



ECOLOGICAL MITIGATION AND ENHANCEMENT STRATEGY

Land adjacent to New House Farm - Marden
Herefordshire

A REPORT FOR CITIZEN HOUSING

This report provides details regarding mitigation and enhancement measures in relation to proposed redevelopment at the site in order protect retained habitats and protected species

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Table 0.1 - Document and Version Control

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Copyright and guidance

This report has been written to provide an objective assessment of the ecological constraints and opportunities that were considered to be present at the site at the time the survey/s were conducted and, should be used solely for the purpose for which it was designed. The copyright must be considered to rest with Co-ecology Ltd whilst use of the report is for the commissioning party and their client only, unless with the express and written consent of Co-ecology Ltd.

The surveys and assessment have been drafted to be in accordance with; British Standard for Biodiversity BS42020:2013, Biodiversity - Code for planning and development and; the Code of Professional Conduct published by the Chartered Institute of Ecology and Environmental management.

N.B. It must be noted that investigations of this sort provide only a snapshot in time of the ecological conditions of a site, are limited in extent and cannot capture the full picture of the biodiversity interests at the given location.

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1 Introduction

Background

- 1.1. Co-Ecology Limited has been commissioned by JBA Consulting on behalf of Citizen Housing to compile an Ecological Mitigation and Enhancement Strategy Report in relation to land adjacent to New House Farm and Marden Primary School, Marden, Herefordshire, HR1 3EW. This document was conditioned as part of the planning permission for the development of the site (Planning Application Reference: P150989/O) for the construction of up to 90 dwellings.
- 1.2. This method statement document has been written to ensure compliance with Condition 18 of the above-mentioned planning application:

“The recommendations set out in the recommendations of the Phase 1 Habitat ecologist’s report from Hills Ecology dated April 2014 and the mitigation and compensation proposals of the great crested newt report from Hills Ecology dated May 2014 should be followed in relation to species mitigation. Prior to the commencement of the development, a full working method statement for protected species present together with a habitat enhancement plan integrated with the landscape proposals should be submitted to and be approved in writing by the local authority and the work shall be implemented as approved”.

Purpose of Report

- 1.3. This report provides a summary of the ecological baseline surveys, along with an assessment of the potential ecological impacts and constraints associated with the development. Proposed mitigation to protect retained habitats and protected species within the design and delivery of the development is included in this document. In addition, enhancement measures and suitable monitoring to enable an effective evaluation of the mitigation employed are detailed which will aim to augment the quality of the site in the long-term for protected species and ensure that any adverse impacts of development activities are fully mitigated, compensated, and restored.
- 1.4. This report is underpinned by the prescriptions within a Method Statement for a great crested newt Mitigation Licence application being compiled by Co-ecology which will be submitted to Natural England and implemented prior to construction.
- 1.5. This strategy is based on details provided in the following documents:
 - Extended Phase 1 Habitat survey (Hills Ecology, 2014);
 - Great crested newt survey (Hills Ecology, 2014);
 - Report on tree constraints, amenity value and condition (Treescan, 2015)
 - Marden GCN Survey (JBA, 2018);
 - Proposed Site Plan (Zebra, 2019)
 - Preliminary Ecological Appraisal Land at Marden, Hereford (Harris Lamb, 2022)
 - Marden Method Statement to support Natural England Protected Species Licence Modification for GCN (Co-ecology, unpublished) (2018- 37088-EPS-MIT).
- 1.6. Mitigation and enhancement proposed herein, form the basis of the strategy that is to be implemented as part of the development. Following the planning and review process and on confirmation of the construction programme, amendments may be required.

Site Context

- 1.7. The site is approx. 5.15 ha in area and is located in the outskirts of Marden, in a semi-rural area north of Hereford, in Herefordshire, HR1 3EW (approx. grid reference for centre of the site SO 52687 47651). The site is immediately bounded by agricultural land to the east and south, by a primary school to the west and residential properties to the north.
- 1.8. The habitats within the site boundary were comprised by recently established neutral grassland bounded by hedgerows. The surrounding habitats in the wider landscape are predominantly arable farmland with a fragmented network of hedgerows and small woodland pockets.

Proposed Works

- 1.9. The proposed development includes the construction of 90 dwellings, with provision of a community space and biodiversity areas.

