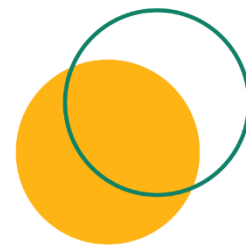




Construction Environmental Management Plan



London Town Property Holding Ltd
Land at Bolney Grange Industrial Park, Jobs Lane, Hickstead, West Sussex

September 2026

Project Information

Title	Construction Environmental Management Plan (CEMP)
Project No.	32839
Sector	Environment
Report	EC
Client	London Town Property Holding Ltd
Revision	C
Status	Final
Date of Issue	30 September 2026

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1 Introduction

1.1 Background & Context

ACP Consultants Ltd. was instructed to produce a Construction Environmental Management Plan to support the discharging of pre-commencement condition 19 of planning application ref: DM/23/3208 to the Mid Sussex District Council. London Town Property Holding Ltd (hereafter referred to as 'the client') has obtained consent for the outline application for the "erection of 10x Class E(g), B2 and B8 Flexible Use Commercial Units including details of access and layout" (hereafter referred to as 'the proposed development') at Land at Bolney Grange Industrial Park, Jobs Lane, Hickstead, West Sussex (hereafter referred to as 'the site'). Proposed plans are supplied in **Appendix 1**. This plan seeks to discharge the below condition:

- 19.** *Prior to the commencement of the development a construction environmental management plan (CEMP: Biodiversity) shall be submitted to and approved in writing by the local planning authority. The CEMP (Biodiversity) shall include the following:*
- a. Risk assessment of potentially damaging construction activities.*
 - b. Identification of "biodiversity protection zones".*
 - c. Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements).*
 - d. The location and timing of sensitive works to avoid harm to biodiversity features.*
 - e. The times during construction when specialist ecologists need to be present on site to oversee works.*
 - f. Responsible persons and lines of communication.*
 - g. The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.*
 - h. Use of protective fences, exclusion barriers and warning signs.*
 - i. Containment, control and removal of any invasive non-native species present on site.*

The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details, unless otherwise agreed in writing by the Local Planning Authority.

A separate Landscape and Ecological Management Plan (LEMP) has been produced concurrently by ACP (2026) which outlines management measures with regards to retained and proposed habitats of value to protected/notable species in order to achieve long-term success and improvements to biodiversity.

1.2 Scope of Report

The aims and objectives of the report are as follows:

- Identify key stakeholder requirements and ensure compliance by all stakeholders with all relevant legislation.
- Detail site-specific methods to avoid, minimise, and mitigate construction effects on the environment and protect/notable species during construction.

2 Ecological Baseline

2.1 Ecological Background Information

The site is located at National Grid Reference TQ 27842 20810. Baseline ecological conditions on site and within the context of the wider surroundings, and in turn the suitability of baseline habitats for protected species, was determined via previous survey efforts carried out by Hone Ecology between August 2022 and September 2026:

- Preliminary Ecological Appraisal (PEA; August 2022)
- Reptile Presence/Likely Absence Survey Report (November 2022)
- Hazel Dormouse Addendum (February 2025)
- Ecology Update Walkover Report v2 (September 2026)

2.2 On-Site and Surrounding Habitats

The site comprises a generally triangular shaped plot of land dominated by semi-improved grassland, with tall ruderals and scattered self-sown trees/surrounding scrub on the southern, western and northern boundaries, and mature trees on the southeastern and western boundaries. Aquatic features present on site comprise a pond at the southeastern corner of the site, bordered by aquatic vegetation and dense scrub to the south and west, as well as a ditch along the southeastern periphery of the site.

Areas of grasslands were subject to previous grazing regimes in 2022, but active management via periodic cutting was observed during the update walkover in 2026 to prevent the spread of scrub on site. Grassland species include perennial ryegrass *Lolium perenne*, Yorkshire fog *Holcus lanatus*, common plantain *Plantago major*, and patches of ragwort *Jacobaea vulgaris*.

Dense scrub, believed to be resultant of an unmanaged hawthorn *Crataegus monogyna* and blackthorn *Prunus spinosa* hedge, is present on the southern, western and northern boundaries with bramble *Rubus fruticosus* understorey. In 2026, evidence of some cutting of bramble growth to prevent extension further into the site was identified: “there has been extensive clearance works at the south of the site which is understood to be in relation to the clearance of the ditch running along the south boundary. It is understood that this was undertaken due to the ditch not having been cleared for some time and to prevent potential flooding issues. It is understood the works were undertaken in March 2026. During these works approximately 1-3m width of the boundary scrub/overgrown hedgerow and understorey was also cleared, degrading the potential habitat for nesting birds, dormice, and great crested newts during their terrestrial phase. The adjacent pond was not directly impacted during these works, but direct connectivity of habitat from the site boundary has been lost. A single line of thin scrub/ immature trees has been retained on the south boundary” (Hone Ecology, September 2026).

