



Construction Environmental Management Plan (CEMP)

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Report	Construction Environmental Management Plan (CEMP): Biodiversity (Condition 15)
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1.0 INTRODUCTION

1.1 Brief

Ecosupport Ltd were commissioned by Ashill Reg Ltd to produce a Construction Environmental Management Plan (CEMP): Biodiversity for the development of the site known as 'West Hoathly Brickworks, Sharphorne'. This was requested to satisfy the discharge of condition 15 of the planning approval (DM/23/0827) which states the following:

Prior to commencement of any 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.*

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.

Reason: To conserve protected and Priority species and allow the LPA to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 (as amended) and s40 of the NERC Act 2006 (Priority habitats & species) and to accord with Policy DP38 of the District Plan.

1.2 Aim

The aim of the CEMP is to protect the ecological interests on the site during the construction period. This includes habitats of importance to be retained and various protected species such as bats, Badgers, reptiles. Great Crested Newts, Hazel Dormice and breeding birds. This report details the approach which construction workers will adopt in dealing with the potential ecological impacts associated with various construction activities, including:

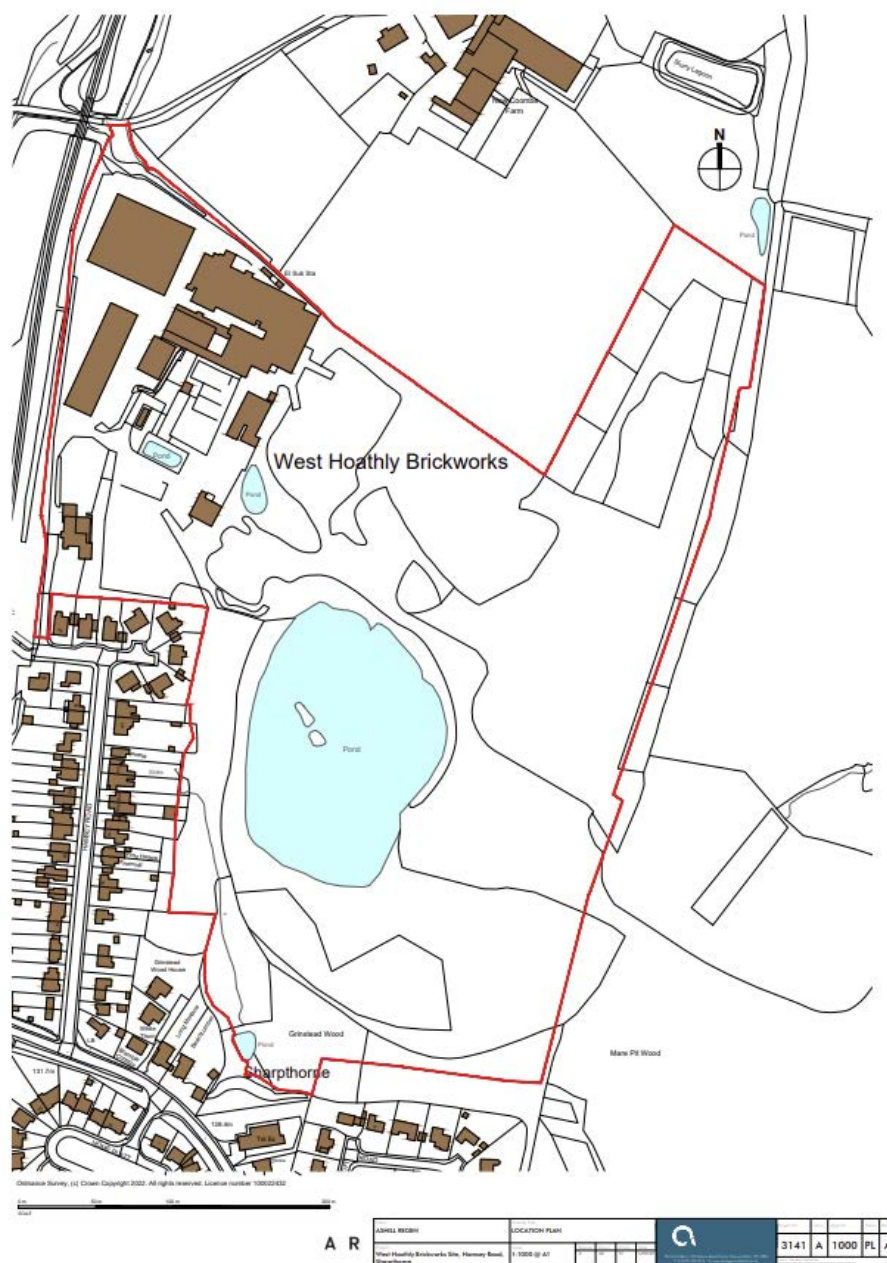
- Details of construction activities which have potential to impact on biodiversity interests of the site;
- Details of sensitive biodiversity zones that require specific protection;

- Method statements to avoid and mitigate impacts on protected species from construction works;
- Details of locations and timing of works to avoid impacts on protected species;
- Outline works which require supervision by an Ecological Clerk of Works (ECoW)
- Outline the roles and responsibilities and lines of communication of the involved parties including the developer, site manager, ECoW and any other contractors/subcontractors;

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 and/or Natural England.

1.3 Site Description

The site comprises the buildings, hardstanding and surrounding woodland / tree lines which made up the former West Hoathly brickworks off of Hamsey Road, Sharpthorne, East Grinstead (centred on OS grid reference TQ 37362 32885) (**Fig 1**). The site is bound by the railway line to the west, residential dwellings to the south, and pastures to the north and east. The immediate surrounding environ is semi-rural comprising a mix of woodlands, grasslands, and the residential areas of Sharpthorne and West Hoathly.

Figure 1. Redline boundary of the site (Omega Architects, 2023) (Drawing Number: 1000).

1.4 Development Proposals

The proposals entail the demolition of existing structures and redevelopment of the site to provide 108 residential dwellings (class c3) and associated works, including the provision of an onsite SANG, access, landscaping, parking and associated works.

Figure 2. Proposed layout for the residential portion of the site (Murdoch Wickham, 2023).

2.0 ECOLOGICAL BASELINE

2.1 Habitats

Site walkovers were conducted by Ecology Solutions in July and November 2022 during which the habitats present on site were identified in accordance with Habitat Definitions Version 1.1 (UK Hab Ltd., 2020). Adam Jessop MSc MCIEEM (Principal Ecologist with Ecosupport Ltd) then undertook an updated walkover on the 7th November 2024 with categorisation of habitats on site updated in line with the Habitat Definitions Version 2.0 (UKHab Ltd., 2023).

A full description of the habitats present on site can be found within the Ecological Assessment for the site (Ecology Solutions, 2023) however the updated UKHab categorisations have been listed below with any notable changes described.

The following habitats were identified across the site:

- Buildings (u1b5) (**Fig 3**) (main development parcel only)
- Developed Land; Sealed Surface (u1b) (**Fig 3**) (main development parcel only)
- Artificial Unvegetated; Unsealed Surface (u1c) (**Fig 4**) (main development parcel and SANG) (***NB the extent of this habitat within the proposed SANG area has significantly reduced as a result of the habitat creation works approved under WSCC/081/14/HO.***)
- Sparsely Vegetated Urban Land (u1f) with ruderal / ephemeral (81) (**Fig 4**) (main development parcel and SANG) (***NB the extent of this habitat within the proposed SANG area has significantly reduced as a result of the habitat creation works approved under WSCC/081/14/HO.***)
- Other Neutral Grassland (g3c) with scattered scrub (10), scattered rushes (14), tall forbs (16), and scattered trees (32) (main development parcel and SANG) (***NB the extent of this grassland has significantly increased within the proposed SANG area as a result of habitat creation works approved under WSCC/081/14/HO.***)
- Broad Leaved Woodland (w1g) with line of trees (33) (**Fig 5**) (main development parcel and SANG)
- Mixed Scrub (h3h) (main development parcel and SANG)
- Bramble Scrub (h3d) (main development parcel and SANG)
- Other Standing Water (r1g) with pond (non-priority) (41), freshwater – artificial (49), and ditch (50) (**Fig 6**) (main development parcel and SANG) (***NB water was noted to have accumulated to form a temporary pond feature (Fig 7) within the previous area of ruderal / ephemeral habitat in the east of the main development parcel.***)
- Other Coniferous Woodland (w2c) with line of trees (33) (main development parcel only)
- Native Hedgerow (h2a) (main development parcel and SANG)
- Built-Up Areas and Gardens (u1) with introduced shrub (847) (main development parcel only)

Figure 3. Example of the developed land and buildings on site (taken November 2024).



Figure 4. Artificial unvegetated land as well as sparsely vegetated urban land (taken November 2024).



Figure 5. View towards the broadleaved woodland with the seeding hat's taken place in the SANG area visible on the ground (taken November 2024).



Figure 6. View of one of the non-priority habitat ponds within the main development parcel (taken November 2024).