Relevant Legislation and Planning Policy

- 1.10. The following key pieces of nature conservation legislation are relevant to this document:
 - The Conservation of Habitats and Species Regulations 2017 (as amended) (commonly referred to as the Habitats Regulations);
 - Wildlife and Countryside Act 1981 (as amended);
 - Natural Environment and Rural Communities Act 2006;
 - [REDACTED]
 - Wild Mammals (Protection) Act 1996.
- 1.11. The National Planning Policy Framework (Department of Communities and Local Government, 2021) requires local authorities to avoid and minimise impacts on biodiversity and to provide net gains in biodiversity when making planning decisions.

2 Baseline ecological/biodiversity features

Baseline Surveys

- 2.1. Preliminary ecological appraisal reports for the proposed development, produced in 2014 and 2018, and protected species surveys (GCN) undertaken in 2014 recommended further surveys for great crested newts, with updated surveys for great crested newts completed by JBA Consulting in 2018.
- 2.2. The protected species surveys concluded the following:
 - [REDACTED]
 - Great crested newt, confirmed the presence of a great crested newt breeding 140m south east of the development boundary. Population surveys undertaken in 2014 identified a medium population of this species in pond 1 (Hills Ecology, 2014). Update surveys in 2018 found small population of GCN using pond 1 (JBA, 2018).
- 2.3. Following the recommendations made in the PEA report and recommendations within the GCN survey reports, a series of measures are described in this document to protect and enhance ecological features identified at the site and within the wider landscape, including:
- 2.4. **Protected sites:** The River Lugg Site of Scientific Interest (SSSI), part of the River Wye Special Area of Conservation (SAC) is located within 2km of the site boundary. The SAC has been designated because of its importance as a wildlife corridor, an essential migration route, and a key breeding area for many nationally and internationally species and is of special interest for its associated plant and animal communities. A Habitat Regulation Assessment (Appropriate Assessment) has already been prepared and approved by Natural England.
- 2.5. **Hedgerows-** southern hedgerow should be retained and protected in accordance with British Standard BS5837 *Trees in relation to Construction (2012)*. Recommended protection measures:
- 2.6. A protective barrier should be erected prior to the commencement of the construction activity and must remain *in situ* and intact until completion.
- 2.7. Southern hedgerow to be managed for UK and local BAP priority species with additional planting and gapping up with native woody species.
- 2.8. Provide a permanent well-vegetated buffer zone of at least 5m width between the southern hedgerow and the proposals.
- 2.9. **Great crested newts-** the site supports suitable terrestrial habitat used by this species (e.g., grassland and hedgerows). A protection fence will be installed around the working areas. Great crested newts will be captured and translocated to suitable retained areas within the site boundary,
- 2.10. **Bats** - suitable foraging and commuting habitat is present on-site and immediately adjacent to the site. Avoid any light pollution impacting on the linear features on site (hedgerows). Bat access tiles to be installed into at least 25% of the new buildings.
- 2.11. **Breeding Birds** - general nesting opportunities are supported within the site and around the site boundaries for a range of widespread bird species. Site clearance should be undertaken outside the bird nesting season (March to August inclusive). If this is not possible, a nesting bird check should be undertaken by a suitably qualified ecologist immediately prior to any vegetation clearance works. Bird boxes to be installed into 40% of all new buildings or fixed to the outside of the brickwork. At least 10% of the bird boxes should be a house sparrow terrace nesting box.

2.12.



3 Impacts & Mitigation measures

Overview

- 3.1. This section sets out impacts and all mitigation measures to be delivered prior to works commencing, during site clearance and during construction. Delivery documents are referenced where applicable.

Designated Sites- Lonely Wood CWS and ASNW

- 3.2. The River Lugg SSSI, part of the River Wye SAC, lays 700m southeast of the site. A Habitat Regulation Assessment (Appropriate Assessment) has already been prepared for the site and approved by Natural England and therefore impacts and mitigation on designated sites are considered to be outside the scope of this report.

Habitats and Flora

Hedgerow Protection

- 3.3. **Biodiversity Objective:** No net loss of habitat. Increase in species diversity and available habitat opportunities post development.
- 3.4. Site activities with potential impacts on hedgerows include:
- Movement of machinery and vehicles.
 - Site vegetation clearance.
 - Digging/excavation or infilling.
 - Pollution/silt runoff.
 - Dust/air pollution.
 - Dumping, spreading, discharge or storage of materials.
 - Construction of access roads and areas of hardstanding.
 - Erection of permanent or temporary structures.
 - Laying of pipes and cables
- 3.5. The majority of boundary hedgerows will be retained and enhanced as part of the proposals. All works at the site must therefore be undertaken in line with advice provided in the Arboriculture Impact Assessment report compiled for the site (Treescan, 2015). Measures prescribed therein include;
- works to clear the sections of hedgerow (See Figure 1) will be carried out by an appropriately qualified and insured contractor in accordance with British Standard 3998:2010 'Tree Work – Recommendations'. Tree Protection Fencing must be installed and signed-off prior to commencement of any vegetation clearance and site construction activities; and
 - in compliance with BS5837 (2012) standards for tree protection, all retained hedgerows will be fully protected during all construction and soft landscaping operations.