Though no description of the pond was provided in previous ecological reports, the pond on site P1 was subject to a Habitat Suitability Index (HSI) assessment which scored 0.79, corresponding to ‘excellent’ suitability for great crested newts. The PEA confirmed a great crested newt survey undertaken on the pond in 2019 (Lizard, 2019) found it to “contain a moderate population of great crested newts” (Hone Ecology, August 2022). In 2026, it was found that “the pond on site has not been directly impacted by the clearance works undertaken on the southern boundary of the site. Its general condition was unchanged from previous site visits with bank boundary vegetation intact, although habitat connectivity with the southern boundary scrub has been broken. The extent of emergent vegetation and water quality was unchanged since the previous survey” (Hone Ecology, September 2026).

The wider landscape is a mosaic of farmland with hedges, with the town of Burgess Hill to the east. There are no statutory designated sites within a 2km radius of the site but one non-statutory Local Wildlife Site (LWS), Pond Lye, is present approximately 1700m northeast of the site.

2.3 Value and Recommendations for Protected Species

Suitability and recommendations for protected species was informed by the most recent Ecology Update Walkover Report undertaken by Hone Ecology dated September 2026, summarised in *Table 2.3* below.

Table 2.3: Suitability and recommendations for protected species, as informed by the Ecology Update Walkover Report (Hone Ecology, September 2026)

Species / Group	Suitability	Recommendations
Great Crested Newts	The habitat quality on the southern boundary has been reduced due to the ditch clearance works, but the pond and remainder of boundary scrub habitats remain suitable to support great crested newts and other amphibians.	A District Level Licence (DLL) is to be acquired prior to the start of any vegetation clearance or development works, with clearance works to be undertaken under supervision of the great crested newt class licence holder following the method given within the licence.
Reptiles	A reptile survey was undertaken on the site in 2022 with no reptiles identified on the site, confirming likely absence. Despite the current management of the site, the grasslands, pond, and boundary scrub on site remain suitable habitats for common reptile species.	Precautionary working methods (as detailed in the Reptile Survey Report, Hone Ecology November 2022): - Stage 1: cut back and remove scattered trees. - Stage 2: strim vegetation with a tractor flail during warm, dry weather to a height of 50mm above ground. - Stage 3: after a minimum of 48 hours during warm, dry weather, the vegetation should be strimmed to ground level. - In the unlikely event a reptile is found, works should cease and an ecologist contacted for advice.
Nesting Birds	The boundary scrub and trees on the boundaries, and scattered trees within site provide suitable nesting potential for birds. The current management of the site maintains a sub-optimal grassland habitat for ground nesting birds.	Any works such as tree and scrub clearance should be undertaken outside the core breeding period for birds of March-August inclusive (although it should be noted that species such as pigeon can breed all year round and remain protected). If this timing is not possible, a nesting bird check of the area to be cleared should be undertaken by an ecologist within 24 hours of the planned works starting to confirm no nesting birds will be impacted. In the event nesting is observed, works in that area will stop immediately, and a 5m buffer placed around the nest until the eggs have hatched and young fledged, or else the nest has been deemed by a suitably experienced ecologist to have been abandoned.

Species / Group	Suitability	Recommendations
Badgers & Hedgehogs	The current walkover indicated no activity by badger on the site, with no signs observed. However, scrub on site still provides low potential to support badgers. The scrub and grassland areas provides moderate potential to provide cover and foraging opportunities for hedgehogs.	Given that an inactive burrow entrance was previously identified on the site it is recommended that a maximum of three months prior to the start of works, a walkover be undertaken to confirm any change in badger activity which may require a full survey and potentially licence for the works. During clearance works, hedgehogs will be searched for and moved to a safe area of the site boundary which is being retained. As a precautionary measure, any holes or trenches on site should be either covered overnight to prevent badger or other animals falling in and getting stuck, or alternatively ramps should be placed in the trench to enable animals to escape in the unlikely event they access the site.
Roosting Bats	No further signs of bat roosting potential were identified on the trees on the site which are impacted by the planned works. For the low potential trees identified on the site, it is understood that these are not impacted by the planned works. The remainder of the immature and semi-mature trees which are impacted by the planned works were with negligible potential for roosting bats.	If any trees identified with low potential for roosting bats will be impacted by the planned works (oak at the southeast and line of sycamores adjacent to the road on the western boundary), it is recommended that a pre-works check is undertaken immediately before any works on these trees. If bats or evidence of bats are found during this check, works on the tree must stop and further surveys will be required to inform a Natural England licence.
Hazel Dormice	Given the single dormouse nest identified during the dormouse survey at Parcel 931 approximately 250m to the northeast in 2025, the potential for dormice on the current site has been increased to moderate. Due to the recent confirmed record and suitable habitat on the site, under the latest best practice guidelines further surveys for dormice are not required and the recent record can be used to inform a Natural England mitigation licence application. A precautionary method under supervision by a dormouse class licenced ecologist for the clearance/reduction of boundary vegetation and scrub has been agreed within the addendum in respect of protected species hazel dormouse.	Given the proximity of the recent dormouse record and suitable habitat on site, a Natural England Dormouse mitigation licence is required to undertake scrub and boundary works, including method statement and suitable timings for the clearance works. These clearance works will be undertaken under supervision of the Named Ecologist on the licence, or a suitably qualified Accredited Agent.

