



Construction Environmental Management Plan (CEMP)

Imberhorne Farm, East
Grinstead

Ecosupport Ltd
K4 Keppel,
Daedalus Park,
Lee-on-the-Solent
PO13 9FX

info@ecosupport.co.uk

VAT: 228 4314 18



Report	Construction Environmental Management Plan (eCEMP): Biodiversity (Condition 31)
Site Name	Imberhorne Farm, East Grinstead
Author(s)	Lewis Lakudzala BSc (Hons), MRes ACIEEM
Checked by	Lyndsey Barratt BSc (Hons) PGCert MCIEEM
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TABLE OF CONTENTS

1.0 INTRODUCTION	4
1.1 Brief.....	4
1.2 Aim	4
1.3 Site Description	5
1.4 Development Proposals.....	5
2.0 ECOLOGICAL BASELINE	7
2.1 Habitats	7
2.2. Bats	9
2.2.1 Previous Survey Work	9
2.2.2 Ground Level Tree Assessments (GLTA) (trees).....	9
2.2.3 Activity Surveys & Static Monitoring (2024).....	11
[REDACTED]	11
2.4 Reptiles.....	12
2.5 Great Crested Newt	12
2.6 Dormice	12
2.7 Breeding and Nesting Birds.....	12
2.8 Designated Sites	13
2.8.1 Ashdown Forest SPA	13
2.8.2 Other Designated Sites.....	13
3.0 SPECIES SPECIFIC MITIGATION	15
3.1 Protection of Retained Trees	15
3.2 Bats	15
3.2.1 Trees.....	15
3.2.2 Lighting During Construction	16
[REDACTED]	
[REDACTED]	
[REDACTED]	17
3.4 Reptile Mitigation Strategy.....	17
3.4.1 Introduction	17
3.4.2 Receptor Area	17
3.4.3 Capture	18
3.4.4 Reptile Hibernacula	20
3.4.5 Log Piles	20
3.5 Great Crested Newts	21
3.5.1 Capture & Exclusion Methods	21
3.5.2 Release Area	21
3.5.3 Capture Effort	21
3.5.4 Destructive Search	22
3.5.5 Site Drainage.....	22
3.5.6 District Level Licensing (DLL).....	22
3.3.7 Toolbox Talk.....	23
3.3.8 Sensitive Habitat Removal	23

3.4 Dormice	23
3.4.1 European Protected Species Licence	23
3.4.2 Vegetation Clearance	23
3.4.3 Minimising Disturbance	24
3.4.4 Dormouse Boxes	25
3.4.5 Newly Planted Areas	25
3.4.6 Responsibility	25
3.5 Breeding and Nesting Birds.....	25
4.0 WATER QUALITY	26
5.0 AIR QUALITY	28
6.0 NOISE, VISUAL and VIBRATION.....	32
7.0 HAZARDOUS SUBSTANCES.....	34
8.0 WASTE DISPOSAL.....	36
9.0 RISK ASSESSMENT.....	37
10.0 RESPONSIBILITY	39
10.1 Training Awareness and Competence.....	40
10.2 Communication	40
10.3 Line of Communication Regarding Ecological Issues	41
10.4 Complaints and Incidents	41
11.0 CONCLUSION	43
12.0 REFERENCES.....	44
APPENDIX I - DISTRICT LEVEL LICENSING CERTIFICATION	45

1.0 INTRODUCTION

1.1 Brief

Ecosupport Ltd were commissioned by Vistry to produce a Construction Environmental Management Plan (CEMP): Biodiversity for the development of the site known as Imberhorne Farm', in East Grinstead. This was requested to satisfy the discharge of condition 31 of the planning approval (DM/23/2699), which states the following:

No development shall take place until 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.

- *Risk assessment of potentially damaging construction activities.*
- *Identification of "biodiversity protection zones".*
- *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).*
- *The location and timing of sensitive works to avoid harm to biodiversity features.*
- *The times during construction when specialist ecologists need to be present on site to oversee works.*
- *Responsible persons and lines of communication.*
- *The role and responsibilities on site of an ecological clerk of works (ECOW) or similarly competent person.*
- *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 (as amended) and to accord with policy DP38 of the Mid Sussex District Plan 2014-2031."

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, GCN, breeding and nesting birds, reptiles, [REDACTED] and Hazel Dormice. This report details the approach that 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;

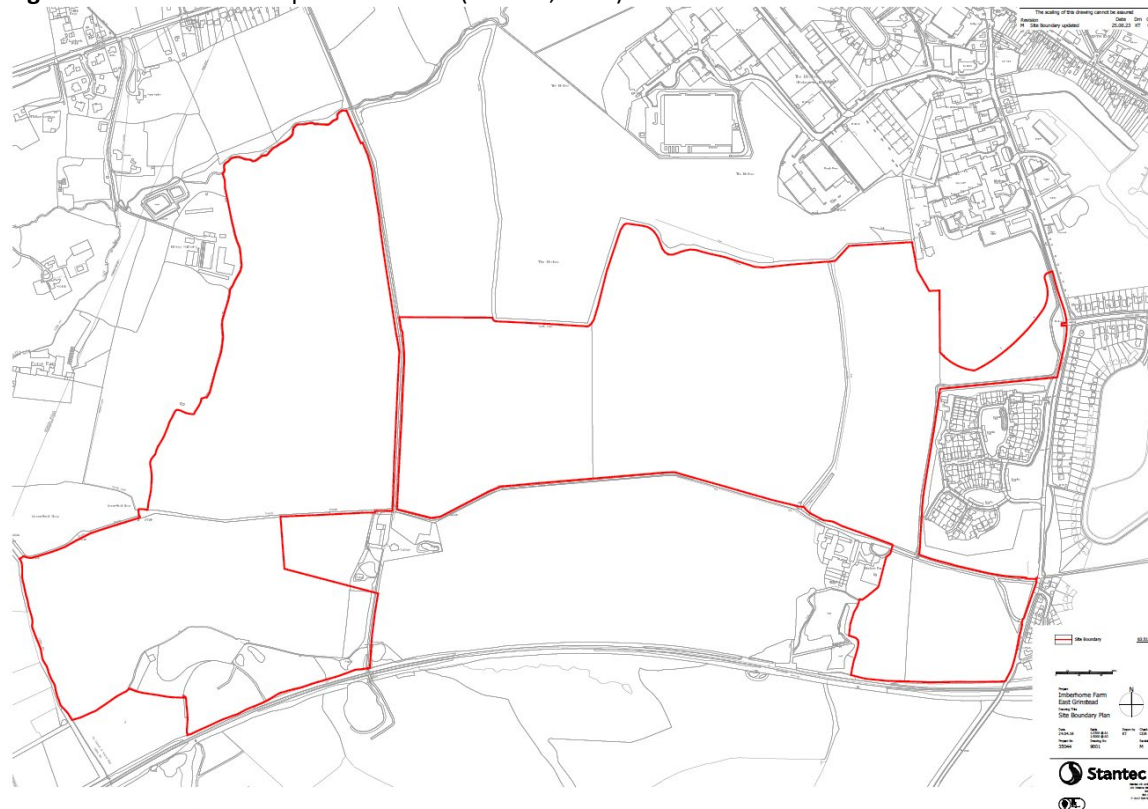
- Details of locations and timing of works to avoid impacts on protected species;
- Outline works which require supervision by an Ecological Clerk of Works (ECOW)
- Outline the roles and responsibilities and lines of communication of the involved parties including the developer, site manager, ECoW and 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 of several arable parcels separated by boundary hedgerows and trees with a parcel of woodland on the southwest. The site is located to the east of Imberhorne Lane, East Grinstead, West Sussex, RH19 1RP (centred on OS grid reference TQ 36810 38625) (**Figure 1**). The site is situated west of the town of East Grinstead and is immediately surrounded by woodland compartments, agricultural fields and residential development.