Hedgerow Removal

- 3.6. Discrete sections of hedgerow (see Figure 1) will be removed in order to create long-term access for the operational phase of the development. This must be undertaken in two phases, in line with the method statement produced as part of the great crested newt protected species mitigation licence obtained for the site.

3.7. The first phase should be undertaken outside of the breeding bird season; taken to nominally run between March and August inclusive, with clearance works possible between September and February. Vegetation will be cut to a height of 15cm above ground level with hand tools and all arisings will be removed. If this is not possible, a check for nesting birds should be undertaken by a suitably qualified ecologist (ECoW) immediately prior to any clearance. If any active nests are identified within the areas to be cleared, a 5m protection buffer zones will be set and all clearance works within the buffer area should be halted until the chicks have fledged.

3.8. The second phase will serve to clear all remaining above ground vegetation clearance and associated hedgerow roots. This will be undertaken in the active period for great crested newts and reptiles; between mid-March and October, in accordance with details provided in the associated GCN Protected Species Mitigation Licence in place at the site. Immediately prior to clearance, the area subject to clearance will first be subject to a detailed hand search for amphibians and reptiles by a suitably qualified ecologist. Any amphibians encountered will be safely captured and released into the pre-selected receptor area. More details regarding the receptor area are provided in the great crested newt section below.

Great crested newt

3.9. **Biodiversity Objective:** No risk of killing/injury to great crested newts, maintain favourable conservation status for the species and increase the available foraging and commuting habitat for great crested newts.

3.10. Site activities with potential impacts on great crested newts include:

- Movement of machinery and vehicles.
- Site vegetation clearance.
- Digging/excavation or infilling.
- Pollution/silt runoff.
- Dust/air pollution.
- Noise
- Lighting
- Dumping, spreading, discharge or storage of materials.
- Construction of access roads and areas of hardstanding.
- Erection of permanent or temporary structures.
- Laying of pipes and cables

3.11. To avoid any impacts, all works including clearance of suitable terrestrial habitat (grassland and hedgerow) and ground works required as part of the construction phase will be carried out in accordance with a Protected Species Mitigation Licence, issued by Natural England. This will enable lawful destruction of terrestrial habitat and all clearance works will be undertaken in accordance with the accompanying and detailed method statement in order to fully safeguard this species. This application to amend this licence will be submitted concurrently with the submission of this document to the LPA for condition approval.

3.12. Mitigation will comprise separating the footprint of the development from the adjacent habitats through the use of Temporary Amphibian Fencing (TAF). Any newts within the working footprint will then be translocated by a capture and release programme with all individuals being relocated to a pre-determined receptor area (see Figure 1) located to the south-east of the site. The receptor site has been chosen because it comprises higher value scrub and grassland mosaic and is within a 100m radius of one of the ponds thought to be used by the target population.

Pre-Construction

3.13. The installation of TAF was undertaken in May 2019 and the newt capture and translocation took place between May to June 2019. In early 2020, Coronavirus pandemic meant works were suspended indefinitely but the TAF was left in situ.

3.14. All sections of the existing TAF will be checked and repaired.

The habitat to be directly impacted by the new sections of TAF will be subject to a hand search by the licenced ecologist or accredited agent immediately prior too works. Any amphibians encountered will be relocated to the receptor area.

3.15.

3.16. Once the TAF has been repaired and modified, the licenced ecologist, or accredited agent, will open and check the traps for a minimum of 30 consecutive days and the capture period will continue until the closure criteria specified in the great crested newt mitigation guidelines has been satisfied; five suitable consecutive nights at the end of the trapping period with no captures of great crested newt. The trapping period will be extended as required to achieve the closure criteria. All captured newts will be released to the predetermined receptor site located to the east.

3.17. On cessation of the trapping effort, the habitats within the capture areas will be removed as part of a destructive search with topsoil removed using an excavator with a toothed bucket under guidance by the licenced ecologist or accredited agent. The ecologist will then carry out a final check once site clearance is complete and once the ecologist confirms the absence of any remaining suitable habitat, construction may then proceed.