2.4 Sensitive Ecological Features

Potential impacts from construction activities and the resultant risks to ecological receptors are summarised in *Table 2.4* below. Measures to mitigate for the anticipated risks to ecological receptors are outlined in Sections 4 and 5 of this report.

Table 2.4: Potential risks to ecological receptors resultant from construction activities

Activity	Risk	Ecological Receptor
Vegetation Clearance Works	- Encroachment into sensitive boundaries - Accidental compaction of root zones - Destruction of edge habitat - Injury or death during vegetation removal for grasslands, boundary scrub, and trees	- Retained boundary trees and scrub - Pond P1 - Ditch - Great crested newts - Hazel dormice - Nesting birds - Common reptiles - Hedgehogs
Excavation & Material Storage	- Pollution with regards to water run-off, noise, and dust during construction phases - Entrapment in open pits/trenches - Terrestrial animals using rubble, debris, or brash piles for shelter	- Retained boundary trees and scrub - Pond P1 - Ditch - Great crested newts - Common reptiles - Badgers and hedgehogs
Nighttime Works & Artificial Lighting	Light spill and subsequent disturbance to foraging and commuting routes along boundary scrub	- Bats - Badgers and hedgehogs
Site Works	Introducing or spreading invasive floral species	- Pond P1 - Ditch

3 Roles & Responsibilities

The identities of the developer are not currently known and as such the management body(ies), legal and funding mechanisms cannot be agreed without these details and so in the circumstances the applicant proposes to provide those details no less than one month before the relevant work commences.

The following key personnel, once known, will be responsible for the management and implementation of works in accordance with the CEMP, with their respective responsibilities:

Site Owner(s): *TBC following site sale*

Main Contractor: *TBC following site sale*

- Ensure all contractors and site personnel comply with the CEMP.

Site Manager: *TBC following site sale*

- Communicate the CEMP and other related documents to all employees.
- Ensure all necessary training is given to personnel to ensure required levels of environmental competence.

Biodiversity Champion: *TBC following site sale*

- A senior leader with operational authority (e.g., contractor, site manager, or project manager) who will oversee and enforce all actions specified in the approved CEMP.
- Notify the ecology team prior to starting construction, provide regular updates as works progress, and utilize ECoW guidance throughout the project lifecycle.
- Serve as the point of contact for any queries relating to the mitigation prescriptions outlined within this CEMP from site personnel.
- Serve as the point of contact for the project ecologist and Ecological Clerk(s) of Works (ECoWs), consulting them on any technical or mitigation questions to protect nearby ecological receptors.
- Management of all necessary documentation to demonstrate compliance with relevant legislation.
- Ensuring that the CEMP is updated as and when required and agreed with the LPA.

Ecological Clerk(s) of Works (ECoW): *TBC following site sale*

- Site induction delivery and "Toolbox Talks" for all operatives.
- Pre-commencement checks.
- On-site supervision during licensed GCN/dormouse vegetation clearance and staged reptile strimming.
- Authority to stop works if ecological non-compliance or protected species are encountered.
- Provide a report of compliance to the LPA where necessary.

4 Mitigation Measures

The following sections detail mitigation measures with regards to ecological receptors.

4.1 Biodiversity Protection Zones

In light of the sensitive ecological features identified which are primarily associated with the retained habitats comprising boundary scrub, mature trees, pond P1, and ditch, a biodiversity protection zone which acts as a buffer zone between works and retained habitats of value shall be established.

The biodiversity protection zone, as shown in **Appendix 2**, will encompass the lands within a 10m radius of both the retained ditch and pond P1 and all areas of retained scrub, with some areas extending beyond the Tree Protection Fencing zones within the Proposed Site Layout Plan (drawing no. 0126/P5; MJB Architecture, 2026).

These areas will be demarcated using physical means of protection, such as exclusion fencing, to prevent unauthorised access and minimise disturbance to sensitive habitats.

Other than for the permitted works and landscaping, within this zone there is to be:

- Limited access only for permitted works by site personnel, vehicles or plant;
- No storage of equipment or building materials; and
- No disposal of any waste materials.

4.2 Timing & Locations of Sensitive Works

To ensure compliance with relevant wildlife legislation, vegetation clearance works, tree felling works, and groundworks are recommended to adhere to the timings and location(s) summarised in *Table 4.2* below.

