



LAND AT HURSTWOOD FARM HAYWARDS HEATH

REPTILE MITIGATION STRATEGY



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QUALITY ASSURANCE

This report has been prepared in accordance with the Chartered Institute of Ecology and Environmental Management (CIEEM) Guidelines for Ecological Report Writing (2nd Edition, December 2017).

The facts stated in this report are true to the best of our knowledge and belief, and any opinions expressed are held genuinely and in accordance with the accepted standards of the profession. ACD Environmental Ltd is a CIEEM Registered Practice.

Client:	Barratt David Wilson Homes Southern Counties
Site/job:	Land at Hurstwood Farm, Haywards Heath
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1 EXECUTIVE SUMMARY

- 1.1. ACD Environmental Ltd have been commissioned to produce a Reptile Mitigation Strategy for a parcel of land known as Hurstwood Farm, Haywards Heath, West Sussex, hereafter referred to as 'the Application Site'. This report has been produced to address **Condition 6** of Mid Sussex District Council and **Condition 5** of Lewes District Council's planning conditions pursuant to Outline Planning Permission for the erection of up to 375 properties, a two-form entry primary school, burial ground, allotments, open space with associated infrastructure, landscaping, and parking areas, with all rights reserved except access.
- 1.2. The Application Site was previously subject to reptile surveys in 2014 by ECOSA and in 2016 by Ecological Planning & Research Ltd (EPR).
- 1.3. The reptile surveys in 2016 recorded a peak count of 21 adult slow worms *Anguis fragilis*, four juvenile slow worms, two adult common lizards *Zootoca vivipara*, and one adult grass snake *Natrix helvetica*. This confirmed that the Application Site supports an exceptional breeding population of slow worms, and a low population of common lizards and grass snakes.
- 1.4. As such, a translocation programme will be required prior to any ground works and construction to avoid significant impacts and physical harm to the population of breeding slow worms and other reptiles that are present.
- 1.5. This document contains details of the methodology for the capture and relocation of reptiles to the 'receptor' area and measures to prevent harm, including exclusion of reptiles from the construction areas prior to and during development.
- 1.6. This document also contains ongoing management prescriptions for the receptor area, to ensure the assigned reptile habitat is protected and maintained in perpetuity.
- 1.7. Implementing all practices, techniques, and prescriptions in this document will help to ensure that there will be no significant impacts on the population of reptiles, and the development will be in conformity with relevant legislation and planning policy.

2 INTRODUCTION AND CONTEXT

- 2.1. ACD Environmental Ltd was instructed by Barratt David Wilson Homes Southern Counties to produce a Reptile Mitigation Strategy for a parcel of land known as Hurstwood Farm, Haywards Heath, West Sussex.
- 2.2. This report has been produced to address **Condition 6** of Mid Sussex District Council and **Condition 5** of Lewes District Council's planning conditions pursuant to Outline Planning Permission for the erection of up to 375 properties, a two-form entry primary school, burial ground, allotments, open space with associated infrastructure, landscaping, and parking areas, with all rights reserved except access.
- 2.3. These conditions state:

"No development shall take place until a Reptile Mitigation Strategy addressing the mitigation and translocation of reptiles has been submitted to and approved in writing by the local planning authority. The Reptile Mitigation Strategy shall include the following.

- a) Purpose and conservation objectives for the proposed works.*
- b) Review of site potential and constraints.*
- c) Detailed design(s) and/or working method(s) to achieve stated objectives.*
- d) Extent and location/area of proposed works on appropriate scale maps and plans.*
- e) Type and source of materials to be used where appropriate, e.g., native species of local provenance.*
- f) Timetable for implementation demonstrating that works are aligned with the proposed phasing of development.*
- g) Persons responsible for implementing the works.*
- h) Details of initial aftercare and long-term maintenance of the Receptor area(s).*
- i) Details for monitoring and remedial measures.*
- j) Details for disposal of any wastes arising from works.*

The Reptile Mitigation Strategy shall be implemented in accordance with the approved details and all features shall be retained in that manner thereafter."