Figure 1. Redline location plan of the site (Stantec, 2018).



1.4 Development Proposals

Planning application for the construction of 550 residential housing units with associated infrastructure and landscaping. The development will be considered in conjunction with the SANGS proposals to the east.

Figure 2. Proposed development plans (Stantec, 2023).

2.0 ECOLOGICAL BASELINE

2.1 Habitats

The initial Preliminary Ecological Appraisal (PEA) was undertaken by the Ecology Partnership in 2016 with updated assessments in 2018 and 2021. The initial field survey which forms the basis of the findings of this report was carried out by Lyndsey Barratt BSc (Hons) PGCert ACIEEM and Lewis Lakudzala BSc (Hons), MRes ACIEEM on the 4th April 2024. Weather conditions were 12 °c with 70% cloud cover. The most recent field survey was undertaken by Lewis Lakudzala BSc (Hons) MRes ACIEEM and Abby Woolston BSc (Hons) MRes on the 25th November 2025. Weather conditions were 7 °c with 90% cloud cover.

Habitats on site pre-development were identified in accordance with the categories specified for a UK Habitats survey, using Habitat Definitions Version 2.0 (UKHab Ltd., 2023). This was chosen as an appropriate habitat categorisation system as it fits within the Biodiversity Metric calculation. Where appropriate primary habitat codes were used although for some habitat types, the use of secondary habitat codes was necessary as well.

For clarity, the site has been divided into sections. The survey findings in this report correspond to the sections shown on the plan below.

Figure 3. Plan displaying the numbered field parcels on the site.

N.B. Parcels 1 and 2 relate to the SANG which is covered under a separate planning application.

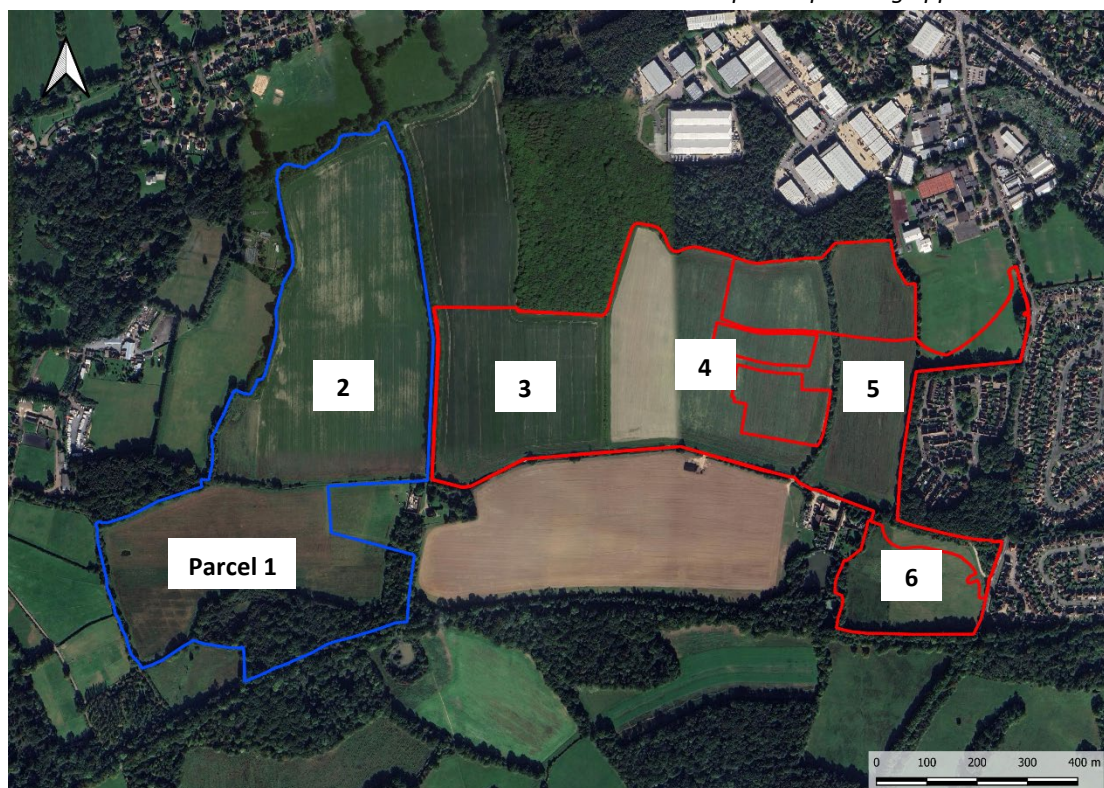
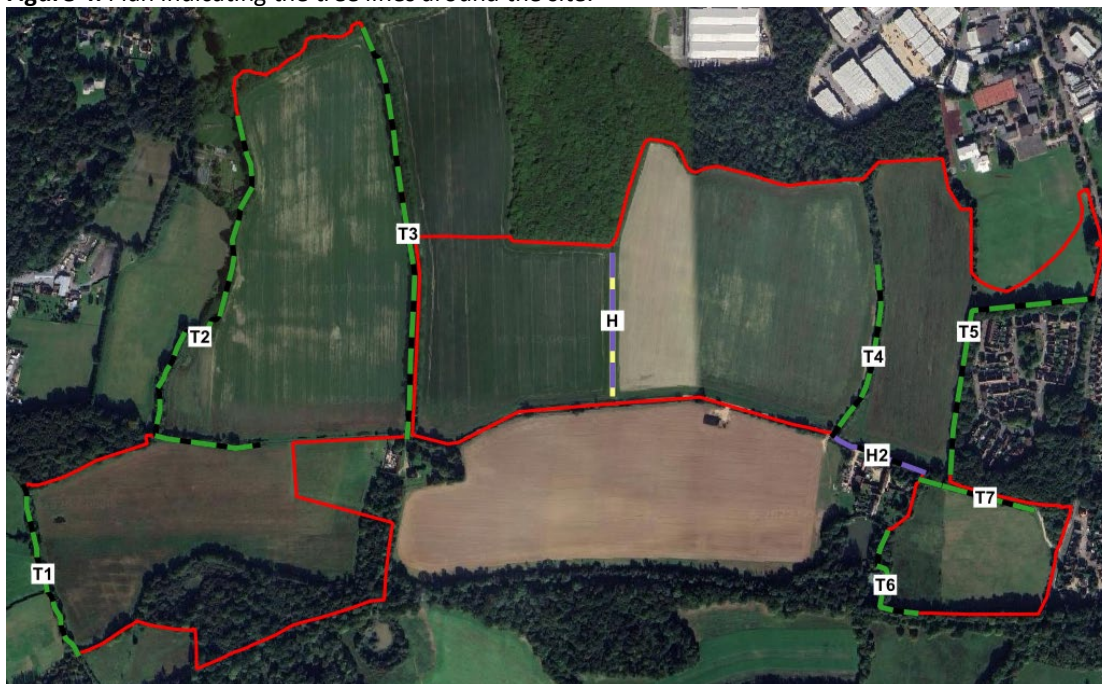


Figure 4. Plan indicating the tree lines around the site.