3.18. The hedgerow areas to be removed from the site will be cleared in two phases in order to remove breeding bird potential prior to the breeding bird season while also fully safeguarding amphibians that may be sheltering in the feature at or below ground level. More details regarding hedgerow clearance are provided in the hedgerow section above.

During works

3.19. Fence checks: Regular fence checks will be undertaken by the on-site contractor to ensure the fence is well maintained so that it forms an effective barrier to amphibian and reptile movement into the site.

Post works

3.20. On full completion of the development, the exclusion fencing will be removed under ecological watching brief and in suitable weather conditions and will avoid the newt hibernation period between mid-October and mid-March.

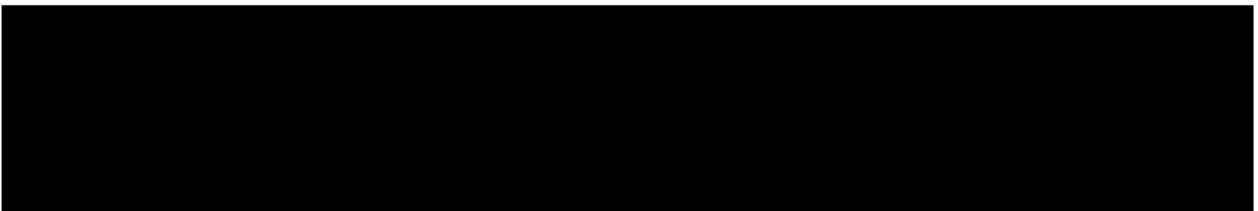
3.21. To compensate for the loss of habitat suitable to support great crested newts, the retained habitats will be enhanced through re-seeding with a native species mix of local provenance or replaced with tree planting, marshy grassland and attenuation basin in the southern section of the site (see Figure 1). The receptor area, in the south east section of the site, will be enhanced with the planting of scrub and scattered trees.

3.22.

3.23.

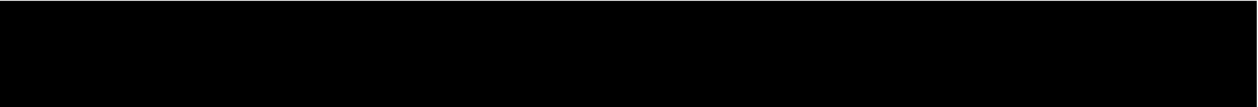
- Digging/excavation or infilling.
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- Noise
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3.24.

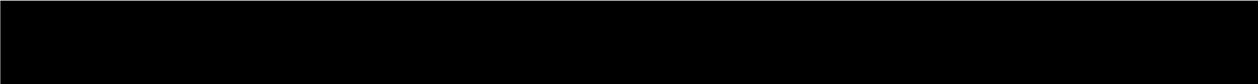


Pre-Construction

3.25.

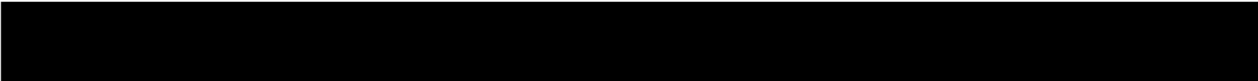


3.26.



During works

3.27.



3.28.



Post works

3.29.



Other species

Bats

- 3.30. Works must serve to maintain bat foraging and connectivity around the site. The key features for bats are the hedgerows. These features will be retained and incorporated into the final site layout (see Figure 1).

3.31. There will be removal of a discrete section of hedgerow for access however, a sufficient vegetated buffer will retain enough of this feature to ensure no disruption to bat dispersal. In addition, retained features which provide suitable foraging and commuting routes for bats will remain unlit during construction and a permanent, sensitive lighting design for the development will be implemented. The scheme will reduce light spill on adjacent boundary features and will follow good practice design measures and guidance from the Institution of Lighting Professionals and the Bat Conservation Trust (2018) to include:

