

East Lancashire Paper Mill, Radcliffe

OTTER SURVEY REPORT

784-B038963

Morris Homes

October 2023

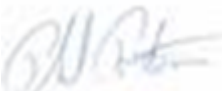
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EXECUTIVE SUMMARY

Contents	Summary
Site Location	The site is located at East Lancashire Paper Mill, Radcliffe (approximately 4.8 km south of Bury in Greater Manchester, National Grid Reference: SD 79296 07445).
Proposals	The proposals are for a residential development, providing up to 400 homes and will include relocation of cricket pitch, including a pavilion, provision of open space and sports facilities and demolition of existing building and structures. As well as reducing the height of the retaining wall along the River Irwell to create a riparian buffer zone and the deculverting of Crow Trees Farm channel. The drawing plan shows the proposed development layout of the site (Appendix B - PL0-P4 and M3477-SD-01-V07)
Previous Results	List of previous reports: • WYG (2016) Extended Phase 1 Habitat Survey Report • WYG (2017) East Lancashire Paper Mill, Badger Site Inspection Report • WYG (2017^a) East Lancashire Paper Mill, Badger Survey Report • WYG (2018) Preliminary Ecological Appraisal • WYG (2018^a) Ecological Appraisal
Scope of this Survey(s)	The scope of this survey is to determine the presence or likely absence of otter using habitats on site and the river immediately adjacent to site to inform an assessment on the potential impacts of development of the site, upon otter to discharge planning condition 16. Completed via a desk-based study as well as a field survey of the site.
Results and Evaluation	• The desk study returned 23 recent records of otter from within 2 km of the site. • Remote cameras identified presence of otter foraging and commuting along the River Irwell within close proximity to the site (approximately 5m from southern boundary). • Due to the high retaining wall directly adjacent to site (See figure 2) there is no potential for resting places or otter holts along this section of the River Irwell. • Due to certain limitations on this survey such as the presence of giant hogweed and unstable banks it was not possible to survey upstream (to the south-east) of the River Irwell. Therefore, it is possible that an otter holt may be present upstream of the site. Even if this is the case this holt would be far enough away from the construction site to not be affected by the works.
Recommendations	Brief summary of recommendations: Mitigation: • Drawing plans (Appendix B - PL0-P4 and M3477-SD-01-V07) shows that hard construction works will take place approximately 30m away from the watercourse and within the current redline

	boundary, therefore an additional buffer zone will not be required. However, works are also planned to the retaining wall to create a high quality riparian buffer zone, including de-culverting Crow Trees Farm Brook, to discharge condition 32 For these works, works should proceed under a method statement as per condition 34. • Avoid working within 30m of the watercourse except for riparian zone works. • Avoid working after dark. • Avoid construction lights at night illuminating the watercourses and suitable habitat surrounding the watercourses likely used by otter. • It is unlikely that any chemicals will be stored near the watercourse, if this is not the case then an appropriate spill kit must be available for secure storage. • Works must follow all pollution prevention measures as per the Construction Management Plan and Industry standard Pollution prevention measures when working in, or near water to promote best practice on site and protect water course. • Backfilling or providing a ramp in excavations before dusk to avoid otter becoming trapped in them. • Site contractors must be made aware, during site inductions, of the presence of otter adjacent to site, and informed what action is to be taken if otter or any evidence of otter are found. Recommendations: • A pre-construction otter survey is to be undertaken once all the invasive plant species have been removed, meaning visibility and access would have improved. Enhancement: • As per landscape plan M3477-SD-01-V07 (appendix B) there is to be retained and newly planted vegetation around the river. To enhance the area for otter, scrub planting with fruit bearing and spikey plants such as blackthorn, hawthorn and bramble, should be favoured to provide a barrier on the Southern perimeter of the site between the current site and the River Irwell; • Invasive plant control due to giant hogweed, under ecological supervision if closer than 30m from the River Irwell; and, • Cleaning the immediate area of fly tipping, under ecological supervision if closer than 30m from the River Irwell.
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1.0 INTRODUCTION

1.1 BACKGROUND

Tetra Tech was commissioned by Morris Homes in September 2022 to undertake an otter (*Lutra lutra*) survey update of the site known as East Lancashire Paper Mill, Radcliffe (hereafter referred to as the 'site'). This follows the completion of an extended Phase 1 habitat survey undertaken in November 2018 by WYG (WYG, 2018^a) which identified that otters are likely to commute through the River Irwell immediately adjacent to the southwest of the site and it is possible that they might occasionally frequent the site to forage and seek places of shelter.