A full description of the habitats present on site can be found within the Ecological Impact Assessment (EclA) associate with the outline application (The Ecology Partnership, 2018 & 2021), however a list of the habitats identified on-site is provided below.

The following habitats were identified across the site:

- Temporary Grass and Clover Leys (c1c) with bare ground (510), recent management (517)
- Modified Grassland (g4) with bare ground (510)
- Modified Grassland (g4) with rushes dominant (15), seasonally wet (502)
- Lowland Mixed Deciduous Woodland with ancient woodland site (28), ponds (priority habitat) (40), coppice (210)
- Woodland (w) with plantation (29)
- Ecologically Valuable Line of trees (34) (w1f) with scattered scrub (10) and ditch (50)
- Species-rich Native Hedgerow (Priority Habitat) (h2a5)
- Hawthorn Hedgerow (h2a6) with active management (516)
- Bramble Scrub (h3d) with ditch (50)
- Blackthorn Scrub (h3a)
- Other Standing Water (r1g) with pond (non-priority) (41)
- Stream (r2b)
- Pond (r)

2.2. Bats

2.2.1 Previous Survey Work

The survey work carried out by The Ecology Partnership (2016) identified Common Pipistrelles (*Pipistrellus pipistrellus*) as the most dominant species during the activity surveys and static monitoring. Other species included Serotine (*Eptesicus serotinus*), Noctule (*Nyctalus noctula*), *Myotis* spp., Brown Long-eared Bats (*Plecotus auritus*) and Soprano Pipistrelles (*Pipistrellus pygmaeus*), with a low number of Leislars (*Nyctalus leisleri*) and Nathusius Pipistrelle (*Pipistrellus nathusii*). The species on-site were comprised largely common and widespread species.

Updated surveys conducted in 2018 provided similar results, with Common Pipistrelles abundant with occasional Soprano Pipistrelles, and infrequent Noctule and *Myotis* spp. and very low numbers of Brown Long-eared Bats and Serotines.

2.2.2 Ground Level Tree Assessments (GLTA) (trees)

During the walkover assessment in 2023, a single tree on site was identified to support potential for roosting bats. This was an oak tree situated within tree line T1 (which was recorded to support three cavities caused by limb tear-outs. The tree was considered to be **PRF – I** for roosting bats (suitable for individual bats).

During updated GLTA assessments undertaken in 2025, all trees proposed for removal were subject to a full, exhaustive ground level tree assessment (GLTA) to determine suitability for roosting bats. A total of 9 trees were identified to support potential for roosting bats. The trees were located within two tree lines, one adjacent to the proposed access road and the other further to the north (see **Figure 5**). Species included 7x Oak (*Quercus robur*) and 2x Horse Chestnut (*Aesculus hippocastanum*). Of the 9 trees identified to support bat roost potential, 6 oak trees were assessed as PRF-M (suitable for maternity roosts and/or multiple bats), while the remaining Oaks (1) and Horse Chestnut Trees (2) were PRF-I (suitable for individual bats).

Figure 5. The locations of the trees on the east of the site which were identified to support potential for roosting bats.



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

2.4 Reptiles

Reptile surveys were undertaken on site in 2016, 2019 and 2024 after identifying potential for reptiles within grassland around the boundaries of the site. The reptile surveys in 2016 (The Ecology Partnership) recorded populations of Common Lizards (*Zootoca vivipara*) and Slow Worm (*Anguis fragilis*). Updated reptile surveys in 2019 recorded Grass Snakes (*Natrix natrix*), Slow Worms And Common Lizards. The reptiles were recorded predominantly along the boundary to the west of the Imberhorne School and in the southeast parcel. No reptiles were located along the margins of the arable fields. The surveys in 2024 recorded a peak count of 2 Slow Worms (one adult male and one sub-adult) and two Common Lizards, recorded across multiple visits. No juvenile Slow Worms were recorded. As such, low populations of Slow Worm, Common Lizard and Grass snakes are present on this site.

2.5 Great Crested Newt

The surveys conducted in 2024 indicated that there was a '**low**' population of GCN present within Pond 10 (Froglife 2001), with the pond being a likely non-breeding pond for low numbers of GCN (maximum count of 2 GCN). Incidentally, low numbers of common newt species were also identified during the 2025 surveys conducted. Due to the presence of GCN within a number of ponds nearby to the site, and the close proximity of the ponds to one another, it is considered likely that GCN will be utilising several of the ponds nearby to the site.

2.6 Dormice

One Dormouse nest was recorded within the western tree line of field 3 during updated surveys completed by Ecosupport in 2024, therefore presence is highly likely to have been established within all areas of suitable habitat on site as well as within all connecting suitable habitat in the local area. Although no confirmed evidence of Dormice utilising the site for breeding purposes was recorded, it is considered likely there is a breeding population on-site due to the presence of nests. Using the valuation criteria outlined within CIEEMs *Guidelines of Ecological Impact Assessment in the United Kingdom* (2018) the site can be considered to be of **County Value** for Dormice, although there is a significant amount of alternative suitable habitat within the immediate local area, including ancient woodland immediately to the north of the site.

2.7 Breeding and Nesting Birds

A total of 49 bird species were recorded during the breeding bird surveys within or immediately beyond the site boundaries. Of the species observed, 23 appear on the Birds of Conservation Concern (BoCC) as declining (red or amber lists) (Eaton *et al.*, 2015) and / or are listed as Species of Principle Importance (SoPI) under the NERC Act (2006). A total of 8 Red-listed and 13 Amber-listed Birds of Conservation Concern were recorded as using the site as a resource, or likely using the site. Of these, at least 10 species were found to be nesting/breeding or likely to be nesting/breeding within or in close proximity to the site. Red and Amber-listed species recorded on site with their SOS status description and approximate numerical range in Sussex (Sussex Ornithology Society, 2020).

A number of the Red & Amber listed species recorded on site are likely to be adaptive to the proposed housing scheme and associated landscaping and open space creation, these include Wrens. These species will adapt fairly readily to semi urban landscapes. With appropriate retention of habitats, linear features and the inclusion of suitable nesting features it would be considered reasonable that the

housing proposal can provide suitable environments for these species to re-establish territories in the future.

2.8 Designated Sites

In addition to the habitats and species identified on site, designated sites outside of the development boundary that may be impacted must be considered. The previous ecological reports (The Ecology Partnership & Ecosupport) identified 2 European designated sites and 2 non-statutory designated sites which may be potentially impacted by the development.