Figure 7. View of one of the presumed temporary ponds within the east of the main development parcel on site (**NB this area was previously mapped as ruderal / ephemeral**) (taken November 2024).



2.2 Bats

2.2.1 Roosting Bats – Previous Survey Work (2022)

Ecology Solutions (2023) conducted a Preliminary Roost Assessment of all of the buildings on site during **July 2022**. No evidence of roosting bats was identified internally and the majority of the buildings were considered to be unsuitable for roosting bats apart from buildings B1 and B4a which were assessed as being of moderate potential for roosting bats. B3 was also considered to offer very low potential for roosting bats.

Ecology Solutions (2023) subsequently undertook emergence / re-entry surveys of B3, B1 and B4a with a summary of their results included within **Table 1** below and details of roost locations indicated in **Fig 8**.

Table 1. Results and evaluation of the emergence / re-entry surveys undertaken by Ecology Solutions in summer 2022 (2023).

Building	Date	Survey Type	Results	Evaluation
B1	3 rd August	Dusk emergence	1 x Soprano Pipistrelle emergence	Soprano Pipistrelle day roost present
	24 th August	Dawn re-entry	2 x Soprano Pipistrelle re-entries	
B4a	4 th August	Dawn re-entry	1 x Common Pipistrelle re-entry	

	23 rd August	Dusk emergence	No emergences	Common Pipistrelle day roost present
	1 st October	Dawn re-entry	1 x Common Pipistrelle re-entry	
B3	23 rd August	Dusk emergence	No emergences	No roosts present

Figure 8. Location of the bat roosts within Buildings B1 and B4a on site as identified by Ecology Solutions in summer 2022 (2023). Yellow = Soprano Pipistrelle day roost. Blue = Common Pipistrelle day roost.



Ecology Solutions (2023) also undertook two dawn backtracking surveys on the 4th August and 24th August 2022 respectively as a precautionary measure to provide further confidence as to whether any of the other industrial buildings on site supported roosting bats. No emergences were noted.

2.2.2 Roosting Bats – Updated Survey Work (2024)

Ecosupport Ltd. conducted an updated Preliminary Roost Assessment of the buildings on site on the 7th November 2024. All of the buildings were noted to be in much the same condition as they were previously with no change to their roosting potential and no new evidence of roosting bats identified (**Figs 9 & 10**).

Figure 9. View of B1 on site (taken November 2024).



Figure 10. View of B4a on site (taken November 2024).



2.2.3 Foraging and Commuting Bats – Previous Survey Work (2022)

As described above, Ecology Solutions (2023) conducted two dawn backtracking surveys on the 4th and 24th August 2022 with each of these carried out in combination with an activity transect of the main development parcel. Overall, activity levels were considered to be low with widespread bat species found to be dominant and 5 species recorded in total including Common Pipistrelle, Soprano Pipistrelle, Myotis sp., Noctule, and Serotine.

No activity surveys were conducted within the proposed SANG.

2.2.4 Foraging and Commuting Bats – Updated Walkover (2024)

During the updated walkover conducted in 2024 by Ecosupport Ltd., the habitats within the main development parcel were noted to be largely unchanged since the previous survey work took place. Therefore, it is considered that the existing survey work provides an accurate reflection of the bat activity on site and that further survey work would be unlikely to produce contrasting results.

2.3 Badgers

2.3.1 Badgers – Previous Walkover (2022)

Ecology Solutions (2023) conducted site walkovers during July and November 2022 with no evidence of Badger activity recorded across the main development parcel or the proposed SANG.

2.3.2 Badgers – Updated Walkover (2024)

During the updated walkover conducted in 2024 by Ecosupport Ltd., no evidence of Badger activity was recorded across the main development parcel or the proposed SANG. However, the woodlands, scrub, and grassland were considered to offer potential foraging and commuting habitat for Badgers.

2.4 Reptiles

2.4.1 Reptiles – Previous Survey Work (2022)

Ecology Solutions (2023) undertook site walkovers in July and November 2022 and found that the main development parcel supported small areas of suitable reptile habitat in the form of rough grassland. Subsequently, Ecology Solutions (2023) undertook a suite of seven presence / likely absence surveys within the main development parcel during September 2022 which identified “small numbers of Slow Worm”, “a single Grass Snake and single Common Lizard”.

As the proposed SANG area is not due to be adversely impacted and did not form part of the application site at the time of the ecological surveys, this area was not subject to a reptile survey. However, given that the proposed SANG is connected to the main development parcel, Ecology Solutions (2023) concluded that reptiles can be assumed present within areas of suitable habitat.

2.4.2 Reptiles – Updated Walkover (2024)

During the updated walkover conducted in 2024 by Ecosupport Ltd., the habitats within the main development parcel were noted to be largely unchanged since the previous survey work took place. Therefore, it is considered that the existing survey work provides an accurate reflection of the reptile population on site and that further survey work would be unlikely to produce contrasting results.

2.5 Great Crested Newts (GCN)

2.5.1 GCN – Previous Survey Work (2021)

In support of an application for nature restoration at the brickworks (WSCC/081/14/HO), various GCN surveys have taken place and a summary of this information is provided below.

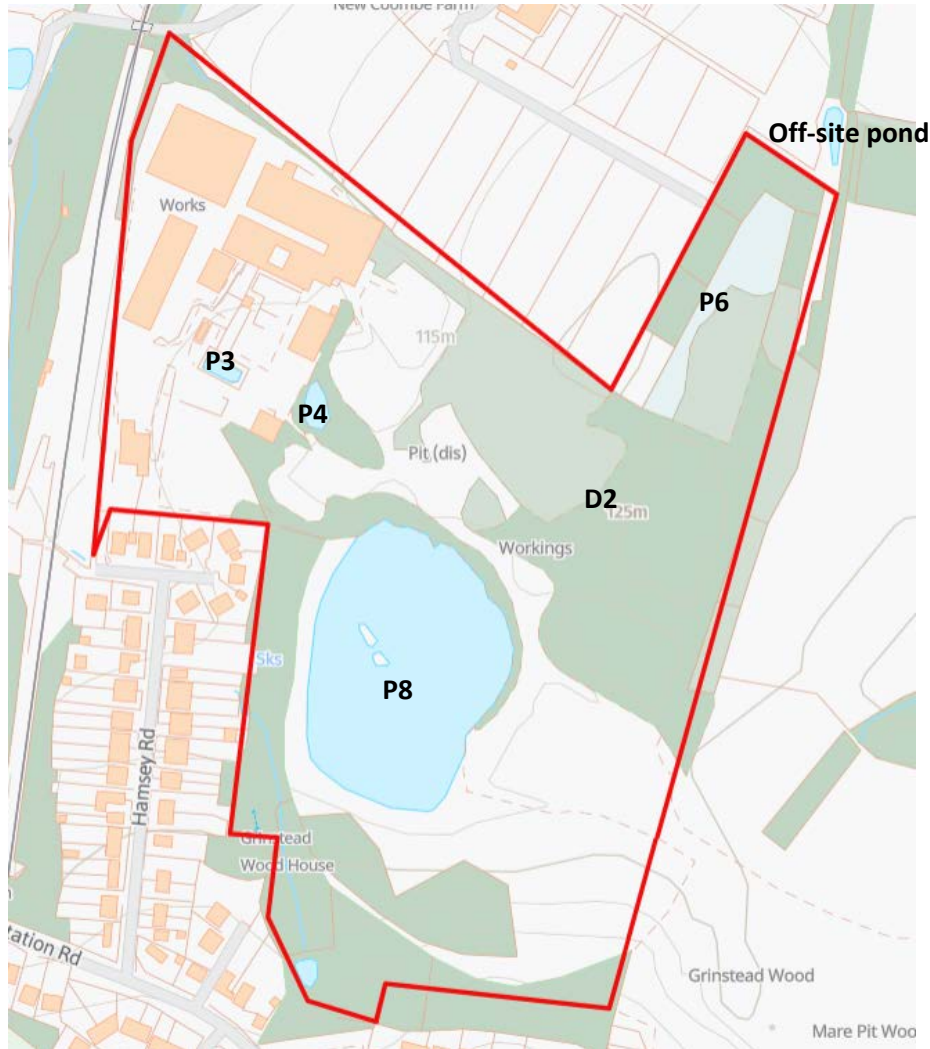
NB to avoid confusion, pond numbers refer to those assigned within the Baseline Habitats plan produced by Ecology Solutions (2023) and illustrated in Fig 11 below.

Eco-Tech conducted eDNA surveys of waterbodies P6, P8, P4, P3 and an off-site pond during April 2021 of which only P6 returned a positive result for GCN presence. Eco-Tech also conducted an egg search within D2 which determined that GCN were likely to be present (FPCR, 2022).

FPCR (2022) subsequently conducted an HSI assessment of the above noted ponds with the off-site pond and P6 deemed to be of moderate and excellent suitability for GCN respectively. Based on the results of the HSI assessments and the findings from Eco-Tech, population surveys were conducted on the off-site pond, P6 and D2 between May and June 2021 with survey techniques

including bottle trapping, sweep netting, torching, and egg searching. GCN were found to be likely absent from the off-site pond. However, a low population of GCN were found to be present within P6 and D2 with a peak count of 10 GCN across both waterbodies.