Site Description

- 2.4. The Application Site comprises approximately 32.4ha of land. The Ordnance Survey Grid Reference for the approximate centre of the site is: TQ 34095 22447.
- 2.5. The Application Site is located to the south-east of the town of Haywards Heath, West Sussex. The Application Site lies on either side of Hurstwood Lane and falls under both the Mid Sussex District and Lewes District. The approximate boundary of the Application Site is shown in **Image 1** below.



Image 1: Approximate boundary of the Application Site. Source: Google Earth.

Surveys

- 2.6. The Application Site was subject to a habitat appraisal in November 2012 and subsequent reptile surveys between May - October 2014 by ECOSA.
- 2.7. Following this, update reptile surveys were carried out between May - June 2016 by EPR. Full details including methodology can be found in the Reptile Survey Report and Mitigation produced by EPR¹.

¹ Ecological Planning & Research Ltd. (April 2017) *Reptile Survey Report and Mitigation*. PDF.

Aims

2.8. The aims of this Reptile Mitigation Strategy are as follows:

- Propose a methodology for the safe capture and translocation of reptiles to the receptor area.
- Confirm the suitability of the proposed receptor area to support the population of reptiles.
- Propose habitat enhancements to ensure that the receptor area is capable of supporting viable reptile populations.
- Propose management prescriptions for the management of the site in perpetuity.

Relevant legislation

- 2.9. All species of reptiles are protected against killing and injury under the Wildlife & Countryside Act 1981 (as amended).
- 2.10. Common species of reptile including slow worm, common lizard, and grass snake are listed as Species of Principal Importance under Section 41 of the Natural Environment & Rural Communities (NERC) Act 2006.

Competence

- 2.11. This report has been written by Benjamin Prego, Consultant Ecologist at ACD Environmental Ltd. Benjamin has several years' experience in the ecology sector carrying out a wide range of surveys, including UK Habitat Classification Surveys and Phase 2 Surveys for protected surveys, and producing high-level reports such as EclAs, LEMPs and CEMPs. Benjamin is a Qualifying Member of the Chartered Institute of Ecology and Environmental Management (CIEEM) and holds a Natural England Class Licence for great crested newts *Triturus cristatus*.
- 2.12. A Technical Review of this report has been undertaken in line with ACD Environmental Ltd's Quality Assurance procedures. The review was carried out by John Constable CMLI and Managing Director of ACD Environmental. John has over 28 years of experience within the industry, overseeing more than 10,000 projects.

3 RESULTS AND EVALUATION

- 3.1. The Application Site was considered suitable to support reptile species due to the presence of long-sward vegetation localised predominantly around the boundaries of the grassland areas and along the edges of the woodlands. As such reptile presence/absence surveys were carried out in 2014 and were updated in 2016 which involved deploying artificial refugia across the site in suitable reptile habitat followed by seven subsequent checks.
- 3.2. The reptile presence/absence surveys in 2016 confirmed the presence of reptiles on-site including a peak count of 21 adult slow worms and four juveniles, and a peak count of two common lizards and one grass snake. According to reptile population size class interpretation², this indicates that the Application Site supports an exceptional breeding population of slow worms, and low populations of common lizard and grass snake.
- 3.3. Without appropriate mitigation there is potential for reptiles to be harmed during the site clearance works and construction phase, and for suitable habitat to be fragmented or lost.
- 3.4. Therefore, a full trapping and translocation exercise is required prior to any ground clearance and the commencement of works in order to safeguard the exceptional breeding population of slow worms identified within the Application Site, as well as any other reptiles that are present.

² Froglife (1999). *Reptile survey - An introduction to planning, conducting and interpreting surveys for snake and lizard conservation*. Froglife advice sheet 10: <http://www.froglife.org/advice/sheets/htm>.

4 REPTILE MITIGATION STRATEGY

- 4.1. The Reptile Mitigation Strategy will involve installing reptile fencing around the perimeter of the areas with identified reptile populations. These areas will then be subject to a trapping and translocation exercise, involving the safe capture and release of reptiles to a suitable receptor area on-site. A suitable receptor area has been identified in the eastern section of the Application Site (see **Appendix 1**).