2.8.1 Ashdown Forest SPA

Ashdown Forest SPA SAC & SSSI are approximately 5.3km southeast, an extensive area of woodland interspersed with wet and dry heath, these habitats support breeding populations of international importance of both Dartford warbler and nightjar for which the site is designated an SPA. Ground nesting birds are particularly vulnerable to disturbance from increases in recreational pressure brought about by the growth in local population that can result from housing developments.

The site lies within the 7km zone of influence around the Ashdown Forest detailed within local planning policy **DP15**. This is the zone where mitigation measures such as the implementation of SANG are likely to be successful, alleviating the impact of recreational pressure through provision of more readily accessible greenspace.

The proposals incorporate the provision of SANG on the western side of the site. The proposed SANGS area extends to 42.55ha in size and is considered to be significant in terms of recreational provision for the new development and would also provide surplus recreational space (as calculated by Natural England 8ha per 1,000 population) for the local population. The SANGS will be linked to the development and existing footpaths and the Worth Way. This will provide an extensive area of open space for the wider community.

For more detailed assessment on impacts to designated sites, refer to the Report to inform Habitat Regulations Assessment Screening Assessment (The Ecology Partnership, 2018) carried out as part of the outline application.

2.8.2 Other Designated Sites

Hedgecourt SSSI is the only statutory designation with a 2km radius. Given the lack of direct connectivity, distance from the site and developed nature of intervening land, it is considered that the proposals would not result in the loss, fragmentation or isolation of this habitat.

The proposals are for an extensive new residential development. However, alongside the development, an extensive SANGS will be designed to integrate and link to the residential development. This will ensure impacts on designated sites due to recreational pressure will be avoided. Furthermore, LEAP and LAPS will be integrated into the residential development design. Therefore, this aspect of local policy **C5** is not considered further.

The development will also include a new primary school and care home. These features will support sports pitches and open space provision within their design, and as such will include recreational features associated with such institutions.

In terms of non-statutory designations, there are two local wildlife sites within 2km, the nearest of which is Worthy Way that runs adjacent to the boundary of the southern field.

The Worth Way is already subject to recreational use and supports a surfaced path that runs along the designation. This has been designed to support recreational use and therefore is likely able to absorb the impacts of increased footfall. The creation of additional walking routes within the SANGS will provide new local opportunities for recreation and as such may provide some alternatives to the Worth Way. No significant impacts are therefore predicted for the Worth Way non-statutory designation site as a result of proposals.

Lobbs Wood and Furnace Pond is located approximately 2km to the west of the site. Considering the distance and the proposals no impacts are predicted on this designated site. As such policy **C5** is not considered further.

3.0 SPECIES SPECIFIC MITIGATION

The following species-specific mitigation will be included within the proposed development.

3.1 Protection of Retained Trees

Any of the trees/hedgerows on site to be retained as part of the proposals will be protected from damage during the works. The trees/hedgerows will be fenced using Heras fencing or similar to prevent access by machinery. This will ensure that the trees are not directly impacted upon during the works and that the root protection zones are not compacted.

3.2 Bats

3.2.1 Trees

3.2.1.1 Initial Potential Roost Feature (PRF) Inspection Surveys

For all trees assessed as PRF-M (potential for maternity roosts and/or multiple bats) (see **Figure 5**), a total of three PRF inspection surveys will be required between May – September (with at least two between May – August), with these visits spaced at least 3 weeks apart (BCT, 2023).

3.2.1.2 Precautionary Working Method Statement (PWMS)

For trees assessed as PRF-I (suitable for individual bats only) (**Figure 5**), the *Roost Resource Approach* will be followed in which no further surveys are required, and a precautionary working method statement will be adhered to (BCT, 2023). The following Precautionary Working Method Statement (PWMS) will be adopted to during works to the tree.

- Any PRFs will be inspected using an endoscope under the supervision of a suitably qualified ecologist immediately prior to tree felling/works. This includes any Ivy being carefully pulled back and checked for bats.
- These works will be conducted between March and October (dependent on suitable weather conditions).
- If all features have been fully inspected and no evidence of bats is identified, the tree must be immediately felled.
- If any features cannot be fully inspected, the tree must be soft-felled.
- If evidence of bats is identified or if any PRF-Ms are found, further survey work will be required. In particular, if bats are found to be present, roost characterisation surveys will be carried out to inform a European Protected Species Licence and a full mitigation strategy will be required.

3.2.1.3 Additional Tree Removal

Any further trees that require removal or remedial works, in addition to those previously already agreed to at the planning stage, will be subject to a detailed ground-based assessment conducted by a qualified ecologist prior to commencement. For trees with Potential Roost Features (PRFs), survey methodology in **Table 1** will be followed if potential for bat roosts is identified.

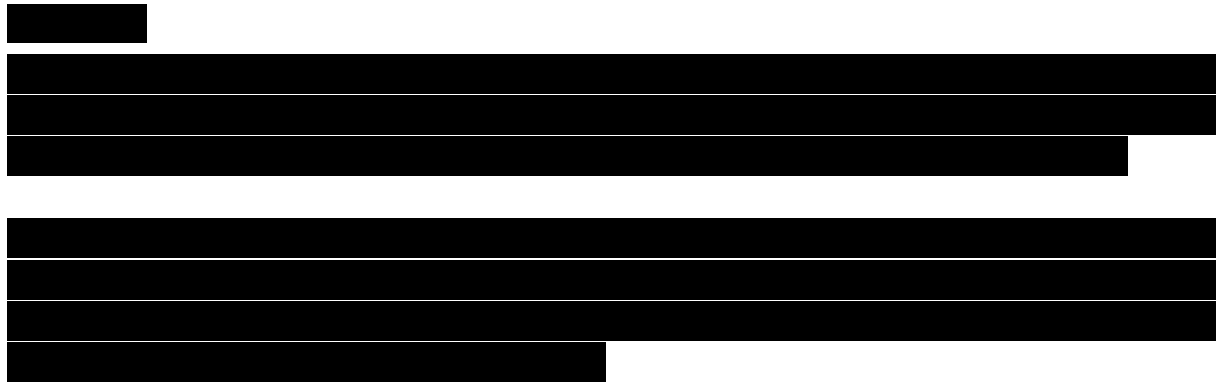
Table 1. Recommended minimum number of survey visits (from Table 7.3, BCT 2016).

Low Roost Suitability	Moderate Roost Suitability	High Roost Suitability / Known Roost
Soft felling undertaken under the supervision of an ecologist.	Two separate survey visits. One dusk emergence and a separate dawn re-entry survey.	Three separate survey visits. At least one dusk emergence and a separate dawn re-entry survey. The third could be either dusk or dawn.

3.2.2 Lighting During Construction

In order to avoid any disturbance to bats (and other potential nocturnal wildlife), construction works within the vicinity of trees and linear features will be limited to appropriate hours. 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).

[REDACTED]	
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3.4 Reptile Mitigation Strategy

3.4.1 Introduction

Due to the legal protection relating to reptiles, it is necessary to implement mitigation to ensure these animals are not harmed as a result of the impending construction works and to ensure that there is no net reduction in the conservation status of reptiles in the local area. Therefore, this mitigation strategy has been produced in accordance with best practice guidelines relating to reptiles and development, published by Gent & Gibson (1998) and the HGBI (1998).

