

Title	Residential Extension & Associated Works, Five Oaks, Legacy, Wrexham, LL14 4ER Great Crested Newt Reasonable Avoidance Measures (RAMs) Method Statement
Date issued	19th November 2021
Client	Mr Geraint Davies
Contract Ref.	C457

1 Introduction

Method Statement

- 1.1 Marches Ecology was commissioned by Mr Geraint Davies to produce a Reasonable Avoidance Measures (RAMs) Method Statement to avoid any impacts on Great Crested Newts (*Triturus cristatus*) due to construction works (residential extension) at Five Oaks, Legacy, Wrexham, LL14 4ER (approximate OS Grid Ref. SJ 2926 4769).
- 1.2 Planning permission¹ for the works has been provided by Wrexham County Borough Council (WCBC), Planning ref: P/2021/0370, dated 06th October 2021, Condition 8 of which states the following:

No part of the development shall commence until a GCN Method Statement has been submitted to, and approved in writing by, the Local Planning Authority. The Method Statement should include, but not necessarily be limited to: the submission of details and plans concerning GCN reasonable avoidance and mitigation measures including fence construction and maintenance; details of timing, phasing and duration of construction activities and conservation measures; a timetable for implementation demonstrating that works are aligned with the proposed phasing of the development; and persons responsible for implementing the works. The development shall be carried out in strict accordance with the Method Statement as may be approved.
- 1.3 Consultation was sought with Emma Broad (WCBC Ecologist) by 'phone on 19th October 2021 to clarify the scope/ requirement of the 'Method Statement'. Emma confirmed that the conclusion of Marches Ecology (2021, *op. cit.*) of a 'basic' RAMs Method Statement would be sufficient in this instance and that the use of, for example, temporary amphibian fencing was not required. It is on this basis that this document has been prepared.
- 1.4 This RAMs Method Statement has been produced to guide the construction works. (Non-licensed) RAMs are often implemented at sites where the risk to individual Great Crested Newts/ their habitat has been assessed as low or negligible. This document briefly assesses the habitat to be impacted by the works/ immediately surrounding area for its potential value to Great Crested Newts. The proposed RAMs are outlined and will ensure as far as is reasonably possible that impacts on Great Crested Newts are minimised/ avoided.

¹ The following report was submitted in support of the planning application: Marches Ecology (2021). *Proposed Residential Extension & Associated Works, Five Oaks, Legacy, Wrexham, LL14 4ER – Ecological Appraisal*. Report prepared on behalf of Mr Geraint Davies. Condition 7 of P/2021/0370 further requires 'the development [to be] carried out in strict accordance with the findings and recommendations' as detailed in this report.

- 1.5 It should be noted that following the RAMs outlined in this Method Statement does not waive or derogate any of the offences under the Habitat Regulations² or Wildlife & Countryside Act 1981³ should an offence be committed. The aim of this Method Statement is to reduce the risk of an offence occurring to an 'acceptable' level by the implementation of reasonable steps.

Project Background

- 1.6 Section 1.4 of Marches Ecology (2021, *op. cit.*) should be referred to for details of the proposed development.
- 1.7 It is understood that the construction works will last approximately 30 weeks (although it is recognised that this might be longer should any ground issues become evident during the works). The works are likely to be phased, whereby the garage will be constructed first. The proposed start date is currently unknown but is likely to be in early December⁴ 2021 (subject to discharge of the required planning conditions, including Condition 8, by WCBC). The (external) works will utilise a maximum of 4-5 no. site personnel at any one time. Machinery will comprise a mini-excavator, mini dumper, skip and various small hand tools. No other information on the scheme has been provided to inform this document.

2 Risk Assessment

Introduction

- 2.1 The following is taken from Marches Ecology (2021, *op. cit.*) which includes the results of an Extended Phase 1 Habitat Survey/ associated background data search undertaken in July 2021 and associated assessment. *Figure 1* of Marches Ecology (2021, *op. cit.*) should be referred to for the locations of target notes.

