



Elite Ecology

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**Todmorden Road,
Littleborough**



Otter Survey Report

July 2026



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07/07/2026	V1	Draft	First Draft
08/07/2026	V1	Final Report	Proofread

0. Executive Summary

This report has been prepared at the request of Corrosion Resistant Products Ltd. Elite Ecology was commissioned to undertake otter (*Lutra lutra*) surveys at the proposed re-development works at Corrosion Resistant Products Ltd, Todmorden Road, Littleborough, Greater Manchester, OL15 9EG (OS Grid Reference: SD 94077 16734).

Under the current proposals, the existing site will be redeveloped in three phases. The first and second phase includes the extension of the manufacturing plant, followed by the extension of storage units in phase 3. Overall, this will result in both the permanent and temporary loss and/or alteration of some of the habitats located on the proposed re-development site.

During the survey visits, no evidence of otter was found within the immediate area of proposed works. The banks of the drainage dyke to the north and south of the pumping station, is much more suitable to support otters due to suitable burrowing substrate, suitable vegetation cover, and generally lower levels of anthropogenic disturbance. No evidence of otters was found here during the survey visits.

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1. Introduction

1.1 Report Rationale

This report has been prepared at the request of Corrosion Resistant Products Ltd. Elite Ecology was commissioned to undertake otter (*Lutra lutra*) surveys at the proposed re-development works at Corrosion Resistant Products Ltd, Todmorden Road, Littleborough, Greater Manchester, OL15 9EG (OS Grid Reference: SD 94077 16734). The field surveys were carried out by the following surveyors:

Mr. Matthew Cotterill: PG Dip, Senior Ecologist

Mr. Thomas Crosby: BSc (Hons), Assistant Ecologist

1.2 Site Description and Works

The site is located in an urban area within Littleborough, a town in Greater Manchester approximately 5km to the north-east of Rochdale.

The site measures approximately 0.97ha and contains a number of habitats. These include buildings, fence, hard standing, hedgerow, lines of trees, modified grassland, scattered trees, scrub, tall forbs, unsealed surface, and wall. The habitats on site could have the potential to support a number of protected species.

Within the wider landscape further habitats are present. These come in the form of amenity grass, hard standing ground, hedgerows, improved grassland, canal, industrial buildings, residential dwellings (and their associated gardens/yards), scattered trees, stream, and woodland. This shows that the habitats in the area surrounding the site have the potential to support protected species.

Under the current proposals, the existing site will be redeveloped in three phases. The first and second phase includes the extension of the manufacturing plant, followed by the extension of storage units in phase 3. Overall, this will result in both the permanent and temporary loss and/or alteration of some of the habitats located on the proposed re-development site.

Figure 1: An aerial map showing the boundary of the site at Todmorden Road, Littleborough (as shown by the red outline).



Figure 2: An aerial map showing the site at Todmorden Road, Littleborough (as shown by the yellow star) in relation to some of the local landscape.