The desirable approach is to avoid development within the areas used by reptiles. If this is not possible, reptiles should be moved to areas within the site that are to be retained, enhanced and managed to provide suitable habitat (relocation). The steps in the mitigation strategy for reptiles are as follows:

- Step 1:** Identification of suitable release area. If a separate site is to be used, it may be necessary to undertake a reptile survey of any potential receptor site to establish the status of existing reptile populations on the site;
- Step 2:** Production and agreement of mitigation strategy;
- Step 3:** Habitat creation, enhancement and/or management of receptor site area (if required);
- Step 4:** Set up of development site with appropriate numbers of artificial refugia and reptile exclusion fencing;
- Step 5:** Capture of reptiles on site and translocation/relocation. This stage must take place between March and September, in order to include the optimal period for reptile capture;
- Step 6:** Destructive search of suitable natural reptile refuges;
- Step 7:** Production of completion report;
- Step 8:** Monitoring success of mitigation.

3.4.2 Receptor Area

3.4.2.1 Location and Description

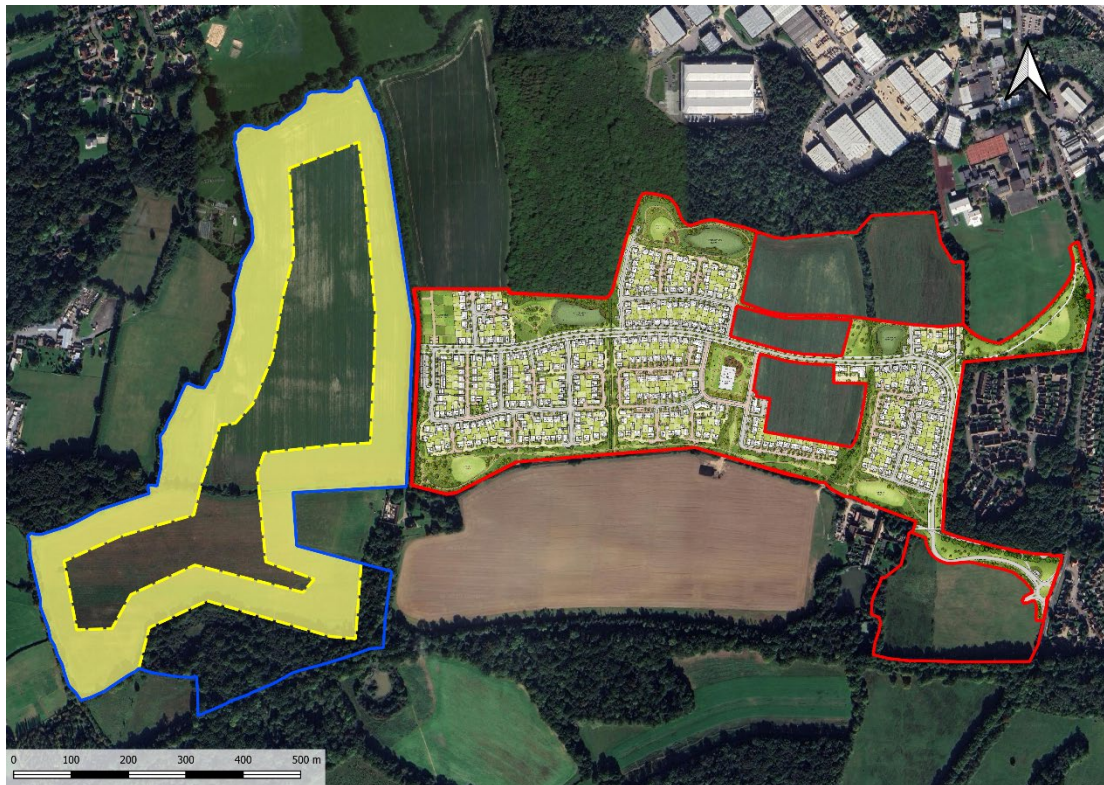
Reptiles captured within the residential area will be translocated to any areas within the SANG **Figure 7**), where no development will take place. The habitats in this area support the structure and heterogeneity required by reptile species (Edgar et al, 2010). Prior to the translocation this area should be surveyed by a suitably qualified ecologist to ensure that the habitats on site are suitable for reptiles. Once a receptor site has been chosen, the grassland present within this area will be left to grow and not cut by the landowner prior to the reptile translocation taking place to allow further development

of tussocks within this area.

3.4.2.2 Enhancement

The receptor area will be managed to benefit reptiles. This will be achieved by cutting the grass one - two times per year and at different times to encourage diversity of plant species present. This cut will be done at a height no lower than 30cm using a hand-held strimmer's to ensure that reptiles are not harmed during the management works.

Figure 7. Indicative location of the proposed receptor site (yellow) within the SANG on the west of the site.



3.4.3 Capture

3.4.3.1 Method

The methodology used for the capture of reptiles will be the same as that used during the survey. Artificial refugia, made from materials such as roofing felt or corrugated metal, allow reptiles to be detected and captured relatively easily. HGBI guidelines (1998) state artificial refugia should be distributed across the site at a minimum density of 50/ha. However, a considerably higher density of refugia will be used in order to maximise the catching potential. These will be distributed across the site. During suitable weather conditions captured reptiles will then be placed within the protected receptor area and transported within a bucket with a perforated lid.

3.4.3.2 Timing

The optimum period for capture of reptiles is April to June and September, however it is possible to capture reptiles outside of this period providing weather conditions are suitable. By ensuring that all reptiles are translocated by the end of September, it will allow sufficient time for reptiles to find suitable hibernation sites within the receptor site.

3.4.3.3 Capture Effort

The survey indicates that there are '**Low**' populations of Slow Worms, Common Lizards and Grass Snakes present on site. The HGBI (1998) and Natural England (2011) guidelines recommend a minimum of 60 capture effort days are to be expended (**Table 2**) however given the limited areas that reptiles were recorded and low counts, 30 days trapping would be considered to be a more proportionate capture effort. Reptile mats will be deployed at an increased density of >100 / ha to increase capture rate and help reduce the number of capture days required. The capture effort will be reviewed on an *ad hoc* basis during the translocation (i.e. when 5 consecutive visits have been carried out in ideal weather conditions¹ where no reptiles are captured (or seen), it is considered that the relocation can come to an end).

Table 2. The minimum capture effort for common reptile species based on HGBI (1998). The figures relevant to this scheme are emboldened and italicised.

Species	Population Size (adult density)	Refugia Density / ha	Minimum No of Trapping Days in Good Weather
Slow Worm	<i>High (> 100 / ha)</i>	100	<i>All suitable days between March and September (min 90 suitable days)</i>
	<i>Medium (> 50 / ha)</i>	100	<i>All suitable days between March and September (min. 70 suitable days)</i>
	Low (< 50 / ha)	50	60 Suitable days (30 days considered proportionate due to limited population size)
Common Lizard	<i>High (> 80 / ha)</i>	100	<i>All suitable days between March and September (min 90 suitable days)</i>
	<i>Medium (> 40 / ha)</i>	100	<i>All suitable days between march and September (min. 70 suitable days)</i>
	Low (< 20 / ha)	50	60 Suitable days (30 days considered proportionate due to limited population size)
Grass Snake	High >4	100	<i>All suitable days between March and September (min 90 suitable days)</i>
	Medium 2-4	100	<i>All suitable days between march and September (min. 70 suitable days)</i>
	Low <2	50	60 Suitable days (30 days considered proportionate due to limited population size)

¹ Suitable weather conditions are generally considered to be between 10 and 18°C with intermittent sunshine and little or no wind and rain (see Froglife 1999).

