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GREAT CRESTED NEWT IMPACT ASSESSMENT

At

**Woodland North of East Court
Farm**

Church Lane
Gravesend
Kent
DA12 2NL

NGR: TQ 68571 73075

Prepared for:	Xanthe Davies, Glampitect
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Date:	27 th August 2025
UES reference:	UES04241/04





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EXECUTIVE SUMMARY

This report is written by Josh Howard BSc, Graduate Field Ecologist for United Environmental Services (UES) Ltd. It provides an assessment of the potential impacts on great crested newts (GCNs) *Triturus cristatus* as a result of a proposed development at Woodland North of East Court Farm, Kent. The proposed development on the site will involve the construction of seven glamping pods with associated access roads, car parking and landscaping.

A GCN impact assessment was undertaken on 22nd May 2025 by Mark Halliwell. The objectives of the survey were to establish the suitability of the proposed development site for GCNs, and to provide an assessment of the likely impacts of the development and how they can be mitigated. All ponds and aquatic features on site and within 250m of the site boundary were assessed for their potential to support GCNs using the Habitat Suitability Index (HSI).

The proposed development site has an area of approximately 0.71ha and contains areas of dense scrub with areas of bare ground where vegetation removal along an access track has occurred. There are several earth bunds located between the bare ground and dense scrub within the northern section of the site. The southern section of the site contains areas of improved grassland, introduced shrub and hardstanding with a small number of temporary buildings.

Five ponds were identified within 250m of the proposed development site. Pond 1 is located approximate 30m west of the proposed development and is directly connected to the proposed development via a hedgerow. The remaining ponds could not be assessed as part of this survey since access was not permitted.

Pond 1 has direct connectivity to the proposed development site via a hedgerow. However, A Habitat Suitability Index (HSI) assessment found the pond to be of below average suitability for GCNs. Additionally, eDNA results returned negative. Whilst Pond 1 returned a negative eDNA result, likely absence of GCN from Ponds 2 – 5 could not be confirmed as access was not provided to conduct eDNA analysis.

Due to the size of the development, the presence of suitable terrestrial habitat on site and the proximity to ponds whereby absence of GCN could not be confirmed, it is considered “likely” that the proposed development will adversely affect GCN. As an alternative to undertaking GCN surveys and registering the site under a European Protected Species Licence (EPSL), it is proposed that the development will be registered under the Natural England District Level Licencing (DLL) scheme. As such the applicant will make a financial contribution to local amphibian conservation (as agreed with and determined by Natural England as part of the DLL application process). This negates the need to conduct any further surveys or to provide any further mitigation and compensation with regard to GCN and the proposed development.

Mitigation measures detailed in this report must be followed to ensure that the potential for detrimental impacts on other common amphibians is minimised.

The report should be read in conjunction with appendices 1 to 5, which give visual representations of the survey results, and the Preliminary Ecological Appraisal also prepared for the site (UES04241/01).



1 INTRODUCTION

1.1 Author, surveyors and qualifications

This report is compiled and written by Josh Howard BSc, UES Graduate Field Ecologist. Josh is licensed by Natural England to disturb, take and handle great crested newts under licence number 2024-12063-CL09-GCN (level 2).

Other surveyors include:

- Mark Halliwell MBiol, UES Senior Ecologist. Mark is licensed by Natural England to disturb, take and handle great crested newts under licence number 2024-12479-CL09-GCN (level 2).

All surveyors have the knowledge, skills and experience identified within CIEEM's "Competencies for Species Survey: Great Crested Newt" (2013) or were under the supervision of a surveyor with the required competencies.

1.2 Survey objectives

UES was commissioned in June 2024 to conduct site surveys which include the following activities:

- To assess the potential of the proposed development area for use by GCN
- Conduct an HSI assessment of ponds within 250m of site, where accessible
- Recommend further surveys, mitigation and compensation, where appropriate

1.3 Proposed development

The proposed development includes the construction of seven glamping pods with associated access roads, car parking and landscaping.