Outline planning permission was granted on 9th September 2022 (Planning Reference: 67597 and 62969). Condition 16 relates to otters associated with this site and states:

"Any application for reserved matters approval relating to land affecting otters shall include an assessment on the potential impacts upon the otters".

This report was prepared by Tetra Tech Consultant Ecologist Katrina Caine BSc (Hons). The conditions pertinent to this report are provided in Appendix A.

1.2 SITE DESCRIPTION

The 'site' is located in Radcliffe (approximately 4.8 km south of Bury) in Greater Manchester. The central Ordnance Survey Grid Reference of the site is SD 79296 07445 (Figure 1).

The site is approximately 18.9 hectares and comprises habitats such as hardstanding, scrub, standing water, amenity grassland, introduced shrub, mature trees, bare ground and buildings.

In the wider area there are large expanses of woodland located in Springwater Park (approximately 0.75km east of the site). Between Springwater Park and the east of the site there is mainly scrub, marsh and grassland habitat. The River Irwell borders the southwest of the site and hydrologically connects Springwater Park to the site. There is also woodland along the south of the river corridor, approximately 0.5km south of the site. Immediately north and west of the site is the urbanised area of Radcliffe.

1.3 DEVELOPMENT PROPOSALS

The proposals are for a residential development, providing up to 400 homes and will include relocation of cricket pitch, including a pavilion, provision of open space and sports facilities and demolition of existing building and structures.

The retaining wall along the River Irwell is to be removed in order to create the functional flood plain on site. A high quality riparian buffer zone will be created to discharge condition 32 along with a method statement for its creation to discharge condition 34.

The drawing plans show the proposed development layout of the site (Appendix B - PL0-P4 and M3477-SD-01-V07).

1.4 PURPOSE OF REPORT

The objective of the assessment is to:

- Determine the presence or likely absence of otter using the River Irwell and habitats associated with the East Lancashire Paper Mill, covering a minimum distance of 200m of the River Irwell (where access available).
- Identify if any additional surveys are required to inform this assessment.
- Determine if any potential impacts on otter are likely to arise from the development.
- Provide preliminary advice and outline strategies to avoid/mitigate/compensate for any likely impacts on otter to discharge planning condition 16.

Note that scientific names are provided at the first mention of each species and common names (where appropriate) are then used throughout the rest of the report for ease of reading.

2.0 METHODOLOGY

2.1 PREVIOUS REPORTS

Previous reports relevant to the site have been reviewed for this report and discussed within the results section. These reports include:

List of previous reports:

- WYG (2016) Extended Phase 1 Habitat Survey Report
- WYG (2017) East Lancashire Paper Mill, Badger Site Inspection Report
- WYG (2017^a) East Lancashire Paper Mill, Badger Survey Report
- WYG (2018) Preliminary Ecological Appraisal
- WYG (2018^a) Ecological Appraisal

2.2 LOCAL ECOLOGICAL RECORDS CENTRE

Information was requested from the Greater Manchester Local Record Centre (GMLRC) on the 26th of October 2022 for records of otters and designated sites relating to otters within a 2 km radius of the site.

2.3 FIELD SURVEYS

On 12th October 2022 an otter survey was undertaken at the site, the survey area covered the River Irwell and a buffer area of 50m upstream and 50m downstream where access permitted – see Figure 2. The survey was conducted by Tetra Tech Associate Ecologist Phil Preston MCIEEM and Tetra Tech Consultant Ecologist Katrina Caine. The weather conditions were 13°C, intermittent rain and overcast with a light breeze.

The otter survey was undertaken in accordance with the best practice guidelines ‘Monitoring the Otter’ (Chanin, 2003). The survey involved two surveyors walking the riverbanks and surrounding habitat areas to check for signs of otters including spraints, slides, runs, footprints, feeding remains, anal jelly, couches/ resting places and holts.

The survey was undertaken, following periods of dry weather so that signs of otter would not have been removed as there had been no recent flooding and focused on features more likely to be used by otters including bases of large trees, dense vegetation, and boulders.

The identification of otter resting places is determined by a range of factors but for this report are categorised as below:

- Actual- the feature shows clear signs of otter use including well worn paths, associated spraints and/ or footprints, or camera trap imagery showing recorded presence;
- Possible- the feature meets the requirements for otter with known activity in the area and signs of otter in close vicinity to the resting place but no indication the entrance is in use; and
- Potential- the feature meets the requirements for otter but no signs of otter in close proximity.