Table 4.2: Constraints with regards to protected species and proposed construction works

Ecological Receptor	Seasonal Constraints		Location(s) and Proposed Works	Notes
	Optimal Working Window	High-Risk Working Window		
Great Crested Newts	March – October	November – February	■ Boundary scrub clearance	Any boundary vegetation works must take place under the supervision of an ECoW who holds a great crested newt class licence. Avoid destructive groundworks during the winter hibernation season.
Reptiles	March – October	November – February	■ Grassland clearance ■ Boundary scrub clearance	Avoid destructive groundworks during the winter hibernation season. Follow precautionary working methods outlined in Section 5.2.
Nesting Birds	September – February	March – August	■ Tree felling	Avoid any vegetation works during the core nesting season.

Ecological Receptor	Seasonal Constraints		Location(s) and Proposed Works	Notes
	Optimal Working Window	High-Risk Working Window		
			Boundary scrub clearance	If the nesting season cannot be avoided, a nesting bird check by a suitably qualified ECoW is required a maximum of 24 hours prior to any vegetation works.
Badgers & Hedgehogs	January – December	N/A	Boundary scrub clearance	Badger walkover of the site and surrounding 30m by a suitably qualified ecologist a maximum of 3 months prior to works. Hedgehogs to be searched for and moved to a safe location by a suitably qualified ECoW if found during vegetation works.
Roosting Bats	November – March	Mid-May – September	Tree felling	If any trees identified with low potential for roosting bats will be impacted by the planned works (oak at the southeast and line of sycamores adjacent to the road on the western boundary), it is recommended that a pre-works check is undertaken by a bat licenced ECoW immediately before any works on these trees.
Hazel Dormice	May Mid-September – October	June – mid-September November – April	Boundary scrub clearance	Any boundary vegetation works must take place under the supervision of an ECoW who is either the named ecologist on the licence or a suitably qualified accredited agent, ideally in two stages. Tool box talk required prior to works. Avoid destructive groundworks during the summer core breeding season as well as the winter hibernation season.

4.3 Tree Protection (GRS Consultancy, 2023)

Tree root protection areas have been identified based on the Arboricultural Impact Assessment (GRS Consultancy, December 2023), with a sufficient buffer as demarcated as 'Tree Protection Fencing' within the Proposed Site Layout Plan (drawing no. 0126/P5; MJB Architecture, 2026). Works shall be carried out in accordance with the measures outlined within Section 4 Construction Exclusion Zones of the Arboricultural Impact Assessment (GRS Consultancy, December 2023).

The following shall be adhered to within the construction exclusion zones:

- No storage of equipment or materials.
- No access to people, plant or vehicles.

- The actions to be carried out within or directly adjacent to the CEZ's shall only be carried out in accordance with this method statement. Where specified these works shall only be carried out under the direct supervision of the arboricultural consultant.
- Provision shall be made to avoid the spillage of chemicals that are toxic to roots into the RPA. It is now standard practice to have emergency spillage kits made available. Liquid chemicals such as oil, bitumen, diesel, and cement shall not be stored, mixed or discharged onto the ground within 10 m of the trees.
- No notice boards, or above ground services, shall be attached to any of the trees. No fires shall be lit within the RPAs of the trees or near enough to the extent of the canopy that branches might be damaged.
- Planning of site operations shall take sufficient account of wide loads, tall loads and plant with booms, jibs and counterweights (including drilling rigs), in order that they can operate without coming into contact with retained trees. Such contact can result in serious damage to the trees and might make their safe retention impossible. Consequently, any transit or traverse of plant in proximity to trees shall be conducted under the supervision of a banksman, to ensure that adequate clearance from trees is maintained at all times.
- Unwanted vegetation shall be removed by hand or by using chemicals that do not damage the roots of the trees that are to be retained.

Trees shall be separated from construction works by protective fencing throughout the duration of the construction phase of the development. A fencing specification is included within *Figure 1* below. Appropriate weatherproof signage is to be included on the fencing to ensure that fences are not moved after being established, as shown in *Figure 2*.

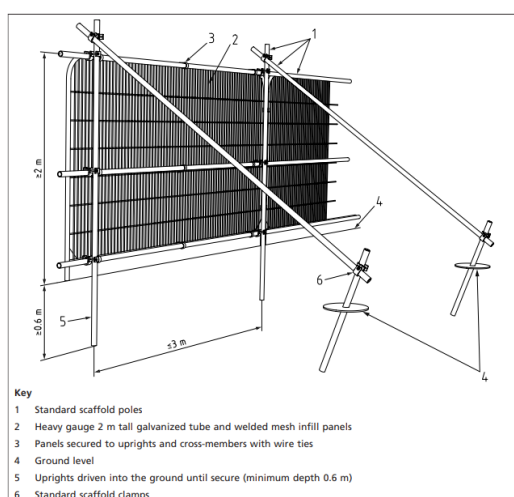


Figure 1: Default protective barrier specification
(British Standards Institute 2012)



Figure 2: Example of appropriate signage to attach to
root protection zone fencing

4.4 Pollution Prevention

4.4.1 Surface Water Runoff & Site Drainage (HOP Consulting Ltd, 2026)

Works shall be carried out in accordance with the construction phase drainage strategy detailed in Section 3 of the Construction Phase Surface Water Management Plan (HOP Consulting Ltd, 2026), which is designed to meet the following criteria:

- Prevention of uncontrolled runoff from leaving the site;
- Prevention of pollution of the downstream receiving ditch network;
- Protection of permanent SuDS features; and
- Safe management of exceedance flows.

