



**Pre-commencement Otter Survey
for a proposed development
on land at
Unit 3
North Bank Road
Port Talbot**

Client: CRS Pizzas Ltd

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Report Reference: WW/24925

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1. Introduction

A preliminary ecological appraisal at a site on North Bank Road, Port Talbot was carried out by Wildwood Ecology in September 2024, to support an application to Neath – Port Talbot Council for the proposed development of an MOT testing station on a brownfield site.

With respect to otters, a European Protected Species, the PEA found no evidence of presence. The first 20m of the bund from the northern road bridge was checked for evidence of otter, and none was observed. The bund onsite was surveyed, and no observations of otter onsite were made. The feeder side bund which is offsite had the potential to support otter shelters although no evidence was observed during the limited access survey in 2024.

Planning permission was subsequently granted, with the following ecological condition:

“Prior to any site clearance or development commencing on-site, an ecological walkover survey should be undertaken by an appropriately competent person (e.g. an ecological clerk of works or on-site ecologist) to ensure there are no otters resting in the area. The findings of this survey shall be finalised and submitted to the Councils Senior Countryside and Wildlife Officer.

Reason: To ensure that ecological surveys to investigate for the presence of otters is overseen by an appropriately competent ecologist to ensure the development complies with Policy EN7 of the Neath Port Talbot Local Development Plan.”

A thorough site inspection was made by the author on 24th September 2025. The aims of the survey were to:

- Check for the physical presence of otters
- locate and describe any otter protected sites (breeding and resting sites) and feeding sites
- identify likely impacts of the proposal on otters or badgers
- identify potential mitigation measures

Whilst ‘one-off’ surveys such as this provide an initial overview of habitats & sites available to otters (eg. for breeding, lying up and feeding), some habitats and areas are used by otters on a seasonal basis and a proper assessment of otter use, and identification of important features can be made only through detailed surveys carried out in each season over a full year. Where potential breeding sites are identified during one-off surveys, or other habitats likely to be seasonally used by otters, further investigations may be recommended in order to properly evaluate the importance of the site and how best to protect it.

2. Otter Ecology and Legislation

Otters use all types of water habitat, including rivers and streams; ditches; wetlands; lakes, ponds and reservoirs; estuaries & the coast. They are nomadic, with each animal inhabiting a large home range – an adult male will use up to 40 km of waterway, often travelling several

kilometres in a night and sometimes taking short cuts across dry land between watercourses. Otter spraints (droppings) are left by otters as territory markers at prominent sites. Although mainly nocturnal, otters will travel and hunt during the day. Their diet is primarily based on fish, but also includes amphibians, birds and small mammals. They will utilise a network of diurnal resting sites across the home range. Such resting sites may only be used on an occasional basis, with otters sleeping in a different place almost every day. In undisturbed rural areas, otters will sleep in relatively exposed places, such as in grass tussocks or the boughs of trees. Where human disturbance is higher, otters choose more hidden resting sites. Typical resting sites include tree root systems, dense scrub thickets, timber or rock piles, earth tunnels and overhung ledges; and couches in rough grassland, sedge tussocks or reedbeds. Couches are nest-like structures up to 1 metre in diameter used for resting. Often made from nearby vegetation, they can be as simple as a depression in a stick pile or under a windblown tree. They are often in a patch of vegetation such as a scrub thicket, a reedbed or an area of rough grassland where it is the patch, rather than the couch site itself, which is important. Otter resting sites are protected from damage and destruction, & disturbance, under the Wildlife & Countryside Act 1981 and the EC Habitats Directive 1992. Otter breeding sites are usually extensive areas of undisturbed cover such as woodland, scrub or reedbed. Breeding can take place at any time of year, but most cubs are born during the autumn & winter. A breeding site will be used intensively for the three months during which the cubs are at the natal den. They are reared by the female alone, and are dependent on her for almost a year.

3. Survey Methodology

During the survey, a search was made for:

- otter spraints (droppings), categorised as fresh, recent or old;
- otter footprints, slides, rolling places;
- resting sites - sites where otters can lie up during the day. Sites are identified as being resting sites if they are typical of the places known to be used. Two categories are used to describe resting sites, depending on the strength of available evidence:

Actual Resting Site – signs that the site is well used by otters are present, including a well trampled entrance, otter spraints or footprints.

Possible Resting site - the site is typical of an otter resting site, with obvious evidence that it is being used by a mammal, but no signs are present that otters use the site.

Potential Resting site – structures which could be used as resting sites by otters, but where no signs of past mammal use are present.