1.4 Structure of the report

This report sets out the methodology, results, and recommendations in relation to a specific GCN survey. Recommendations are in line with statutory legislation and planning policy objectives.

The report should be read in conjunction with appendices 1 to 5, which give visual representations of the survey results. It should also be read in conjunction with the PEA also prepared for the site (UES04241/01).



2 METHODOLOGY

2.1 Desk study

Aerial photographs and Ordnance Survey maps were used to identify all water bodies on the site and within a 250m radius of the site boundary.

A search for protected species or otherwise notable species and local designated sites was undertaken as part of a previous report (UES04241/01) within a 2km radius of the proposed development site by Kent and Medway Biological Records Centre.

2.2 Field survey

2.2.1 Habitat suitability index (HSI)

A site visit was undertaken on 22nd May 2025. All ponds and aquatic features on site and within 250m of the site boundary were assessed for their potential to support GCNs using the HSI. The HSI is a tool used to provide a numerical indication of the quality of a waterbody in terms of GCN breeding and associated habitat requirements on a scale of 0-1 (0 indicating unsuitable habitat, 1 representing optimal habitat).

HSI scores incorporate ten Suitability Indices (SIs), all of which are factors thought to affect GCNs, namely:

SI 1: Site location	SI 6: Waterfowl presence
SI 2: Size of pond	SI 7: Fish presence
SI 3: Pond permanence	SI 8: Number of ponds within 1km
SI 4: Water quality	SI 9: Terrestrial habitat
SI 5: Perimeter shading	SI 10: Macrophyte cover

In some cases, a net may be used to assess certain SIs, such as water quality. Once a measurement or category has been given for each SI this can then be converted to a figure between 0 and 1 for use in the HSI calculation. This figure is either translated from an assigned category or measurement or read from a graph in the case of a percentage or number.

The HSI is then calculated from the following formula:

$$\text{HSI} = (\text{SI1} \times \text{SI2} \times \text{SI3} \times \text{SI4} \times \text{SI5} \times \text{SI6} \times \text{SI7} \times \text{SI8} \times \text{SI9} \times \text{SI10})^{1/10}$$

This will give a final HSI result between 0 and 1, providing a measure of habitat suitability for GCN.

The information gathered from the survey was used to provide a likelihood of GCNs and other amphibians being present in the area, in both aquatic and terrestrial habitats.

The proposed development, based on the plans provided, was also assessed for the potential to cause harm to GCNs (if present) using the Natural England Rapid Risk Assessment Tool.

All ponds were noted on the pond plan (Appendix 1).



2.2.2 Environmental DNA (eDNA) testing

eDNA testing provides a GCN presence / absence result from water samples taken from a pond, following specific protocols detailed in Biggs *et al.*, 2014. These protocols have been approved by Natural England as a method to determine GCN presence or absence in a waterbody, within the newt breeding season, from 15th April to 30th June. Using the sterile kit provided from a laboratory, 20 water samples are taken from intervals around each pond and then mixed together. From there, a 15ml sample is transferred into each of the 6 sample tubes, which contain a preserving fluid. The samples are kept refrigerated overnight and sent to the laboratory for analysis.

2.3 Survey limitations

Access to Ponds 2, 3, 4, and 5 was not permitted. As such, no eDNA sample could be taken, neither could they be subjected to a HSI assessment.



3 RESULTS

3.1 Terrestrial habitat assessment

3.1.1 The proposed development site

The proposed development site has an area of approximately 0.71ha and contains areas of dense scrub with areas of bare ground where vegetation removal along an access track has occurred. There are several earth bunds located between the bare ground and dense scrub within the northern section of the site. The southern section of the site contains areas of improved grassland, introduced shrub and hardstanding with a small number of temporary buildings. There are also five ponds within a 250m radius of the proposed development site.