Figure 11. Location of the previously surveyed waterbodies (Magic Maps, 2025).



2.5.2 GCN – Previous Natural England Licence Application

To enable the nature restoration works (for the SANG) approved under WSCC/081/14/HO, a GCN licence was applied for and granted during 2022. Under this licence, a receptor area was established within the north of the proposed SANG area and bound by exclusion fencing to prevent GCN from re-entering the brickworks site. Trapping was undertaken within the main development parcel and proposed SANG area between July and August 2022 with a total of 19 GCN relocated to the receptor.

2.5.3 GCN – Previous Survey Work (2022)

Ecology Solutions did not undertake targeted GCN surveys however, during the 2022 reptile surveys, a single GCN was identified under a reptile refugia along the eastern boundary of the main development parcel.

2.5.4 GCN – Evaluation

During the updated walkover conducted in 2024 by Ecosupport Ltd., the habitats within the main development parcel were noted to be largely unchanged since the previous survey work took place (although were more unmanaged). Of particular relevance to GCN, the extent of suitable habitat was much the same aside from the presence of a new temporary pond feature in the east of the main development parcel (**Fig 7**).

However, given that a single GCN was identified during the 2022 reptile survey and considering that the exclusion fencing did not continue along the northern boundary of the main development parcel, it is considered that a small number of GCN are likely to still be present on site.

2.6 Hazel Dormice

During both of the walkovers conducted by Ecology Solutions (2023) in 2022 and the updated walkover conducted by Ecosupport Ltd. in 2024, much of the site was found to be unsuitable for Dormice (comprising largely of hardstanding, unsealed surfaces, and ruderal habitat) with suitable habitat restricted only to the woodlands. The tree lines and scrub on site were noted to be sparse and poorly structured and were therefore only of very limited value for Hazel Dormice.

Ecology Solutions (2023) concluded that Dormouse surveys would not be necessary and, instead, precautionary working measures would be put in place during works to any suitable Dormouse habitat. Given the lack of local records and limited potential for Dormice to be present on site while considering that the development will result in minimal impacts to suitable Dormouse habitat, it is considered that this approach is appropriate and proportionate for the scale of impact (with mitigation detailed further in **Section 5.7** below).

2.7 Birds

During both of the walkovers conducted by Ecology Solutions (2023) in 2022 and the updated walkover conducted by Ecosupport Ltd. in 2024, much of the site was found to be unsuitable for nesting birds (comprising largely of hardstanding, unsealed surfaces, and ruderal habitat) with suitable habitat restricted largely to the woodlands, hedgerows, tree lines, and scrub.

Ecology Solutions (2023) concluded that breeding bird surveys would not be necessary and, instead, standard precautionary working measures would be put in place during works to any suitable nesting bird habitat. Given that the vast majority of suitable nesting bird habitat on site is set to be retained and considering that surveys would be unlikely to identify any new areas of importance to breeding birds, it is considered that this approach is appropriate and proportionate for the scale of impact (with mitigation detailed further in **Section 5.8** below).

2.8 Hedgehogs

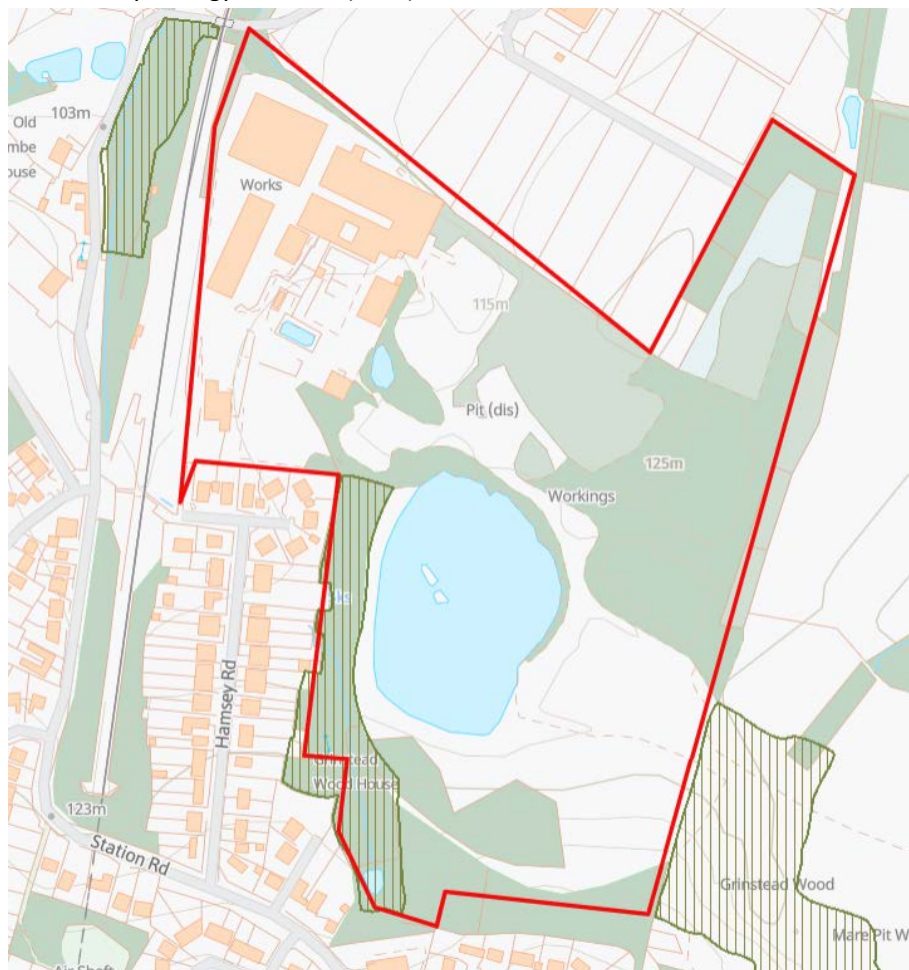
Given the presence of woodland within the site boundary, it is possible that Hedgehogs may use the site for foraging and commuting.

2.9 Designated Sites

NB details of the all of the designated sites lying within the vicinity of the site are provided within the Ecological Assessment (Ecology Solutions, 2023). Only those sites which may be impacted during the construction phase of the development are detailed herein.

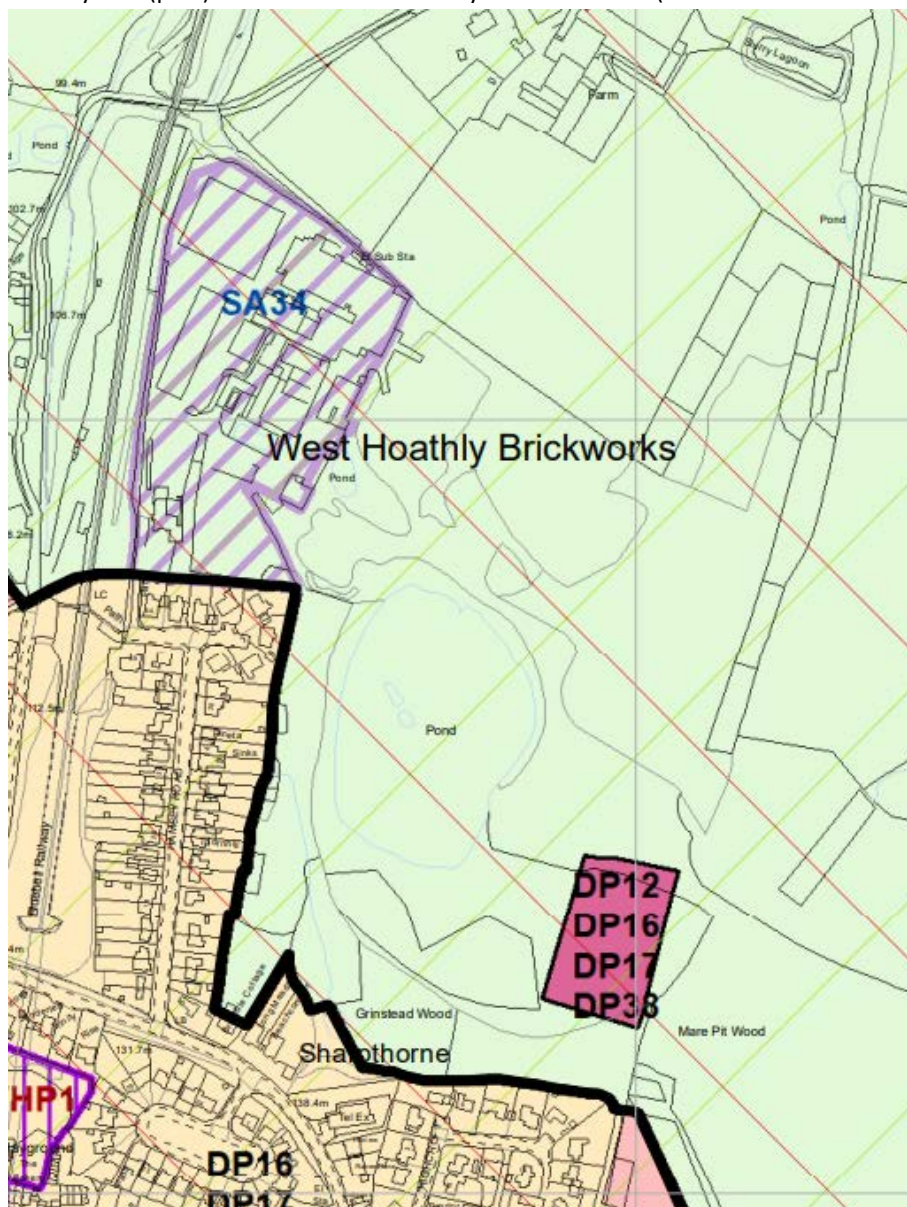
As identified by Ecology Solutions (2023) and illustrated in **Fig 12** below, one parcel of Ancient Semi-Natural Woodland (ASNW) lies within the site boundary (within the proposed SANG area) while two further parcels lie within close proximity to the eastern and western boundaries of the site (although the western parcel lies across the other side of the railway track).