- breeding sites – in particular, for paths through vegetation from the stream to suitable cover that could lead to a natal den. Otter Breeding Sites are typically large areas of

undisturbed cover free from flooding and within easy reach of a good food supply (Liles, 2003b).

- feeding areas – in particular, sites with abundant amphibians;
- travelling routes – mammal paths along the bank, and short cuts.

Key sites were recorded using a Geode GPS giving a grid reference accurate to below 1m. Photographs were taken using a digital camera.

There were no significant constraints to the survey. The bund alongside the feeder was accessed along its length despite dense vegetation in places. A Japanese knotweed control team had sprayed the knotweed on the other side of the bund, alongside the site, on the previous day.

4. Results



Map 1: Boundary of Survey Area and location of possible resting place

No spraints were found, and no breeding sites or actual resting places. A single possible resting place was found near the northern end of the bund (Figure 1, Map 1), just outside the boundary of the proposed works. This comprised a concrete slab set into the bund, with a dry cavity below. A faint animal trail led from here towards the watercourse a few metres below. There were no paw prints, spraints, fur or otter scent in the vicinity, and the cavity appeared to be unoccupied at the time of survey.



Figure 1. Possible Otter Resting Place

As the site held no recent evidence of otter usage, and the only possible resting place lay outside of the proposed work area, no further consideration should be required. If the proposed works are significantly delayed, a further pre-commencement check may be required.



Vegetation on the bund comprises young willow, buddleia, bramble and other scrub; no evidence of otters was found here and the site is unlikely to be used for breeding

Discussion and Recommendations

No evidence of otters was found during survey of the application area. However, the adjoining bund and river is likely to be used by commuting or foraging otters on occasions, and a possible resting place was noted here. Although the proposed works are unlikely to impact on otters and no European Protected Species licence is required, best practice should be employed during construction. The following Reasonable Avoidance Measures should be instigated with respect to otters.

Potential Impacts on Otters During Construction and Operation

Otters are inquisitive animals and may be attracted onto work sites during the **construction phase** to investigate new machinery or spoil heaps (Highways Agency, 1999). Otters therefore risk becoming trapped in any pits, piping, chemical containers or wire mesh. As otters are largely nocturnal, any night works may also lead to otters being run-over by works vehicles. Such events are not common, but the otter's status as a European protected species means that such an incident would constitute a serious impact.

Otters using the river could suffer increased disturbance during both construction and operation of the site. Noise from machinery and vehicles, light for night working, the possible obstruction of otter pathways and the presence of humans can all have adverse impacts. Consideration will need to be given so as to avoid such disturbance during the construction phase.

Pollution of the watercourses and water features in the area could result in serious long-term damage to the productivity and diversity of nearby habitats, this having a negative impact on both otters and their food supply. Sediment release following construction activities would have an adverse impact on fish populations, which in turn could affect otter prey availability.

There is also the potential for accidental spillages e.g. from oil and diesel drums. As well as reducing the amount of available prey, a particularly severe spillage may lead to a bio-accumulation of contaminants in prey species. High levels of pollutants may therefore accumulate in otters resulting in mortality. Being large carnivores, otters are particularly vulnerable to changes in food availability at all levels of the food chain.

Reasonable Avoidance Measures for Otters

The following mitigation plan regarding otters will be strictly adhered to:

- No construction work will take place outside of daylight hours
- During construction work, the development site will be made 'otter safe'. For example, any excavations, including trenches and trial pits more than 0.5m deep should be covered in the evening to prevent animals falling in. Where pits and trenches cannot be closed or filled on a nightly basis, a plank should be placed into the excavation so an animal can use this as a means of escape if necessary. Any open pipes, whether installed or being stored, should be closed to prevent any animals entering and becoming trapped.

- A discharge treatment plant should be installed on the site. The excavation for this will take place immediately before installation. If it is to be left overnight, it will be fully covered and/or a ramp will be formed from a plank of wood to allow any otter that falls in to escape. The treatment plant itself will have all vents/holes covered until installed and operational.
- During construction works, site compounds and storage or waste dumping facilities must be located at a safe distance away from the watercourse.
- During the construction phase, contractors must adhere to best practice guidelines with regards to preventing pollution incidents.

5. Summary and Conclusions

Otters may use the river for commuting and foraging, but no signs of otters were found on the site. A single possible resting place was found, but this lies outside of the proposed site boundary / clearance zone. The proposed construction work is therefore unlikely to impact negatively on otters, and no EPS licence is required. However, Reasonable Avoidance Measures are suggested, and these should be fully implemented during the construction and operational phases of the development.