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DATE: 26th July 2024

SITE: East Lancs Paper Mill, Cricket Relocation Area,
Radcliffe

REFERENCE: UES03854/13

AMPHIBIANS & PRIORITY HABITATS

I am writing to provide the results of recent ecological survey work undertaken by United Environmental Services (UES) at the proposed cricket pitch relocation area for the proposed development known as East Lancs Paper Mill, Radcliffe. This report also provides a response to comments received regarding the presence of priority habitats and protected amphibian species on site.

Comments on the presence of priority habitats and protected amphibians were provided to Planning Officer's at Bury Council in early 2024 and were subsequently circulated to David Dutton at Greater Manchester Ecology Unit (GMEU) for review. The comments highlighted the presence of a mapped priority habitat on site and the presence of numerous amphibian species including natterjack toad *Epidalea calamita*, pool frog *Pelophylax lessonae*, palmate newt *Lissotriton helveticus*, smooth newt *Lissotriton vulgaris*, common frog *Rana temporaria* and common toad *Bufo bufo*.

Priority habitats

A suite of ecological surveys have previously been undertaken of the site by WYG to inform the now approved outline planning permission (references 62969 and 67597).

A Preliminary Ecological Appraisal (PEA) survey undertaken by WYG in 2018 identified and mapped the habitats on site. The majority of the site was classified as marshy grassland, with some areas of broadleaved semi-natural woodland, dense willow scrub and tall ruderal vegetation at the margins. A small area mapped as swamp was also identified within the northern section of the site, located immediately adjacent to an area of woodland.

This small area of swamp is mapped as the lowland fen priority habitat on MagicMaps. The PEA undertaken by WYG highlighted that woodland is a priority habitat under Section 41 of

the NERC act 2006. It also highlighted the ecological value of the habitats on site, including the marshy grassland and swamp, however the assessment did not consider that these habitats to qualify as any priority habitat.

In order to discharge conditions of the approved outline planning permission, UES have undertaken a suite of breeding bird and bat activity surveys of the site across 2024. These surveys were undertaken by numerous UES ecologists, including myself, Tom Kenwright BSc MSc ACIEEM, UES Senior Ecologist. I hold a Level 5 Botanical Society for Britain and Ireland (BSBI) field identification skills certificate (FISC), which certifies me as competent to undertake phase 1 habitat, UKHab and national vegetation classification (NVC) surveys.

Whilst on site conducting ecological surveys, the habitats on site could be viewed in detail. The site remains in a similar condition as when it was assessed in 2018, however it has been subject to natural successional processes, the main change being significant encroachment of self-seeded willow-scrub across the site, forming multiple scattered and dense stands. Additionally, whilst the small area of swamp was not previously found to be holding water in 2018, it not appears to be holding standing water for most of the year. UES agrees with the conclusions of the previous WYG assessment that the marshy grassland and swamp habitats on site do not meet the criteria to qualify as any priority habitats.

Given the value of the swamp habitat and its open water, it has been agreed that this area can be retained and protected as part of the development proposals.

Amphibians

The comments received by Bury council and GMEU provide anecdotal evidence for the presence of a number of amphibians on site, namely natterjack toads and pool frogs, in addition to a number of more common and widespread species.

Natterjack toads are a coastal specialist species, almost exclusively confined to coastal sand dune systems, coastal grazing marshes or sandy heaths, though a single colony has been found on an upland fell site in Cumbria. Given their habitat requirements, natterjack toads have a limited distribution, and the closest known population is on the Sefton Coast, located approximately 49km from the proposed development site.

Pool frogs were declared extinct in the UK in 1995, since being officially reintroduced to just two sites in Norfolk.

Given the site's location and the habitats present, it is considered that there is no potential for natterjack toads or pool frogs to be present on site, within the immediate vicinity of the site, or to be adversely impacted by the proposed development.

Great crested newts (GCNs) *Triturus cristatus* are subject to both national and international protection and are much more widespread across the UK compared to the aforementioned species. As such, a GCN eDNA survey was undertaken of the swamp area by UES on the 27th July 2024. The results of the eDNA assessment were negative (see Appendix 1), indicating that GCNs are not using this waterbody. Given these results and the results of previous GCN surveys and assessments of the site, it is considered that GCNs are not present on site or within the immediate vicinity of the site, and they will not be adversely impacted by the proposed development.

No other amphibian species that could be present on site are subject to any European or national protection (other than the prohibit their sale and trade). Common toad is a priority species however, making them a material planning consideration.

Given that there will be no loss of breeding habitat and there will be some retention of foraging, commuting, sheltering and hibernating habitats, both on site and within the immediate vicinity, it is considered that the proposed development won't have a significant adverse impact on local common toad populations.

In order to limit the potential for harm to common toad and other amphibians to the lowest practicable level during the construction phase of the development, the following reasonable avoidance measures (RAMs) should be implemented:

- Prior to the start of works or any vehicle access, all areas of grassland within the working area are to be mown / cut to have a sward height below 10cm. This mowing is to be undertaken at least 24 hours prior to the start of works in order to give any amphibians present time to move off site of their own accord. The mown / cleared areas will then be maintained with a short sward below 10cm until the works on site have been completed.
- Any potential hibernacula created on site during the construction works are to be removed by hand. If hibernacula cannot be removed by hand e.g., due to its weight, it will be lifted vertically opposed to being dragged horizontally and the area will be checked immediately afterwards for sheltering wildlife. Hibernacula could include piles of brash, rubble, bricks, loose soil, debris, brash piles etc.
- No excavations are to be left open overnight. If this is not feasible a plank should be left within the excavation at a 45-degree angle to allow trapped wildlife to escape. Any open excavations should be checked for trapped wildlife in the morning prior to start of works on site.
- All open excavations are to be checked for trapped wildlife immediately prior to backfilling.
- Where possible, materials will be stored on pallets off the ground in order to reduce the risk of amphibians sheltering underneath them.
- If any amphibians (excluding GCNs) are found on site during the construction phase of the development, they will be transported by hand to a suitable area of retained habitat outside of the working area. Suitable habitats include the base of dense scrub or other sheltered vegetated areas.
- In the highly unlikely event that a GCN is observed on site, works in that area will stop immediately and UES will be called for advice on how to best proceed.

It is considered that with the exception of common toads, as a priority species, there are no protected amphibian species on site. The proposed RAMs will serve to protect common toad and other common amphibian species that may be present on site. Additionally, it is considered that with the exception of the woodland, there are no priority habitats on site. Furthermore, the area of swamp habitat is due to be retained as part of the proposals. As

such, it is considered that no further surveys or compensation measures are required with regards to these ecological receptors.

If you require anything else or wish to discuss, please do not hesitate to get in touch with myself or another member of staff at UES.

Yours faithfully,

Tom Kenwright BSc MSc ACIEEM
Senior Ecologist
United Environmental Services Ltd

Appendix 1 – GCN eDNA Results

Folio No: 2701-2024
Purchase Order: UES03854
Contact: United Environmental
Services Ltd (UES)
Issue Date: 12.07.2024
Received Date: 01.07.2024

GCN Report

Technical Report



SureScreen Scientifics

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
0808	East Lancs Paper Mill, Pond 1	SD7958707456	Pass	Pass	Negative	0/12

Matters affecting result: none

Reported by: Daisy Chambers

Approved by: Chelsea Warner



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.