3.4.3.4 Destructive Search

Following the conclusion of the relocation, a destructive search of the site is required. This would entail the sensitive stripping of vegetation on site using a toothed bucket where habitat is suitable for reptiles and can be focused on areas where reptile numbers were highest.

3.4.3.5 Protection of Receptor

The proposed receptor area will be located within the designated SANG, which will be safeguarded from future development and managed in accordance with the approved SANG Management Plan. Where necessary, a small area of post and rail fencing will be installed to protect the receptor area from public footpath disturbance during the construction phase.

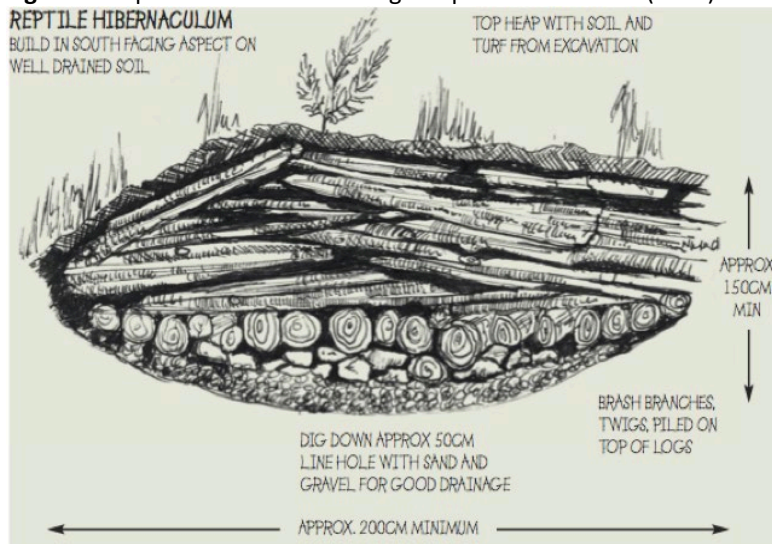
3.4.3.6 Post-completion Monitoring

Given the population size of Slow Worms present and the residential nature of the site, it is not considered necessary to conduct any monitoring post completion.

3.4.4 Reptile Hibernacula

To act as a biodiversity enhancement for reptiles, the site will include 2 hibernaculum to provide any reptiles that recolonise these areas suitable locations to bask and hibernate within. The hibernacula will be created following the specification outlined within Reptile Habitat Management: Guidelines for Landowners (HART, 2009) (**Figure 8**).

Figure 8. Reptile hibernaculum design as provided in HART (2009).



3.4.5 Log Piles

In addition, it is recommended that 2 log piles will be constructed, on the north and south site boundaries, to provide sheltering and hibernating opportunities for a range of wildlife such as reptiles and small mammals, as well as attracting invertebrates as a foraging resource.

3.5 Great Crested Newts

3.5.1 Capture & Exclusion Methods

Within the red zone, Great Crested Newt trapping will take place in suitable habitat within 100m of any suitable ponds. Any GCN within the site will be guided into pitfall traps / under carpet tiles through the use of an exclusion fence around the site's perimeter. Capture effort will be supplemented with the addition of drift fencing to improve capture efficiency. The fencing will be of a standard Temporary Amphibian Fence (TAF) specification using polyethylene UV stabilised fence with wooden stakes. The fence has been designed to enclose the development area and prevent the further immigration of newts from the ponds or surrounding habitats. In order to remain in line with the best practice guidance (English Nature, 2001) the following points will be addressed in the installation of the TAF and semi-permanent fence;

- Fencing installation will be carried out under the supervision of an SQE
- The grass within the proposed fence line will first be strimmed down to 10 – 15 cm then searched and cleared of any amphibians prior to the digger being on site to dig the trench.
- The fencing layout will avoid gaps through which newts could pass.
- The fence will be erected to a height of 600 mm above ground level with depth of 250 mm (to include a lip) to prevent newts from passing underneath.
- The backfill will be placed turf downwards in the trench to suppress re-growth of grass.
- All fence trenches will be filled on the same day as being dug
- Pitfall buckets will be fitted flush up to the fence with their tops just below ground level.
- Spacing of the pitfalls should generally be between 5 and 10 meters.
- Carpet tiles will also be used in-between pitfall traps to increase capture effort and allow capturing from areas where the ground would be prohibitively hard for pitfall traps (i.e. around hard standing areas).

3.5.2 Release Area

Any GCN found will be released into appropriate areas within the SANG (**Figure 7**). This area and its surroundings support woodland classified as 'good' terrestrial habitat (using ARG, 2010) and additional cover amphibians and reptiles will be provided in the form of 2 log piles. As the habitat to be permanently lost on site is generally considered to be or **Low** suitability capture numbers would likely be low (especially given that only two GCN were recorded during the most recent surveys in 2024). Given the low numbers of GCN expected to be caught combined with the areas beyond the fence boundary being extensive, it is considered that it would be more than sufficient to sustain the extra population, should any GCN be captured from within the development site.

3.5.3 Capture Effort

Although there is a large meta-population of GCN within the ponds around the site, given the sub-optimal habitat on site, and the low numbers of GCN recorded during the surveys (The Ecology Partnership, 2018; Ecosupport, 2024), it is considered 25 trappings days would be sufficient to clear the site of GCN (this will however be reviewed on an *ad hoc* basis during the capture). Suitable trapping days are defined within the GCN mitigation guidelines (English Nature, 2001) as night air temperatures of > 5 °C with rain (or if no rain there should have been some rain in the last few days so the ground is

damp). As a guide, 5 trapping days with no captures would indicate that suitable effort has been expended at most sites, though this would come down to the conditions outlined within the District Level License (see **Appendix I**).

3.5.4 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, the buildings, hardstanding and any waste vegetation piles will be destructively searched. This will involve a suitably qualified and licenced ecologist being present while the buildings are sensitively taken down and the hardstanding and waste vegetation piles sensitively removed. A thorough search of the materials will be undertaken, and any amphibians captured will immediately be placed within a container and transported to the release site within the SANG in the western portion of the site.

3.5.5 Site Drainage

To avoid potential conflicts between the installation of drains around the site and amphibians potentially becoming trapped in them, every drain will have a 45-degree angled curb 1 m either side of it. This will prevent any amphibians who hit the flat surface of the curbs and following it falling into the drains as they will have a means of getting over these linear features. As an additional form of mitigation against trapped amphibians, each drain will also be fitted with an escape ladder. The mesh ladders available from the British Herpetological Society (BES) should be used as they have proved successful in trails (**Figure 9**) (McInroy & Rose, 2015).

Figure 9. Image of mesh amphibian escape ladders that will be placed in every open drain on site.