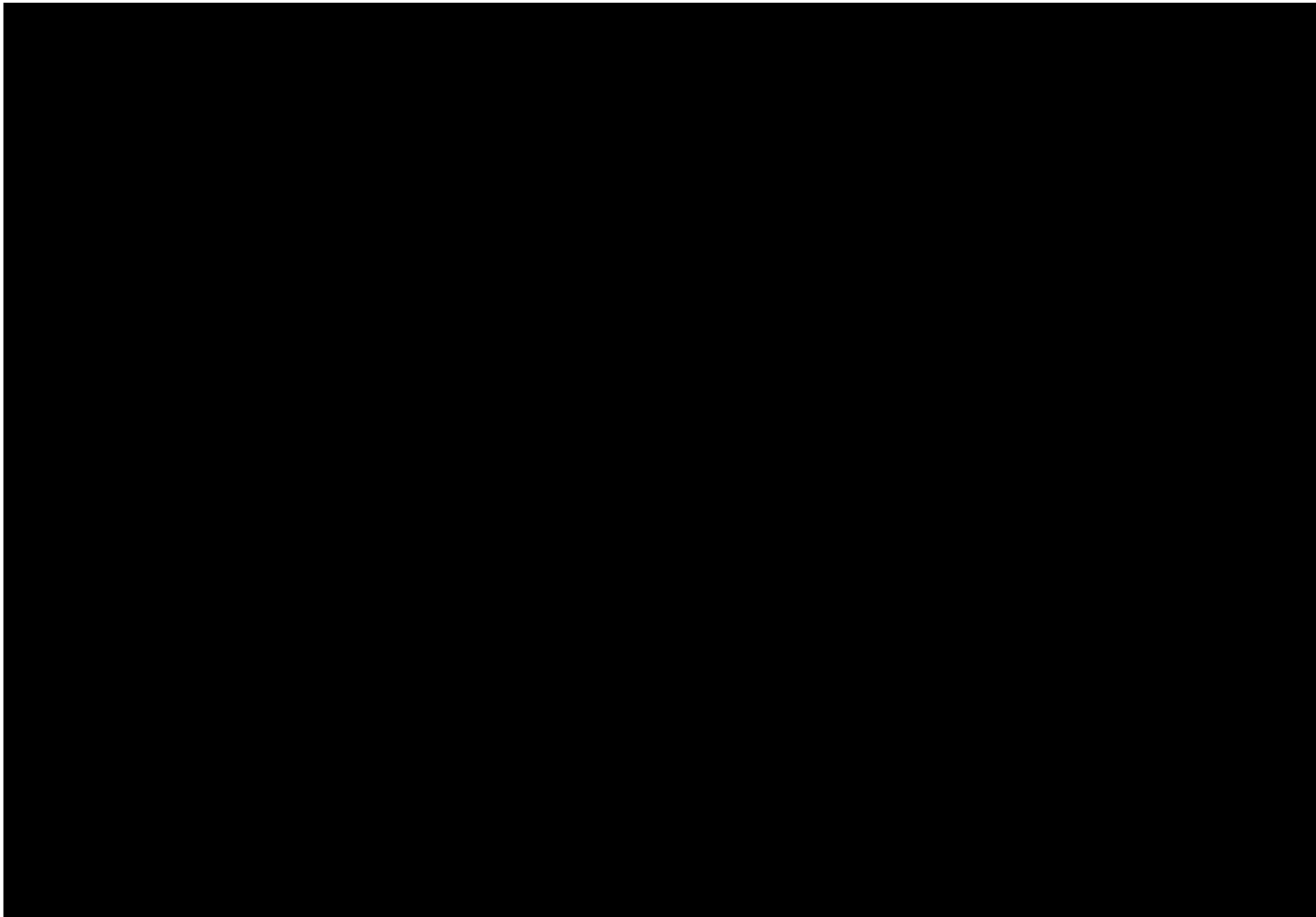
- Retained habitats associated with the development will not be directly illuminated either during construction or during the operational phases of the development. This is of particular relevance during the spring, summer and autumn months when bats are active, and when artificial lighting is required at the site within an hour of dusk or dawn; either for construction activities or for health and safety reasons during operation.
- The lighting design will address four key design principles:
 - 1) Use of unnecessary lighting will be avoided;
 - 2) Spatial spread of lighting will be minimised (to take into account both primary and reflected light sources). Directional lighting can be achieved by angle and orientation of beam, use of a cowl, louvre or other light shield, or a combination of these;
 - 3) Timing and duration of lighting; timers and bespoke dimming regimes may be used to ensure that luminaires are reduced at times of predicted low use. These can be set to change with the seasons and therefore reflect the shifting time of dusk and dawn throughout the year. Motion sensors provide further control to ensure that areas are illuminated only when required; and
 - 4) Intensity and colour of lighting – light intensity will be designed to be as low as possible whilst meeting the objectives of the intended function. The colour of lighting will need to take into account the sensitivity of the ecological receptors on Site. Light sources selected should emit zero ultra-violet light wherever possible. Interim guidance from the Bat Conservation Trust (2014) recommends that white and blue spectrum light should be avoided or, where white lights are required, these should be of warm/neutral colour and have a peak wavelength above 550 nanometres. Where lighting is required for vehicular access, lighting will be designed to ensure road safety requirements are met, while still delivering the design principles above as far as is possible. Use of directional lighting (hoods, cowls, etc) may be of benefit in this situation.

