**From:** Turner, Owen   
**Sent:** 17 December 2024 09:48  
**To:** [Nathan.Nicholls@Barnet.gov.uk](mailto:Nathan.Nicholls@Barnet.gov.uk)  
**Cc:** Pugh, Steve <[steven.pugh@naturalengland.org.uk](mailto:steven.pugh@naturalengland.org.uk)>  
**Subject:** RE: GCN and precautionary working method - response required

Dear Mr Nicholls,

Thank you for the query and apologies with the delay getting back to you. I’ve provided some clarification on some of your points below.

As mentioned by Dylan, you are correct that further survey work should be undertaken in and around the site before a decision is made as to whether or not a licence is required for the works. High HSI scores and positive eDNA results are a fairly conclusive indicator that GCN may be present and that a population size class assessment survey would be required. In some applications, we permit the use of Licencing Policy 4 (LP4) when surveys cannot be completed or are limited. However, LP4 is not a substitute for survey, but rather a way to facilitate a reduced effort. We would expect applicants to survey as much of the surrounding area as possible and provide justification as to why certain ponds could not be monitored before granting the use of LP4. In addition to this, licencing policies can only be used in licencing applications and are issued at Natural England’s discretion. Any action taken quoting a licencing policy without a licence and expressed permission from Natural England would constitute a wildlife crime.

With regards to the plan to complete works under a precautionary method statement, whilst I cannot provide advice on a specific document, I would say that given the location of the site and the number of ponds in the immediate vicinity, this would be extremely high risk in the absence of a survey confirming the absence of a GCN population on site (or the presence of an extremely small one). Should the development area be considered GCN habitat, and the favourable conservation status of the local population be impacted by the works under a precautionary method statement without a licence from Natural England, then this would again constitute a wildlife crime. If you believe this has occurred, then you should contact your local wildlife crime officer.

As mentioned, I cannot provide comment on a specific document such as this in the absence of a licence application. However, if the ecologist or the applicant are seeking advice on any plans or proposals, they should look to contact us through our DAS and PSS schemes. This service will allow them to speak to one of our officers who will be able to directly advise them on the suitable course of action. If they wish to make an enquiry, you can direct them to this mailbox: [PSSEnquiries@naturalengland.org.uk](mailto:PSSEnquiries@naturalengland.org.uk)

I hope that addresses most of your questions, and apologies again for the delay. If you wish to discuss this further, you can reply directly to this email or give me a call on the number in the email signature below.

Thank you,

Kind regards,

Owen Turner

Senior Wildlife Licensing Officer

Natural England Wildlife Licensing Service

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[**www.gov.uk/natural-england**](https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.gov.uk%2Fnatural-england&data=05%7C02%7CNathan.Nicholls%40Barnet.gov.uk%7C131c4be560874477135008dd1e8123f0%7C1ba468b914144675be4f53c478ad47bb%7C0%7C0%7C638700262240723487%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=Y37UIDcSXc8WMaCxz3hYav8JpGJ0Vl1VFeY1o4Mpym4%3D&reserved=0)



To help people consider the environment Natural England offers two chargeable services   
- the [Discretionary Advice Service](https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.gov.uk%2Fguidance%2Fdevelopers-get-environmental-advice-on-your-planning-proposals&data=05%7C02%7CNathan.Nicholls%40Barnet.gov.uk%7C131c4be560874477135008dd1e8123f0%7C1ba468b914144675be4f53c478ad47bb%7C0%7C0%7C638700262240741263%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=NhuPMXLhfKssp8CmIM3RUzsUFgGjcbeFnN8A%2FyGa2ZU%3D&reserved=0) (DAS), which can provide advice on planning/licensing proposals   
- the [Pre-submission Screening Service](https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.gov.uk%2Fguidance%2Fpre-submission-screening-service-advice-on-planning-proposals-affecting-protected-species&data=05%7C02%7CNathan.Nicholls%40Barnet.gov.uk%7C131c4be560874477135008dd1e8123f0%7C1ba468b914144675be4f53c478ad47bb%7C0%7C0%7C638700262240758007%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=f6VpsV9dT1R%2FFAwvxVYi8kAlEFg04DTMABfABmPPznM%3D&reserved=0) (PSS) for European Protected Species mitigation licence applications.