

Natalie Gentry  
Macar Homes (Southern  
Home Counties) Limited  
By email only

10<sup>th</sup> August 2026



Dear Natalie

**RE: Response to consultee comments from NatureSpace regarding the submitted Great Crested Newt Mitigation Method Statement for a consented development at Partridge Green**

Nature Space were consulted by Horsham District Council with regard to the submitted Great Crested Newt Mitigation Method Statement<sup>1</sup> (GCN MMS) for the consented development at Partridge Green. The GCN MMS was required to discharge ecology related Schedule of Condition 7 (planning permission ref: APP/Z3825/W/23/ 3324144) which states:

*'No development, including demolition pursuant to the permission granted, shall commence unless a Great Crested Newt Mitigation Method Statement has been submitted to and approved in writing by the local planning authority. This will contain precautionary mitigation measures and/or works to reduce potential impacts to Great Crested Newts during the construction phase. The measures and/works shall be carried out strictly in accordance with the approved details and shall be retained in that manner thereafter.'*

NatureSpace have reviewed the supplied GCN MMS, and in their response<sup>2</sup> to Horsham DC they have recommended that updated surveys are undertaken to re-confirm the current status of ponds within 250m and the likely impact of the development on GCN, and in order to determine whether a Non-Licensed Method Statement (NLMS) is still sufficient to manage GCN concerns.

To inform this response, MAGIC<sup>3</sup> was consulted (August 2026) and the closest positive GCN records were 3.92km away. In the intervening time since the surveys (described briefly below) were completed, the UK GCN population is generally understood to have declined, due to the well-publicised decrease in the number and suitability of ponds across the landscape.

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<sup>1</sup> Harper Environmental Ltd. Great Crested Newt Mitigation Method Statement, Partridge Green, December 2025

<sup>2</sup> Email dated 22<sup>nd</sup> July 2026 from Laura [Downs@naturespaceuk.com](mailto:Downs@naturespaceuk.com) to Kate [Turner@horsham.gov.uk](mailto:Turner@horsham.gov.uk) re: DC/26/0835 | Land North Of The Rise Partridge Green West Sussex

<sup>3</sup> <https://magic.defra.gov.uk/>

As set out in the GCN MMS, there have been a number of surveys in the past, through which the absence of GCN was confirmed. Ponds within 250m were identified to have poor suitability, frequently dry and where access was possible, surveys confirmed GCN were absent.

The closest pond (pond 1) is 30m away, and 75m from the part of the site to be developed. During the historic rounds of surveys, no access was ever granted to this pond in 2013, 2016 or 2019. It was recorded that the waterbody was fully enclosed by metal corrugated fencing, with numerous waterfowl presence and the pond was heavily poached. These factors make the presence of GCN historically very unlikely, and colonisation since then even more unlikely. Additionally it was considered unlikely to be able to gain access to the waterbody in future visits due to the repeated access refusals, and so an endeavour to undertake an updated survey in the survey season in 2027 would likely be futile. Pond 4, 70m north-east of the site was surveyed in 2013 and was incredibly shallow (30cm deep) with minimal vegetation. No GCN were recorded during the survey effort, with water levels reducing over the survey period. Access was refused for the 2016 and 2019 round of surveys, with the landowner stating it was man-made and above the water table. Again, any attempt to do an update survey in 2027 would likely be refused. Given climatic conditions the pond is liable to be fully dried out and holding water only for short periods during periods of high rainfall. The remaining three ponds 210 – 240m from the site have all tested negative for GCN via DNA and have had access refusals in either 2016 or 2019.

The time between the surveys and the present date is acknowledged. However those ponds where access was gained were negative for GCN, and access has repeatedly been refused for survey on multiple occasions. The closest ponds were unsuitable to support GCN. Ponds 3 and 5 had the best suitability however these are located 210m and 240m from the site and also tested negative. It is highly unlikely that the ponds have improved in suitability for GCN in the intervening period. Conditions in the UK have also been much drier for the last few years, reducing suitability for the shallowest ponds (ponds 2 and 4).

Overall, even if there were to be a delay to spring 2027 in order to try to survey the ponds within 250m the likelihood is that access would once more be refused. It is considered that trying to undertake further surveys would not achieve anything and cause an unreasonable planning delay to the consented development.

**Given the historic survey results, poor suitability of untested ponds, lack of ponds onsite and the absence of GCN records within 3.92km it is considered that the risk of an offense occurring (i.e. a GCN is found onsite and killed during site clearance) is extremely low.**

**Therefore I am confident in concluding that a Non-Licensed Method Statement (NLMS) as set out in the GCN MMS, is still the most appropriate approach for development of the site.**

A precautionary watching brief has been prescribed for vegetation clearance, with a robust methodology. If any newts are found which has been assessed as incredibly unlikely (negligible potential), works will cease and a protected species licence will be sought at that point. There is

very good reason to have confidence that no harm will occur to protected species, the law won't be broken, and the conservation status of GCN in the area won't be affected.

Should you have any queries about the above, please don't hesitate to contact me.

Yours sincerely

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Dr Stephanie Harper

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