Birds

3.32. To avoid the disturbance of active nesting birds, any suitable habitat that is within the construction footprint will be cleared outside the main bird nesting season. If this is not possible due to timing constraints associated with other protected species, it may be necessary to clear suitable bird nesting habitat between March and August. In this instance, it is recommended that:

- A suitably qualified ECoW will survey habitat immediately prior to its removal. The duration and frequency of attendance will be dependent on the programme of works for site clearance.
- If an active nest is identified, a buffer area of at least 5m (or wider as appropriate and dependent upon the species identified) will be set. No clearance works will be allowed within the buffer area until the chicks have fledged.

3.33. If at any time, evidence of a previously unidentified protected species is encountered then works must immediately cease and an ecologist consulted in order to ascertain the best way to proceed with the works.



4 Site enhancement measures

- 4.1. Retained (enhanced) and newly created habitat south and east of the new housing development site will be replanted with a mosaic of tree, shrub, grassland, and hedgerow as part of the great crested newt mitigation strategy.
- 4.2. Planting mixes have been selected to include native nectar and berry bearing species, of local provenance wherever possible, to provide suitable foraging, refuge and nesting habitat for particular species recorded within the site and the surrounding area. The planting layout will also ensure structural diversity and connectivity to the wider landscape is maximised wherever possible.
- 4.3. Management of the retained grassland areas will be undertaken to control the abundance of the more competitive species, and to provide a structurally and botanically diverse area which will enhance foraging opportunities for invertebrates, amphibians, reptiles, [REDACTED] birds and bats.

Habitat Creation Measures

- 4.4. The habitat creation measures detailed below are illustrated on Figure 2 below and are based on the associated planting plans and planting schedule for the site (Drawing references: ZLA_908-L-010 – ZLA_908_12 inclusive and PL003_Proposed site plan). These are embedded within the associated LMP (Enzygo 2021^b).

Trees

- 4.5. New tree planting will be undertaken within the developable areas and in the newly created/restored/enhanced areas. Species will comprise native species and include oak *Quercus robur*, wild cherry *Prunus avium*, field maple *Acer campestre*, downy birch *Betula pubescens*, apple *Malus domestica*, crab apple *Malus sylvestris* and alder *Alnus glutinosa*.

Hedgerow

- 4.6. All gaps that were created on the hedgerow along the northern boundary to facilitate construction will be replanted (see Figure 2) with a mixture of field maple, hazel *Corylus avellana*, hawthorn *Crataegus monogyna*, holly *Illex aquifolium*, honeysuckle *Lonicera periclymenum* and blackthorn *Prunus spinosa*.

New Scrub area

- 4.7. An area of scrub will be planted along the southern half of the receptor site (see Figure 2) in accordance with the compensation measures proposed within the great crested newt mitigation licence covering the site.

Grasslands

- 4.8. Areas of neutral grassland will be re-planted along the southern boundary of the site and areas of wet (marshy) grassland will be created around the proposed attenuation basins (see Figure 2). These areas of grassland should be seeded with native wildflower species rich mixes.
- 4.9. Areas of grassland around the southern and eastern boundaries will be managed as a longer sward with bi-annual cuts in order to maintain connectivity for great crested newts and enhance the available terrestrial habitat supported at the site. This management approach for the areas of grassland will also favour reptile and small mammal populations within the site boundary.