Temporary Drainage Measures

A temporary cut off ditch should be installed along the northern boundary to intercept overland flow generated from off-site flow and to divert it around the construction area. Within the working area, temporary swales should be installed and aligned to convey construction runoff southwards between the proposed footprint of the new units. At the natural low point in the southeast, a temporary settlement and attenuation area should be formed to manage silt and provide controlled discharge to the ditch network.

Pollution Prevention

Potential contaminants during construction include suspended solids, hydrocarbons, cement washout, and general construction debris.

Fuel and chemical storage should be bunded with 110% containment and located away from the south-east drainage route. Concrete washout should be managed in lined, impermeable pits. Plant is to be inspected regularly, and spill kits should be made available at all refuelling points. In addition, a wheel washing facility should be provided at the site exit to minimise the risk of sediment tracking onto public roads.

Runoff Volume & Flow Control

Temporary attenuation should be provided within the settlement area, with a controlled discharge rate to suit the temporary nature of the construction phase works. During extreme rainfall, exceedance flows should be allowed follow the natural topography toward the south-east, avoiding compounds, storage areas, and public highways.

Site Control Measures

During the construction phase, a multistage silt control strategy should be implemented to prevent sediment laden runoff from entering the existing ditch network and the proposed SuDS features.

The first line of defence would likely comprise silt fencing installed along these boundaries, positioned immediately upslope of the existing watercourse and proposed attenuation ponds. This fencing is installed to intercept fine sediments mobilised during earthworks and provides a passive filtration barrier that aligns with the natural fall of the site.

Within the temporary swales and drainage channels, straw bale check dams should be installed at intervals determined by the channel gradient. These check dams slow the velocity of runoff, encouraging suspended solids to settle out before water reaches the temporary settlement area. At key discharge points—particularly where temporary drainage connects to the settlement/attenuation area—sediment traps should be formed to capture accumulated fines. Inspection of these traps should be undertaken regularly and emptied to maintain their operational capacity.

In addition to these passive measures, this strategy allows for the option for proprietary treatment systems such as Siltbuster units where higher sediment loads or water quality risks are anticipated. These modular treatment units provide active settlement and, where required, chemical dosing to remove fine suspended solids that cannot be effectively captured by passive systems alone.

A Siltbuster unit may be deployed at the outlet of the temporary settlement area or upstream of the controlled discharge to the existing ditch network, depending on construction sequencing and observed water quality. This provides a robust final treatment stage and should be designed to comply with Environment Agency pollution prevention requirements and to also protect the permanent SuDS features from siltation.

The inclusion of proprietary systems also offers flexibility: units can be relocated as construction progresses, scaled to match runoff volumes and operated continuously during periods of heavy rainfall or intensive earthworks. Together, these passive and proprietary measures are considered to provide a comprehensive, layered silt control strategy that significantly reduces the risk of pollution from this source during the construction phase.

4.4.2 Material Storage

It is recommended that the Biodiversity Champion ensures the following:

- Keep all stockpiles off exposed ground and store materials and chemicals securely in compliance with COSHH regulations (HSE 2002).
- Store all contaminated materials, chemicals, and hazardous substances on an impermeable surface within a bunded area, regardless of location on site.
- Position chemicals and hazardous substances away from high-traffic zones to prevent accidental vehicle or impact damage.
- Ensure all chemicals and hazardous substances remain clearly labelled, tightly sealed when not in use, and regularly inspected to confirm container integrity.
- Promptly replace damaged or aging containers to fulfil duty of care standards, noting that compromised containers must be handled as hazardous waste.
- Train all personnel on emergency response procedures and the proper deployment of spill kits.
- Appoint and maintain a designated, responsible person on site at all times.
- Lock storage facilities when not in use.

4.4.3 Airborne Particle Suppression

It is recommended that the Biodiversity Champion ensures the following:

- Deploy effective water suppression during site clearance, earthworks, and construction. Handheld sprays are more effective for targeted delivery, or use manually controlled high-volume systems that emit fine droplets to knock down dust.
- Bag and clear away vegetation and organic debris promptly, or dampen it thoroughly prior to starting site clearance.
- Carry out regular site inspections to monitor compliance.
- Turn off all vehicle engines when idling or stationary to limit emissions.
- Prioritise mains electricity or battery-powered equipment over petrol or diesel generators wherever feasible.
- Require cutting, grinding, and sawing tools to be operated with integrated dust suppression, such as water sprays or local exhaust ventilation.
- Maintain a reliable on-site water supply dedicated to dust mitigation, utilizing non-potable water whenever practical and suitable.
- Enclose chutes and conveyors and keep all waste skips covered when handling excavated or waste materials.
- Use enclosed chutes and conveyors and covered skips for waste and excavated material.