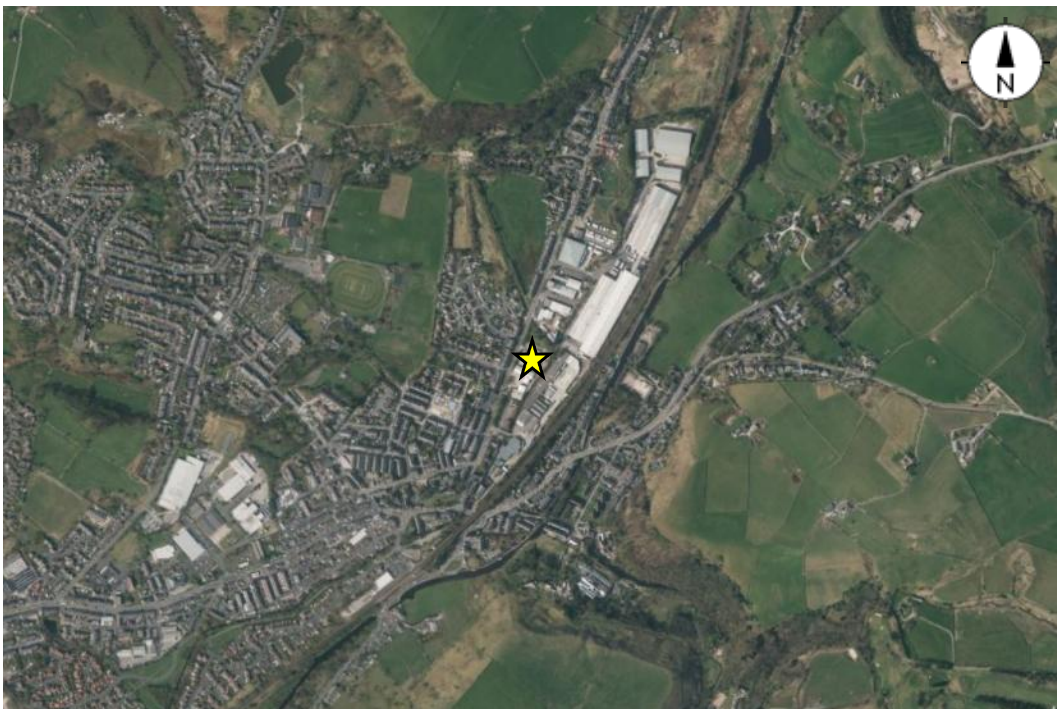


Figure 3: An OS map obtained from Bing showing the location of Todmorden Road, Littleborough (as shown by the yellow star).



2. Survey Methodology

2.1 Desktop Survey

A variety of resources were independently consulted to assess the known local records within the nearby area and the importance of the site within the local landscape from an ecological perspective. The resources used were www.naturalengland.org.uk, www.ordnancesurvey.co.uk, Google Maps, Google Earth, and Bing Maps. A search of other relevant nature conservation information was made through the use of the Multi-Agency Geographic Information for the Countryside (MAGIC) database.

The local records centre was contacted to provide data on all otter sightings within 2km of the proposed development site. Greater Manchester Ecology Unit (GMEU) were the relevant local records centre for this project.

2.2 Field Survey

Field Signs

Otter surveys aim to record any field signs of their presence at a surveyed site. This will determine the activity levels and behaviour patterns along a waterbody. A stretch of 600m of appropriate habitat along water features nearby to the development site is inspected for field signs.

The field survey will find areas of otter activity and identify:

- Footprints
- Spraints
- Feeding Remains
- Slides
- Couches
- Holts

Holts

Otter holts are places or structures that are used by specimens for shelter on a permanent basis. These holts are often situated within vegetated banksides where they utilise tree root systems, boulders or in a hole/burrow. Around otter holts, you will often identify additional evidence of their presence, such as footprints or spraint. These features have multiple entrances and could be connected to couches areas.

Couches (also referred to as 'lying-up' areas)

These are features along the banksides of waterways where otters will rest, groom or feed. Couches are often partially hidden along bankside shelves or amongst reeds and grasses. Other evidence of otter presence may also be present at these sites.

Natal Dens

These are holts that otters use to give birth to their young and subsequently rear them. These dens are usually well hidden amongst vegetation with very little evidence of otter activity around them. It is not uncommon for a natal den to be set away from the waterbody in a nearby woodland.

3. Desktop Survey Results

3.1 Ecological Data Results

Several records of otter have been recorded within close proximity to the site, with the nearest being.

The Ecological Data Search provided by GMEU revealed twenty-one records of otter and/or field signs within the 2km search radius. These records range from 2018 to 2020. Records within 500m of the site are shown in the table below, full results can be found in **Appendix B**.

Metres (m) from Site	Bearing	Grid Reference	Date	Record Type
50	NE	SD94141679	23/07/2018	Droppings
175	NE	SD9419916900	23/07/2018	10+ Spraints
199	NE	SD9420916923	23/07/2018	Commuting (Tracks / Trail)
234	SW	SD9347116149	18/07/2018	1 Adult Female; 1 Juvenile
281	SW	SD9392716365	23/07/2018	3 Droppings
314	S	SD9391316333	13/09/2019	2 Droppings
398	SW	SD9378916316	13/09/2019	Droppings
437	SW	SD9374716294	13/09/2019	Droppings
484	SW	SD9370616265	13/09/2019	Droppings
548	SW	SD9364716233	13/09/2019	Droppings
585	SE	SD94261618	09/06/2020	1 Adult
585	SE	SD94261618	09/06/2020	1 Adult
694	SW	SD9351716158	13/09/2019	Droppings
728	NE	SD9453117346	23/07/2018	Droppings
729	SW	SD9347916149	13/09/2019	3 Droppings
734	SW	SD9347116149	18/07/2018	1 Juvenile
759	N	SD94361747	23/07/2018	Droppings
1,060	N	SD9448717742	23/07/2018	Droppings
1,090	SW	SD93241587	14/06/2020	1 Feeding
1,090	SW	SD93241587	12/06/2020	1 Male; Feeding
1,160	SW	SD932158	12/06/2020	1 Male