3.1.2 Surrounding habitats

The wider area features arable fields demarcated by hedgerows, and pockets of woodland. All five ponds are situated within the surrounding area and outside of the development footprint.

Ponds 3 and 4 are located within arable land to the north of the site, whilst Ponds 1, 2 and 5 are situated within woodland or surrounded by mixed scrub. Pond 1 is in close proximity and well connected to the proposed development site by virtue of a hedgerow.

The land between the ponds and the development area consists of dense scrub, arable land, as well as small pockets of urban and built up areas with associated roads. Lower Higham Road is unlikely to act as a significant barrier for commuting newts, although there are no direct commuting corridors, such as hedgerows, rough grassland or tracts of woodland.

Numerous records indicate the historical presence of GCN within a 2km radius of the proposed development site:

- Records of GCNs were returned from within 2km of the proposed development site, the closest of which is located approximately 404m to the north of the proposed development site in 1982. Within the last 25 years, the closest record is located approximately 1.73km northeast of the site in 2013. Records of common frog *Rana temporaria*, common toad *Bufo bufo*, smooth newt *Lissotriton vulgaris*, and palmate newt *Lissotriton helveticus*, were also returned from within 2km of the proposed development site

In summary, five ponds are present within 250m of the proposed development site. Ponds 3 and 4 are separated from the development site by at least 100m of intensely managed arable land and lack good quality commuting routes. Ponds 2 and 5 are situated within an area of woodland east of the site. Pond 1 is linked to the proposed development site through a hedgerow which will provide a sheltered commuting corridor.

3.2 Aquatic habitat assessment

3.2.1 Pond 1 – Grid reference: TQ 68505 73116

This pond (See Appendix 3 – Photographs 1 & 2) is located approximately 36m west of the proposed development (see Appendix 1 – Pond plan). The pond measures approximately 340m². It is situated by the side of a road and heavily shaded by scrub. The scrub generally



comprises grey willow *Salix cinerea*, but with wild plum *Prunus americana*, bramble *Rubus fruticosus*, hawthorn *Crataegus monogyna* and *Ulmus Sp.* also present. Macrofauna are extremely limited. The only aquatic plants noted were great reedmace *Typha latifolia*. Egg laying opportunities are therefore limited to decaying leaf litter from reedmace and over shading scrub. A poor diversity of aquatic invertebrates were present with only water shrimp and bloodworm noted. No egg folds were noted of GCN or otherwise.

3.2.2 Pond 2 – Grid reference: TQ 68684 73012

This pond is located approximately 80m to the east of the site (Photograph 3). Access was not granted during this survey, although it was accessed during the original PEA undertaken in October 2023. It is a multi-lobed woodland pond that separates and merges as the water level rises and falls. Aquatic vegetation within the pond is solely comprised of common duckweed *Lemna minor*, however, marginal vegetation includes pendulous sedge *Carex pendula*, stinging nettle *Urtica dioica*, cleavers *Galium aparine*, gypsywort *Lycopus europaeus*, and emergent willow *Salix sp.* The pond is entirely shaded by hawthorn and willow scrub.

3.2.3 Pond 3 – Grid reference: TQ 68579 73259

As access was not permitted, no aquatic habitat assessment could be undertaken.

3.2.4 Pond 4 – Grid reference: TQ 68399 73276

As access was not permitted, no aquatic habitat assessment could be undertaken.

3.2.5 Pond 5 - Grid reference: TQ 68786 72945

As access was not permitted, no aquatic habitat assessment could be undertaken.



4 IMPACT ASSESSMENT

4.1 HSI results

Five ponds are present within a 250m radius of the proposed development site.

Pond 1 achieved an HSI score of 56, which indicates the pond is of 'below average' suitability to support breeding GCNs. SIs which particularly reduce the overall score include.

Access was not permitted for the remaining ponds. As such they were not subject to a HSI assessment.