4.4.4 Noise

The Biodiversity Champion is responsible for maintaining low noise levels in line with the Control of Pollution Act 1974 and British Standard 5228-1:2009 to prevent disruptive noise and vibration. For this site, key controls include:

- Restricting working hours to minimise night-time operations.
- Selecting the quietest available equipment and shutting down idle machinery.
- Scheduling deliveries strictly within designated working hours.

Compliance with the plant machinery noise limits set out in Table B.1 (BSI, 2014), reproduced below, serves as the primary control for mitigating construction noise.

Table B.1 Methods of reducing noise levels from construction plant

Plant	Noise reduction of plant			Alternative plant
	Source of noise	Possible remedies (to be discussed with machine manufacturers)	A-weighted sound reduction dB	
Hammer drive piling equipment	Pneumatic/diesel hammer or steam winch vibrator driver	Enclose hammer head and top of pile in acoustic screen	5 to 10	Bored piling Vibratory system Drop hammer completely enclosed in box with opening at top for crane access Steel jacket completely enclosing drop hammer with dolly and polystyrene chips fed to impact surface to dissipate energy Pressed-in piling which generates its driving force from the frictional restraint of other piles
	Sheet pile	Acoustically dampen sheet steel piles to reduce levels of resonant vibration		
	Impact on pile	Use resilient pad (dolly) between pile and hammer head. Packing needs to be kept in good condition		
	Cranes cables, pile guides and attachments	Careful alignment of pile and rig		
	Power units or base machine	Fix more efficient sound reduction equipment or exhaust. Acoustically dampen panels and covers. When intended by the manufacturer, engine panels need to be kept closed. Use acoustic screens when possible		
Earth-moving plant: • bulldozer • compactor • crane • dump truck • dumper • excavator • grader • loader • scraper	Engine	Fit more efficient exhaust sound reduction equipment Manufacturers' enclosure panels need to be kept closed	5 to 10	Alternative super silenced plant might be available. Consult manufacturers for details
Compressors and generators	Engine Compressor or generator body shell	Fit more efficient sound reduction equipment Acoustically dampen metal casing Manufacturers' enclosure panels need to be kept closed	Up to 10	Super silenced plant is available. Consult manufacturers for details Electric-powered compressors are available as opposed to diesel or petrol Sound-reduced compressor or generator can be used to supply several pieces of plant. Use centralized generator system
	Total machine	Erect acoustic screen between compressor or generator and noise-sensitive area. When possible, line of sight between top of machine and reception point needs to be obscured Enclose compressor or generator in ventilated acoustic enclosure	Up to 10 Up to 20	
Pneumatic concrete breaker, rock drills and tools	Tool	Fit suitably designed muffler or sound reduction equipment to reduce noise without impairing machine efficiency Ensure all leaks in air line are sealed	Up to 15	Hydraulic and electric tools are available For large areas of concrete, machine designed to break concrete in bending can be used Thermic lance
	Bit	Use dampened bit to eliminate ringing		
	Total machine	Erect acoustic screen between compressor or generator and noise-sensitive area. When possible, line of sight between top of machine and reception point needs to be obscured Enclose breaker or rock drill in portable or fixed acoustic enclosure with suitable ventilation	Up to 10 Up to 20	
Rotary drills, diamond drilling and boring	Drive motor and bit	Use machine inside acoustic shed with adequate ventilation	Up to 15	Thermic lance

4.4.5 Implementation of the Waste Hierarchy

The Biodiversity Champion must ensure all construction activities follow the Waste Hierarchy (DEFRA 2011) to minimise waste generation throughout the development. The construction phase must adhere to the following principles, in order of priority:

Primary Objectives

- Re-use products and materials wherever feasible.
- Recycle and compost material resources when re-use is not possible.
- Recover energy from remaining waste materials.

Disposal Protocols

- Authorized transfer: entrust controlled waste exclusively to an authorized entity (e.g., Waste Collection Authority, Environmental Permit holder, Registered Waste Carrier, or Waste Disposal Authority).
- Waste transfer notes: accompany all non-hazardous waste transfers with a Waste Transfer Note, retained for a minimum of two years.
- Consignment notes: transport hazardous waste under a detailed Hazardous Waste Consignment Note, retained for at least three years.
- Chain of custody: maintain legal responsibility for all waste until its final recovery or complete disposal.