4. Field Survey

4.1 Constraints on Obtaining the Survey Data

No constraints on obtaining the survey data were identified.

4.2 Environmental Variables

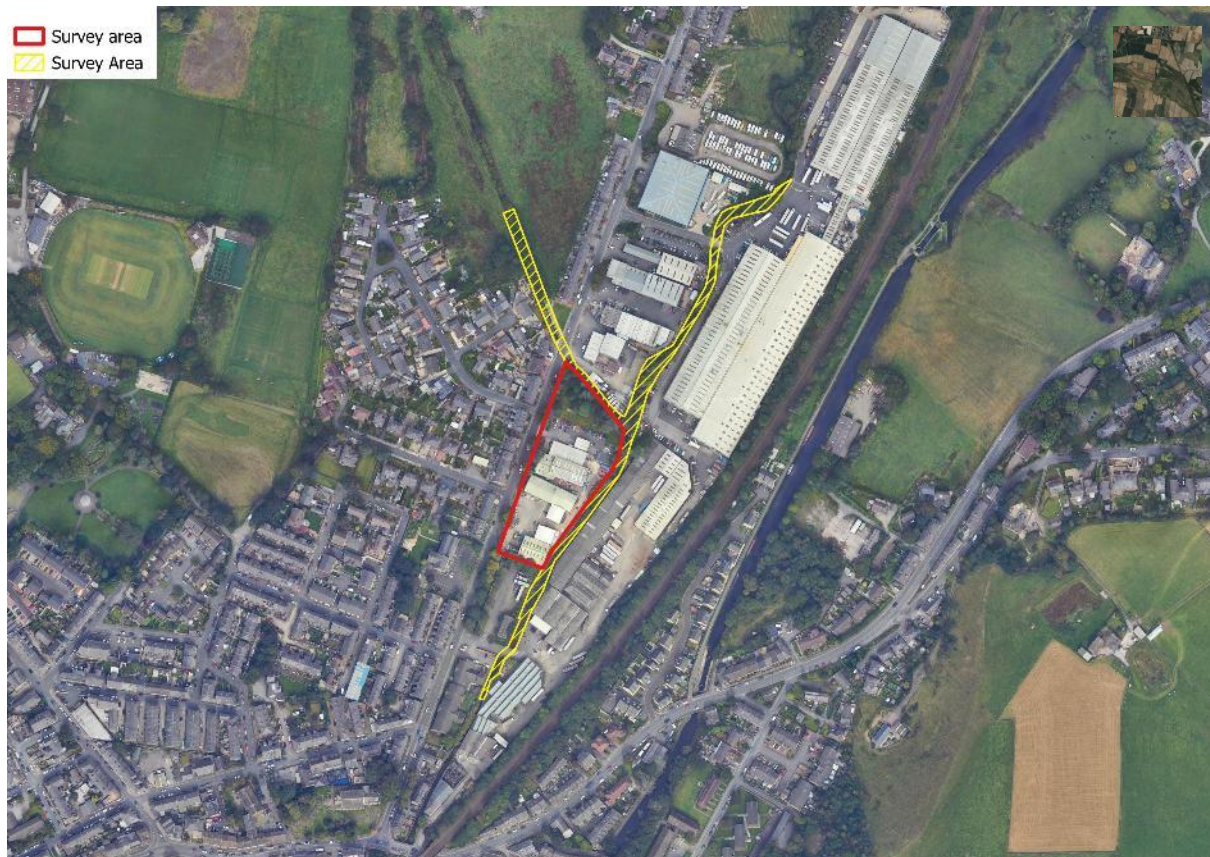
The environmental variables on the survey visits can be found within the **Table 1**.