Detailed scores and calculations are included in Appendix 4 – HSI results.

4.2 Impacts

The following rapid risk assessment tool has been developed by Natural England in order to establish whether it is necessary to apply for a licence. It assumes that the pond(s) identified during the site visit are suitable GCN breeding ponds, which in some cases will not be the case.

Component	Likely effect (select one for each component; select the most harmful option if more than one is likely; lists are in order of harm, top to bottom)	Notional offence probability score
Great crested newt breeding pond(s)	No effect	0
Land within 100m of any breeding pond(s)	0.1 – 0.5 ha lost or damaged	0.5
Land 100-250m from any breeding pond(s)	0.1 – 0.5 ha lost or damaged	0.1
Land >250m from any breeding pond(s)	0.1 – 0.5 ha lost or damaged	0.005
Individual great crested newts	No effect	0
Maximum:		0.5
Rapid risk assessment result:		AMBER: OFFENCE LIKELY

"Amber: offence likely" indicates that the development activities are of such a type, scale and location that an offence is likely. In this case, the best option is to redesign the development (location, layout, methods, duration or timing; see **Non-licensed avoidance measures tool**) so that the effects are minimised. You can do this and then re-run the risk assessment to test whether the result changes or preferably run your own detailed site-specific assessment. Bear in mind that this generic risk assessment will over- or under-estimate some risks because it cannot consider site-specific details, as mentioned in caveats above. In particular, the exact location of the development in relation to resting places, dispersal areas and barriers should be critically examined. Once you have amended the scheme you will need to decide if a licence is required; this should be done if on balance you believe an offence is reasonably likely.

The key components of the risk assessment contributing to the result of 'Amber: offence likely' is the size of the development area and proximity to nearby ponds. However, Pond 1 was assessed as 'below average' by the Habitat Suitability Index and eDNA results returned a negative result.

Despite this, Ponds 2 – 5 could not be accessed as part of this survey, and whilst the proposals are limited in nature and there are no recent records of GCN within the development area, the presence of GCN cannot be discounted.



5 RECOMMENDATIONS

As an alternative to undertaking GCN surveys and registering the site under an EPSL, it is proposed that the development will be registered under the Natural England DLL scheme. As such the applicant will make a financial contribution to local amphibian conservation (as agreed with and determined by Natural England as part of the DLL application process). This negates the need to conduct any further surveys or to provide any further mitigation and compensation with regard to GCN and the proposed development.

Although the presence of GCNs on site is considered to be unlikely, works on site should still be completed under the following reasonable avoidance measures, in order to safeguard other common amphibian species which may be present on site:

- The grassland on site should continue to be mown / grazed to have a sward length below 10cm to discourage amphibians from sheltering within the working area. The grassland will then be maintained with a short sward until the works on site have been completed.
- No excavations are to be left open overnight. If this is not feasible, a plank should be left within the excavation at a 45° angle to allow amphibians to escape. Any open excavations should be checked for amphibians in the morning prior to the start of works on site.
- All open excavations are to be checked for trapped wildlife immediately prior to backfilling.
- Materials will be stored on pallets off the ground in order to reduce the risk of amphibians sheltering underneath them.



6 CONCLUSION

The development proposals involve the construction of seven glamping pods with associated access roads, car parking and landscaping.

The proposed development site has an area of approximately 0.71ha and contains areas of dense scrub with areas of bare ground where vegetation removal along an access track has occurred. There are several earth bunds located between the bare ground and dense scrub within the northern section of the site.

Five ponds are located within a 250m buffer of the proposed development site. However, access was only granted to Pond 1. As such it is the only pond that was subject to eDNA sampling and a HSI assessment.

Pond 1 has direct connectivity to the proposed development site via a hedgerow. However, A Habitat Suitability Index (HSI) assessment found the pond to be of below average suitability for GCNs. Additionally, eDNA results returned negative. Whilst Pond 1 returned a negative eDNA result, likely absence of GCN from Ponds 2 – 5 could not be confirmed as access was not provided to conduct eDNA analysis.

