

# Invasive Non-Native Species (INNS) Protocol



17/10/2025

*This Invasive Non-Native Species (INNS) Protocol outlines the procedures for identifying, managing, and preventing the spread of invasive vegetation at Crown House, Huddersfield. The plan details the legal context, site responsibilities, removal and disposal methods, and biosecurity measures to ensure full compliance with the Wildlife and Countryside Act 1981 (as amended) and Environment Agency guidance. Implementation of this protocol will support safe, lawful eradication of *Buddleja davidii*, *Cotoneaster* sp. and bindweed, followed by reinstatement with native species as part of the site's long-term biodiversity enhancement strategy.*

# Document Control Sheet

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## 1. Purpose and Scope

This protocol sets out the procedures to be followed by all site personnel for identifying, handling, removing, and disposing of invasive non-native plant species (INNS) and other dominating vegetation encountered during construction and landscaping works at Crown House, Huddersfield.

The purpose is to ensure that all site activities are compliant with UK legislation and best practice guidance, preventing the spread of invasive plants both within and beyond the site boundary.

This protocol applies to all contractors, site managers, and the Ecological Clerk of Works (ECoW) working under Hewitt & Carr Services supervision during both the construction and long-term management phases.

## 2. Legal Framework

- **Wildlife and Countryside Act 1981 (as amended):** It is an offence under Section 14(2) to plant or otherwise cause any species listed in Schedule 9 to grow in the wild.
- **Environmental Protection Act 1990:** Invasive plant material and contaminated soil are classed as controlled waste and must be handled accordingly.
- **Environment Agency Regulatory Position Statement (RPS 178):** Outlines conditions under which invasive plant material can be buried or composted on site, or otherwise must be transported by licensed carrier to an approved facility.
- **The Invasive Alien Species (Enforcement and Permitting) Order 2019:** Provides further controls for certain invasive species under EU retained law.

Failure to comply with the above legislation may result in prosecution and significant fines.

### 3. Site Context and Identified Species

Surveys undertaken by HCS have confirmed the presence of the following invasive or dominating non-native plants at Crown House:

Species	Latin Name	Status	Location	Priority
Buddleia	<i>Buddleja davidii</i>	Invasive ornamental	Western boundary, brickwork, roof	High
Cotoneaster	<i>Cotoneaster horizontalis</i>	Schedule 9 species	Western shrub bed	High
Bindweed	<i>Calystegia sepium</i>	Dominant native weed (control required)	Western and southern boundaries	Moderate

No other Schedule 9 species were recorded; however, all site personnel should remain alert for additional occurrences (e.g. Japanese knotweed, giant hogweed, Himalayan balsam) and report them to the ECoW immediately.

### 4. Responsibilities

Role	Responsibility
Site Manager	Ensure this protocol is communicated to all contractors and adhered to during all site works.
ECoW (HCS)	Identify and delineate invasive plant stands, supervise removal, and verify compliance.
Contractors	Follow ECoW instructions, handle material as controlled waste, and maintain site hygiene.
Landscape Contractor	Ensure only certified, weed-free topsoil and planting stock are used for reinstatement.

All staff involved in vegetation clearance will receive a toolbox talk from the ECoW covering identification, risks, and safe handling procedures.

## 5. Procedure for Removal and Control

### 5.1 Identification and Delineation

- Invasive stands will be marked with biodegradable spray paint or temporary stakes and clearly shown on the site plan.
- The ECoW will record GPS coordinates for each affected area.

### 5.2 Timing

- Works will be scheduled for late summer to early autumn when vegetation is mature but prior to seed dispersal.
- Any follow-up treatments should occur the following growing season if regrowth occurs.

### 5.3 Physical Removal

- Excavate the top 300 mm of affected soil (deeper if root systems persist).
- Carefully bag and seal all plant material and contaminated soil.
- Use dedicated tools for INNS clearance; clean equipment thoroughly after use to prevent cross-contamination.

### 5.4 Chemical Treatment (if required)

- Apply glyphosate-based herbicide to regrowth under the supervision of a qualified operative (PA1/PA6 certificate).
- Avoid spraying near tree roots or newly seeded areas.

### 5.5 Disposal

- Remove all contaminated material to a licensed green-waste facility capable of handling invasive species.

## 6. Reinstatement and Monitoring

- Refill excavated areas with clean, certified topsoil.
- Replant using the native shrub and wildflower mixes specified in the Biodiversity Enhancement & Management Plan.
- The ECoW will inspect the treated areas quarterly in Year 1 and annually thereafter for 5 years to confirm eradication.
- If regrowth exceeds 5 % cover in any treated area, repeat control measures.

## 7. Biosecurity and Site Hygiene

- All contractors must clean boots, tools, and machinery before leaving the site to prevent seed or root transfer.
- Vehicles transporting invasive waste must use sealed containers or tarpaulins.
- Imported materials (topsoil, mulch, compost) must be certified free of invasive propagules.

## 8. Incident Response

If an invasive species not previously identified is discovered:

1. Stop all works in the immediate area.
2. Mark and secure the area to prevent disturbance.
3. Notify the Site Manager and ECoW immediately.
4. The ECoW will verify species identity and advise on containment or removal procedures.
5. Update the INNS log and site plan.

## 9. Record Keeping and Reporting

- Maintain an INNS Register including species, location, date of removal, disposal route, and follow-up inspection results.
- Keep waste transfer notes for all removed material.
- Reports will be filed with Abode and available for inspection by the Local Planning Authority or Environment Agency upon request.

## 10. Review

This protocol will be reviewed annually during the first five years and updated as required based on monitoring results or changes in legislation. Long-term compliance with the BEMP will depend on ongoing awareness and good site hygiene throughout the 30-year management period.

## 11. Conclusion

Implementation of this Invasive Non-Native Species Protocol will ensure that all invasive and dominating vegetation at Crown House is eradicated in a lawful and environmentally responsible manner. Through consistent monitoring, safe disposal, and reinstatement with native flora, the risk of future spread will be minimised, safeguarding the ecological integrity of the site and surrounding urban landscape.