Table 1: The environmental conditions during the day of the otter surveys at Todmorden Road, Littleborough.

Environmental variables	Otter Survey 1 10/09/2025	Otter Survey 2 16/07/2025
Temperature Start:	16°C	28°C
Temperature Finish:	16°C	28°C
Humidity Start:	67%	50%
Humidity finish:	67%	50%
Cloud Cover Start:	70%	10%
Cloud Cover Finish:	70%	10%
Wind Speed:	Low	Low
Precipitation:	None	None

4.3 Walkover Survey

Figure 4: An aerial map showing the surveyed area during the otter survey at Todmorden Road, Littleborough.



During the survey visits, no evidence of otter (*Lutra lutra*) was found within the immediate area of proposed works. The banks of the drainage dyke to the north and south of the pumping station, is much more suitable to support otters due to suitable burrowing substrate, suitable vegetation cover, and generally lower levels of anthropogenic disturbance. No evidence of otter was found here during the survey visits.

5. Impact assessment

5.1 Otter (*Lutra lutra*)

Based on the information gathered during the site visits, no evidence of otters was found during the survey effort.

Overall, the proposed scheme of works has been deemed to have a **negligible** impact on otters due to the lack of evidence of otter presence in the surveyed area.

6. Recommendations

6.1 Otter (*Lutra lutra*)

No mandatory recommendations have been made due to the development deemed to be of **negligible** impact to otters.

7. References

Biodiversity 2020: A strategy for England's wildlife and ecosystem services (2011).

Circular 06/05 Biodiversity and Geological Conservation – Statutory Obligations and Their Impact System (2005).

Countryside and Rights of Way Act 2000 (c.37). London: HMSO.

Defra (2007a) Securing a Healthy Natural Environment: an action plan for embedding an ecosystems approach. PB12853. Defra London.

Defra (2007b) An Introductory Guide to Valuing Ecosystems Services. PB12852. Defra London.

Institute of Ecology and Environmental Management (2006), Guidelines for Ecological Impact Assessment in the United Kingdom.

Institute of Ecology and Environmental Management, Professional Guidance Series.

Institute of Environmental Assessment (1995). Guidance for Baseline Ecological Assessment.

Millennium Ecosystem Assessment (2005).

National Planning Policy Framework (2024).

Natural Environment and Rural Communities (NERC) Act 2006.

The Conservation (Natural Habitats, etc.) (Amendment) Regulations 2007. SI 2007/1843, London: HMSO.

The Conservation of Habitats and Species Regulations 2017 (Amendment). SI 2017/1012.

The natural choice: securing the value of nature (2011) (Natural Environment White Paper).

UK Biodiversity Action Plan (2007). UK List of Priority Species. Joint Nature Conservation Committee.

Wildlife and Countryside Act 1981 (and amendments) (c.69). London: HMSO.

