (inhibition or degradation).
Positive Replicates	A single eDNA extract is produced for each pond. The extract is then analysed to detect the presence of GCN DNA. A total of 12 replicates of this analysis is performed per eDNA extract. If at least 1 of the replicates is positive for the presence of GCN DNA, the pond is declared positive for the presence of Great Crested Newts.

METHODOLOGY

Upon arrival in the laboratory, the 6 sample tubes are checked for sample volume, leakage and any other damage. The samples are also inspected for macroscopic debris. Based on the outcome of this inspection, the decision is made as to whether the sample is suitable for further processing. Samples that have passed this inspection step are centrifuged. The resulting pellets (containing the eDNA) from each tube are then combined. The eDNA is then isolated (extracted) from the combined pellet.

Inhibitors, more specifically PCR inhibitors, are substances in the eDNA sample which may be co-isolated with the DNA and which interfere with eDNA detection assays. All eDNA extracts are tested for the presence of inhibitors. When a sample has been shown to be inhibited and the results of the GCN detection assay are negative, we cannot be sure whether the sample is truly negative for GCN DNA or that the inhibitors have prevented the GCN assay from working correctly. In this scenario, the result is reported as inconclusive.

eDNA Technical Report



The ability to detect a control marker that has been spiked into the sample tubes during the kit manufacturing process is also tested. If this marker cannot be detected, it suggests that that DNA in the sample has been degraded. Some possible causes of degradation can be the conditions under which the sample has been stored (eg exposure to high temperatures or UV from excessive sunlight) or contamination with substances that destroy DNA. If the control DNA is not detected but the GCN detection assay is positive for GCN, then the sample is reported as positive for GCN DNA. However, if neither the control DNA nor GCN DNA is detected, the sample is reported as inconclusive because we cannot know whether there was any GCN DNA present in the sample but it was degraded prior to analysis.

The GCN detection assay targets a portion of the GCN mitochondrial DNA. This assay is detailed in WC1067 Analytical and Methodological Development for Improved Surveillance of The Great Crested Newt (version 1.1). This assay specifically detects GCN DNA. If GCN DNA is detected in at least 1 of the 12 replicate GCN detection assays, the sample is reported as positive for the presence of GCN. A technique called quantitative PCR (qPCR) is used in the inhibition, degradation and GCN detection assays to detect specific regions of DNA. Positive and negative controls are used in each of the assays and these have to give the expected results in order for the sample to be declared positive or negative for GCN DNA.

Cellmark participates in the FERA proficiency testing scheme and achieved 100% in the 2021 test. Driven by quality, Cellmark has held international ISO quality certification since 1990. Cellmark provides a range of laboratory testing services accredited to ISO 17025 and although delivered to the same exacting quality standards, Cellmark's eDNA service is not yet included on the scope of its ISO 17025 accreditation. Cellmark is certified to ISO 9001, ISO 14001 and to ISO 27001.