

Our ref: 10973/OGJ

Peter Lee  
Tandridge District Council

masterplanning ■  
environmental assessment ■  
landscape design ■  
urban design ■  
ecology ■  
architecture ■  
arboriculture ■  
graphic design ■

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Studio 2 Dunley Hill Court  
Dunley Hill Farm  
Ranmore  
Dorking  
Surrey  
RH5 6SX

Tel: 01509 672772  
mail@fpcr.co.uk  
www.fpcr.co.uk

Dear Peter

## 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 Naturespace's initial 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 (EcIA) 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 EcIA report submitted to support the application, including all appendices.

It is worth reiterating the key findings of the EcIA 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 EcIA 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

FPCR Environment and Design Limited.  
Registered in England No: 7128076. Registered Office: Lockington Hall, Lockington, Derby DE74 2RH

Details of Directors and Associates are available on our website.

Offices also at  
Lockington Hall, Lockington, Derby DE74 2RH  
Addlepool Business Centre Clyst St George, Exeter, Devon EX3 0NR  
York Biotech Campus, Sand Hutton, York YO41 1LZ  
Aizlewoods Mill, Nursery Street, Sheffield S3 8GG



Oliver Grice-Jackson  
Associate (Ecology)  
FPCR Environment and Design Ltd

[oliver.jackson@fpcr.co.uk](mailto:oliver.jackson@fpcr.co.uk)