

REASONABLE AVOIDANCE MEASURES LETTER STATEMENT FOR [REDACTED] WILKINSON FARM, MANCHESTER ROAD, BLACKROD, BL6 5SU

1.1. INTRODUCTION

1.1.1. Collington Winter Environmental Ltd was commissioned by Mr Wilkinson to produce a Letter Statement relating [REDACTED] for the proposed works to be completed at Wilkinson Farm, Manchester Road, Blackrod, BL6 5SU. The proposed works relate to the construction of a stable block on existing hardstanding habitat.

1.1.2. The author of this method statement is Caitlin O'Connor, Ecologist at Collington Winter Environmental Ltd. The project has been managed and overseen by Olivia Collington BSc (Hons), MEnvSc, CEnv. Director at Collington Winter Environmental. Olivia is highly experienced managing schemes and has produced many ecological reports to inform planning permission.

1.2. LOCATION

1.2.1. Please refer to Figure 1.1 for the site location. The site is in Blackrod, a town and civil parish in the Metropolitan Borough of Bolton, Greater Manchester.



Figure 1.1 Site Location

1.3. OBJECTIVES

1.3.1. The objectives of the GCN assessment are as follows:

- Identify any ponds within a 250m boundary from the site.
- Record details of each pond within 250m of the site.
- Assess the potential of each pond within 250m of the site to support GCN populations.
- Identify the potential for GCN to be present within the site.

Determine the need for any further surveys or mitigation required.

1.4. RELEVANT LEGISLATION

1.4.1. GCNs are fully protected under Schedule 2 of the Conservation of Species and Habitats Regulations 2017 and Schedule 5 of the Wildlife and Countryside Act 1981 (as amended). Combined, these acts make it an offence to:

Kill, injure or take a GCN (or attempt to);

Destroy any place where they live or breed;

Damage any one of the above places (or any part of it);

Obstruct access to these places;

Disturb a GCN in any place it uses for shelter;

Disturb the species such that it affects its ability to hibernate or migrate;

Sell/ exchange (or offer for sale/exchange) any part of a GCN, live or dead

1.4.2. GCN are also listed in Section 41 of the Natural Environments and Rural Communities Act (NERC) 2006 as Species of Principal Importance for conservation in England. National objectives and targets for GCN include the maintenance of the geographical range and viability of existing GCN populations to ensure that it remains in favourable conservation status.

1.5. SURVEY METHODOLOGY

1.5.1. An initial desk-based assessment of the site was undertaken to collate baseline data. The desk study included:

Review of Magic.gov.uk website for details of any previous European Protected Species Licences (EPSLs) for GCN, designated sites and notable habitats within 5 km of the site.

Review of aerial and OS maps for habitat information, as well as determining locations of potential waterbodies to be considered in the assessment.

1.5.2. A walkover was completed on the 6th July 2023 by Olivia Collington BSc (Hons), MEnvSc, CEnv Director at Collington Winter Environmental Ltd who holds a Class I GCN Mitigation Licence (Reference: **2020-47030-CLS-CLS**)

1.5.3. Whilst on site, each waterbody on site and within 250m of the site boundary was visited and took extensive photos and notes to be used during the Habitat Suitability Index.

1.5.4. One pond was identified within 250 m of the site boundary (P1), approximately 100m southwest from the proposed development site. As GCNs' upper dispersal limit is generally considered to be up to 250 m from a waterbody (though occurrence of greater distances does exist), ponds beyond this distance were not assessed due to limited connectivity (English Nature, 2001).

1.5.5. The pond underwent a Habitat Suitability Index (HSI) assessment following the methodology set out in ARG UK Advice Notice 5 (Oldham et al., 2010). Ten habitat suitability indices were assessed and inputted into the HSI equation, which generates a score between 0 and 1. The calculated score corresponds to the estimated pond suitability for GCN.

