Great Crested Newt – Precautionary Working Method Statement

Exolum, Sawtry PSD May 2025

1.0 Introduction

1.1 This Great Crested Newt Precautionary Working Method Statement has been prepared by CSA Environmental on behalf of Exolum in relation minor demolition works proposed at Sawtry PSD (hereafter referred to as 'the Site').

1.2 This Precautionary Working Method Statement (PWMS) has been written in relation to potential impacts to great crested newt (GCN) *Triturus cristatus* that could occur because of the proposed minor demolition works (refer to Appendix A for Phase I Demolition Plan).

1.3 Surveys conducted in 2024 confirmed the presence of GCN within nine of the ten structures that hold water within the Site (refer to Appendix B for GCN Survey Plan). A peak count of 190 GCN were recorded, which is defined as 'large' or 'exceptional' population with breeding likely in most waterbodies (English Nature, 2001).

1.4 Whilst requiring aquatic habitats to breed, GCN occupy terrestrial environments for the majority of the year. It is therefore likely that individual will be present within the grassland across the Site, principally within 50m of ponds, and up to typically 250m, with some occasional movement up to 500m.

1.5 The purpose of this document is to ensure that the proposed demolition works are undertaken in such a way as to accord with wildlife legislation and to mitigate the potential risk of killing or injury of GCN, and an offence under various legislation, principally the Conservation of Habitats & Species Regulation, 2019 as amended, as set out in detail below.

2.0 Description of Works

2.1 Demolition works will be undertaken by Eastern Demolition Limited on behalf of Exolum. The scope of the demolition works and Methods statement is provided in Appendix A. In summary, this will include:

- Demolition down to ground level of disused loading gantry and associated equipment
- Removal of lighting towers, steel cap to pit plus associated metalwork, and backfilling pit

- Removal of redundant filter vessel and associated piping and hand rails, and back filling
- Removal of dis-used additive storage tanks and associated frame/walkway, backfilling where required
- Removal of lamp posts to ground level
- Removal and disposal of contents of workshops
- Demolition of workshops down to ground level

3.0 Legislation

3.1 GCN are afforded protection under Schedule 2 of the Conservation of Habitats and Species (Amendment) Regulations 2012, Regulation 41.

3.2 GCN are also listed under Schedule 5 of The Wildlife and Countryside Act 1981 (as amended) and therefore receive protection under Section 9 of this Act, (as amended by the Countryside and Rights of Way Act 2000).

3.3 Taken together this legislation makes it an offence to:

- Deliberately capture or kill a GCN
- Deliberately disturb a GCN
- Intentionally or recklessly disturb a GCN whilst occupying a structure or place used for shelter or protection
- Deliberately take or destroy the eggs of a GCN
- Intentionally or recklessly obstruct access to any structure or place a GCN uses for shelter or protection
- Damage or destroy a breeding site or resting place of a GCN

<u>Justification of Non-Licensed Approach</u>

3.4 The scope of the proposed demolition is limited to a small number of structures and features. No waterbodies (or structures holding water) are proposed to be demolished.

3.5 Most of the proposed demolition will involve removing structures to ground level, with the working area limited to existing hardstanding.

3.6 Below ground demolition is proposed for three structures (vessels and pits), which will comprise removing internal piping/filter vessels, metal work and filling pits to grade level.

3.7 Given the small extent of temporary work activities to structures of limited suitability for terrestrial GCN, the works present a low risk to individual GCN and no permanent impacts to their habitats. Non-licensed avoidance measures are therefore deemed appropriate to avoid risk an offence being committed under the relevant legislation

3.8 This approach accords with Natural England's GCN Licence Method Statement guidance[1] which states that "… *many potentially licensable activities can in fact be avoided by careful planning of the development combined with simple precautionary measures. In many cases, adopting such an approach may mean no license is required (as no offence would be committed)".*

3.9 The precautionary measures outlined below are designed to safeguard GCN from impacts during the proposed works and are considered appropriate to avoid risk of an offence being committed in respect of wildlife.

4.0 Impact Avoidance Measures

Summary of Key Considerations

4.1 The **compound/working area** will be located on an area of existing hardstanding, over 50m from waterbodies known to support GCN.