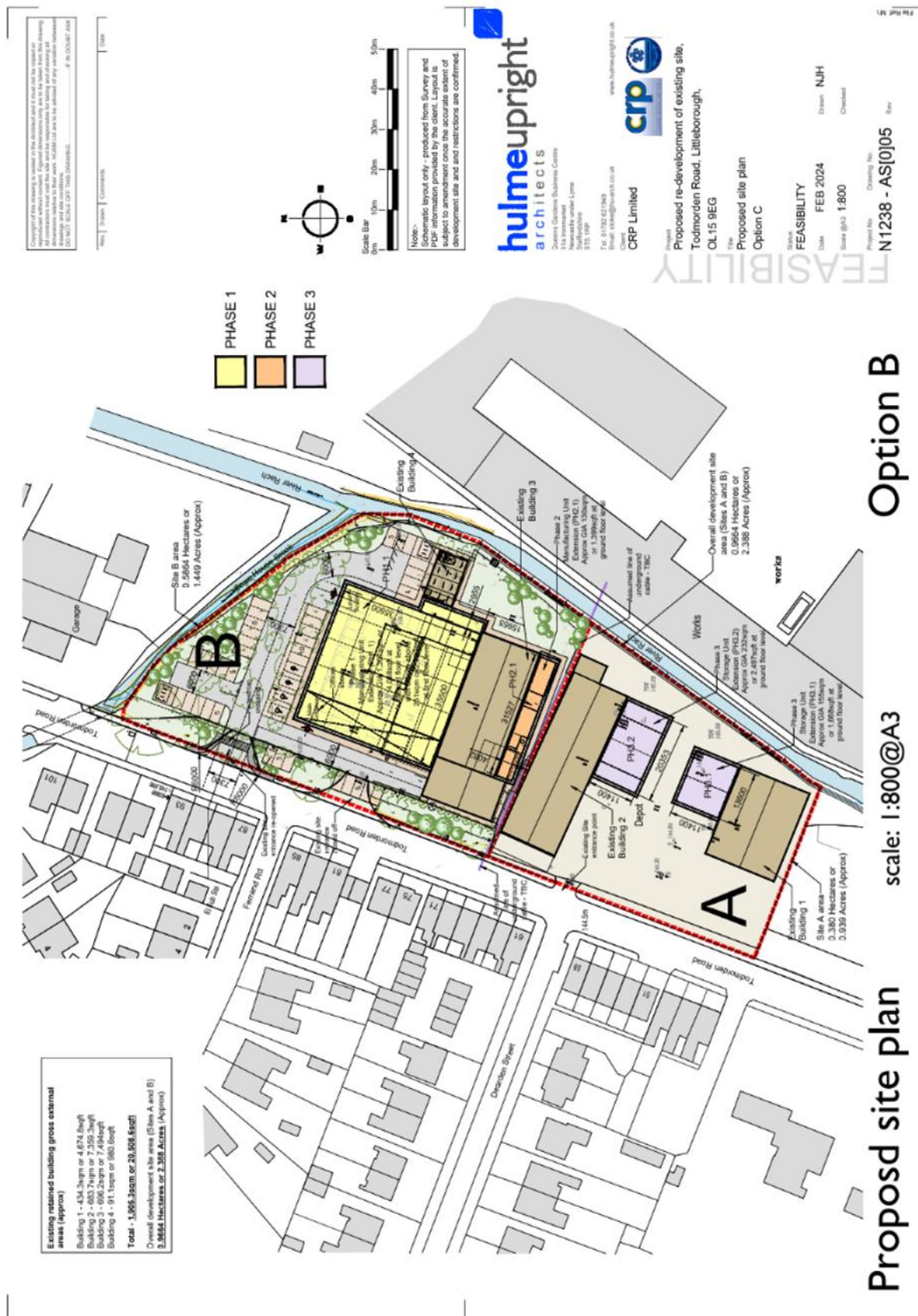
8. Appendices

Appendix A: Site Plans

Appendix B: Biodiversity Legislation and Policy

Appendix C: KMBRC Otter Records Table

Appendix A: Site Plans



Appendix B: Biodiversity Legislation and Policy

General Legislation and Policy:

The framework of legislation and policy which underpins nature conservation in England. This is a material consideration in the planning process in England.

Conservation of Habitats and Species Regulations 2017 (Habitats Regulations 2010 as amended)

The Conservation of Habitats and Species Regulations 2017 consolidate and update the Conservation Regulations 1994 and the conservation of habitats and species regulations 2010 (and all their amendments). The Conservation of Habitats and Species Regulations 2017 are the principal means by which the EEC Council Directive 92/43 (The Habitats Directive) as amended is transposed into English and Welsh law.

The Conservation of Habitats and Species Regulations 2017 place duty upon the relevant authority of government to identify sites which are of importance to the habitats and species listed in Annexes I and II of the Habitats Directive. Those sites which meet the criteria are, in conjunction with the European Commission, designated as Sites of Community Importance, which are subsequently identified as Special Areas of Conservation (SAC) by the European Union member states. The regulations also place a duty upon the government to maintain a register of European protected sites designated as a result of EC Directive 79/409/EEC on the Conservation of Wild Birds (The Birds Directive). These sites are termed Special Protection Areas (SPA) and, in conjunction with SACs, form a network of sites known as Natura 2000. The Habitats Directive introduces for the first time for protected areas, the precautionary principle; that is that projects can only be permitted having ascertained no adverse effect on the integrity of the site. Projects may still be permitted if there are no alternatives, and there are imperative reasons of overriding public interest.