To provide additional survey data four remote sensor infra-red cameras (Bushnell HD) were deployed for an initial 21-day monitoring period (see Figure 2 for locations and Appendix C for target notes). The locations for the camera traps were limited due to large areas of the bank of the River Irwell being covered with giant hogweed, making them inaccessible. Camera traps need to be attached to stable objects (ideally trees) and these were limited along the bank, meaning the cameras were located close together due to a lack of stable objects along the bank. The cameras were initially deployed on 3rd November 2022, with camera checks (including SD card swaps) occurring once every week and then collected in on the 24th of November (total of 2 checks).

2.4 LIMITATIONS

Otter surveys can be carried out at any time of year but is best to avoid periods following prolonged heavy rainfall and/or high water when spraints and other signs of otter may have been washed away (NatureScot).

During the initial survey there was light rain, however this was not heavy enough to wash away any signs of otter.

Water levels were higher than usual, on the day of the field survey however this did not affect the survey.

Access to River Irwell banks was limited due to the urban location of the site and river, with the surveyors inspecting for otter signs standing at the top of the retaining wall and from the areas that were accessible along the bank. The depth and flow rate of the river meant that no direct access to either the river or the retaining wall was possible. The western section of the site had a retaining wall, therefore there was no access to the riverbank on this side. As well as this, some areas of the banks could also not be accessed due to the presence of dense scrub vegetation and Giant Hogweed (although these areas were assessed in WYG, 2018 when vegetation levels were low).

On the day of the survey (12th of October 2022) surveyors attempted to survey the large pond on site (approximately 200m Northeast of the River Irwell). However due to a large metal fence surrounding the pond surveyors were unable to access and survey this area.

The details of this report will remain valid for a period of **one year** from the date of the survey, after which the validity of this assessment must be reviewed to determine whether further updates are necessary. Note that the recommendations within this report must be reviewed (and reassessed if necessary) should there be any changes to the red line boundary or development proposals which this report was based on.

3.0 BASELINE CONDITIONS

3.1 PREVIOUS SURVEY RESULTS

An Ecological Appraisal (WYG, 2016 and WYG, 2018) of the site was carried out in December 2016 and in August 2018. Neither of these two surveys identified any suitable habitat for otter within the site boundary and the habitats were found to be sub-optimal, however, the report stated that otters are likely to commute through the River Irwell immediately adjacent to the southwest of the site and it is possible that they might occasionally frequent the site to forage and seek places of shelter based on species records.

3.2 LOCAL RECORDS CENTRE

The data provided by GMLRC returned 23 recent records of otter from within 2 km of the site. Records dated from 2019 to 2022. The closest record was located next to the River Irwell 0.5 km southeast of the site.

No designated sites were found within 2 km that relate to otter.

3.3 RESULTS

Although no evidence of otter (holts, spraints or prints) was found during the field survey, otter were confirmed present via the camera traps throughout the monitoring period.

Otters recorded during camera trapping are detailed in Table 1 below, and locations noted in Figure 2.

Table 1: Remote Camera Results

Camera Reference (See Figure 2 for location)	Description	Photographs
Camera 2	A camera trap recorded one adult otter passing along the banks to the south of the site on 3 rd November 2022.	Photograph 1 

Camera Reference (See Figure 2 for location)	Description	Photographs
Camera 2	A camera trap recorded one adult otter passing along the banks to the south of the site on 8 th November 2022.	Photograph 2 

The majority of the terrestrial habitat within the site was sub-optimal for supporting otter, however the River Irwell has a consistent water flow providing a range of fish species for otter prey and can provide unobstructed commuting links to suitable habitat sites.

The on-site pond was inaccessible to surveyors due to a large metal fence surrounding it.

The majority of the northern bank of the adjacent section of the River Irwell comprises a vertical brick retaining wall (See Figure 2) which does not provide any potential for resting places or holts.

Incidental:

Giant Hogweed is listed as Schedule 9 under the Wildlife and Countryside Act 1981 and as such it is an offence to cause the spread of this invasive species.

4.0 RELEVANT LEGISLATION

Otters are afforded full protection under Section 9 of the W&CA through their inclusion on Schedule 5 of the Act and also receive full protection as European Protected Species under The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019, known as the Habitats Regulations.