Receptor Site

- 4.2. An area of grassland in the eastern parcel of the site has been selected as a suitable reptile receptor site. This area is considered to provide suitable reptile habitat given the presence of longer sward vegetation along the boundaries of the grassland for foraging and refuge, with suitable basking areas in the form of existing deadwood within glades and clearings in the grassland.
- 4.3. Moreover, the proposed reptile receptor area will provide connectivity to habitats beyond the site boundary, including the adjacent parcels of woodland to the north and south, and will prevent fragmentation of local reptile populations.
- 4.4. The breeding population of slow worms identified within the Application Site is considered exceptional, according to the relevant guidance, and slow worms are known to live at high densities often within limited home range sizes. The on-site receptor area is approximately 5.5ha and is therefore considered a sufficient size to support the population of reptiles identified in previous surveys, particularly with sustained connectivity to off-site habitats.
- 4.5. As such, and with reference to Best Practice Guidelines³, it is considered that this on-site receptor area is appropriate for the translocation of the reptile population within the Application Site.

Pre-translocation

- 4.6. Hibernacula in the form of log piles will be set up in the allocated receptor area within the site boundary. This will provide refuge for reptiles released during the translocation before they disperse into the surrounding habitats. In addition, the grassland habitats within the receptor area will be left unmanaged during the translocation period in order to allow the vegetation to grow long.
- 4.7. Log piles should be situated in sunny locations and constructed using timber and branches from pruned and/or coppiced and/or pollarded trees.

³ HGBI (1998) *Evaluating local mitigation/translocation programmes: Maintaining Best Practice and lawful standards*. HGBI advisory notes for Amphibian and Reptile Groups (ARGs). Available at: <https://www.arguk.org/downloads-in-pages/resources/scientific-and-technical-reports/4-evaluating-local-mitigation-translocation-best-practice-and-lawful-standards/file>.

- 4.8. The log piles should not be moved and will remain in-situ during the construction and operational phases of the development. New materials can be added every 1-2 years as necessary to maintain the piles.
- 4.9. In order to reduce the risk of public disturbance, piles should be placed in discreet locations, such as within areas of long grass along the boundaries of the receptor area. Installing log piles within existing vegetation will also provide cover immediately surrounding, or adjacent to, the pile. However, due to the high levels of public access on-site, the materials can be either partially buried in the ground or anchored with wire or secured with wire stapled to the larger logs.

Translocation Exercise

Reptile fencing

- 4.10. A reptile exclusion zone using semi-permanent HDPE reptile fencing will be installed around the Application Site boundaries within areas where reptile populations were identified. This fencing will prevent reptiles from re-accessing the Application Site during construction works.
- 4.11. The reptile receptor area will be fenced along the development boundary only, i.e., in a manner that protects the area from construction but will ensure surrounding reptile habitats are not fragmented. Please refer to the Reptile Mitigation Plan in **Appendix 1** for the approximate location of the reptile fencing.
- 4.12. The reptile fencing will be set out according to **Figure 1** below, being approximately 600mm above ground and 250mm below ground, with a 250mm topfold/overhang on the receptor area side of the fence. 2000-gauge plastic is recommended. The installation of this fencing should be carried out under the supervision of a suitably qualified ecologist.

Semi-permanent Reptile Fencing: Free-standing or attached to boundary fences

2 mm thick HDPE sheeting is a material which has been used to create effective semi-permanent reptile barriers. Although the membrane material is relatively expensive, these fences can be easy to install, potentially buried using a modified plough rather than a trench. The use of this kind of membrane also produces a more robust fence than the lighter-weight membranes and generally do not need to be protected by additional fences (however they tend to be marginally less robust than part-buried 'half-pipe' designs).

This fence design can be used in conjunction with timber post and rail highway boundary fencing, or as a stand-alone fence. The diagrams below show both of these alternatives. (It is also possible to install the membrane clear of the post footings due to the flexible nature of the materials.)