4.2 Works will only be undertaken by Eastern Demolition Limited following a **toolbox talk by a Suitably Qualified Ecologist (SQE)**.

4.3 A SQE will also **review the working areas prior to commencement** and will undertake **walkover** of work areas including searching in any pits/vessels and structures for amphibians and other animals prior to works. This must take place no more than 24 hours before the demolition/works activity in that area is to be undertaken.

4.4 Operatives are only to commence demolition of structures/vessels/pits (i.e. **below ground works**) following the above searches by an SQE. This must have been undertaken the morning of demolition of these structures.

4.5 Should amphibians or other wildlife be found by site operatives during the demolition, works in that area should cease and a SQE contacted for advice.

Further Avoidance Measures

4.6 The following measures, intended to safeguard GCN, will be implemented and the contents of this document made available to contractors carrying out the works.

[1]Natural England (2020) Template for Method Statement to support application for licence under Regulation 55(2)(e) of The Conservation of Habitats and Species Regulations 2017 (as amended) in respect of great crested newts Triturus cristatus. Form WML-A14-2 (Version April 2020)

Location of Works

4.7 The location of the primary works compound should be within hardstanding and over 50m from waterbodies confirmed to support breeding GCN.

4.8 Working areas within grassland will be kept to a minimum (this includes tracking of machinery, which should utilise existing roadways).

4.9 Works within grassland or below ground (including infilling or removing materials from vessels/pits) will be subject to timing restrictions or supervision as set out below.

Toolbox Talk

4.10 Lead site staff (i.e. Site Manager) and all contractors on site will be given a full toolbox talk in respect of GCN (and other ecological matters) by the SQE, prior to the commencement of any works on-site, including a full explanation of this method statement. This method statement will be kept on-site at all times.

4.11 Any relevant site staff, contractors and subcontractors not in attendance will be briefed by the lead site staff.

4.12 Briefings will include details of the legal protection of GCN, the precautionary methods of working (outlined below), tips on identification of GCN and procedures to follow should this species be encountered.

Timing of Works & Supervision

4.13 GCN typically hibernate from October to February (inclusive), migrating to ponds from March onwards to breed, with many returning to terrestrial habitat from June. Early life stage (efts), young GCN and some adults remain and overwinter in ponds.

4.14 For all works, the following controls and restrictions will apply:

- **No works to hibernation habitats** (i.e. below ground impacts) will be undertaken between October and February.
- No works that disturb ground will be undertaken late-February – March, or between September and October, to avoid key migration periods.
- **Working areas within any grassland** should be subject to review by a SQE and will require a search of any suitable habitat (to be undertaken within 24hrs of the scheduled activities).
- Working areas that include **below ground impacts, including infilling or removing materials from vessels/pits**, will require a check and GCN fingertip search by a SQE (to be undertaken the day off scheduled activities).
- The GCN fingertip search will comprise a search of materials within pits/vessels (which may require assistance from demolition

operatives), as well as around edges of pits/grassland where GCN may seek refuge. Further supervision may be required if the SQE checks are not thorough (due to limited access or visibility).

4.15 All machinery/materials storage, welfare units and spoil will be on existing hardstanding and beyond 50m of waterbodies known to support GCN.

Emergency Procedure

4.16 The following procedure will be followed **in the event that GCN are found** at any time during works at the Site:

- **Works in immediate vicinity of great crested newt** must cease.
- The SQE is contacted immediately for confirmation of GCN presence and advice. The SQE would then contact Natural England to explain the scenario and seek advice for how to proceed.
- Any individual at immediate risk can be moved out of harm's way and deposited within suitable habitat far from the works area. Whilst this action is strictly unlawful, the persons undertaking this action are subject to defence in respect of protecting the individual animal(s).
- Natural England may advise to cease works and obtain relevant derogation licence, or to proceed with caution (subject to circumstances).