Summary Evaluation of Risk to Great Crested Newts and Reptiles

Habitat Assessment

- 2.2 *Paragraph 3.3.20:*
- Features of potential value to Great Crested Newts (for foraging, refugia and hibernacula) within the survey site are largely limited to old/ defunct built structures (including brick/ patio slab steps) located underneath the raised wooded decking at *Target Note 2*, disturbed edges of remaining decking at *Target Note 2a*, exposed old sections of breeze block/ stone walls (partly submerged) at *Target Note 3* (including occasional small brick/ rubble mounds) and the bases of boundary hedgerows. Locally these may be of high-quality potential value. Landscaping to the east of the dwelling includes hard-surfaces/ low breeze block and timber sleeper walls, and small/ disturbed beds of ornamental planting; locally these features may be of some value. The mown lawns are of negligible value, however animals would be able to disperse across these areas should they be present.

² 'EU legislation which applied directly or indirectly to the UK before 11.00 pm on 31st December 2020 has been retained in UK law as a form of domestic legislation known as 'retained EU legislation'. This is set out in Sections 2 and 3 of the European Union (Withdrawal) Act 2018' - <https://www.legislation.gov.uk/>

³ HMSO (1981). *The Wildlife and Countryside Act 1981*. HMSO, London.

⁴ This RAMs Method Statement takes into account potential weather (temperature) related restrictions with regards undertaking the works in winter months.



Defunct brick/ patio slab steps located underneath the raised wooded decking at *Target Note 2*.



Old sections of breeze block/ stone walls (partly submerged), and associated small brick/ rubble mounds, at *Target Note 3*.

Status of Great Crested Newts in the Area

2.3 *Paragraph 3.3.15:*

Cofnod provided 10 Great Crested Newt records for the 1 km search area. The closest is from a location approximately 320 m to the west: this being dated 2017, for '2' individuals (from author knowledge presumed to be a terrestrial record). The next closest is from the 'acid tar lagoon' at Llwyneinion, which is located approximately 430 m to the south-west of

the survey site at its closest point: this record is dated 2010 and was submitted by Marches Ecology; it is further discussed below. A cluster of 5 records are located to the north of the survey site, the closest being approximately 480 m away. Cofnod have also provided records for Common Frog (*Rana temporaria*), Common Toad (*Bufo bufo*), Palmate Newt (*Lissotriton helveticus*) and Smooth Newt (*Lissotriton vulgaris*).

2.4 *Paragraph 3.3.16:*

There is no aquatic habitat within the survey site and or immediately adjacent land.

2.5 *Paragraph 3.3.17:*

An initial review of the OS map 1:25, 000 scale and relevant internet-based mapping including aerial photography⁵, along with author knowledge, indicates that there may be only one waterbody within approximately 250 m of the survey site (excluding ditches), as follows:

- Pond 1. A pond within a disused railway line at SJ 2932 4746. This is located approximately 240 m to the south of the survey site. It was identified by Marches Ecology in 2010 as part of an unrelated project: it was provided an 'Average' Habitat Suitability Index (HSI) at the time. It is unknown if this pond remains and or its current ecological status.

2.6 *Paragraph 3.3.18:*

A detailed pond scoping exercise has not been undertaken to confirm the presence/absence of this waterbody; other waterbodies could be present in the locality, including in private gardens.

2.7 *Paragraph 3.3.19:*

The 'acid tar lagoon' at Llwyneinion is located approximately 430 m to the south-west as detailed above. In 2010 this was recorded as supporting a medium population (*i.e.* between 11-100 individuals) as defined by the Great Crested Newt mitigation guidelines (English Nature (2001)). However due to survey constraints it was determined at the time that the results could be quite justifiably extrapolated to a large population (*i.e.* over 100 individuals). A large population of Palmate Newts was also recorded.

Summary

2.8 *Paragraph 4.2.22:*

The potential presence of Great Crested Newts in terrestrial habitat is governed more by the proximity of a suitable breeding waterbody than by the quality of the terrestrial habitat. There may be only one waterbody within approximately 250 m of the survey site, this being located approximately 240 m to the south; the current ecological status of this is unknown. However, a large breeding population of Great Crested Newts is known to be supported by an 'acid tar lagoon' at Llwyneinion, approximately 430 m to the south-west.