Figure 12. Location of the Ancient Semi-Natural Woodland parcels identified within / close to the site as identified by Ecology Solutions (2023).



Furthermore, the West Hoathly SSSI is located in the south-eastern corner of the SANG as identified within the local plan map in **Fig 13** below.

Figure 13. Screenshot from Mid Sussex District Council local plan map illustrating the location of West Hoathly SSSI (pink) within the West Hoathly Brickworks site (Mid Sussex District Council, 2022).



3.0 BIODIVERSITY PROTECTION ZONES

Several Biodiversity Protection Zones (BPZs) will be established across the site to ensure the protection of habitats deemed valuable for wildlife including GCN, reptiles, bats and breeding birds.

As described further in **Section 5.2**, the BPZs include the GCN receptor, wider SANG (including the ASNW and West Hoathly SSSI), 15m ASNW buffer, and retained boundary habitats. These will be protected by Heras fencing as well as HDPE exclusion fencing where appropriate (i.e. around the GCN and reptile receptors). The location of BPZs and protective fencing can be seen in **Appendix 1** with the location of HDPE exclusion fencing indicated in **Appendix 2**.

4.0 CONSTRUCTION MITIGATION MEASURES

4.1 Risk Assessment

A summary of the risk assessment of potential impacts and reference to relevant method statements has been provided in **Table 2**.

Table 2. Summary of risk assessment and mitigation

Ecological Feature	Risk Assessment of Potential Impacts	Summary of Mitigation Required & Relevant Method Statements
Retained habitats	Damage from machinery or from storage of materials, soil compaction Accidental killing, harm or disturbance to species using retained habitats	Before construction - Protective fencing and BPZs established (Section 5.2) - Toolbox talk (Section 5.1) During construction - Regular monitoring of fencing and fencing repairs as needed (Section 5.10)
	Damage from pollution such as atmospheric pollution (e.g. dust) coating vegetation or aquatic pollution from runoff leading to deposition of soil, silt or chemicals in sensitive habitats, which could lead to degradation of habitat	Before construction - General good practice measures are detailed in Section 4.2 below. During construction - Ecological monitoring (Section 5.10)
Roosting bats	Killing, injury and/or disturbance of bats and destruction or damage to roosts	Before construction - Toolbox talk (Section 5.1) - EPSL obtained (Section 5.3) - Install mitigation bat boxes (Section 5.3) During construction - Sensitive demolition of buildings in line with EPSL method statement (Section 5.3) After construction - Confirm compensation bat boxes are in place (Section 5.3)
Foraging and commuting bats	Lighting may impact on foraging and commuting activity	During construction Sensitive lighting (Sections 5.3 & 5.9).
Badgers and nocturnal mammals	Badgers and other terrestrial mammals may become entrapped in excavations or may be killed or injured during works (such as collision with vehicles)	During construction Precautionary measures will be employed during construction (Section 5.4)
Reptiles	Accidental killing or injury of reptiles	Before construction - HDPE exclusion fencing installed (Section 5.5) - Reptile translocation carried out (Section 5.5)

		• Destructive search (Section 5.5) During construction • Regular monitoring of fencing and fencing repairs as needed (Section 5.10) After construction • Exclusion fencing removed (Section 5.5)
Great Crested Newts	Accidental killing or harm to GCN or impacts to GCN habitat	Before construction • Toolbox talk (Section 5.1) • Fencing installed (Section 5.6) • GCN trapping carried out (Section 5.6) • Destructive search (Section 5.6) During construction • Regular monitoring of fencing and fencing repairs as needed (Section 5.10) After construction • Exclusion fencing removed (Section 5.6)
Hazel Dormice	Accidental killing or ham to Hazel Dormice (if present)	Before construction • Toolbox talk (Section 5.1) • Installation of mitigatory Dormouse boxes (Section 5.7) During construction • Precautionary measures during any habitat removal (Section 5.7)
Nesting birds	Nesting birds in habitats such as woodland and scrub may be impacted by vegetation clearance resulting in death, injury or disturbance.	During construction • Timing of vegetation clearance to avoid March-September if possible (Section 5.8) • If not possible, a nesting bird check will be carried out within 48 hours prior to works and any nests retained (Section 5.8)

4.2 General Good Practice Construction Measures

The below sections outline general good practices to adopt to ensure protection of ecological features. These will be included within a full CEMP which will detail the required site-specific measures.

4.2.1 Dust Generation

Generation of dust will be mitigated by wetting down and/or using screening as needed. Particular care will be taken around the BPZs or valuable retained habitats such as woodland.

4.2.2 Excavations and Trenches

Any excavations or trenches will be covered at night and/or escape ramps will be provided to prevent nocturnal species such as badger and hedgehog from becoming trapped. These areas will be inspected each morning to ensure no wildlife has been trapped.

4.2.3 Open Pipework

Any open pipework larger than 15cm diameter will be covered at the end of each day to avoid mammals such as Hedgehogs from entering pipes and potentially becoming trapped.

4.2.4 Hazardous Materials and Waste

Any chemicals or hazardous materials and waste will be stored in secure areas according to best practice and will be well-labelled. No construction materials will be stored within BPZs and any hazardous materials will be stored away from the BPZ.

4.2.5 Storage of Materials

Materials will be stored to avoid creating potential refuges for wildlife. This includes avoiding stacked or piled materials on the ground. The site should be kept tidy with storage of materials off the ground such as on pallets or in skips. Materials will be stored away from valuable retained vegetation where possible (e.g. woodland) to avoid impacts from dust generation or disturbance of wildlife species.

Storage of stockpiles or soils should be smoothed as much as possible to prevent opportunities for cavities or burrows being created. If an animal is found within the site, it should be moved gently to habitat away from the working area, or an ecologist consulted if required.

5.0 Method Statements for Habitats and Protected Species

The following method statements have been produced to ensure protection of retained habitats and protected species within the site:

1. Toolbox talk
2. Biodiversity Protection Zones
3. Bats
4. Badgers and Nocturnal Mammals
5. Reptiles
6. GCN
7. Hazel Dormice
8. Nesting birds
9. Lighting during construction
10. Ecological Monitoring during construction

5.1 Toolbox Talk

5.1.1 Summary

- **Description:** A Toolbox Talk provided to all site personnel to cover all ecological constraints and method statements.
- **Purpose:** To ensure site personnel are aware of ecological obligations and will carry out construction works as per method statements for the protection of habitats and species.
- **Dates:** Prior to construction commencing, and throughout the construction period for any new site personnel or if there are any significant changes in status of ecological features requiring a change in practice.
- **Relevant Personnel:** Ecological Clerk of Works (ECoW) and Site Manager.

5.1.2 Method Statement

A Toolbox Talk will be provided prior to the commencement of construction. This will be provided by the ECoW to all site personnel. Following this, it will be the responsibility of the Site Manager to provide all information within the toolbox talk to any new site workers as part of their site induction. The information provided to site personnel will include all method statements included within this report to sufficient detail necessary for site personnel to understand ecological constraints and obligations.

5.1.3 Reporting & Further Requirements

A record of the Toolbox Talk will be kept of details including location, date and participants. Participants will sign or initial the record to confirm they have understood the constraints and method statements. Following the initial talk, all new site workers will be provided the toolbox talk as part of their site induction and they will sign to confirm they have understood.

If the Site Manager changes, a Toolbox Talk will be provided by the ECoW to the new Site Manager.

5.2 Biodiversity Protection Zones

5.2.1 Summary

- **Description:** Biodiversity Protection Zones (BPZs) will be established and protected.
- **Purpose:** To protect retained habitats and protected species including GCN and reptiles.
- **Dates:** Established prior to construction and maintained in place until all construction completed.
- **Relevant Personnel:** Ecological Clerk of Works (ECoW), Fencing Contractor and Site Manager.