'Suitably Qualified Ecologist' (SQE) Contact Details

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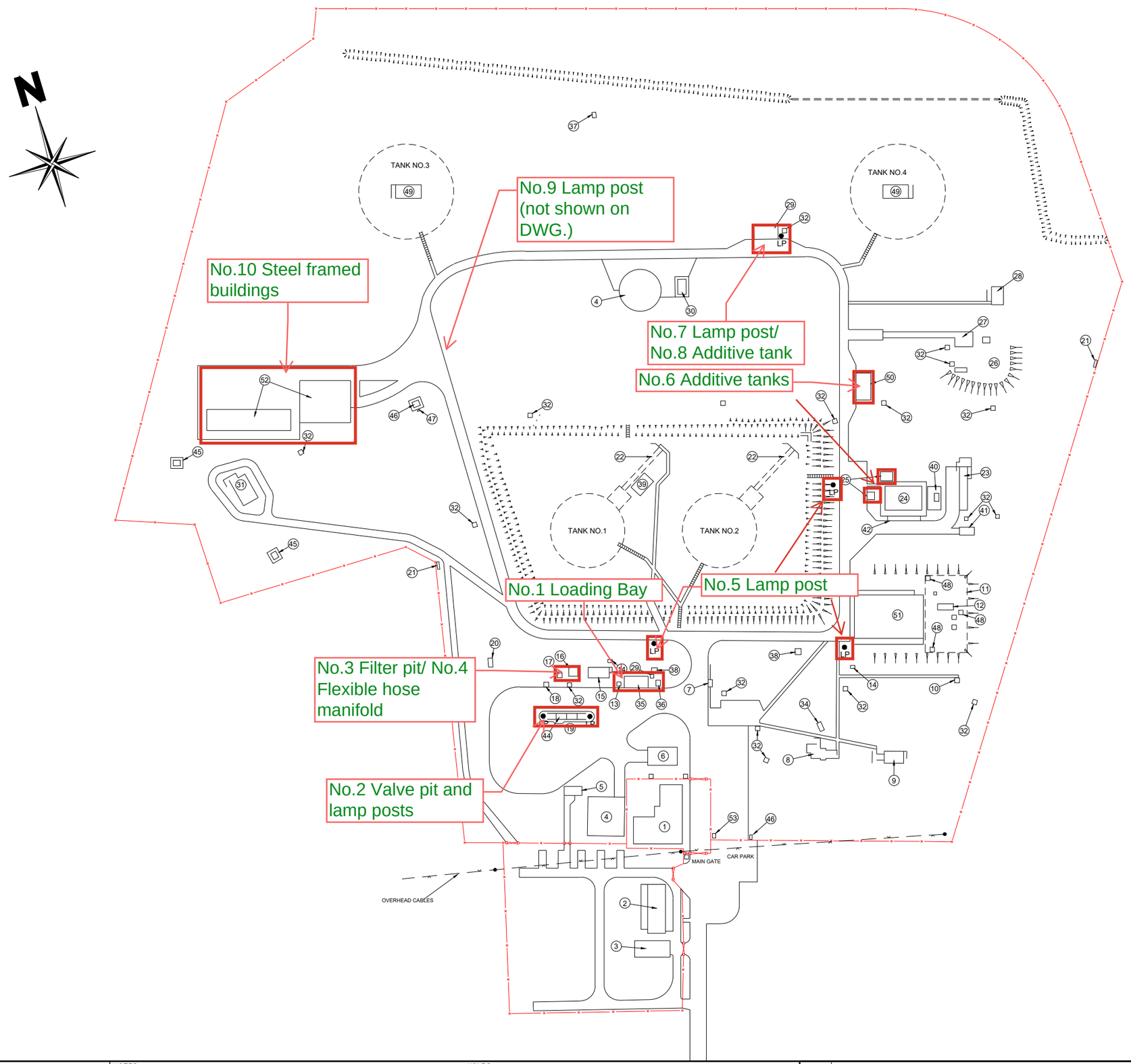
Appendix A