1.5.6. Please see Figure 1.5.1 for the location of the pond.



Figure 1.5.1 Pond Location

1.6. DESK STUDY

1.6.1. The following EPSLs for GCN were located within 5km from the site boundary based on consultation with magic.gov.uk:

- EPSM2009-1381 and EPSM2009-1384 were located approximately 3.5km southeast from the site and allowed for the destruction of a resting place between 18/10/2011-31/10/2013.
- 2018-35369-EPS-MIT-1 and 2018-35369-EPS-MIT-2 were located approximately 3.6km southeast from the site and allowed for the damage and destruction of a resting place between 10/07/2018-31/10/2039.
- 2018-34884-EPS-MIT-1 was located approximately 4.9km northwest from the site and allowed for the damage and destruction of a resting place between 08/08/2018-31/12/2025.

1.6.2. Licences located 3.5km and 3.6km from the site are separated from the site by the M61 motorway.

1.6.3. A review of the Bolton Planning Portal was conducted to review previous planning applications at the site. Previous planning applications include a Full Planning Application (Ref: 91304/14) for “change of use and conversion of barn and stable to holiday let tourism accommodation, to include bed and breakfast use”, granted on 04/04/2014. Greater Manchester Ecology Unit (GMEU) was consulted on this application due to a pond located approximately 100 m from the site which ultimately concluded that the risk of GCN on site was low and no further mitigation was necessary. The decision notice states:

“There is a pond within the farmland to the west of the site, within 100 metres from the application site. The Ecology Unit consider the proposed development would be low risk [REDACTED] however they request that a suitable informative is attached to any decision to draw the applicant’s attention to the relevant legislation”.

1.6.4. The most recent planning application has been granted at the site relating to the erection of a domestic garage (Ref: 13863/22) granted on 06/09/2022 subject to conditions. GMEU was not consulted on this planning application and no ecological information was requested or submitted.

1.6.5. A phone call between Mr David Dutton of GMEU and Miss Caitlin O’Connor of Collington Winter Environmental Ltd dated 19/10/2023 confirmed the reasonable avoidance measures (RAMs) would be sufficient if the information provided regarding the habitats is correct.

1.7. HABITAT SUITABILITY INDEX

1.7.1. One pond was present approximately 100m from the proposed development site. No further ponds were located within 250 m of the site boundary. As GCNs’ upper dispersal limit is generally considered to be up to 250 m from

a waterbody (though occurrence of greater distances does exist), ponds beyond this distance were not assessed due to limited connectivity (English Nature, 2001).

1.7.2. Table 1.7.1 for a summary of the HSI.

Table 1.7.1 HSI Summary

Pond ref.	P1
Grid Reference	SD 62112 09868
SI1 – Location	1
SI2 – Pond Area	0.98
SI3 – Pond Drying	0.9
SI4 – Water Quality	0.33
SI5 – Shade	1
SI6 – Fowl	0.67
SI7 – Fish	0.01
SI8 – Ponds	1
SI9 – Terr’l Habitat	0.33
SI10 - Macrophytes	0.4
HSI Score	0.44
Pond Suitability	Poor

1.7.3. P1 has been assessed as having ‘Poor’ suitability for GCN as per the HIS Index. The pond has been heavily stocked with fish and is used regularly as an angling pond. Wooden fishing pegs are located across the banks of the pond. Limited emergent and floating vegetation was identified across its extent apart from water lillies (*Nymphaeaceae spp.*) and edges of the pond were shaded by mature treelines. Please see the Appendix for photographs of the pond.

1.7.4. The following qualities have contributed towards a ‘Poor’ Suitability:

‘Optimal’ location within the UK.

A pond area of approximately 825m².

Never dries.

‘Poor’ water quality - Low invertebrate diversity (e.g. species such as midge and mosquito larvae). Few submerged plants

Less than 60% shaded.

Minor Waterfowl - Waterfowl present, but little indication of impact on pond vegetation. Pond still supports submerged plants and banks are not denuded of vegetation.