The Conservation of Habitats and Species Regulations 2017 also provide for the protection of individual species of fauna and flora of European conservation concern listed in Schedules 2 and 5 respectively. Schedule 2 includes species such as otter and great crested newt for which the UK population represents a significant proportion of the total European population. It is an offence to deliberately kill, injure, disturb or trade these species. Schedule 5 plant species are protected from unlawful destruction, uprooting or trade under the regulations.

The Wildlife and Countryside Act (WCA) 1981 (As amended)

The WCA, as amended, consolidates, and amends pre-existing national wildlife legislation in order to implement the Bern Convention and the Birds Directive. It complements the Conservation (Natural Habitats. & c.) Regulations 1994 (as amended), offering protection to a wider range of species. The Act also provides for the designation and protection of national conservation sites of value for their floral, faunal or geological features, termed Sites of Special Scientific Interest (SSSIs).

Schedules of the act provide lists of protected species, both flora and fauna, and detail the possible offences that apply to these species.

The Countryside and Rights of Way (CROW) Act 2000

The CROW Act, introduced in England and Wales in 2000, amends and strengthens existing wildlife legislation detailed in the WCA. It places a duty on government departments and the National Assembly for Wales to have regard for biodiversity and provides increased powers for the protection and maintenance of SSSIs.

The Act also contains lists of habitats and species (Section 74) for which conservation measures should be promoted, in accordance with the recommendations of the Convention on Biological Diversity (Rio Earth Summit) 1992.

The Natural Environment and Rural Communities (NERC) Act 2006

Section 40 of the NERC Act places a duty upon all local authorities and public bodies in England and Wales to promote and enhance biodiversity in all of their functions. Sections 41 (England) and 42 (Wales) list habitats and species of principal importance to the conservation of biodiversity. These lists supersede Section 74 of the CRoW Act 2000. These species and habitats are a material consideration in the planning process.

The Hedgerow Regulations 1997

The Hedgerow Regulations make provision for the identification of important hedgerows which may not be removed without permission from the Local Planning Authority.

UK Biodiversity Action Plan

The United Kingdom Biodiversity Action Plan (UKBAP), first published in 1994 and updated in 2007, is a government initiative designed to implement the requirements of the Convention of Biological Diversity to conserve and enhance species and habitats. The UKBAP contains a list of priority habitats and species of conservation concern in the UK, and outlines biodiversity initiatives designed to enhance their conservation status. Lists of Broad and Local habitats are also included. The priority habitats and species correlate with those listed on Section 41 and 42 of the NERC Act.

The UKBAP requires that conservation of biodiversity is addressed at a county level through the production of Local BAPs. These are complementary to the UKBAP, however are targeted towards species of conservation concern characteristic of each area. In addition, a number of local authorities and large organisations have produced their own BAPs. UKBAP and Local BAP targets with regard to species and habitats are a material consideration in the planning process.

Planning Policy (England) and National Planning Policy Framework

In early 2012, the National Planning Policy Framework (NPPF) replaced much previous planning policy guidance, including Planning Policy Statement 9: Biological and Geological Conservation. The government circular 06/05: Biodiversity and Geological Conservation - Statutory Obligations and Their Impact within the Planning System, which accompanied PPS9, still remains valid. A presumption towards sustainable development is at the heart of the NPPF. This presumption does not apply however where developments require appropriate assessment under the Birds or Habitats Directives. The latest National Planning Policy Framework was updated in February 2019, with the section in relation to conserving the natural environment being located within section 15.

Section 15, on conserving and enhancing the natural environment, sets out how the planning system should contribute to and enhance the natural and local environment by minimising impacts on biodiversity and, where possible, provide net gains in biodiversity. Opportunities to incorporate biodiversity gains into a development should be encouraged.

If a proposed development would result in significant harm to the natural environment which cannot be avoided (through the use of an alternative site with less harmful impacts), mitigated or compensated for (as a last resort) then planning permission should be refused.

Species Specific Legislation

This section contains a summary of legislation with relation to the species present or potentially present in the survey area. The reader should refer to the original legislation for definitive interpretation.