Demolition Proposals



KEY	
ITEM	DESCRIPTION
1	OFFICES AND MESS BUILDING
2	MAIN STORE
3	GARAGE / WORKSHOP
4	STATIC WATER TANK (2 OFF)
5	LEAK TRAILER STORE
6	FOAM STORE
7	DIESEL OFF-LOADING PIT 'J'
8	GO-DEVIL PIT 'B'
9	NO.2 STANDBY GENERATOR HOUSE
10	UNDERGROUND DIESEL OIL TANK
11	UNDERGROUND PUMPHOUSE
12	ESCAPE / VENT SHAFT
13	NO.2 OFF-LOADING PIT 'F'
14	ORIFICE PIT (2 OFF)
15	SWITCH ROOM / CHECKERS HUT
16	FILTER PIT 'G'
17	FILTER DRAIN TANK (FILL, DIP AND VENT CONNECTIONS)
18	NO.1 OFF-LOADING PIT 'E'
19	RETRACTABLE LOADING PIT 'H'
20	VALVE PIT 'D'
21	TRANSFORMER RECTIFIER STATION (2 OFF)
22	TANK TUNNEL
23	INTERCEPTOR PIT
24	MANIFOLD PIT 'A'
25	ANTI ICING ADDITIVE TANK (2 OFF)
26	NO.1 MV SWITCHGEAR AND GENERATOR ROOM
27	NO.1 MV SWITCHGEAR AND GENERATOR ROOM ENTRANCE
28	NO.2 SWITCHROOM
29	SLOPS TANK (2 OFF)
30	FOAM STORE
31	FILTER PIT 'C' (CONTAINS BLOCK VALVE)
32	DRAIN PIT (17 OFF)
33	VENT
34	SEPTIC TANK
35	LOADING GANTRY
36	BOTTOM LOADING PIT. (TANK NO.1 ONLY)
37	WATER MANHOLE
38	VALVE PIT
39	FILTER ROOM (TANK NO.1 ONLY)
40	FILTERS AND TANK PAD
41	GARAGE (POWER STORE)
42	DRUM LOADING RAMP
43	WATER HYDRANT PIT
44	BOTTOM LOADING PITS
45	PIPELINE ACCESS CHAMBER (2 OFF)
46	MARK 2 UGS
47	UGS ELECTRICAL CABINET
48	CABLE DUCT (3 OFF)
49	TANK PUMPROOM
50	AL41 ADDITIVE TANK
51	PIPE PIT
52	WAR DAMAGE BUILDINGS
53	WATER HYDRANT PIT

10m 0 10m 20m 30m 40m

SCALE 1:500

DESIGN CRITERIA

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NOTES

ALL FACILITIES EXCEPT THE VALVE PITS AND FILTER PIT 'C' ON THE PIPELINE (ITEMS [31] & [45]) AND THE INTERCEPTOR (ITEM [23]) ARE NO LONGER IN USE.

THE OTHER FACILITIES ARE MAINTAINED UNDER A "CARE AND MAINTENANCE" PROGRAMME.

ONLY LOCATION OF OPERATIONAL EQUIPMENT CONFIRMED.

HOLDS 1. ***

REV	DESCRIPTION	DATE	DRAWN	CHKD	APPR
A	UPDATED FROM LSSAW001, EXOLUM BORDER & NUMBER APPLIED	15/12/2023	JP		

EXOLUM PIPELINE SYSTEM LTD
1st Floor,
55 King William Street,
London.
EC4R 9AD.
Web: www.exolum.com

This drawing and the information contained herein is the property of **EXOLUM Pipeline System LTD** and is provided on condition that it will not be reproduced, copied, lent or disclosed, directly or indirectly, nor used for any other purpose than that for which it is specifically furnished.