4.5 Lighting (Lightable, 2026)

4.5.1 Construction Phase Lighting

Lighting during the construction phase is expected to be short-term and reversible but shall be carried out in accordance with measures set out in Section 9 of the Lighting Assessment (Lightable, 2026) to minimise adverse impacts. The following will be adhered to:

- Lighting will operate in all external areas used by construction workers after dark in order to provide a safe and secure working environment without over lighting. High-quality LED light sources with high colour rendering index (CRI) shall be utilised to maximise visibility with efficient light output;
- Lighting shall be provided to meet the target lux level as set out in BS EN 12464-2 Lighting of outdoor workplaces without over lighting. Luminaires shall be mounted at the lowest practical mounting height, providing lighting only where lighting is required;
- Lighting shall only be operated during hours of darkness and within the construction working hours set out in Condition 8 of the Planning Permission (08:00 - 18:00 Hours Monday - Friday, 09:00 - 13:00 Hours Saturday, and no work permitted on Sundays or Bank/Public Holidays);
- Lighting controls should be employed to dim or switch off any lighting that is not needed;
- Lighting that needs to be sited close to the perimeter or sensitive areas should be fitted with shielding or be switched off or dimmed when not in use;
- Lighting should be controlled in such a way to illuminate high activity, hazardous or high security areas while reducing lighting levels at less pertinent areas; and
- The Contractor should act responsibly to adjust any temporary lighting reported as causing nuisance.

4.5.2 Wildlife Sensitive Lighting Strategy

External lighting will be installed in a way as to limit artificial light spill over habitats of value to protected species which may be using the site, as shown in the External Lighting Lux Plot Layout Plan (drawing no. L0282-LTBL-DWG-002 Rev P1; Lightable, 2026) which is reproduced in **Appendix 3**.

All external lighting will be installed in accordance with the Lighting Assessment (Lightable, 2026) which adheres to Guidance Note 08/23: Bats and Artificial lighting at Night (ILP, 2023):

- Light levels have been proposed to be as low as possible as required to fulfil the lighting need.
- All luminaires lack UV elements when manufactured. LED lights sources have been specified and metal halide, compact fluorescent sources shall not be used.
- Warm White lights have been proposed at 2700k.
- Luminaires shall be mounted horizontally, with no light output above 90° and/or no upward tilt.

- Motion sensors have been avoided, as standard practice they are not appropriate at this type of development. Instead, light spill has been reduced to negligible levels using latest generation optical control.

4.6 Invasive Species Management

Although no invasive non-native species listed under the Wildlife and Countryside Act (1981) or problematic species are currently present on site, construction activities risk introducing them via imported materials. To mitigate this risk, the following measures will be enforced:

- A Biosecurity Declaration Form will be distributed via email to all contractors bringing plant machinery to the site, requiring all equipment to be thoroughly power-washed to remove mud and debris before arrival, with completed forms returned to the Biodiversity Champion prior to delivery or access. Issue this declaration form alongside a copy of the CEMP to all subcontractors intending to bring machinery onto the site.
- Inspect all incoming plant equipment in a designated quarantine area upon arrival to verify cleanliness, immediately refusing entry to any machinery deemed inadequately cleaned.

5 Precautionary Working Methods for Protected Species

5.1 Great Crested Newts

A District Level Licence (DLL) for great crested newts is required prior to works. Vegetation clearance to be **supervised by an ECoW who is a great crested newt class licence holder**. Vegetation clearance will adhere to the measures as required by the DLL.

5.2 Reptiles (Hone Ecology, 2022)

In line with recommendations from the Reptile Presence/Likely Absence Survey Report (Hone Ecology, November 2022), vegetation clearance on site should be completed in three stages:

1. Cut back and remove scattered trees. This can be undertaken at any time of year, but nesting birds must be left undisturbed within a 5m radius until their young have fledged. The breeding bird season is between March and August inclusive. If tree felling works are to be carried out during breeding bird season, an ecologist must first carry out a nesting bird survey prior to any felling works, and the felling must be completed within 48 hours of the nesting bird survey being completed.
2. Strim vegetation with a tractor flail during warm dry weather to a height of 50mm above ground. Mowing should be conducted systematically by mowing towards areas of retained habitats, for example starting at one end of an area and move slowly back and forth. This would allow any animals to feel the vibrations from the mower and move out of harm's way and into retained habitats. Suitable cutting techniques are shown in *Figure 3* below. A flail on a balanced arm above the ground should be used as shown in *Figure 4* below.

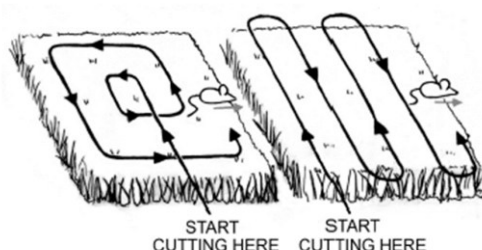


Figure 3: A schematic representation of suitable systematic cutting techniques



Figure 4: Flail on a balanced arm about ground.