Due to the size of the development, the presence of suitable terrestrial habitat on site and the proximity to potential GCN breeding ponds, it is considered “likely” that the proposed development will adversely affect GCN. As an alternative to undertaking GCN surveys and registering the site under an EPSL, it is proposed that the development will be registered under the Natural England DLL scheme. As such the applicant will make a financial contribution to local amphibian conservation (as agreed with and determined by Natural England as part of the DLL application process). This negates the need to conduct any further surveys or to provide any further mitigation and compensation with regard to GCN and the proposed development.

Mitigation measures detailed in section 5 of this report must be followed to ensure that the potential for detrimental impacts on other common amphibians is minimised.



7 REFERENCES

Anon. (2001). *Great Crested Newt Mitigation Guidelines*. English Nature.

Chartered Institute of Ecology and Environmental Management (2013). *Competencies for Species Survey: Great Crested Newts*.

Ministry of Housing, Communities & Local Government (2024). *National Planning Policy Framework*.

Oldham R.S., Keeble J., Swan M.J.S. & Jeffcote M. (2000). *Evaluating the suitability of habitat for the Great Crested Newt* (*Triturus cristatus*). *Herpetological Journal* 10 (4), 143-155.



APPENDICES

Appendix 1 – Pond plan



Preliminary Ecological Appraisal

Site: Woodland North of East
Court Farm, Kent
NGR: TQ 68571 73075
Author: Ysobella Cox
Date: 20.11.2023



Key

- A2.1 - Dense scrub
- B4 - Improved grassland
- G1 - Standing water
- J4 - Bare ground
- J5 - Hardstanding
- Target note
- Survey boundary

Map data © 2023 Google, Imagery © 2023 Google

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Appendix 2 – Aerial photographs



**Woodland North of East Court
Farm, Gravesend**

Close aerial photograph

— Development boundary





**Woodland North of East Court
Farm, Gravesend**

Wide aerial photograph

 Site location





Appendix 3 – Photographs



Photograph 1 – Roadside view of Pond 1 featuring great reedmace, bramble, and willow scrub.



Photograph 2 – Roadside view of Pond 1 displaying the extent of great reedmace's cover.



Photograph 3. View within Pond 1 showing the low water levels and absence of macrophytes.



Photograph 4 – Pond 2, with a cover of *Lemna minor*.



Photograph 5 – View of Pond 2's edge displaying the decreased water level.



Appendix 4 – HSI results

GCN HSI Calculations

	Pond number	1	2	3	4
	Grid reference	TQ 68505 73116	TQ6866073007	TQ6857773252	TQ6840573253
SI number	SI description	SI Results			
1	Geographic location	1	N/A - pond not assessed	N/A - pond not assessed	N/A - pond not assessed
2	Pond area	0.2			
3	Pond permanence	0.9			
4	Water quality	0.33			
5	Shade	0.4			
6	Water fowl	1			
7	Fish	1			
8	Pond density	1			
9	Terrestrial habitat	0.33			
10	Macrophyte cover	0.4			
HSI score:		0.56			
Pond suitability:		Below average	N/A	N/A	N/A

HSI Score	Pond Suitability
< 0.50	Poor
0.50 - 0.59	Below average
0.60 - 0.69	Average
0.70 - 0.79	Good
> 0.80	Excellent

5
TQ6878072942
N/A - pond not assessed
N/A



Appendix 5 – eDNA results

Folio No: 1900-2025
Purchase Order: UES04241
Contact: United Environmental Services Ltd (UES)
Issue Date: 11.06.2025
Received Date: 28.05.2025

GCN Report

Technical Report



SureScreen Scientifics

Folio No: 1900-2025
Purchase Order: UES04241
Contact: United Environmental Services Ltd (UES)
Issue Date: 11.06.2025
Received Date: 28.05.2025

GCN eDNA Analysis

Summary

When great crested newts (GCN), *Triturus cristatus*, inhabit a pond, they continuously release small amounts of their DNA into the environment. By collecting and analyzing water samples, we can detect these small traces of environmental DNA (eDNA) to confirm GCN habitation or establish GCN absence.