This makes it an offence to:

- Intentionally, deliberately or recklessly capture, kill, injure or take a wild otter; and/or
- Intentionally, deliberately or recklessly damage or destroy any breeding site, structure or resting place which any otter uses for shelter or protection;
- **Intentionally, deliberately, or recklessly disturb any otter while it is occupying a structure or place which it uses for shelter or protection; and/or**
- Intentionally or recklessly obstruct access to any structure or place which an otter uses for shelter or protection; and/or
- Deliberately take an animal; and/or
- Deliberately possess or control, transport, sell or exchange or offer for sale or exchange and live or dead otter or any part or derivative of one (if obtained after May 1994); and/or
- Sell, offer or expose for sale, or possess or transport for the purpose of sale, any live or dead otter, or any part of anything derived from such an animal; and/or
- Publish or cause to be published any advertisement likely to be understood as conveying that one buys or sells, or intends to buy or sell, any of those things; and/or
- Knowingly cause or permit any of the above acts to be carried out.

Disturbance is defined as that which is likely to impair their ability to:

- Survive, to breed or reproduce, or to rear or nurture their young, or to hibernate or migrate; or
- To affect significantly the local distribution or abundance of the species.

5.0 IMPACT ASSESSMENT

Otters are present and using the River Irwell for foraging and commuting purposes. However due to the high retaining wall directly adjacent to site (See figure 2) there is no potential for resting places or otter holts along this part of the River Irwell. The Greater Manchester Ecology Unit report 2018 states that, 'it is unlikely that they utilise the site because of the high retaining walls'.

Due to certain limitations on this survey such as the presence of giant hogweed and unstable banks it was not possible to survey upstream (to the south-east) of the River Irwell. Therefore, it is possible that an otter holt may be present upstream of the site and has not been identified by surveyors. Even if this is the case this holt would be far enough away from the construction site to not be affected by the works.

The River Irwell watercourse forms an important foraging and commuting area for otters and is of local importance value. This is based on the number of records of otters recorded via the desk study as well as the camera traps along the river during the monitoring period.

With the construction of 400 new houses as well as sports facilities and roads so close to the River Irwell it is likely to increase disturbance events around the river. However, site design plans show that the proposals will provide better foraging opportunities in the long term due to the deculverting of Crow Trees Farm channel to the pond. It is therefore considered that the project is unlikely to affect conservation status of otters in the river during construction phase and operational phases provided recommendations are followed.

As the current site is in a heavily urbanised area with rail and section of scrap yard in close proximity it has been considered that noise will not be a factor during works.

5.1 DISTURBANCE DURING CONSTRUCTION AND OPERATION

The standing advice guidance in England does not provide disturbance distances, therefore guidance provided within the Northern Ireland Environment Agency (NIEA) and Scotland's Nature Agency (NatureScot) standing advice has been applied to this site.

Based on available guidance (NIEA, undated, Liles, 2003 and NatureScot standing advice) non-breeding otter are susceptible to disturbance within 30m of an otter resting place.

6.0 MITIGATION AND LICENSING

Design plans (Appendix B - PL0-P4 and M3477-SD-01-V07) shows that building works will take place approximately 30m away from the watercourse and within the current redline boundary therefore an additional buffer zone will not be required. However, works on the retaining wall and riparian zone will come within 30m of the river.

No mitigation licenses for otters are required for this project, due to there being no potential for holts directly adjacent to the site. However, the following measures must be implemented during the construction phase:

- Adherence to a method statement as per planning condition 34.
- Provision of Toolbox Talk to Site Personnel - Prior to any works being undertaken, a suitably qualified ecologist will provide a toolbox talk to communicate the potential for otter frequenting

the watercourses. The toolbox talk will include contingency measures if otter are recorded on site at any stage of construction as detailed below.

- Emergency Procedure - An emergency procedure will be communicated to site personnel via the toolbox talk emphasising that if any signs of otter be encountered or suspected, all works in the area will cease and the ecologist informed immediately.
- Working Hours - Otter movement up and downstream for foraging and commuting is more likely to be undertaken during the hours of darkness. Works will be restricted to daylight hours wherever possible, avoiding any work and construction lighting illuminating the watercourses after dark within 30m of the River Irwell with work only being undertaken between the hours of 07:00 and 20:00 in order to minimise disturbance.
- Access to the River Irwell must be restricted to prevent any disturbance to foraging and commuting areas, with care to be taken not to block the river.
- Site compound- the site compound (including all machine, chemical and material storage) must be located as far as possible away from the River Irwell - minimum of 30m.
- Artificial Lighting Controls - Some additional lighting may be required during the construction. Directional lights will be discussed with the ecologist to minimise any risk of disturbance on any fauna that may potentially be present in the working area.
- Standard best practice and pollution control measures must be followed at all times during construction (e.g. CIRIA, 2001) to reduce the potential of the retained eastern lake and other watercourses being impacted by dust, uncontrolled surface water run-off or other pollution incidents.
- Backfilling or providing a ramp in excavations before dusk to avoid otter becoming trapped in them.