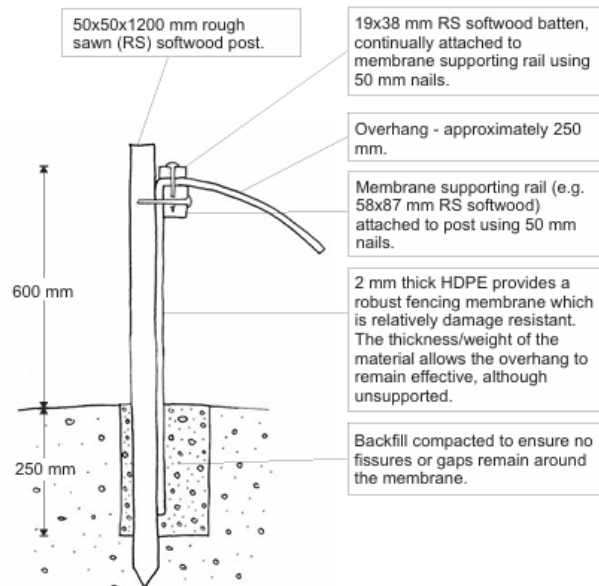


Figure 1: Reptile-proof fencing design⁴

- 4.13. The state of the fencing will be inspected daily during the construction phase, and any breaches will be fixed immediately.
- 4.14. The reptile fencing must remain in place for the duration of construction and must not be removed until all construction works have been completed. This will protect reptiles from harm and, once removed, will allow them to re-colonise suitable areas within the Application Site.

Capture and Relocation

- 4.15. Once the reptile fence has been established the reptile 'trapping' phase will involve placing sections of artificial reptile refugia which will comprise of 50cm² sheets of bitumen felt. Artificial refugia are best placed at high densities (to maximise capture rate) and positioned in locations which will be attractive to reptiles (e.g. sun traps).
- 4.16. Given the identification of an exceptional population of slow worms on-site, a minimum of 60 days of trapping is required. However, a significant proportion of the reptiles identified on-site during the surveys were found within the proposed receptor area and, as such, will not be impacted by the

⁴ Highways Agency (2005). *Nature Conservation Advice in Relation to Amphibians*. Design Manual for Roads and Bridges Volume 10, Section 4, Part 7, Highways Agency

works and will not require translocation. Therefore, it is recommended that if, after 30 days of trapping, there are five clear days where no reptiles are found, trapping will cease, and a destructive search can then take place.

- 4.17. In order to find reptiles while they are basking, it is generally best to search when the air temperatures are between 9 - 18°C. On cooler days, bright sunshine is a good sign, while hazy or intermittent sun gives the best results at the warmer end of the scale. Rainy or windy conditions are usually unsuitable. The sequence of weather conditions is significant.
- 4.18. Reptiles can be captured in their active season between April and September/early October, but the most profitable season is spring, particularly April. Summer can produce intermittent trapping results because it can become too hot to trap, and reptiles may be reluctant to emerge above ground during such conditions. September is also a good month, but more neonates (new-borns) are likely to be present, which can prolong trapping.
- 4.19. Reptile trapping will be carried out by experienced ecologists and reptiles will be transported in safe accommodation (terrariums or buckets lined with vegetation/ substrate) to the receptor area, and released at created hibernacula points and in suitable weather, as soon as possible following capture.
- 4.20. Habitat manipulation will be carried out during the latter stages of trapping to increase the rate of captures. This will involve reducing the amount of suitable vegetation cover by strimming and mowing areas of rough grass. 'Islands' of rank vegetation can be left, and it is around here that the remaining reptiles will be concentrated, thus rendering the reptiles easier to catch.
- 4.21. Once five clear days of zero captures have been achieved in suitable weather conditions, trapping will cease, and a destructive search will take place.

Destructive Search

- 4.22. Following the translocation phase, the vegetation within the translocation areas will be subject to a destructive search under the supervision of a suitably qualified ecologist. The remaining tussocky grassland habitat within the western section of the Application Site is considered to be sub-optimal for reptiles, with few reptiles likely to be present, however, as a precaution these areas will also be subject to a destructive search to ensure that no reptiles are harmed during the construction phase.
- 4.23. The destructive search will begin with the careful removal of any features which may provide refuge for reptiles, such as brash piles. Such features will be sensitively cleared by hand or by appropriate machinery and thoroughly searched to ensure no reptiles are present. Vegetation will be thoroughly searched by a suitably qualified ecologist for the presence of reptiles prior to removal, following

which, systematic stripping will take place with the use of an excavator with a toothed bucket. Firstly, the top few centimetres of the ground will be removed, to expose reptiles sheltering in crevices just below the surface.