2.9 *Paragraph 4.2.23:*

Taking the large breeding population size at the tar pit into account it is considered possible that associated animals could potentially access the survey site. Most Great Crested Newts

⁵ <https://www.google.co.uk/maps/place/Rhostyllen,+Wrexham+LL14+4ER/@53.0220353,-3.0561237,374m/data=!3m1!1e3!4m5!3m4!1s0x487ac7e6afab07f1:0xd755a46f820d1793!8m2!3d53.0234431!4d-3.0539434>

travel no more than 250 m from their breeding ponds with the majority utilising habitats closer than this (especially if these are of high quality), however newts can disperse up to 1 km from their breeding sites. There are no significant reasons why individual animals should disperse across/ utilise terrestrial habitats within the survey site (for example it does not appear to form part of an obvious dispersal corridor to other ponds and does not support high quality foraging habitat), however this cannot be ruled out (especially considering the potential features present (for example at *Target Note 2*) and the absence of any significant barriers to dispersal).

- 2.10 While there is the potential for disturbance or killing of Great Crested Newts during the proposed works, the risk accorded by the proposal (which is of small scale and short duration) is considered to be low/ negligible at the present time. As such this RAMs Method Statement details a precautionary approach to avoid any impacts on [individual] Great Crested Newts. Subject to appropriate implementation of this RAMs scheme no impacts due to the proposal on the Favourable Conservation Status of the local Great Crested Newt population are envisaged.

3 Great Crested Newt Legislation

Summary

- The Great Crested Newt is protected under the relevant law. The legislation applies to all life stages, including eggs, larvae, juveniles and adults.
- It is illegal to handle, injure/ kill and or disturb any Great Crested Newt. It is also illegal to damage or destroy Great Crested Newt habitat.
- Breaking the law can lead to fines of up to £5000 per offence and, potentially, prison sentences of up to six months.

- 3.1 This sub-section provides a brief summary of key legislation relevant to Great Crested Newts and is current at 23rd September 2021. It should not be considered a comprehensive review and is not meant to be so. It is provided here for information only and is not intended to replace specialised legal advice. It does not replace the text of the legislation but summarises the salient points.
- 3.2 The UK exited the EU on 31st January 2020. There will now follow a transition period until the end of the year during which EU legislation and policy will be followed⁶. *'EU legislation which applied directly or indirectly to the UK before 11.00 pm on 31st December 2020 has been retained in UK law as a form of domestic legislation known as 'retained EU legislation'. This is set out in Sections 2 and 3 of the European Union (Withdrawal) Act 2018'*⁷.
- 3.3 Great Crested Newts are listed on *Schedule 5* of the *Wildlife and Countryside Act 1981* (as amended)⁸, and receive full protection under *Section 9*. The 1981 Act was amended by the *Countryside and Rights of Way Act 2000*⁹ which further extends the protection. They are also listed as European Protected Species on *Schedule 2* of *The Conservation of Habitats and Species Regulations 2017*^{10,11} which gives it full protection under *Regulation 42(1)*. The legislation applies to all life stages of the Great Crested Newt, including eggs, larvae, juveniles and adults.
- 3.4 Under the above legislation it is an offence to intentionally or recklessly:
- kill, injure or take an individual of such a species;
 - possess any part of such species either alive or dead;
 - damage, destroy or obstruct access to any place or structure used by such species for shelter, rest, protection or breeding;
 - disturb such a species whilst using any place of shelter or protection; or
 - sell or attempt to sell any such species.
- 3.5 The Great Crested Newt is included on *Section 7* of the *Environment Act 2016*¹².

⁶ <https://cieem.net/referencing-environmental-eu-legislation-post-brexit/>

⁷ <https://www.legislation.gov.uk/eu-legislation-and-uk-law#:~:text=The%20UK%20is%20no%20longer,on%20legislation.gov.uk>

⁸ HMSO (1981). *The Wildlife and Countryside Act 1981*. HMSO, London.

⁹ HMSO (2000). *The Countryside and Rights of Way Act 2000*. HMSO, London.

¹⁰ HMSO (2017). *The Conservation of Habitats and Species Regulations 2017*. HMSO, London.

¹¹ Amended in line with EU Exit by *The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019*.

¹² HMSO (2016). *The Environment Act (Wales) 2016*. HMSO, London.

4 Great Crested Newt Identification

Summary

- GCNs are the largest of the three British species of newt; adult males can reach 15 cm in length, with females slightly larger at 18 cm (the photos/ pictures below are not life-size).
- The upper surface and flanks are black and warty, with a row of silver dots present along the side of the head and body.
- The belly is dark orange or yellow with a pattern of black blotches.

4.1 This sub-section of the document is provided for reference in the event that any amphibians are found on site during the proposed development and while the ecologist is not present. It will be discussed with all site personnel prior to the start of work. Identification of any newts that may be found is likely to require the confirmation of a suitably qualified ecologist.