RECOMMENDATIONS

It is recommended that the following measures are considered as part of the scheme for otter and other wildlife using the watercourses:

- A pre-construction otter survey is undertaken once all the invasive plant species have been removed around the riverbank, meaning visibility and access would have improved.

ENHANCEMENT

It is recommended that the following enhancement measures are considered as part of the scheme for otter and other wildlife using the watercourses:

- As per landscape plan M3477-SD-01-V07 (appendix B) there is to be retained and newly planted vegetation around the river. To enhance the area for otter, scrub planting with fruit bearing and spikey plants such as blackthorn, hawthorn and bramble, should be favoured to provide a barrier on the Southern perimeter of the site between the current site and the River Irwell;
- Invasive plant control due to giant hogweed, under ecological supervision if closer than 30m from the River Irwell; and,
- Cleaning the immediate area of fly tipping, under ecological supervision if closer than 30m from the River Irwell.

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- WYG (2017^a) East Lancashire Paper Mill, Badger Survey Report
- WYG (2018) East Lancashire Paper Mill, Preliminary Ecological Appraisal
- WYG (2018^a) East Lancashire Paper Mill, Ecological Appraisal

FIGURES

Figure 1 – Site Location Plan

Figure 2 – Otter Camera Trap Locations Plan

APPENDIX A – REPORT CONDITIONS

This Report has been prepared using reasonable skill and care for the sole benefit of Morris Homes (“the Client”) for the proposed uses stated in the report by [Tetra Tech Limited] (“Tetra Tech”). Tetra Tech exclude all liability for any other uses and to any other party. The report must not be relied on or reproduced in whole or in part by any other party without the copyright holder’s permission.

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The report refers, within the limitations stated, to the environment of the site in the context of the surrounding area at the time of the inspections’. Environmental conditions can vary and no warranty is given as to the possibility of changes in the environment of the site and surrounding area at differing times. No investigative method can eliminate the possibility of obtaining partially imprecise, incomplete or not fully representative information. Any monitoring or survey work undertaken as part of the commission will have been subject to limitations, including for example timescale, seasonal and weather-related conditions. Actual environmental conditions are typically more complex and variable than the investigative, predictive and modelling approaches indicate in practice, and the output of such approaches cannot be relied upon as a comprehensive or accurate indicator of future conditions. The “shelf life” of the Report will be determined by a number of factors including; its original purpose, the Client’s instructions, passage of time, advances in technology and techniques, changes in legislation etc. and therefore may require future re-assessment.

The whole of the report must be read as other sections of the report may contain information which puts into context the findings in any executive summary.

Tetra Tech reserves the right to share this Report and any related materials, surveys, drawings and/or documents at any time with the relevant Local Ecological Records Centre (LREC), any relevant statutory body or any equivalent organisation as Tetra Tech may reasonably require from time-to-time.

The performance of environmental protection measures and of buildings and other structures in relation to acoustics, vibration, noise mitigation and other environmental issues is influenced to a large extent by the degree to which the relevant environmental considerations are incorporated into the final design and specifications and the quality of workmanship and compliance with the specifications on site during construction. Tetra Tech accepts no liability for issues with performance arising from such factors.

APPENDIX B – DRAWINGS

APPENDIX C – TARGET NOTES

Target Number	Description	Photograph
TN1	Camera 1 placed on the riverbank of the river Irwell where accessible due to giant hogweed on site. Focusing on the eastern bank of the River Irwell. Grid Reference: SD 79246 07255	
TN2	Camera 2 placed on the riverbank of the river Irwell where accessible due to giant hogweed on site. Focusing on the eastern bank of the River Irwell. Grid Reference: SD 79245 07257	

TN3	Camera 3 placed on the riverbank of the river Irwell where accessible due to giant hogweed on site. Focusing on the eastern bank of the River Irwell. Grid Reference: SD 79259 07248	
TN4	Camera 4 placed on the riverbank of the river Irwell where accessible due to giant hogweed on site. Focusing on the eastern bank of the River Irwell. Grid Reference: SD 79259 07241	