Major impact of fish – Dense populations of fish known to be present.

A pond density of 1 ponds/km² – based on the number of ponds occurring within 1 km of survey pond.

‘Poor’ terrestrial habitat - Habitat with poor structure (e.g. amenity grassland, improved pasture and arable) that offers limited opportunities (less than 25% of available area) for foraging and shelter.

Approximately 10% macrophyte cover (Estimated) - This includes emergent, floating plants (excluding duckweed) and submerged plants reaching the surface.

1.8. REASONABLE AVOIDANCE MEASURES

1.8.1. The proposed development relates to the erection of a stable block on existing hardstanding habitat approximately 100m from the site. Hardstanding habitats are suboptimal for GCN due to the lack of suitable refugia and no vegetation clearance is to occur to facilitate development. Therefore, it is deemed that the risk of GCN being present on site and being injured/killed is low.

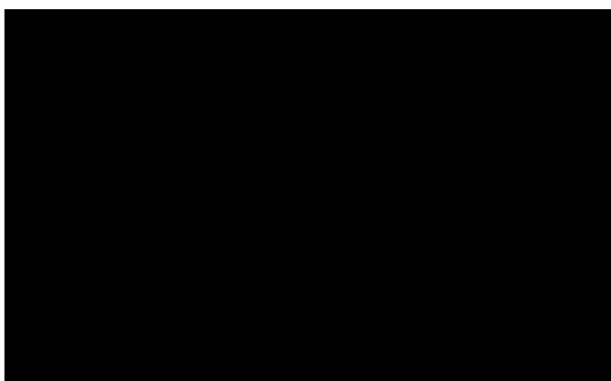
1.8.2. The following RAMs are to be adhered to:

- A toolbox talk will be provided by a professional and/or suitably qualified and/or experienced (competent) ecologist to all site workers/contractor(s) undertaking works. This should focus on GCN and their ecology prior to works commencing. The toolbox talk will cover (please see appendices for the sheet):
 - Identification and ecology GCN;
 - Habitat utilised by the protected species.
 - The high level of legal protection afforded to the protected species and the criminal sanctions that can be imposed if the relevant law is broken, including fines and imprisonment;
 - A clear instruction that if any protected species is seen, or if any other animal which could be a protected species is seen, then the Site Manager is immediately informed and that he or she immediately stops all works and informs the Ecologist;
 - The role of the licensed Ecologist.
 - The details of the method statement and the need for supervision of some works by an ecologist; and
 - Procedures for contractors to follow in the unlikely event that any protected species is encountered during works when the ecologist is not present.
- All hibernacula (i.e. rubble piles, compost heaps and old stone walls) will be dismantled by hand and hand searched under the direction and supervision of a professional and/or suitably qualified and/or experienced (competent) and licensed ecologist.
- All machinery, equipment and materials will be stored on areas of hardstanding or any other areas identified by the ecologist as unsuitable for GCN i.e. maintained/regularly mown/short-cropped grass and/or bare ground.
- All trenches/footings/foundations etc. will be excavated individually and back filled immediately after where possible. Where this is not possible, excavation will be covered to prevent GCN from becoming trapped with excavation. If this is not possible, one or both sides of the excavation will be sloped in order to allow egress from the excavation or a suitable ramp provided to allow animals to escape. Any trenches/footings/foundations must be checked regularly by site staff for trapped animals.

1.8.3. In the unlikely chance, that any terrestrial GCNs are located during the RAM's, all works must cease immediately, and Natural England contacted for a Mitigation License. No GCN is to be handled and the refugia is to be placed back to provide suitable cover for the species. If any common amphibians are identified, they should be moved by hand to an area away from construction activities.

Yours sincerely,

For and on behalf of Collington Winter Environmental Ltd.




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APPENDIX

Feature	Photograph
<p><i>Photographs of P1</i></p>	

Where the proposed stable will be located.