4.2 Great Crested Newts are the largest of the three British species of newt; adult males can reach 15 cm in length, with females slightly larger at 18 cm. The upper surface and flanks are dark brown/ black and distinctly warty, with a row of white/ silver dots present along the side of the head and body. Males develop a characteristic jagged dorsal crest (which has a marked break where the tail joins the body) during the breeding season (although this lies flat when on dry land). The belly is dark orange or yellow with a distinct pattern of black blotches. The throat is whitish and thickly spotted with brown/ black.



Male Great Crested Newt on land (above) and female (below).





Underside of male Great Crested Newt.

- 4.3 The Great Crested Newt may be confused with the Smooth Newt (*Lissotriton vulgaris*), although adults of this species are generally smaller (at 10-11 cm). Although the male Smooth Newt develops a dorsal crest, this is unbroken from head to tail and is also undulating, as opposed to jagged. The male has brown/ olive green or tan skin with black spots and the female a light brown colouration with darker spots or speckles. The belly of both the male and female is creamy yellow or orange, and the throat slightly lighter, both with dark spots or speckles.



Male Smooth Newts on land.

- 4.4 The third species of British newt is the Palmate Newt (*Lissotriton helveticus*). It is slightly smaller than the Smooth Newt at 7-11 cm in length, although it is superficially similar. The two species can be difficult to distinguish, particularly females. The male Palmate Newt has a much less developed dorsal crest (which is also straight edged as opposed to undulating) than a male Smooth Newt. The male Palmate has a 4-7 mm tail filament and black frills / well developed webbing on the hind feet. Typically, the throat of males and females is pure white/ pinkish and very rarely spotted (in contrast to Smooth Newts).

5 Great Crested Newt Ecology

- 5.1 This sub-section of the document is provided as a brief introduction to the ecology of Great Crested Newts. It is not a substitute for detailed knowledge and experience of working with the species.
- 5.2 Great Crested Newts live both in water (aquatic habitat) and on land (terrestrial habitat). Aquatic habitat is required for breeding and feeding. Terrestrial habitat is required for foraging (for food) and for hibernation during the winter. They can be present in their breeding waterbody between spring and autumn but individuals often spend less time than that in aquatic habitat. The remainder of the year is spent on land. Some adults will migrate back to their breeding waterbody as early as late January but most move later, in March. Adult newts generally leave the waterbody from late May onwards.
- 5.3 Adult females lay eggs individually on submerged plants and can lay 200 eggs in a season. Larvae hatch after about three weeks and take another two to three months to complete their development. While some juveniles leave the waterbody (usually from August onwards) in this first year (and hibernate on land) some will over-winter in the waterbody.
- 5.4 Great Crested Newts hibernate during the winter often underground amongst tree roots, in mammal burrows, down the side of walls/ house foundations, in cellars, and beneath piles of stones/ logs, *etc.* Hibernation may last from October to February. While on land and outside the hibernation period, Great Crested Newts require refuge from extremes of weather. During the day they will rest in dense vegetation, under refuges (logs, *etc.*), or underground. They will emerge from these refuges at night to forage and or migrate.

6 Method Statement

Preparatory

6.1 This RAMs Method Statement will be discussed in detail with all personnel/ contractors involved with the proposed construction before any works are carried out. This will take the form of a toolbox talk/ site meeting to be presented by the ecologist and will incorporate the following:

- known information regarding the status of Great Crested Newt at the site;
- legal protection afforded Great Crested Newt and associated penalties;
- identification features of Great Crested Newt;
- responsibilities of site personnel/ on-site contractors with regards implementation of a working protocol (to include provision of a watching brief); and
- the procedures to follow should a Great Crested Newt (or other amphibian) be located during the construction period.

This information will be incorporated into all subsequent site inductions for new personnel/ contractors.

6.2 Before any works commence a copy of this method statement will be issued to all site personnel/ contractors and a signed copy will be retained by the ecologist. The contact details of the ecologist responsible for implementing this RAMs Method Statement will be provided to all site personnel before the start of work. This method statement must be strictly adhered to by all site personnel/ contractors involved with the proposed development. A copy of this document will then be kept on site and provided to new relevant site personnel/ contractors as appropriate.