5.2.2 Method Statement

Several Biodiversity Protection Zones will be maintained on site. Firstly, the GCN receptor and wider SANG area (which encompasses the West Hoathly SSSI and ASNW parcel) will form BPZs. As these areas form part of the reptile and GCN mitigation strategies, HDPE exclusion fencing will be installed along the relevant boundaries of these zones to prevent wildlife from entering the construction area. Heras fencing will also be installed along the boundary of these BPZs following BS 5837:2012 Trees which will prevent entry into these areas. Furthermore, the retained boundary habitats within the main development parcel as well as the 15m ASNW buffer will be protected with Heras fencing (*NB there will be creation of footpaths within this 15m buffer in the development area and the SANG but access will be restricted*). Plans showing the BPZs and protective fencing (**Appendix 1**) as well as the HDPE exclusion fencing (**Appendix 2**) are appended to this report.

The protective fencing will remain in place until construction works are complete, no site personnel or machinery will enter the BPZs, and no materials will be stored within these areas. Where personnel must access the BPZs to carry out management works (such as for the creation of footpaths, landscaping and habitat enhancement), the minimum required personnel and smallest-sized machinery possible will be used to carry out the works (e.g. hand machinery will be used wherever suitable or a mini digger will be used as opposed to a large excavator).

The fencing installation will be overseen by the ECoW, who will ensure it has been correctly installed.

5.2.3 Reporting & Further Requirements

The fence will be inspected monthly with an Ecological Inspection Form completed by the ECoW and provided to the Site Manager. It will be the responsibility of the Site Manager to ensure the fencing is maintained and any repairs are carried immediately as necessary.

5.3 Bats

5.3.1 Summary

- **Description:** Buildings B1 and B4a support bat roosts – a European Protected Species Licence will be required prior to works taking place and works to the roosts will need to

be carried out sensitively under the supervision of an ecologist. Compensation for the loss of roosts will be provided.

- **Purpose:** To avoid death or injury to bats and compensate for the loss of roosting opportunities.
- **Dates:** Anytime of year but during suitable weather conditions.
- **Relevant Personnel:** Ecological Clerk of Works (ECoW)

5.3.2 Method Statement

5.3.2.1 Roosting Bats – EPSL

All works that affect the bat roosts within buildings B1 and B4a must take place under a European Protected Species Licence obtained from Natural England. The destruction of the roosts and capture of bats (if required) will need to be carried out under the supervision of a licensed Ecologist. All works would be detailed within the EPSL Method Statement required as part of the licence application.

5.3.2.2 Roosting Bats – Updated Emergence Surveys

For the purposes of informing the EPS licence, a single updated emergence survey will be conducted for both B1 and B4a. This will include the use of NVA's (Night Vision Aid) to cover the entirety of each building.

Nevertheless, given that no bats or fresh droppings were identified within either building during the updated inspection in 2024, it is considered unlikely that the status of the roosts will have changed. Therefore, the below sections detail the appropriate mitigation strategy for the Common Pipistrelle and Soprano Pipistrelle day roosts identified.

5.3.2.3 Roosting Bats – Timing of Works

Given that the roosts present are day roosts, no specific timing restrictions are required under the Bat Mitigation Guidelines (Reason, P.F. and Wray S., 2023). However, as bats are particularly vulnerable when they are in a torpid state, works will take place in suitable weather conditions (i.e. when overnight temperatures do not drop below 8 degrees immediately prior to or after works to the roost take place) as defined by best practice guidance (Mitchell-Jones et al. 2004).

5.3.2.4 Roosting Bats – Toolbox Talk & Supervision

Prior to any works getting underway the licensed bat worker will give a Toolbox talk which will detail best practice methods of sensitive stripping/removal of roofing tiles/materials (including the roof lining), as well as the sensitive dismantling of any other features considered suitable for roosting bats. Personnel will be educated on signs of bats and that, in the unlikely event a bat is found whilst the licensed ecologist is not on site, that **all works should stop immediately** until the licensee returns to site.

The licensed bat worker will then assist contractors with the removal of construction materials surrounding the roost and any other areas which are considered to be high risk for roosting bats.

5.3.2.5 Roosting Bats – Capture (If Required)

If during the sensitive removal of construction materials bats are discovered, the supervising ecologist will place the individuals into a holding bag (a soft cloth bag with closure-strings and with seams on the outside (Mitchell-Jones and McLeish, 2004)) to ensure the bat keeps calm and will not take flight during daylight hours. They will then immediately transport the bat to the mitigating bat box where the bat will be released and left undisturbed. During this time, the licensed bat worker will be wearing appropriate bat handling gloves to ensure the bat does not come to any harm. The licensed bat worker will have ample experience in handling a variety of bats and is confident in doing so.

5.3.2.6 Roosting Bats – Bat Boxes

Prior to any works getting underway 2 No. Vivara Pro Large Multi-Chamber bat boxes (**Fig 14**) will be erected onto suitable retained trees on site. This box is designed as a summer roosting space for various species of bats, including crevice-dwelling species such as Common and Soprano Pipistrelles. The bat box maintains a stable temperature inside and is painted black to absorb warmth. The box should be erected 3-6m high and in an open, sunny position (preferably facing a southern direction).

Once the works have been completed these boxes will be left in situ in perpetuity to compensate for the loss of 1 No. Common Pipistrelle day roost and 1 No. Soprano Pipistrelle day roost.

Figure 14. The Large Multi Chamber Bat Box to be erected on site (NHBS, 2023).



5.3.2.7 Foraging and Commuting Bats – Lighting During Construction

In order to avoid any disturbance to bats (and other potential nocturnal wildlife), construction works will be limited to daylight hours and will not be undertaken 30 minutes prior to dusk through to dawn. All lighting will be sensitive to the use of the site by nocturnal wildlife and will comply with Guidance Note 08/23 Bats and Artificial Lighting at night (ILP / BCT, 2023).

5.3.3 Reporting & Further Requirements

The bat roosts on site are of site value and the Bat Mitigation Guidelines (Reason & Wray, 2023) do not recommend further conditions in relation to the post development monitoring such roosts. However, all mitigation works will be overseen by the ECoW and a compliance check will also be undertaken upon completion of the works to ensure the compensatory bat boxes remain in situ, are appropriately located and remain in good condition.

Monthly ecological monitoring and Ecological Inspection Forms (see **Section 5.10**) will also be required as standard.

5.4 Badgers and Nocturnal Mammals

5.4.1 Summary

- **Description:** Foraging and commuting Badgers may be present on site and avoidance measures will be required during construction. An updated walkover will also be required to check for new evidence of Badger activity.
- **Purpose:** To prevent accidental death or injury or various wildlife such as Badgers and other mammals.
- **Dates:** Immediately prior to and during construction period.
- **Relevant Personnel:** Suitably qualified ecologist and Site Manager.

5.4.2 Method Statement

5.4.2.1 Updated Walkover

Although no evidence of Badgers was recorded on site, the site does have potential for foraging and commuting Badgers. Therefore, a walkover of the site is recommended to be undertaken by a suitably qualified ecologist in search of recent Badger activity immediately prior to works commencing (within 4 weeks of ground works starting). In the case that evidence of recent Badger activity is identified, further survey works may be required to assess the status of any potential Badger setts on site.

5.4.2.2 Avoidance Measures

The following avoidance measures will be carried out during construction to allow connectivity within the site for mammals and prevent any harm to mammals that may be present:

- 10-15cm gaps will be maintained at least every 200m in external fencing to allow mammals to move within the site.
- Any excavations or trenches will be covered nightly and/or a rough wooden plank will be placed inside at a 45 degree angle to allow animals to climb out.
- Pipework with a diameter >15cm will be covered at the end of each day to prevent animals such as hedgehogs from entering.
- All electrical equipment or installations will be secured or fenced to prevent wildlife entering and being electrocuted.
- A 10mph speed limit will be imposed on site to prevent collision with wildlife.

- If an injured animal is found, the ECoW must be immediately consulted and if required the RSPCA Helpline (0300 123 4999) to rescue the animal.

5.4.3 Reporting & Further Requirements

No additional monitoring beyond the monthly ecological monitoring and Ecological Inspection Forms (see **Section 5.10**) is required.

5.5 Reptiles

5.5.1 Summary

- **Description:** Reptiles will be translocated from the main development parcel / construction area into the proposed SANG. Exclusion fencing will be installed around the boundary of the main development parcel / construction area.
- **Purpose:** To prevent accidental death or injury to reptiles and provide suitable habitat compensation.
- **Dates:** Prior to start of construction (between April and September) with fencing in place until completion of construction.
- **Relevant Personnel:** Ecological Clerk of Works (ECoW), Fencing Contractor, and Site Manager.

5.5.2 Method Statement

5.5.2.1 Receptor Area

The proposed SANG area (including the GCN receptor area) will serve as the receptor area for any reptiles captured from the main development parcel. Extensive areas of meadow grassland already exist across the SANG as a result of the nature restoration works conducted in accordance with WSCC/081/14/HO. Marshy grassland is also present within the GCN receptor area which would be particularly suitable for Grass Snakes. Finally, as part of the proposed SANG management plan, hibernacula are expected to be created across the SANG which will further enhance the receptor for reptiles.