- 4.24. Ecologists would be positioned to catch reptiles as they are disturbed. Following this, larger and deeper excavations will be made, concentrating on areas which afford shelter to reptiles, such as tree stumps, debris and grass tussocks. Particular care will be taken when emptying the bucket in case any reptiles are dug up with the soil.
- 4.25. Given that slow worms spend large amounts of time underground, habitat manipulation can be less effective at sites containing buried material and other debris, therefore it is likely that reptiles (particularly slow worms which are largely subterranean) will also be found during the destructive search. Even when carried out using experienced contractors and ecologists, destructive searches may kill or injure a small percentage of animals and the lawfulness of this method requires careful interpretation. Hence why the destructive search is typically carried out after other methods (i.e. trapping) have been used.
- 4.26. After the destructive search is complete it is recommended that the construction phase is commenced shortly afterwards before vegetation has a chance to regrow and the habitat becomes suitable for reptiles once again.
- 4.27. The reptile fencing will be checked on a weekly basis following the translocation and destructive search, and during the course of the development by the Site Manager. If any damage occurs, the fencing must be repaired immediately.

5 HABITAT MANAGEMENT AND MONITORING

- 5.1. The reptile receptor area will be enhanced in the final stages of the construction phase to provide a high biodiversity value and ensure its favourable status to reptiles is maintained. This may include overseeding with a tussocky grass seed mixture and planting scrub along the boundaries between the woodland and the grassland to provide foraging and refuge opportunities.
- 5.2. Following completion of the construction phase, the reptile receptor area will be managed for the purpose of providing suitable reptile habitat, including foraging and hibernation resources. An overview of suggested enhancement and management measures are provided below. Full details will be provided within a Biodiversity Enhancement Strategy to ensure the Application Site is appropriately managed and reptiles will be safeguarded in perpetuity.
- 5.3. The new networks of footpaths to be created within the open space areas in the Application Site, particularly in the proposed receptor site, will be designed to be diverted away from sensitive reptile habitat and managed by mowing to discourage people from straying from the path into the surrounding rough grassland and scrub habitat. Fencing will be installed where necessary to incorporate a suitable buffer from reptile habitat to prevent access by people and dogs.

Grassland

- 5.4. The designated receptor area in the eastern extent of the Application Site will be overseed with a tussocky grass seed mixture such as Emorsgate EG10 Tussock Grass Mixture. EG10 is a 100% grass seed mixture, comprising tussocky grasses such as cock's foot *Dactylis glomerata*, slender-creeping red fescue *Festuca rubra ssp rubra*, and meadow foxtail *Alopecurus pratensis*. Once established, this grassland will require little or no maintenance.
- 5.5. Established tussocky grasslands will be cut on a rotation of no less than three years (i.e. one third of the grassland is cut each year) to control scrub development whilst maintaining a diverse tussocky structure.
- 5.6. Pockets of grassland will be left uncut to create longer stands of vegetation to ensure refuges are always available.
- 5.7. Where grassland meets scrub/woodland, 1m margins of uncut grass will be left to create a buffer zone and retain wildlife corridors.
- 5.8. Tussocky grassland cutting will be undertaken sensitively with use of hand tools (e.g., strimming/brush-cutting) to a minimum height of 150mm.
- 5.9. Any vegetation cutting or removal should be carried out between September-October, on dry days

when temperatures are above 10°C as reptiles will be active and can move out of harm's way.