Results

Lab ID	Site Name	OS Reference	Degradation Check	Inhibition Check	Result	Positive Replicates
GCN25 1225	Woodland North East Court Farm	TQ 68513 73119	Pass	Pass	Negative	0/12

Matters affecting result: none

Reported by: Amy Bermudez

Approved by: Jennifer Higginbottom

Methodology

The samples detailed above have been analyzed for the presence of GCN eDNA following the protocol stated in DEFRA WC1067 'Analytical and methodological development for improved surveillance of the Great Crested Newt, Appendix 5.' (Biggs et al. 2014). Each of the 6 sub-sample tubes are first centrifuged and pooled together into a single sample tube which then undergoes DNA extraction. The extracted sample is then analyzed using real-time PCR (qPCR), which uses species-specific molecular markers to amplify GCN DNA within a sample. These markers are unique to GCN DNA, meaning that there should be no detection of closely related species.

If GCN DNA is present, the DNA is amplified up to a detectable level, resulting in positive species detection. If GCN DNA is not present then amplification does not occur, and a negative result is recorded. Analysis of eDNA requires attention to detail to prevent the risk of contamination. True positive controls, negative controls, and spiked synthetic DNA are included in every analysis and these have to be correct before any result is declared and reported. Stages of the DNA analysis are also conducted in different buildings at our premises for added analytical security.

SureScreen Scientifics Ltd is ISO9001 accredited and participates in Natural England's proficiency testing scheme for GCN eDNA testing.

Interpretation of Results

Sample Integrity Check:

When samples are received in the laboratory, they are inspected for any tube leakage, suitability of sample (not too much mud or weed etc.) and absence of any factors that could potentially lead to inconclusive results. Any samples which fail this test are rejected and eliminated before analysis.

Degradation Check:

Pass/Fail. Analysis of the spiked DNA marker to see if there has been degradation of the kit or sample between the date it was made to the date of analysis. Degradation of the spiked DNA marker may lead indicate a risk of false negative results.

Inhibition Check:

Pass/Fail. The presence of inhibitors within a sample is assessed using a DNA marker. If inhibition is detected, samples are purified and re-analyzed. Inhibitors cannot always be removed, if the inhibition check fails, the sample should be re-collected.

Result:

Presence of GCN eDNA (Positive/Negative/Inconclusive)

Positive: GCN DNA was identified within the sample, indicative of GCN presence within the sampling location at the time the sample was taken or within the recent past at the sampling location.

Positive Replicates: Number of positive qPCR replicates out of a series of 12. If one or more of these are found to be positive the pond is declared positive for GCN presence. It may be assumed that small fractions of positive analyses suggest low level presence, but this cannot currently be used for population studies. In accordance with the WC1067 Natural England protocol, even a score of 1/12 is declared positive. 0/12 indicates negative GCN presence.

Negative: GCN eDNA was not detected or is below the threshold detection level and the test result should be considered as evidence of GCN absence, however, does not exclude the potential for GCN presence below the limit of detection.

Inconclusive: Controls indicate inhibition or degradation of the sample, resulting in the inability to provide conclusive evidence for GCN presence or absence.





Appendix 6 – Statutory and planning context

Ecological assessments

Ecological assessments play an important part within the planning context; they include an initial assessment which highlights any specific interests of a site. From the initial site assessment, the surveyor assesses the suitability of habitats within the site to support protected species and makes recommendations for further survey works if required. The following paragraphs provide a brief interpretation of the legislative protection that is relevant to the findings of this report.

