

From: Nicola.Pettifer <Nicola.Pettifer@horsham.gov.uk>
Sent: 24 June 2026 09:50:27 UTC+01:00
To: "Nicola.Pettifer" <Nicola.Pettifer@horsham.gov.uk>
Subject: FW: DC/24/1676 - New Place Nurseries London Road Pulborough West Sussex

Nicola Pettifer

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From: Laura Downs
Sent: 23 June 2026 18:30
To: Nicola.Pettifer <Nicola.Pettifer@horsham.gov.uk>
Subject: Re: DC/24/1676 - New Place Nurseries London Road Pulborough West Sussex

Hi Nic,

I have now reviewed the applicant's GCN technical note alongside the drone imagery provided. I appreciate that the applicant has stated that the site has become less suitable since the ground sheeting was removed, meaning the site is dominated by sand, although it is not very clear the condition of the remaining habitat (e.g. composition, height etc.) from the drone imagery. Additionally, more recent survey information was provided for the onsite pond to demonstrate a likely absence.

However the last survey undertaken on p1 was in 2021, therefore 5 years ago, which is beyond both CIEEM and Natural England's guidance for this type of survey data. Within the GCN technical note, NE's guidance relating to the survey threshold has been referenced, which states that information on ponds up to 500m is not required in this instance due to habitat

quality, and the limit should be on those up to 250m. However pond 1 is only 132m away from the site. Due to the proximity of this pond, it's direct connectivity to the site through woodland, and the scale of the development, the standardised approach and our recommendation would be to survey p1.

It would however be fair to note that due to the stated condition of the onsite habitat, and as GCN were not encountered during reptile surveys*, a Precautionary Working Method statement may be a suitable option. If the LPA are satisfied with an alternative approach of a Precautionary Working Method Statement, then we would recommend that a GCN specific statement should be written by a suitably qualified ecologist and either submitted to the LPA prior to determination or secured via pre-commencement condition.

*not a standard survey technique for GCN but can provide incidental evidence in some circumstances

Best wishes,

Laura Downs (*she/her*)

District Licensing Officer (Great Crested Newts) – West Sussex

NatureSpace Partnership

w: www.naturespaceuk.com

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