Working Protocol

Introduction

6.3 Visual/ hand-searches will be undertaken by a suitably qualified ecologist who holds a Natural Resources Wales (NRW) licence to survey and/ or disturb Great Crested Newts. A watching brief will be maintained by site personnel who have attended a tool-box talk.

6.4 Should a Great Crested Newt be located during implementation of the RAMs (*i.e.* by the licenced ecologist) then it would be moved away from the immediate work area by the ecologist and relocated for welfare reasons only to a suitable 'receptor' site. All work would then be suspended until further notice and NRW consulted. It is possible that in this instance or if a Great Crested Newt is found at any other time during the work, an NRW 'development' licence may be required in order to lawfully proceed. Work should not recommence until the ecologist has provided such confirmation. Other amphibians that may be found during the implementation of the RAMs scheme would also be moved to the 'receptor' site.

6.5 Should a Great Crested Newt (or other newt) be discovered at any other time during the works (*i.e.* during the watching brief), the following procedure must be undertaken:

- Site personnel/ contractors will halt all work immediately and inform the ecologist. A suitably qualified ecologist will provide verbal advice on identification before any action is taken.

- If the ecologist confirms that the amphibian is e.g. a Smooth Newt, then site personnel/ contractors can move it to an appropriate location outside the development site (as outlined above), firstly making sure hands are damp.
- If the ecologist verbally confirms that the amphibian is/ may be a Great Crested Newt then site personnel will wait for the ecologist to arrive to confirm identification and remove it to an appropriate location outside the development site (as outlined above);
- If a Great Crested Newt is confirmed, then actions as detailed in *paragraph 6.4* above will be implemented.

6.6 If another amphibian such as a Common Frog (*Rana temporaria*) or Common Toad is found during work, and confidently identified, site personnel should move the animal outside the development site (firstly making sure their hands are damp). Appropriate records should be kept of such measures.

Site Walkover

6.7 Prior to the start of any work associated with the construction, a site walkover will be completed by the ecologist and the site manager in order that the boundaries of the works and the stages/ requirements associated with this Method Statement can be formally agreed. Where deemed necessary the boundaries of the works footprint will be subject to temporary fencing¹³. Subsequently no works (including the use of machinery) will be undertaken outside of the fenced area without the prior knowledge of the ecologist. This walkover will also identify suitable areas for the storage of materials etc. (likely to be existing areas of bare ground/ hard-standing).

Visual- Hand- & Destructive-searches, & Vegetation/ Soil Stripping

6.8 This stage will be completed during mild weather conditions (*i.e.* above 5 °C temperature for the day and subsequent night).

6.9 Features of potential value to Great Crested Newts that will be impacted by the construction works largely comprise the following (refer to *Figure 1* of Marches Ecology (2021, *op. cit.*):

- *Target Note 2*: old/ defunct built structures (including brick/ patio slab steps) located underneath the raised wooded decking;
- *Target Note 2a*: disturbed edges of remaining decking; and
- *Target Note 3*: exposed old sections of breeze block/ stone walls (partly submerged) (including occasional small brick/ rubble mounds).

It is possible that other features such as low breeze block and timber sleeper walls, and small/ disturbed beds of ornamental planting may be impacted.

6.10 The edges of the regularly mown lawn may also be impacted however at the current time no controlled vegetation removal works are deemed necessary. However, should long vegetation (over 0.10 m in height) be identified within the footprint of the proposals during the site walkover this approach would require review and the Method Statement updating accordingly.

¹³ Paragraph 4.2.6 of Marches Ecology (2021, *op. cit.*) includes the following:

‘...temporary protective fencing (e.g. heras) will be installed around the works footprint in advance. Such fences will remain in-situ until the completion of the construction. No access/ storage of materials/ construction work, etc. will be allowed beyond them. Where in close proximity to trees this fencing will meet the necessary WCBC tree-protection specifications.’