3. After a minimum of 48 hours during warm dry weather the vegetation should be strimmed to ground level.

In addition, the following precautionary working methods will be applied:

- Any excavations will be covered overnight, or a ramp will be installed to enable any trapped reptiles to escape.
- Any rubble piles will be dismantled by hand and debris and brash will be stored on pallets or removed from the site to prevent reptiles from utilising these areas.
- In the unlikely event a reptile is found during or after clearance works, then works should cease in that area and the **ECoW should be contacted for advice**.

5.3 Nesting Birds

Vegetation clearance will be undertaken outside the core nesting period 01 March to 31 August. **If this timeframe cannot be avoided, a nesting bird check of the vegetation (and any remaining or regrowth vegetation from earlier cuts) will be undertaken by a suitably qualified ECoW**, within 24 hours prior to the commencement of work.

If any active nests are found during the nesting bird check, all active nests will need to be retained with a species-appropriate (generally 5m or more) buffer until the young have fledged (species-specific but typically 4-6 weeks). The buffer will need to be increased in the event of the presence of any Schedule 1 species as reckless disturbance as well of destruction of the nests of such species is an offence. Buffer zones regarding Schedule 1 species are on a case-by-case, species-by-species basis and must be reflected accordingly.

If active nests are identified, these will need to include signage on any fencing or buffer boundary to make awareness of presence. Examples of appropriate installed work signs are shown in *Figure 5* opposite.

Signs will be installed in full view in areas where nesting birds have been identified on the pre-work checks.



Figure 5: Work signage for active nests

5.4 Badgers & Hedgehogs

Given that an inactive burrow entrance was previously identified on the site it is recommended that a maximum of three months prior to the start of works, a walkover be undertaken to confirm any change in badger activity. The walkover will be undertaken by a suitably qualified ecologist who will detail findings about any mammal burrows found on and within a 30m radius of the site. If any burrows are found, camera traps must be deployed to determine activity and usage. Should any badger setts be identified within a 30m radius of areas requiring excavation or heavy machinery, further camera trap deployments and licencing may be required to disturb, damage, or destroy an active badger sett.

Further, a precautionary working method will be applied during works, which would also be applicable to hedgehogs, with the following measures:

- A **pre-commencement inspection of the site for hedgehogs by a suitably qualified ECoW** will be undertaken prior to any vegetation clearance works. If any hedgehogs are found they are to be moved to a safe sheltered area of the site boundary which is being retained.
- Any excavations will be covered overnight, or a ramp will be installed to enable any trapped badgers or hedgehogs to escape.

5.5 Roosting Bats

If any trees identified with low potential for roosting bats will be impacted by the planned works (oak at the southeast and line of sycamores adjacent to the road on the western boundary), it is recommended that a **pre-works check is undertaken by a bat licenced ECoW** immediately before any works on these trees. Endoscopes and Mobile Elevation Work Platforms (MEWPs) may be required.

If bats or evidence of bats are found during this check, works on the tree(s) must stop and further bat emergence surveys will be required to inform a Natural England licence.

5.6 Hazel Dormice (Hone Ecology, 2025)

A Natural England dormouse mitigation licence is required to undertake scrub and boundary works. Vegetation clearance is to be **supervised by an ECoW who is either the named ecologist on the licence or a suitably qualified accredited agent**. Vegetation clearance will adhere to the measures and suitable timings as outlined in the Hazel Dormice Addendum (Hone Ecology, 2025) as follows:

Two Stage Approach:

- Ideally, the removal of the vegetation will be undertaken in two stages to avoid bird nesting season:
 - Stage 1 – the coppicing of above ground hedgerow/ tree/ scrub vegetation to a height of 300mm carried out over the winter months (**November to March**);
 - Stage 2 – grubbing out of roots, stumps and arising during the summer months (**May only**) to avoid disturbing potential hibernating dormice.
- The first stage of vegetation clearance will be undertaken by contractors briefed by the licenced ecologist. A **toolbox talk** will be given prior to the clearance detailing the legal implications and legislation associated with dormice, outline their behaviour and measures to ensure they are not disturbed or harmed during works if present, and that works must stop immediately in the unlikely event a dormouse is observed.
- Works will be carried out under the supervision of the licenced ecologist/ accredited agent who will hand search the vegetation for dormice. In the event a dormouse is observed, works will stop immediately, and if necessary a dead hedge created to provide habitat connectivity across the works area.

Single Stage Approach:

- In the event the above is not possible, the clearance will be undertaken in a single stage approach during the dormouse active season but to avoid the key breeding and hibernation periods (**May only, or 15 September to 31 October**) with finger-tip search undertaken by the licenced ecologist prior to trees and scrub being cleared to ground level, with toolbox talk given as above.
- A check for nesting birds will also be included. In the event an active nest is observed, clearance works will be stopped in that area, with a 5m vegetation buffer around the nest. Works in that area will not continue until the young have fledged, or the nest is confirmed by an ecologist to have been abandoned.

Appendix 1: Proposed Site Plan



Appendix 2: Biodiversity Protection Zones