Scrub

- 5.10. Patches of native scrub can be planted along the margins of the receptor area to act as a natural wildlife buffer between the grassland and the adjacent woodland.
- 5.11. The native scrub patches will be cut to form 'scallops' along the south facing edges to provide a diverse range of habitat niches and increase the number of sheltered basking spots; this is particularly valuable during bouts of hot weather. Moreover, the presence of scrub will provide refugia overnight and sometimes during winter, as well as creating windbreaks and pockets of warm microhabitat favoured by reptiles (Edgar *et al.* 2010)⁵.
- 5.12. Management of scrub will be necessary to maintain mid-successional stage habitats. Therefore, pruning and cutting of small sections of scrub should be undertaken on a long rotation e.g. every 5-7 years. Sunny, south-facing aspects favoured by reptiles should be prioritised for management with most shading scrub removed from such areas. No more than 20% of scrub should be removed/coppiced at any one time.
- 5.13. This rotational cutting regime will increase the age ranges within the scrub and give diversity in structure.

Hibernacula

- 5.14. A total of three permanent hibernacula will be created in the receptor area to ensure there is suitable hibernating habitat for reptiles in the construction and operational phase of the Application (as shown in **Figure 2**).
- 5.15. Reptile hibernacula will be created utilising a mounded, or 'above-ground' design as opposed to the traditional subterranean design, to reduce the risk of flooding.
- 5.16. Above-ground hibernacula will comprise a minimum area of 1500 x 1500mm. The hibernacula will be constructed from piled up rocks, logs, dead wood and other suitable rubble. Soil can be loosely filled between layers during construction, following which the hibernacula will be capped with a layer of topsoil, turf or moss approximately 50-100mm thick. The addition of a geotextile membrane beneath the capping layer may be used to prevent soil, or other loose material, from collapsing into the voids below. Small gaps must be left for reptiles to enter and exit the finished hibernaculum.

⁵ Edgar, P., Foster, J. and Baker, J. (2010). *Reptile Habitat Management Handbook*. Amphibian and Reptile Conservation, Bournemouth.

Hibernaculum on impermeable ground

Where ground conditions are impermeable, then an 'above-ground' or mounded design should be utilised in order to prevent the hibernaculum from flooding. This design should also be used if it is not possible to excavate a pit for any other reason.

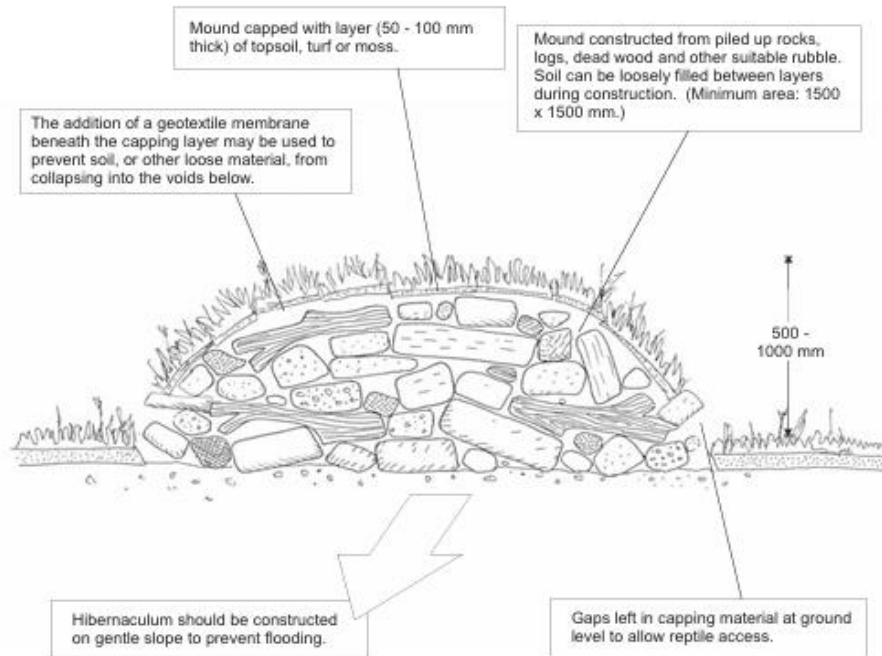


Figure 2: Reptile hibernaculum building diagram⁴.