Habitat Enhancement Measures

Bats

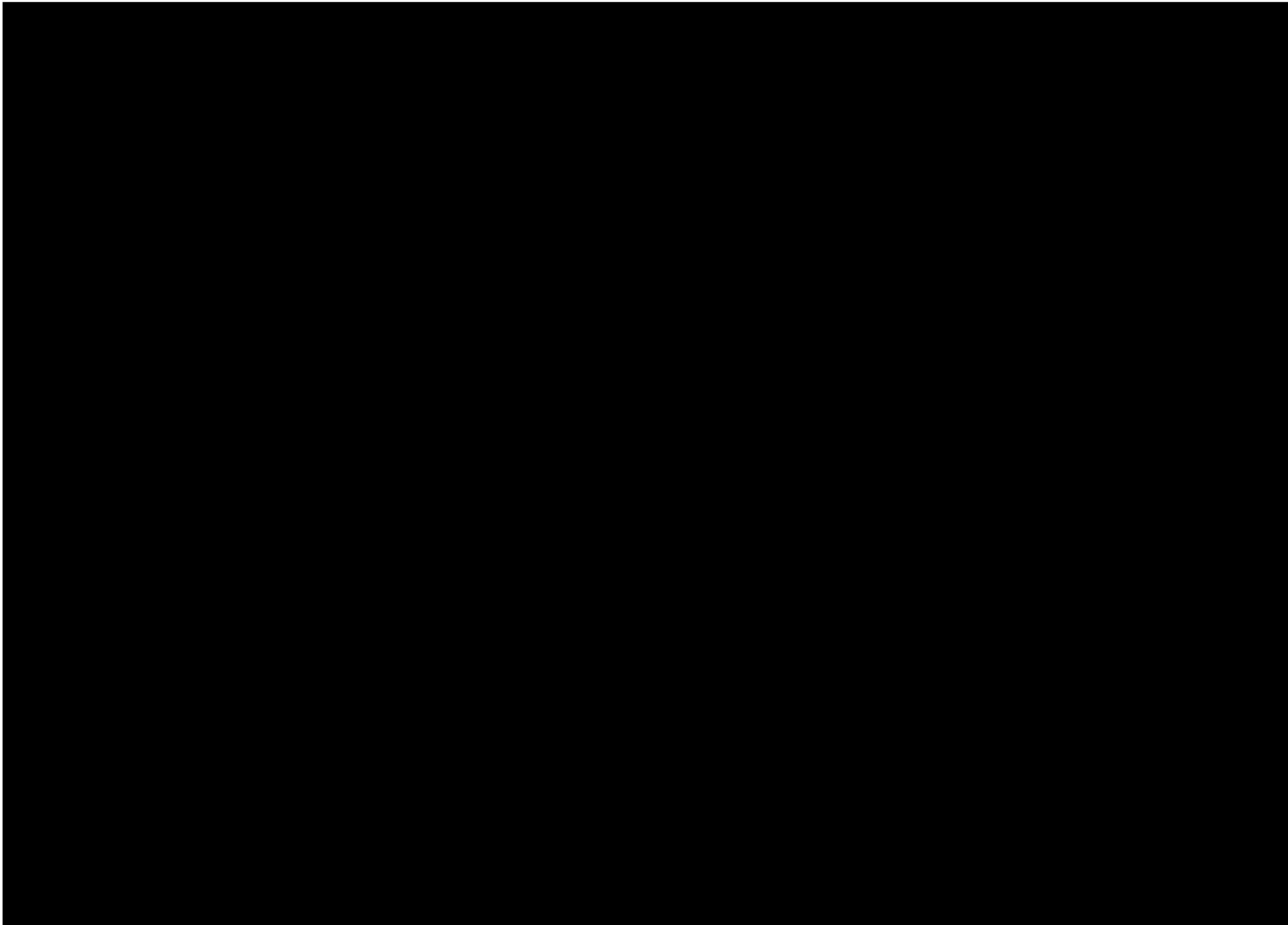
- 4.10. Bat access tiles will be installed on at least 25% of the buildings (see Figure 2 for an indication of location)
- 4.11. Implementing a sensitive lighting scheme at the site which will aim to avoid any unnecessary lighting within the scheme. Lights should be trained away from the hedgerows and retained habitats within or immediately adjacent to the site boundary.

Birds

- 4.12. Tree, hedgerow and scrub planting undertaken as part of the landscaping design will provide additional food and nesting resources for birds. Adopting a relaxed grassland management regime will also increase invertebrate availability which in turn will create additional food provision for birds.
- 4.13. Bird boxes should be installed on at least 40% of the new buildings (see Figure 2 for indicative location). Of those, at least 10% should be sparrow terrace nesting boxes.

Invertebrates

- 4.14. The landscape planting throughout the site, together with relaxed management of grassland areas will ensure that there is sufficient structural diversity, and suitable species, to provide ideal conditions for the local invertebrate community. Creation of hibernacula piles will also benefit the local invertebrate community, as will any scrub/wildflower planting and new pond creation.