Otters

The Eurasian otters and their resting places are protected under both domestic and European legislation. The legislation that covers otters are the Conservation of Habitats and Species Regulations 2010 (as amended), EC Directive (92/43/EEC) – listed on annexes IIa and IVa, Bern Convention – listed on annexe II, the Wildlife and Countryside Act 1981 (as amended) – listed under schedule 5 and 6.

Under the Conservation of Habitats and Species Regulations 2010 (as amended), it is an offence to:

- Deliberately capture or kill an otter
- Deliberately disturb an otter in such a way as to be of a significant impact on:
 - The ability of any significant group of otters to survive, breed or rear their young
 - The local distribution or abundance of otters
- Damage or destroy a breeding site or resting place of any otter

Under schedule 5 of the Wildlife and Countryside Act 1981 (as amended), it is an offence to:

- Intentionally damage, destroy or obstruct access to any place that an otter uses for shelter or protection
- Intentionally or recklessly disturb an otter while it is occupying a structure or place that it uses for shelter or protection

Under EC Directive (92/43/EEC) – listed on annexes IIa and IVa, development activity is deemed to be in breach of the legislation unless it can be deemed that:

- There is an overriding public interest
- There is no satisfactory alternative
- The development will not affect the favourable conservation status of the population in its natural range

If these factors can be demonstrated to Natural England, a development licence can be issued to allow the works to proceed, subject to conditions.

Otter Survey Report

Appendix C: Otter Records Table

Metres (m) from Site	Bearing	Grid Reference	Date	Record Type
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175	NE	SD9419916900	23/07/2018	10+ Spraints
199	NE	SD9420916923	23/07/2018	Commuting (Tracks / Trail)
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1,060	N	SD9448717742	23/07/2018	Droppings
1,090	SW	SD93241587	14/06/2020	1 Feeding
1,090	SW	SD93241587	12/06/2020	1 Male; Feeding
1,160	SW	SD932158	12/06/2020	1 Male

9. Notice to Readers: Conditions of this Report

All reports are certified products and cannot be shown, copied, or distributed to third parties without the written permission of Elite Ecology. No liability is accepted for the contents of the report, other than to that of the client(s). If any part of this report is altered without the written permission of Elite Ecology, then the whole report becomes invalid.

Elite Ecology agrees to supply ecological consulting services and advice of a preliminary or thorough nature as advised or commissioned. Upon commissioning Elite Ecology to undertake the work, the client(s) grant access to the site upon the agreed date. If no site access is available upon this date, Elite Ecology holds the right to charge the client(s) for lost staffing time and additional travel costs.

Elite Ecology undertake all site surveys with reasonable skill, care, and diligence, within the terms of the contract that has been agreed with the client and abiding by the Elite Ecology Terms and Conditions. The actions of the surveyors on site, and during the production of the report, were undertaken in accordance with the Code of Professional Conduct for the Chartered Institute of Ecology and Environmental Management.

The latest good practice guidelines put in place by Natural England or the relevant statutory conservation bodies have been followed by the surveyors on site. If those methodologies fail to identify a protected species during the survey efforts, no responsibility can be attributed to Elite Ecology. If any of these guidelines are adapted between the date(s) of the surveys being undertaken and the submission of this report, then Elite Ecology takes no responsibility for this.

Should any equipment be damaged or lost on site at the fault of the client(s), then Elite Ecology withholds the right to charge 100% above the current market value for that exact product or the nearest similar product.

The survey results purport the current status of the site and its potential for protected species utilisation at the time of surveying. It should not be viewed as a complete list of the possible flora and fauna species that could be using the site at different times of the year.

Elite Ecology has been provided with full payment for this report and thus the product has been released to the client(s) for the purpose of their planning application. If any part of the report is lost or altered without the written permission of Elite Ecology, then the entire report becomes invalid. Due to the potential for continual change within the natural world, this report is valid for **2 years only** from the date of the last survey visit. If this report is submitted after the 2-year deadline, then a further updated inspection will be required to ascertain whether the site remains in the same condition as it was when initially inspected.

No reliance should be made on any such comments in relation to the structural integrity of the features located on the surveyed site. All information within the report is based solely on evidence that has been found on site during the service provided. No individual opinion or inference will be made other than that of the suitably qualified ecologist appointed to the project.