- 5.17. The hibernacula will be allowed to colonise with ruderal species, which will provide valuable habitats for invertebrates.
- 5.18. The hibernacula should be completed prior to the first season of hibernation following completion of the construction works.
- 5.19. Within the reptile hibernaculum areas, only strimming is permitted. Pockets of grassland will be left uncut to maintain a mosaic of basking habitat and cover, which will ensure suitable reptile habitat is always available.
- 5.20. The vegetation within the immediate vicinity should be cut back to avoid the hibernacula becoming densely shaded. Mowing should be carried out during the reptile active period which runs between April-early October, taking care not to create large areas of short grassland within the immediate vicinity of the hibernacula.

Post-translocation monitoring

- 5.21. The reptile population will be monitored by carrying out an early spring survey in year two, year four, and year six post-translocation, i.e., a total of three surveys spread across three separate years.
- 5.22. Detailed methods for reptile monitoring surveys will be in accordance with the relevant published

guidelines.

- 5.23. Following each survey, a short report will be produced relating to management objectives, and to monitor the condition of the habitats to determine whether management prescriptions need to be adjusted to reach the desired outcomes (i.e., uneven-aged swards of tussocky grassland). A copy of the monitoring report will be sent to the Local Planning Authority and Local Wildlife Trust.
- 5.24. The receptor area will be managed in perpetuity for the conservation of reptiles, by way of a suitable legal agreement.

6 SCHEDULE OF WORKS

6.1. The work schedule for monitoring, maintenance and management activities are set out within **Table 1**. The works schedule below may be subject to changes in timings subject to the construction phase schedule. In the instance that any changes in timings are required, the Developer and/or the appointed management company is to contact an ecologist at ACD Environmental Ltd to confirm agreement to any amendments.

6.2. The colour coding within **Table 1** is as follows:

	Optimal months
	Sub-optimal months (may be acceptable if appropriate measures are undertaken)
	Unsuitable months

6.3. Where ECoW presence is required, it is demonstrated with the following symbol:

	Supervision required for reptiles
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Table 1: Work schedule for translocation, supervised clearance, maintenance and monitoring.

Action		J	F	M	A	M	J	J	A	S	O	N	D
PRE-CONSTRUCTION													
Installation of log piles to act as hibernacula within the proposed receptor site.													
Installation of reptile fencing under supervision of a suitably qualified ecologist.													
Safe capture and translocation of reptile species to the designated receptor site.													
Destructive search of reptile habitat including tussocky grassland under supervision of a suitably qualified ecologist.													
THROUGHOUT CONSTRUCTION PHASE													
Checks to be carried out each day to include a check of any exposed excavations/pipes to ensure no reptiles have become trapped overnight.													
Weekly check of all reptile fencing and any damage to be repaired immediately.													
POST COMPLETION													
Year 1	Creation of above-ground reptile hibernacula.												
	Overseeding of grassland in the receptor site with a tussocky grass seed mixture.												
	Creation of new scrub buffer between the grassland and adjacent woodland habitats within the receptor site.												
1-3 years	Phased cut of the tussocky grassland within the receptor site on a rotation of every 3 years.												
Bi-annual until year 6	Reptile population monitoring surveys to be undertaken by an ecologist every two years. Results used to feedback into the mitigation strategy as required and to rectify any issues.												
5-7 years	Pruning/cutting of small sections of scrub.												

7 CONCLUSIONS

- 7.1. This Reptile Mitigation Strategy has been produced to fulfil **Condition 6** of Mid Sussex District Council and **Condition 5** of Lewes District Council's planning conditions pursuant to Outline Planning Permission for the erection of up to 375 properties, a two-form entry primary school, burial ground, allotments, open space with associated infrastructure, landscaping, and parking areas, with all rights reserved except access.
- 7.2. Reptiles will be protected for the duration of construction with installation of reptile fencing around the Application boundaries to prevent re-access into the construction zones as shown in **Appendix 1**.
- 7.3. The proposed receptor area is considered to be suitable to accommodate the translocated population of reptiles, and will be subject to enhancements and sympathetic, targeted, long-term management in accordance with this Reptile Mitigation Strategy and the Biodiversity Enhancement Strategy.
- 7.4. With implementation of the measures outlined within this report, it is considered that there will be no significant impacts upon reptile populations, and the Application will be in conformity with relevant legislation and policy.

APPENDIX 1: REPTILE MITIGATION PLAN



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