5.5.2.2 Fencing

As described within **Section 5.5.2.3**, HDPE exclusion fencing will be installed around the boundaries of the main development parcel / construction area. Locations of fencing can be seen in **Appendix 2**. This will be installed prior to translocation works and will remain in situ until construction is complete.

5.5.2.3 Translocation

Reptile refugia (e.g. roofing felts and tins) will be placed at high density around all areas to be trapped out. Capture of reptiles will take place in suitable weather conditions (i.e. temperatures are 10-18°C with no rain). Capture of reptiles can be carried out between April and September and must be completed prior to construction. All reptiles captured will be moved into the proposed SANG area which serves as the reptile receptor.

The survey indicated that the site supported a low population of Slow Worms, Grass Snakes and Common Lizards and the HGBI (1998) guidelines therefore recommend a minimum of 60 capture effort days are expended. However, given the low number of reptiles identified (peak count of 1 adult Grass Snake, 1 adult Common Lizard and 2 adult Slow Worms), it is considered that 30 capture days would be more proportionate. This will be reviewed on an ad-hoc basis throughout the capture period and the relocation may come to an end once 5 consecutive visits have been carried out without identifying any reptile presence.

5.5.2.4 Destructive Search

Following completion of the translocation, a destructive search will be carried out. An excavator with a toothed bucket will gently remove the surface vegetation and topsoil under supervision of the ECoW and any additional reptiles captured will be moved to the receptor. This must take place in suitable weather / timing (i.e. April to early October, temperatures of 10-20oC with no rain).

5.5.3 Reporting & Further Requirements

The ECoW will oversee the implementation of this method statement. They will ensure the fencing is installed correctly prior to commencement of translocation, oversee capture, and supervise the destructive search.

The ECoW will keep records of a Mitigation Work Log, which will be provided to the Site Manager, and complete the monthly Ecological Inspection Form as part of ecological monitoring (see **Section 5.10**). Monitoring will include checking the HDPE exclusion fencing. Should any repairs be required, these will be reported by the ECoW to the Site Manager. It will be the responsibility of the Site Manager to ensure the fencing is maintained and any repairs are carried immediately as necessary.

5.6 Great Crested Newts (GCN)

5.6.1 Summary

- **Description:** GCN are present on site and will be translocated and excluded from the area of works during the construction phase. Exclusion fencing will be provided around the boundary of the main development parcel / construction area and will connect to the existing exclusion fencing around the GCN receptor. Appropriate habitat will be provided to compensate for losses.
- **Purpose:** To avoid impacts such as killing or injury of GCN and ensure works legally take place under a suitable GCN mitigation licence.
- **Dates:** Trapping to take place prior to construction (between March and October). HDPE and TAF fencing to be installed prior to trapping with TAF fencing removed following completion of trapping and HDPE fencing left in situ until construction is complete.
- **Relevant Personnel:** Ecological Clerk of Works (ECoW), Fencing Contractor and Site Manager.

5.6.2 Method Statement

5.6.2.1 New Natural England European Protected Species Licence

While there is an extant GCN licence for the site, this was obtained in association with an application for nature restoration works for the SANG (WSCC/081/14/HO). Given that this CEMP is associated with a new application for the delivery of a residential development and SANG area and considering that a small number of GCN are understood to still be present on site, it is considered appropriate to apply for a new GCN licence.

The new GCN licence must be obtained prior to any works taking place to suitable GCN habitat on site.

5.6.2.2 Updated Surveys

In support of the new GCN licence application, an updated suite of GCN population surveys will be undertaken between March and June for the waterbodies which previously supported GCN (see P6 and D2 within **Fig 11**). These will be conducted in line with the guidance published within the Great Crested Newt Mitigation Guidelines (English Nature, 2001).

Updated eDNA surveys will also be undertaken between late April and mid-June for all of the waterbodies on site and within 500m of the site which are accessible and considered to be suitable for GCN. These surveys will be completed in accordance with best practice guidance as published by Biggs *et al.* (2014).

5.6.2.3 Fencing

Trapping will be used to exclude GCN from the main development parcel / construction area. HDPE exclusion fencing will be installed around the boundary of this area and this will connect with the existing exclusion fencing present along the boundary of the GCN receptor area (installed by FPCR (2022)). The HDPE fencing will be kept in place for the duration of the construction period with the approximate locations indicated in **Appendix 2**.

Ordinarily, temporary amphibian fencing (TAF) would also be installed within these areas to aid in trapping however, as the main development parcel currently comprises almost entirely of hardstanding and buildings, it will not be possible to install any TAF fencing.

NB the intention is for HDPE exclusion fencing to extent all the way around the boundaries of the site however, due to the extent of hard standing present, it may not be possible to install fencing in some areas.

5.6.2.4 Trapping

Pitfall traps and carpet tiles will be installed approximately every 10m along the inside of fences to facilitate capture of GCN. Trapping will take place for a minimum period of 30 trapping days and until there are at least 5 negative captures days. Any GCN or other amphibians that are captured will be moved to log piles within the receptor area.

The optimal period for trapping is March to May when GCN are migrating, but trapping may also continue until October. Trapping will take place in suitable weather conditions (i.e. when there has been rain in recent days and minimum nighttime temperatures are not less than 6°C). If pitfall trap checking will not take place in the next day, pitfall traps will be securely closed to prevent prolonged entrapment of GCN or other animals.

5.6.2.5 Receptor Area & Compensatory Habitat

Any GCN found will be released into the receptor area located in the northern portion of the SANG on the day of capture (see **Appendix 2**). This area largely comprises of woodland, marshy grassland and ponds which would be classified as 'good' terrestrial habitat (using ARG, 2010). FPCR (2022) further enhanced this area for GCN through the creation of 5 hibernacula and 3 log piles. Given the extent of habitat available within the receptor and the expected low capture numbers, it is considered that the receptor area will have sufficient capacity to sustain the extra population.

5.6.2.6 Destructive Search

Once a point has been reached when the ecologist is satisfied that all reasonable measures have been taken to ensure that newts have been sufficiently captured, all areas of suitable GCN habitat within the main development parcel / construction area will be destructively searched. This would entail the sensitive stripping of vegetation from suitable GCN habitat on site using a toothed bucket. Any natural GCN refugia such as brash piles will also be sensitively dismantled.

Works will be supervised by a suitably qualified ecologist and should be undertaken during the active GCN period (typically late March until early October) when temperatures are above 12°C with sunshine. The supervising ecologist will capture any GCN found and relocate them to the receptor area. The cleared areas will then be regularly managed and maintained unsuitable for GCN for the duration of the works. Please note, any suitable habitat within the root protection zone will not have the topsoil stripped and will only be maintained cut at ground level.

5.6.3 Reporting & Further Requirements

The ECoW will oversee the implementation of this method statement. They will ensure the fencing is installed correctly prior to commencement of trapping, oversee trapping, and supervise the destructive search.

The ECoW will keep records of a GCN Mitigation Work Log, which will be provided to the Site Manager, and complete the monthly Ecological Inspection Form as part of ecological monitoring (see **Section 5.10**). Monitoring will include checking the HDPE exclusion fencing and temporary amphibian fencing. Should any repairs be required, these will be reported by the ECoW to the Site Manager. It will be the responsibility of the Site Manager to ensure the fencing is maintained and any repairs are carried immediately as necessary.

5.7 Hazel Dormice

5.7.1 Summary

- **Description:** There is limited potential for Hazel Dormice to be present within trees and shrubs. Precautionary working methods must be implemented during vegetation clearance.
- **Purpose:** To prevent accidental death or injury to Hazel Dormice.
- **Dates:** Between late April-mid May or during October, prior to construction until completion of construction.
- **Relevant Personnel:** Ecological Clerk of Works (ECoW), Vegetation Clearance Contractor, and Site Manager.

5.7.2 Method Statement

5.7.2.1 Mitigation Dormouse Boxes

Prior to vegetation clearance commencing, 5 Dormouse nest boxes will be installed throughout suitable retained habitat (which will lie outside of private gardens post-development) to act as receptors for any Dormice found during the sensitive clearance works (outlined below).

5.7.2.2 Sensitive Clearance Methodology

All clearance of suitable Dormouse habitat will adopt the following methodology:

- Fingertip search of all vegetation to be cleared, by the licenced ecologist, immediately prior to clearance commencing (on the same day and every day clearance occurs). If any Dormice are found, works will cease and Natural England will be consulted.
- The licenced ecologist will deliver a toolbox talk to the vegetation clearance contractors, detailing the sensitive measures required. The ecologist will then supervise all vegetation clearance. No clearance will be undertaken without the supervision of the ecologist.
- Hand tools will be utilised to sensitively cut vegetation down to ground level in a **single stage**. This will be undertaken in a directional fashion to passively encourage Dormice to move away from the works area towards retained, suitable habitats (i.e retained tree line along southern boundary). All arisings will be moved away from the cleared areas immediately to an area within the central part of the site and will then be chipped and immediately removed from site.
- In the unlikely event of any Dormice being discovered (within areas where they cannot be left in situ), they will be moved (along with their nest) into one of the nest boxes.