5 Long-term management and post-completion monitoring

- 5.1. Following completion of the development, a programme of monitoring for habitats and species will be undertaken. This is required to determine whether the mitigation which has been put in place has been successful and identify any changes which may be required to future management and maintenance of the site to ensure all features of ecological value are maintained in the future.
- 5.2. It is anticipated that the maintenance of the site will be completed in line with the Detailed Landscape proposals (Zebra, 2019) and the method statement accompanying the Natural England's GCN Mitigation licence for the project which will provide guidance on management techniques to maintain the ecological features of value within the site over a period of at least the first five years of management (and up to 25 years for some features). The plan will also set out the schedule and frequency of any monitoring surveys required. Maintenance of the site will also be completed in accordance with the associated great crested newt licence.

6 Mechanisms to Secure Delivery

- 6.1. Prior to the commencement of any works on site, including the setting up of site compounds and access onto the site, the Principal Contractor (and any personnel appointed by the Principal Contractor) will receive a formal briefing by the project ecologist. This briefing will detail all relevant protected species issues as set out within this document. A copy of this document must be read and understood by all contractors conducting the works.
- 6.2. The Principal Contractor will then be responsible for relaying any necessary information to contractors on site, either employed by them directly or third parties. Advice will be sought from the project ecologist in the event of complex issues arising or in cases where there is any doubt as to the action to be taken. Any deviation from this document will be discussed with the project ecologist prior to seeking approval from the Local Planning Authority as necessary.
- 6.3. The site is owned by Citizen Housing, and they are responsible for arranging site access and contractors accordingly.
- 6.4. The Principal Contractor or a any third party employed to undertake specific services, will be responsible for implementing all of the necessary avoidance/mitigation/enhancement measures detailed within this document and any additional mitigation detailed within the separate associated great crested newt [REDACTED]
- 6.5. A suitably qualified and experienced ecologist, licensed/accredited where necessary, will be provided and act as an ECoW. The role of the ECoW is in accordance with BS42020:2013 (BSI., 2013) and will satisfy the following requirement:

'An ecological Clerk of works should be able to demonstrate a level of experience and competence commensurate with the complexity of the role needed on site to deal with the wide range of ecological issues likely to be encountered and to adapt to new and unforeseen challenges raised by development activities'

Responsible Persons and Lines of Communication

- 6.6. Details of personnel and lines of communication necessary for the full implementation of the mitigation and enhancement strategy is shown in table 6.1 below:

Table 6.1 Responsible persons and lines of communication Features

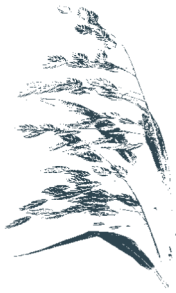
Required Information	Responsible Person	Line of Communication
Advice and monitoring in relation to regulations, legal consents, planning conditions, environmental procedures and contractual arrangements.	Project Ecologist	Request for advice or monitoring received from the Project Manager (TBC)
Training and toolbox talks for staff.	ECoW: Project Ecologist	Request for training and toolbox talks received from the Lead Contractor (TBC) or the Project Manager (TBC)
Contingency measures in the event of an accident or occurrence of other potentially damaging incidents.	Lead Contractor (TBC)	Advice on contingency measures in the event of an accident received from the ECoW, project ecologist and the Project Manager, (TBC)

Table 6.1 Responsible persons and lines of communication Features

Required Information	Responsible Person	Line of Communication
Periodic reporting on the success of advice/toolbox talks etc. as required, for example, by planning conditions.	Lead Contractor (TBC), ECoW, project ecologist and Project Manager (TBC)	All reporting fed back to the Project Manager (TBC)

References

- British Standards Institution (2013). *Biodiversity – Code of practice for planning and development*. BS 42020:2013. BSI, London.
- CIEEM (2019) *Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine Version 1.1*. Chartered Institute of Ecology and Environmental Management, Winchester.
- Co-Ecology (2023) *Marden Method Statement Amendment Document*.
- Harris Lamb (2022) *Preliminary Ecological Appraisal land at Marden, Hereford*.
- Hills Ecology (2014) *Extended Phase 1 Habitat Survey*. Unpublished
- Hills Ecology (2014) *Great crested newt survey*. Unpublished
- Treescan (2015). *Report on tree constraints, amenity value and condition*.
- JBA (2018) *Marden GCN Survey*
- Zebra Landscape Architects (2019) *Proposed Site Plan*.
- Zebra Landscape Architects (2019) *Detailed Landscape proposals*



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