- 6.11 Assuming controlled vegetation removal is not required, the ecologist will initially supervise the removal (destructive search) of the features at *Target Note 2* identified in *paragraph 6.9* above. Where possible these works will be completed by hand, otherwise a mini-excavator with a toothed bucket will be utilised. This will be initiated in a slow, methodical manner. The old/ defunct built structures should be destructively searched until the ecologist is confident that all features of potential value to amphibians (including subterranean ones) have been identified and investigated. This process should also include the careful investigation of any interfaces between built structures and soil.
- 6.12 After perceived sufficient effort has been expended, the ecologist will subsequently decide on whether it may be appropriate to undertake a 'sampling approach' for the remainder of this area and remaining features elsewhere (as identified in *paragraph 6.9*). This decision will be based on for example considering what (if any) numbers and species of amphibians have been 'captured' up to that point. This decision will be documented and the site manager informed; it will then be implemented, *i.e.* either by carrying on with a full destructive search or to limit to a sampling approach.
- 6.13 Dependant on the 'results' of the above, the ecologist may also deem it to be appropriate for soil-stripping works to be completed, either across the entire footprint of the works, or in a sampling approach. If undertaken the soil will be stripped (utilising a mini-excavator with a toothed bucket) in a systematic manner in one direction.
- 6.14 This process will ensure, as far as is reasonably practical, that the surface of the work area is unsuitable for Great Crested Newts.
- 6.15 All removed debris (for example bricks, patio slabs, breeze blocks and soil) should be immediately removed from site/ stored in a skip on existing bare ground/ hard-standing. If soil is to be stored on site, then the mounds should be subject to compaction on creation. This will ensure, as far as is practicable, that the creation of potential refugia associated with the mounds is limited; this will be subject to review by the ecologist. The ecologist may also need to supervise the eventual removal of the soil mound.

Watching Brief

- 6.16 At times when there is less/ no risk to Great Crested Newts the ecologist will remain on stand-by (off-site) for the duration of the work; site contractors (who have attended a tool-box talk) will be responsible for implementing a watching-brief.
- 6.17 All construction works will be limited to the work area previously subject to clearance and hand-/ visual-searches (the boundaries of which will be, where deemed necessary, appropriately fenced/ taped as detailed above); no works (including access by machinery, storage of equipment, materials, tools *etc.*) will be undertaken outside of this area (unless restricted to existing hard-standing). In the event that this is required, the ecologist should be contacted in order that visual-/ hand-searches *etc.* can be undertaken.
- 6.18 At the start of each working day (immediately prior to the start of work or *e.g.* vehicles/ machinery accessing the site) the work area will be subject to a walkover by site personnel/ on-site contractors. Should an amphibian be observed during this walkover, or throughout any aspect of the works when the ecologist is off-site, then the procedure as outlined in the 'working protocol/ introduction' should be followed.

- 6.19 When stored materials/ equipment/ temporary structures are moved (for example pallets, skips), they should be lifted vertically, and particular attention paid to determine if any amphibians are located underneath.

General Procedures

- 6.20 In addition to that outlined above, the following measures will be undertaken:
- Where possible, the clearance works/ soil strip will incorporate associated ground preparation to ensure that the ground is compacted and that no potential refugia are created within the works footprint; this will be subject to advice from an ecologist.
 - Any holes/ excavations will be subject to compaction on creation to ensure that potential refugia (*i.e.* formed by cracks/ un-compacted material) are minimised as much as is reasonably possible.
 - Soil/ waste building debris/ other such coarse debris should be removed off site on the same day that it is created. Should this not be possible, it should be stored in a skip.
 - Storage of building materials must be constrained to areas of existing hard-standing or areas of bare earth. Such material should ideally be stored on pallets or similar (*i.e.* off the ground)/ wrapped in visqueen or similar (to prevent access by newts).
 - Machinery, equipment and vehicles must remain on existing hard surfaces, or areas subject to detailed visual/ hand-searches. No machinery or other materials will be stored on any grass or other vegetation overnight.
 - Ideally, any holes/ excavations should be back-filled prior to the end of the working day. Where this is not possible, a suitable ramp will be created (or for example a plank of wood utilised) so as to provide newts with a means of escape. The hole/ excavation must be subject to a visual search for newts in the morning, by site personnel/ on-site contractors.
 - Any servicing or repair of machinery or vehicles will be carried out on areas of hard-standing; and
 - Refuelling of machinery or vehicles will also be carried out in accordance with the appropriate Environment Agency Guidance for Pollution Prevention and all other relevant pollution guidance.
- 6.21 Site personnel/ on-site contractors should contact the ecologist if they have any queries regarding this Method Statement. The ecologist overseeing this project is Max Ellson (Marches Ecology) who can be reached on 07950 220188. In the event that the ecologist cannot be contacted, please contact Tom Knight (07928 212545).