3.5.6 District Level Licensing (DLL)

At this stage the site has enrolled onto the Naturespace District Level Licensing (DLL) scheme under Licensing Certificate NSP1054MSDC (issued 11 September 2025) for planning application DM/23/2699 (associated with outline permission).

As stated within the NatureSpace GCN DLL Certification:

“This proposed development has been evaluated in relation to the terms and conditions of the District Licence and to the NatureSpace great crested newt strategy and no further compensation actions are required by the developer.

Once the planning authority has granted the developer an authorisation to cover works under their District Licence for great crested newts, licensable works may proceed at the site. The authorisation is a written letter, signed by the planning authority’s signatory, and it forms a separate document to the planning permission Decision Notice.”

For the full certification see **Appendix I**.

3.3.7 Toolbox Talk

Before any works commence an ecologist must brief all site operatives. This briefing must include details of the legal protection of GCN, all precautionary steps that must be taken during the proposed works, an annotated key detailing the appearance, characteristics and optimal habitat of GCN as well as what actions need to be taken if a GCN is found on site.

3.3.8 Sensitive Habitat Removal

Habitats on site are being removed in accordance with the Dormouse mitigation strategy (see section 3.4). Should any newts be found during these works they will be relocated to suitable habitat within the SANG. Any scrub, trees or shrub requiring removal will be reduced in height gradually (50cm and then 10cm) under the direct supervision of an ecologist which will encourage any sheltering amphibians to move out of the area prior to removal of the scrub. An ecologist will undertake a fingertip search of the remaining scrub stalks / vegetation bases prior to clearance to ground level. Where amphibians or reptiles are found, they will be moved to the adjacent woodland strip under cover.

3.4 Dormice

3.4.1 European Protected Species Licence

The proposed plans will require removal of sections of woodland / hedgerow and Bramble scrub on-site. Although only a single Dormouse nest was recorded within a hedgerow, the hedgerow is connected with suitable habitats within the wider site, therefore these habitats are also likely to support Dormice. Dormice should therefore be assumed to be present within all areas of the site. A European Protected Species Licence (EPSL) will be required for any works impacting the woodland / hedgerows / mature trees and bramble scrub and such works must be carried out under the EPSL.

3.4.2 Vegetation Clearance

It is expected that a total 0.391ha of suitable Dormouse habitat in the form of hedgerows will be cleared under a single stage methodology. Any Dormice discovered during the works will be either be left undisturbed in place (if deemed safe by the ecologist) or will be relocated to a similar location to where they were found in retained habitat (e.g. if the animal is found within leaf litter, then the animal

will be placed in leaf litter). 10 No. Dormouse nest boxes will be placed into the woodland and treelines within the southeast of the site since as where most of the habitat removal will take place. The boxes will act as receptors in the unlikely event of any Dormice being found.

3.4.2.1 Clearance Methodology

The following methodologies outline a single stage option for the clearance work to be carried in accordance with the Natural England EPSL.

Single stage methodology

Vegetation clearance within the site will be undertaken under a single-stage approach, carried out sensitively under the supervision of a Licensed Ecologist (LE) and in accordance with current dormouse mitigation guidelines and best practice. Clearance will be undertaken during the active season (typically May to September inclusive), when dormice are less likely to be in torpor or hibernation.

Habitats will be cleared in a directional manner, as specified within the European Protected Species License for the site, encouraging any dormice present to disperse naturally into adjacent retained habitat. Prior and during vegetation removal, hand searching of suitable habitat will be undertaken by the LE. All arisings will be removed from site following inspection by the Licensed Ecologist to prevent the risk of dormice re-occupying removed material. Clearance will avoid periods of unsuitable weather and will be timed to ensure that no hibernation nests are affected.

3.4.3 Minimising Disturbance

Prior to construction works commencing the retained woodland / tree lines / scrub will be protected from damage during the works. They will be fenced using Heras fencing or similar to prevent access by machinery. Where large mature trees are present, they will be protected using standard arboricultural tree protection measures which include protection of the canopy and prevention of root compaction. Access will not be permitted behind this fencing by construction personnel. This will protect Dormouse habitat from direct damage/disturbance and dust. Signage will also be added (on top of the usual warnings for tree protective fencing) stating things such as:

Protected Dormouse Habitat

It is an Offence to Damage / Disturb this Habitat

This will provide protection for the [REDACTED] on site and any wildlife species that may be using the margins of the site as well as bats, invertebrates, reptiles and other mammals. No vehicles will enter the protective ring fencing and no materials will be stored within their circumference. All protective fencing must be in place prior to any construction machinery arriving on site, before any works on site get underway, and will remain in place until all work is completed. This will minimise the level of disturbance within the boundary habitat / buffer areas for [REDACTED] during the works and ensure the habitats and any wildlife species that may be using them are protected.

3.4.4 Dormouse Boxes

Prior to the commencement of vegetation removal, at least 10 No Dormouse boxes will be installed by a suitably qualified ecologist in suitable habitat to be retained to enhance the site for Dormice. The boxes will be checked at years 1 – 10 post clearance works by a licenced ecologist and the data submitted to the National Dormouse Monitoring Programme (NDMP).

3.4.5 Newly Planted Areas

Scrub / tree planting will be carried out within the application site prior to the commencement of works, or within the next suitable planting period following the commencement of construction, to compensate for the loss of vegetation suitable for Dormice. These areas will require appropriate management, detailed and secured by the NE EPS licence, to ensure they remain suitable for use by Dormice.

3.4.6 Responsibility

The plants will be managed for a minimum period of 12 months by the developer post completion of development, covering the first part of the establishment period. Protection, maintenance and monitoring of the newly planted areas will be safeguarded within the granted EPSL work schedule. Ownership / management responsibilities for the POS will then be transferred to a management company which is as yet unappointed.

3.5 Breeding and Nesting Birds

The majority of breeding bird habitat is to be retained under current proposals, however in order to avoid disturbance of nesting birds or damage to their nests, all demolition and habitat removal works will be undertaken outside of the bird nesting season (typically March – August dependent on weather). If this is not possible, sections to be cleared should be thoroughly checked by a suitability qualified ecologist immediately prior to clearance. If any active nests are found they should be left undisturbed with a suitable buffer of vegetation (5m) until the nestlings have fledged.

4.0 WATER QUALITY

As there is a watercourse system that runs around the site, in addition to several ponds on and within close proximity, measure must be taken to prevent the degradation of water quality. Given that the quality of stormwater and groundwater can be negatively impacted during construction activities, polluted run-off from the site has the potential to enter this area if not controlled and could impact on these habitats.

Some general practical measures and sensitive working practices with regard to water quality are provided in **Table 3** below.

Table 3. Practical measures and sensitive working practices involving water during construction.

