

Our ref: 10973/OGJ

Peter Lee
Tandridge District Council

5th February 2024

Dear Peter

masterplanning ■
environmental assessment ■
landscape design ■
urban design ■
ecology ■
architecture ■
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NUTFIELD GREEN PARK – NATURESPACE FURTHER INFORMATION RESPONSE

This letter has been prepared by FPCR Environment and Design on behalf of Nutfield Park Developments Ltd (NPD) regarding the proposed development at Nutfield Green Park, The Former Laporte Works, Nutfield Road, Nutfield, Surrey (planning ref: 2023/1281). Following submission, Naturespace have provided a response to Tandridge District Council (TDC) as part of their role as a statutory consultee (Naturespace Case Reference: 2023/1281). This letter report has been prepared to respond to Naturespaces initials comments.

In their response, Naturespace has inaccurately stated that “*No waterbodies have been surveyed for their presence/likely absence of great crested newts or assessed for their suitability.*” eDNA surveys were undertaken to inform our Ecological Impact Assessment (EclA) as detailed in the accompanying GCN report submitted as part of the application. In the first instance, we would invite Naturespace to undertake a review of the EclA report submitted to support the application, including all appendices.

It is worth reiterating the key findings of the EclA report that the proposals will deliver significant enhancement for GCN through the provision of native species-rich grassland, mixed scrub, woodlands and additional pond habitats. This will improve breeding and foraging resources across the Site for GCN. The EclA and accompanying GCN report have assessed the risk of the proposals harming or killing GCN is extremely low and so at this stage a Natural England Derogation licence is not considered necessary.

In any event, a RM application will be informed by updated GCN surveys and in the event that any ponds within 250m of the construction area that are suitably connected to the Site are identified as supporting GCN where they were not before, appropriate mitigation measures will be recommended to avoid any breaches in legislation. The Site provides ample opportunities for enhancement where required as part of any Natural England licence application if required. Naturespace’s District Level Licence (DLL) scheme would not be considered an appropriate nor proportionate avenue for mitigation as the scheme incorrectly assumes that all habitats within any given site are lost. This is particularly inaccurate in the case of the Nutfield Green Park scheme as >85% of the Site is proposed for habitat creation/enhancement as part of the 52ha green infrastructure proposals.

Yours faithfully

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A handwritten signature in black ink, appearing to read 'OGJ', with a large, sweeping flourish extending from the end.

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