[redacted]
Sent: 19 October 2026 16:42
To: Alice.Johnson [redacted]
[redacted]
Subject: RE: DC/26/0660, Ingfield Manor School

Afternoon Alice,

Thank you for the ecologist comments.

Our ecologist has reviewed and confirmed that:

"According to the Natural England guidance for the acceptable age of survey data, as taken from the EPSM Method Statement, as we are losing more than 0.05ha of habitat and the nearest pond is within 50m of the site, then the age of the data can be up to three years old. In this case we are assuming that the habitat loss will be temporary as we will be creating habitats suitable for GCN on site as part of the proposals, including ponds, grassland and hedgerows. Please see the table, taken directly from Natural England's Method Statement outlining this.

Temporary habitat loss or damage					
Pond(s) lost or damaged, with or without other habitat loss or damage	*≥0*	*YES*	*YES*	*YES*	*2*
No ponds lost or damaged, development within 50m of nearest pond	*≤0.05*	*YES*	*NO*	*YES*	*3*
	>0.05	*YES*	*YES*	*YES*	*3*
No ponds lost or damaged, development 50-100m from nearest pond	*≤0.5*	*YES*	*NO*	*NO*	*4*
	>0.5	*YES*	*YES*	*YES*	*3*
No ponds lost or damaged, development >100m from nearest pond	*≤5*	*YES*	*NO*	*NO*	*4*
	>5	*YES*	*NO*	*YES*	*4*

In addition to the above, the results of the 2024 surveys were consistent with the results of the surveys carried out in 2019, which also recorded no more than a small population of great crested newt on site. Given there have been no significant changes to the habitats on site between 2024 and 2026, it is considered unlikely that the results of any further survey works would differ significantly to what has been previously recorded."

Regarding the potential conditions, in addition to our previous comments, our ecologist has highlighted that conditions 2 and 3 could still be problematic: *"The EPSM licence applications would require us to discharge these conditions before applying for/issuing the licence, but we can't discharge the condition without the licence."*

It is noted that the NPPF (Aug 2026), under policy DM7, states: *"Decision-makers should assume, unless there is clear evidence to the contrary, that those separate regimes will operate effectively",* and *"planning decisions should not seek to duplicate or extend controls imposed by separate regulatory regimes".* Consequently, given this is controlled by the required ecology licencing, it is questioned if these conditions meet the requirements under DM6 and are 'necessary' (a), 'relevant to planning' (b), and 'capable of being complied with' (c).

We trust this is helpful and happy to discuss further if needed.

Regards
James

James Williams
BA (Hons) MA MRTPI
Associate

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For and on behalf of Vail Williams

T: 0118 909 7400 [redacted]

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