No more than 500 m² of habitat will be cleared in a single day and works will take place during late April to mid-May (provided temperatures are warm enough for Dormice to have emerged from hibernation) or during October to avoid the breeding period (but ensure works are done during a time when Dormice are active).

5.6.3 Reporting & Further Requirements

No additional monitoring beyond the monthly ecological monitoring and Ecological Inspection Forms (see **Section 5.10**) is required.

5.8 Nesting Birds

5.8.1 Summary

- **Description:** Vegetation which could support nesting birds will have preventative measures and/or nesting bird checks.
- **Purpose:** To prevent accidental death or injury to birds or disturbance (and abandonment) of nests.
- **Dates:** Prior to construction until completion of construction.
- **Relevant Personnel:** Site Manager, Vegetation Clearance Contractor, and Ecological Clerk of Works (ECoW).

5.8.2 Method Statement

5.8.2.1 Vegetation clearance

Vegetation clearance will be carried out between October and February where possible to avoid bird nesting season.

Where this is not possible, the following measures will be carried out as relevant:

- Any vegetation to be cleared will be checked by the ECoW for nesting birds within 48 hours prior to clearance. If any active nests are present, they will be retained in situ with a minimum c.5m exclusion zone until the birds have fledged. The exclusion zone will be marked with barrier tape with notices placed stating this area will not be disturbed due to nesting birds.

If any birds begin to nest in new buildings being constructed, works will cease and the ECoW will be contacted. An exclusion zone marked with barrier tape and a notice will be put in place as above and works will not proceed until the chicks have fledged.

5.8.3 Reporting & Further Requirements

No additional reporting beyond the monthly ecological monitoring and Ecological Inspection Forms (see **Section 5.10**) is required. However, if nesting activity is identified, active nests may be monitored more regularly to determine when nesting activity is completed for any delayed works to proceed.

5.9 Lighting During Construction

5.9.1 Summary

- **Description:** Artificial lighting will be avoided or minimised.
- **Purpose:** To reduce impacts on bats and other nocturnal wildlife.

- **Dates:** During construction period.
- **Relevant Personnel:** Site Manager.

5.9.2 Method Statement

The following avoidance measures will be carried out during construction to minimise impacts from lighting on nocturnal wildlife:

- Works will be limited to daylight hours and no artificial lighting will be employed unless necessary and agreed with the ECoW
- No lighting will be used outside daytime working hours. If required for security, this will be on a motion sensor with a time limit.
- Where lighting is necessary, it will be directed away from retained habitats, site boundaries or Biodiversity Protection Zones.

5.9.3 Reporting & Further Requirements

No additional monitoring beyond the monthly ecological reporting (see **Section 5.10**) is required. Any changes to lighting will be reported to the ECoW by the Site Manager.

5.10 Ecological Monitoring During Construction

5.10.1 Summary

- **Description:** Monthly monitoring will be carried out.
- **Purpose:** To ensure protection of retained habitats and protected species.
- **Dates:** Beginning at least one month prior to construction and until the completion of construction works.
- **Relevant Personnel:** Ecological Clerk of Works (ECoW).

5.10.2 Method Statement

Monthly inspections by an ecologist will be carried out of the following to ensure compliance with the CEMP:

- Fencing is correctly installed and remains in good repair;
- Biodiversity Protection Zones (BPZs) are protected and in good condition;
- Condition of all retained habitats;
- Implementation of all previous method statements, with the following specific actions as relevant:
 - I. Inspection of compensatory bat boxes to ensure correctly installed;
 - II. Identification of any signs of Badger or mammal activity;
 - III. Identification of any nesting bird activity that may be impacted by works;
 - IV. Adherence to the lighting strategy;
 - V. Adherence to specific requirements under the EPSL for bats and for GCN;
 - VI. Adherence to specific requirements under the mitigation strategy for reptiles;
 - VII. Adherence to specific precautionary working methods for Hazel Dormice and nesting birds;

VIII. Adherence to avoidance measures for nocturnal mammals.

5.10.3 Reporting & Further Requirements

An Ecological Inspection Form will be completed monthly by the ecologist, which will summarise the findings of the monthly inspection. The form will be provided to the Site Manager and Client. If any immediate action is required, the Site Manager and Client will be informed immediately, with necessary remedial actions to be carried out as soon as possible.

6.0 TIMING OF SENSITIVE WORKS

6.1 Construction Programme

Based on feedback from the developer, the proposed construction dates are from June / July 2025 – August 2028.

6.2 Timing of Sensitive Works

Timings for sensitive works are required. The above method statements detail where specific timings are required. A summary of timings of sensitive works can be seen in **Table 3**.

Table 3. Summary of timings of sensitive works on site.

Species & Relevant Method Statement	Dates / Weather Conditions	Details
Roosting bats (Section 5.3)	March – October (optimal) Can be carried out in suitable weather conditions (dry/calm and temperatures are no lower than 8°C for at least an hour or two from dusk on 3-4 consecutive nights prior to works)	Sensitive demolition of buildings in accordance with the approved EPSL.
Reptiles (Section 5.5)	April to September in suitable weather 10-18°C	Translocation of reptiles (exclusion fencing and refugia to be installed prior to this).
	March – October in suitable weather >12°C	Destructive search for reptiles.
GCN (Section 5.6)	March – May (optimal) to October when night temperatures not <6°C and not too dry	GCN trapping operation (exclusion fencing and pitfall traps to be installed prior to this).
	March – October in suitable weather >12°C	Destructive search for GCN.
Hazel Dormice (Section 5.7)	Late April – mid May or October	Sensitive vegetation clearance with installation of mitigatory Dormouse boxes prior to works.
Nesting birds (Section 5.8)	October - February	Vegetation clearance should be carried out outside bird nesting season. If not possible, a nesting bird check will be required between March-Sep, with any nests suitably protected.

7.0 RESPONSIBLE PERSONS AND LINES OF COMMUNICATION

7.1 Ecological Clerk of Works (ECoW)

A suitably qualified Ecological Clerk of Works (ECoW) will be appointed for the development. This person will have suitable qualifications, training, experience and licences to carry out the works on site. The ECoW will be responsible for providing advice to the Client and Site Manager appointed and overseeing sensitive works as needed.

The ECoW will have the following specific responsibilities for the duration of the project:

- Implementation of method statements to ensure all ecological features are protected with mitigation, compensation and enhancements carried out as needed;
- Provision of training and informative updates such as through toolbox talks;
- Completion of monitoring and reporting as per **Section 5.10**;
- Supervision of all sensitive works, as per the method statements;
- Investigation and reporting of any incidents which may affect ecological features (e.g. spills, pollution, damage to retained habitats, protected species in works site, etc.)
- Completion of regular records and reporting to Site Manager, Client, Contractors, Natural England, LPA, etc. as needed;
- Completion of licence returns to Natural England upon completion of works;
- Provision of advice to the Client on any ecological constraints or features as needed; and
- Monitoring post-construction to ensure a compliance check of all compensation / enhancement features, management of habitats and implementation of any additional mitigation needed;

It is highly recommended that the ECoW is the named ecologist for any licences required (e.g. bat mitigation EPSL and GCN mitigation EPSL). If this is not possible, the ECoW will be responsible for:

- Communicating regularly with the named ecologist and monitoring works as necessary;
- Confirm when the named ecologist will be required for works.

7.2 Roles

The CEMP (Biodiversity) will be distributed to all responsible parties to ensure that the environmental requirements are communicated effectively. **Table 4** below describes the roles and responsibilities to ensure the implementation of this CEMP. It is the overall responsibility of the Client to ensure roles are appointed prior to works commencing and that the Contractors are suitably trained to be carrying out the work.

Table 4. Key roles and responsibilities.

Role	Responsible Party	Responsibilities
Client	Developer	- Responsible for appointing Contractors and ensuring all contractors comply with environmental legislation - Responsible for appointing ECoW - Overall responsibility for the implementation of this CEMP
Lead Contractor	TBC	- Responsible for appointing Site Manager - Prepare site specific Risk Assessment and Method Statements taking into account all environmental issues
Site Manager	TBC	- Have a detailed understanding of ecological constraints on site - Provide toolbox talk for all new contractors/sub-contractors as part of site induction - Regular communication with ECoW - Ensure works on site conform to method statements
Contractor/Sub-Contractors	TBC	- Understand ecological constraints on site (i.e. through the toolbox talk as part of site induction) - Report any concerns to Site Manager - Take appropriate action to rectify any non-conformance
Ecological Clerk of Works	TBC	- As described in Section 7.1 - Maintain regular communication and report to Site Manager all ecological constraints, findings or breaches of the CEMP within the site; - Provide monitoring reports to Client at regular intervals
Licenced Ecologist	TBC	Responsible for obtaining the GCN EPS licence and will be the point of contact for any works that might affect the parameters of that licence.