Location
SAWTRY

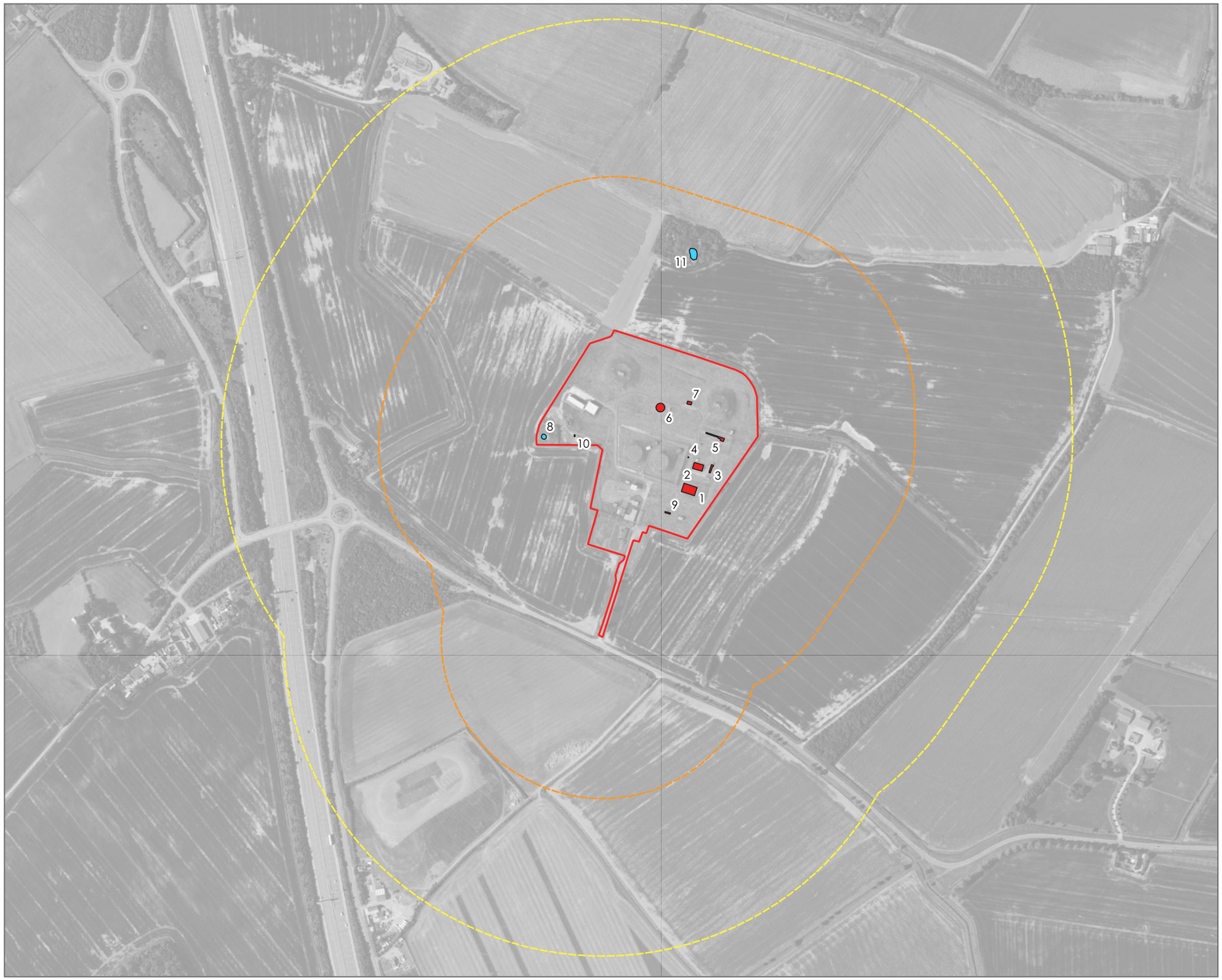
Title
SITE GENERAL ARRANGEMENT

Operation
EXOPS PIPELINE & STORAGE SYSTEMS

Scale	Document Number	Revision
NTS	EXOPS-SAW-LAY-PLA-0002	A

Appendix B

GCN Survey Plan



N

- Redline boundary
- Waterbody - great crested newt present
- Waterbody - great crested newt absent
- 250m buffer
- 500m buffer

Waterbody no.	HSI	eDNA	Peak GCN Count
1	Good	Positive	107
2	Average	Positive	48
3	Poor	Inaccessible	21
4	Poor	Inaccessible	3
5	Poor	Positive	18
6	Below average	Inaccessible	1
7	Below average	Negative	1
8	Poor	Dry	Dry
9	Poor	Inaccessible	5
10	Below average	Negative	0
11	No access	No access	No access

0 250 500 m

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Project	Sawtry PSD	Date	August 2024	Drawing No.	CSA/6797/106
Drawing Title	Great Crested Newt Survey Plan	Scale	Refer to scale	Rev	A
Client	Exolum	Drawn	SV	Checked	BW