Great crested newts

Great crested newts (GCN) *Triturus cristatus* and their habitat (aquatic and terrestrial) are afforded full protection by the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2017.

If both national and international legislation are taken together, it is an offence to:

- Deliberately, intentionally or recklessly kill, injure or capture GCN
- Deliberately, intentionally or recklessly disturb GCN in such a way to be likely to significantly affect:
 - their ability to survive, breed, reproduce, rear or nurture their young
 - their ability to hibernate or migrate
 - their local distribution or abundance
- Deliberately, intentionally or recklessly take or destroy the eggs of GCN
- Damage or destroy breeding sites or resting places of GCN
- Intentionally or recklessly disturb sheltering GCN, or obstruct access to their resting place
- Keep, transport, sell or exchange, or offer for sale or exchange any live or dead GCN, any part of GCN or anything derived from GCN

Penalties for offences include fines of up to £5000, plus up to six months imprisonment, for each offence committed.

GCN are also protected by the Protection of Animals Act 1911, which prohibits cruelty and mistreatment. Releasing a GCN in such a way as to cause undue suffering may be an offence under the Abandonment of Animals Act 1960.

In addition to the above, there are various statutory provisions relating to the transport of animals, designed to ensure their welfare. GCN are also listed under Section 41 of the NERC Act.

It is important to identify the presence of GCN individuals and also to identify suitable habitat on sites so that legal obligations regarding this species can be observed. If a survey identifies the presence of GCN on the site, an assessment of the population size class is required. This can then inform a mitigation scheme, which would need to be developed in liaison with the local Natural England team, and which minimises direct threats to newts and compensates for any loss of habitat. A licence issued by Natural England is required for the legal implementation of a mitigation scheme.

A Natural England mitigation licence application requires a Mitigation Method Statement and a Reasoned Statement of Application. The Mitigation Method Statement contains details of the proposed mitigation works. The Reasoned Statement needs to provide a rational and reasoned justification as to why the proposed development meets the requirements of the Conservation (National Habitats & c.) regulations 1994, namely Regulations 44(2)(e), (f) or (g), and 44(3)(a).

Other amphibians

More common British amphibians, such as Common frog *Rana temporaria*, Common toad *Bufo bufo*, Smooth newt *Triturus vulgaris* and Palmate newt *Triturus helveticus* are protected only by

Section 9(5) of the Wildlife and Countryside Act 1981 (as amended). This section prohibits sale, barter, exchange, transporting for sale and advertising to sell or to buy.

The above named species are also listed as UK Species of Conservation Concern. Due to general declines in most British amphibian species in recent years, many local authorities require amphibian surveys as a planning condition, or as part of environmental information submitted as part of a planning application, even where the presence of GCN is ruled out.

Natterjack toad *Bufo calamita* and Pool frog *Pelophylax lessonae* are also offered the same level of protection as GCN, through the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2017. Natterjack toad, Common toad and Pool frog are also listed under Section 41 of the NERC Act.

Water bodies that support all five (more common) species of British amphibians in high numbers, may be afforded protection in local plans, as Sites of Importance for Nature Conservation (SINC), or a similar equivalent, for sites of local importance. A site may require statutory protection as a Site of Special Scientific Interest (SSSI).

Planning policy

National Planning Guidance is issued in the form of the National Planning Policy Framework 2021 (NPPF). The most relevant section is 15: Conserving and enhancing the natural environment.

Key relevant principles stated in 15: Conserving and enhancing the natural environment are;

- 174.** Planning policies and decisions should contribute to and enhance the natural and local environment by:
- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
 - b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
 - c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
 - d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
 - e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
 - f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.
- 179.** To protect and enhance biodiversity and geodiversity, plans should:
- a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity⁶¹; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation⁶²; and
 - b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity

- 180.** When determining planning applications, local planning authorities should apply the following principles:
- a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;
 - b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;
 - c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons⁶³ and a suitable compensation strategy exists; and
 - d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.