7.3 Training Awareness and Competence

Site staff shall be competent to perform tasks that have the potential to cause a significant ecological impact. Competence is defined in terms of appropriate education, training and experience. Ecological awareness and training shall be achieved by:

- Site induction, including a talk given by the ECoW (or by the Site Manager after the initial Toolbox Talk), during which information on all ecological sensitivities, constraints and the method statements within this CEMP will be provided. The importance of leaving areas outside of the construction zone undisturbed once the protective fencing is installed will be emphasised.

- Information on protected species will be given including field signs to look out for during construction work.
- Environmental posters and site notices will be erected around the site.

7.4 Line of Communication Regarding Ecological Issues

Prior to works getting underway, all staff will be aware of the ecological features and associated issues on site. They will be conscious of the impacts of their actions not only on the retained areas on site but also the locality of nationally and internationally designated sites nearby. They will also be mindful during works of field signs of protected species and finally of the steps to take in the eventuality that an ecological situation arises. Therefore, as soon as an issue is uncovered/advice is needed, the Site Manager will be contacted immediately, who will inform the ECoW to visit site if needed and to advise accordingly.

8.0 SUMMARY OF CEMP

Table 5 below provides a summary of the construction mitigation measures, species at risk, responsibilities and timing of year the works are to be undertaken.

Table 5. Summary of the CEMP (Biodiversity) detailing mitigation measures required, who is responsible for these measures, and when such measures must be carried out.

Ecological Feature	Mitigation Required	Responsible Party / Parties	Timing
Retained habitats	Protective fencing will be put in place to protect retained habitat and BPZs (Section 5.2)	Site manager	Any time prior to construction
	Toolbox talk will be provided to all personnel accessing site to outline ecological features and risks (Section 5.1)	ECoW Site Manager	Any time prior to construction and continuing during construction for new staff
	Regular monitoring will be carried out of fencing. Any damage to protective fencing will be reported to the site manager, who will organize repairs (Section 5.10)	ECoW Site Manager	Prior to and during construction
	Ecological monitoring will be carried out including inspection of habitats regularly (Section 5.10)	ECoW Site Manager	Monthly by site manager and bi-annually by ecologist throughout entire construction period
Roosting bats	A Natural England bat mitigation licence will be obtained for all works potentially affecting the identified roosts within B1 and B4a (Section 5.3).	ECoW	EPSL in place prior to commencement of building demolition works
	All mitigating bat boxes will be installed prior to destruction of the identified bat roosts (Section 5.3).	ECoW	Anytime prior to demolition
	A pre-construction check will be carried out immediately before demolition to check for bats (Section 5.3).	ECoW (and Named Ecologist if not same person)	Anytime in suitable weather (but March to October is optimal)
	All works to be carried out as per Section 5.3 bat method statement including soft demolition with supervision by the licensed ecologist.		
Foraging and commuting bats	A sensitive lighting method statement will be in place and adhered to throughout the construction period (Section 5.9).	Site Manager	During construction

Badgers and nocturnal mammals	Precautionary measures will be employed during construction (Section 5.4)	Site Manager	Throughout construction period
	Artificial lighting will be avoided or sensitive measures will be used (Section 5.9)	Site Manager	Throughout construction period
Reptiles	HDPE exclusion fencing to be installed as per Appendix 2	Site Manager Fencing Contractor	Immediately prior to reptile capture
	Reptiles will be trapped out of the construction area and moved into the receptor site (Section 5.5).	ECoW	April to September in suitable weather conditions Prior to construction
	A destructive search will be conducted following completion of the trapping (Section 5.5).	ECoW	April to September in suitable weather conditions
	Fencing to be regularly monitored to ensure it remains in good condition with any damage to be repaired (Section 5.10).	ECoW Site Manager	Monthly throughout construction
	All exclusion fencing will be removed after construction is complete (Section 5.5).	Site Manager Fencing Contractor	After completion of all construction
Great Crested Newts	A Natural England GCN mitigation licence will be obtained prior to works to any suitable GCN habitat (Section 5.6).	Licenced Ecologist	EPSL in place prior to removal of suitable GCN habitat
	TAF and HDPE exclusion fencing to be installed (Section 5.6).	Licenced Ecologist Fencing Contractor	Immediately prior to GCN capture
	GCN will be trapped out of the construction area and moved into the receptor site (under the granted GCN mitigation licence) (Section 5.6)	Licenced Ecologist	Optimal period March to May, can continue into October, suitable weather conditions. Prior to construction.
	Destructive search of suitable habitat areas and hand searches of refugia under supervision of an ecologist (Section 5.6)	Licenced Ecologist	March to October in suitable weather Prior to Construction
	Fencing to be regularly monitored to ensure it remains in good condition with any damage to be repaired (Section 5.10).	Licenced Ecologist Site Manager	Monthly throughout construction

	All exclusion fencing will be removed after construction is complete (Section 5.5).	Site Manager Licenced Ecologist Fencing Contractor	After completion of all construction
Hazel Dormice	Installation of mitigation Dormouse boxes (Section 5.7).	ECoW	Prior to vegetation clearance
	Sensitive removal of suitable Dormouse habitat under supervision of an ecologist (Section 5.7).	ECoW	Late April – mid May or October Prior to construction
Nesting birds	Timing of vegetation clearance to avoid nesting season (Section 5.8).	Site Manager	October – February
	If not possible to avoid vegetation clearance outside nesting season, a nesting bird check will be carried out. Any identified nests will be retained with a suitable exclusion zone (typically c.5m exclusion zone in vegetation) (Section 5.8).	ECoW	March – September, within 48 hours prior to works
All features	Monthly monitoring inspections will be carried out by the site manager and bi-annual inspections by the ecologist to inspect all features and ensure compliance with CEMP.	ECoW Site Manager	Monthly by site manager and bi-annually by ecologist throughout entire construction period

9.0 REFERENCES

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APPENDIX 1. Biodiversity Protection Zones



Legend

— Site Boundary

--- West Hoathly SSSI Boundary

--- ASNW Boundary

++ Heras fencing

Biodiversity Protection Zones

■ GCN receptor

■ Wider SANG

■ 15m ASNW buffer

■ Retained boundary habitats



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Map	Biodiversity Protection Zones (BPZs)
Site	West Hoathly Brickworks, Sharpthorne
Client	Ashill Reg Ltd
Date	20/02/2025

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APPENDIX 2. Reptile / GCN Fencing and Receptor Plan



Legend

- Site Boundary
- Reptile and GCN capture area
- GCN receptor area within proposed SANG (reptiles may be translocated here or into the wider SANG)
- Wider SANG area (reptiles may be translocated into this area)
- - - New HDPE exclusion fencing to be installed around boundaries of construction area
- - - Existing exclusion fencing installed around the boundary of the GCN receptor by FPCR as part of the extant GCN licence
- ◊ Existing bespoke gate to allow human access into SANG without disrupting effectiveness of GCN exclusion fencing



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Map	GCN / Reptile Fencing & Receptor Plan
Site	West Hoathly Brickworks
Client	Ashill Reg Ltd
Date	19/02/2025

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APPENDIX 3. Ecological Inspection Form

Report no. _____ Date: _____	Ecological Inspection Form
Site Conditions	
Biodiversity Protection Zones & Retained Habitats	Is protective fencing in place?..... Condition..... CEMP Compliance: YES / NO Action required..... Responsibility..... Date must be completed..... Additional Comments.....
Lighting strategy	Comments..... CEMP Compliance: YES / NO Proposed changes..... Responsibility..... Date must be completed.....
Avoidance Measures for Nocturnal Mammals	Comments..... CEMP Compliance: YES / NO Remedial action:..... Responsibility..... Date must be completed.....
Species specific method statements	
Bats	Works completed since previous inspection.....

	 Works planned..... CEMP Compliance: YES / NO Departures from CEMP..... Action required..... Responsibility..... Date must be completed.....
Reptiles	Works completed since previous inspection..... Works planned..... CEMP Compliance: YES / NO Departures from CEMP..... Action required..... Responsibility..... Date must be completed.....
GCN	Works completed since previous inspection..... Works planned..... CEMP Compliance: YES / NO Departures from CEMP..... Action required.....

	Responsibility..... Date must be completed.....
Hazel Dormice	Works completed since previous inspection..... Works planned..... CEMP Compliance: YES / NO Departures from CEMP..... Action required..... Responsibility..... Date must be completed.....
Nesting Birds	Description..... Restrictions on works..... CEMP Compliance: YES / NO Departures from CEMP..... Action required..... Responsibility..... Date must be completed.....
Badgers	Any potential badger setts / holes..... CEMP Compliance: YES / NO Departures from CEMP..... Action required.....

	Responsibility..... Date must be completed.....
Any other relevant works	Description..... Action required..... Responsibility..... Date must be completed.....
Signed by ECoW	
Date	
Communicated to and copy has been provided to Site Manager	YES / NO (if no, state reason)