Issue(s) to Control	Best Practices to be Adopted
Stormwater polluted with debris / chemicals	• Minimise the areas of exposed ground as much as possible to reduce silt transportation • Install hydraulic barriers, silt traps and cut-off trenches • Locate siltation traps at key points on the site and discharge all runoff through the traps. • Provide adequate drainage channels lined with impervious material. • Ensure integrity of hoarding to prevent uncontrolled discharge to stormwater drains outside site boundaries. • Avoid carrying out earthworks during the rainy season and if it is not avoidable ensure that the works are kept to a minimum. • Surround earthworks by dykes or embankments for flood protection and cover earthworks as appropriate. • Avoid the use of soil stockpiles. In the case temporary storage (1-2 days) is required, soils will be stored away from the eastern boundary where aquatic pollution is more likely. • To prevent soil erosion, compact earthworks final surfaces and perform subsequent permanent work/surface protection immediately after surface formation and provide appropriate drainage. • Cover and seal manholes (including newly constructed ones). • Do not store oil within 10m of nearby watercourses.
Groundwater Contamination	• If ground contamination is encountered during construction works, work will stop immediately and measures will be taken to prevent disturbance and mobilisation of contaminants until the contamination has been treated in situ or removed for off site treatment. • During construction, existing ground levels will be raised in areas of the site as part of the proposed development, reducing the risk of groundwater interference
Concrete	• Recycle wastewater from washing of mixer trucks, drum mixers and similar equipment wherever practical to minimise wastewater discharge. • Treat all contaminated surface water from concrete operations with appropriate facilities.

Dust, Hazardous Substances and Waste	Follow dust management measures as per Section 5, Hazardous Substances measures as per Section 7 and Waste Disposal measures as per Section 8 to prevent pollution of nearby watercourses via these mediums.
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5.0 AIR QUALITY

Construction activities have the potential to impact on air quality. Construction activities are associated with the generation of nuisance dust (larger particles) and PM₁₀ emissions. The larger particles tend to fall out quickly and therefore the impacts are generally most likely to be felt within 200m of the development (Bureau Veritas, 2013). ***Worth Way Country Park is located adjacent to the south and boundary habitats on-site have been assessed as holding up to regional value for wildlife (ancient woodland).*** Construction activities may also affect nearby designated sites, including High Weald AONB, and several LWS' located in close proximity to the site. This could occur through the generation of dust, which may be transported and deposited onto sensitive habitats and vegetation, leading to temporary localised effects. Measures are to be taken to avoid dust entering the surrounding habitats. Any piles of sand, soil or other small particle materials should be kept damp on days of strong winds and/or covered with geo-textile fabric to prevent the amount of dust and debris leaving the site as outlined above. **Table 4** provides the site-specific techniques which will be imposed in order to prevent/minimise air and dust pollution upon ecology and local residents, respectively, during the construction phase.

Table 4. Imposed measures and sensitive working practices involving air pollution control.

Issue(s) to Control	Best Practices to be Adopted
Communications	● Display the name and contact details of person(s) accountable for air quality and dust issues on the site boundary. This may be the environment manager/engineer or the site manager ● Display the head or regional office contact information
Site Management	● Record all dust and air quality complaints, identify cause(s), take appropriate measures to reduce emissions in a timely manner, and record the measures taken ● Make the complaints log available to the LPA upon request ● Record any exceptional incidents that cause dust and/or air emissions, either on- or offsite, and the action taken to resolve the situation in the log book ● Hold regular liaison meetings with other high risk construction sites within 250 m of the site boundary, to ensure plans are co-ordinated and dust and particulate matter emissions are minimized.
Monitoring	● Carry out regular site inspections, record inspection results, and make an inspection log available to the LPA upon request ● Increase the frequency of site inspections when activities with a high potential to produce dust are being carried out and during prolonged dry or windy conditions

Issue(s) to Control	Best Practices to be Adopted
Site Preparation	● Where a site boundary adjoins a road, street, service lane or other area accessible to the public, provide hoarding of not less than 1.8m high from ground level along the entire length of that portion of the site boundary except for a site entrance or exit. For phase 2a, this is of most relevance to the public footpath along the southern boundary. ● “Plan site layout so that machinery and dust causing activities are located away from receptors, as far as is possible ● Fully enclose site operations where there is a high potential for dust production, that are active for an extensive period ● Avoid site runoff of water or mud ● Keep site fencing, barriers and scaffolding clean using wet methods ● Remove materials that have a potential to produce dust from site as soon as possible, unless being re-used
Operating Vehicle/Machinery and Sustainable Travel	● Conduct routine and major maintenance in accordance to manufacturer’s instructions, and maintain records of all inspections and maintenance works. ● Minimise the number of machines on site working ● Use fuel of quality specified by manufacturer/supplier. ● Shut down all vehicles and plant in intermittent use between work periods or throttle down to a minimum idling speed (if the former is not possible). ● Restrict vehicles to minimum practicable speed limits (< 10 km/h). ● Where a vehicle leaving a construction site is carrying a load of dusty materials, cover the load entirely by clean impervious sheeting, which extends over the edges of properly fitting side and tail boards and dampen materials before transportation. ● Make sure dusty materials are not loaded to a level higher than the side and tail boards. ● Avoid the use of diesel or petrol powered generators and use mains electricity or battery powered equipment where practicable ● Impose and signpost a maximum-speed-limit of 15mph on surfaced and 10mph on unsurfaced haul roads and work areas
Operations	● Operate air pollution control equipment properly and effectively, in accordance to manufacturer’s instructions. ● Ensure an adequate water supply on the site for effective dust suppression, using non-potable water where possible and appropriate. ● In the event of a malfunctioning or breakdown of any air pollution control equipment, suspend the plant, process(s) or activity(s) concerned as soon as practicable until the equipment is restored to its proper function. ● Ensure equipment is available to clean any dry spillages, and clean up spillages as soon as reasonably practicable using wet cleaning methods ● Control height from which excavated materials are dropped to a practical minimum and “se fine water sprays wherever appropriate. ● Only use cutting, grinding or sawing equipment fitted or in conjunction with suitable dust suppression techniques

Issue(s) to Control	Best Practices to be Adopted
Waste Management	● Avoid bonfires or burning of waste materials ● Dispose of cement, pulverized fuel ash or any other dusty materials collected by fabric filters or other air pollution control system or equipment in totally enclosed containers.
Earthworks	● Treat exposed earth properly by applying water spray, surface compaction, turfing, hydroseeding, vegetation planting or sealing with latex, vinyl, bitumen, shortcrete or temporary covers. ● Schedule construction programme to complete works on open areas as quickly as possible. ● Spray working area of any excavation or earth moving operation with water immediately before, during and immediately after the operation. ● "Re-vegetate earthworks and exposed areas/soil stockpiles to stabilise surfaces as soon as practicable
Debris Handling	● Cover debris entirely by impervious sheeting or store in a debris collection area, sheltered on top and 3 sides. ● Enclose every debris chute by impervious sheeting or similar materials. ● Before debris is dumped into a debris chute, spray with water.
Construction	● Cover stockpiles of dusty materials over 50m³ entirely by impervious sheeting with enclosure extending at least 1 m above and beyond the stored materials. ● Place stockpiles of dusty materials in an area sheltered on the top and the 3 sides. ● Spray stockpiles of dusty materials with water. ● Avoid scabbling (roughening of concrete surfaces) if possible. ● Ensure sand and other aggregates are stored in bunded areas and are not allowed to dry out. ● Ensure bulk cement and other fine powder materials are delivered in enclosed tankers and stored in silos with suitable emission control systems to prevent escape of material and overfilling during delivery.
Cement	● For every stock of more than 20 bags of cement cover entirely by impervious sheeting or place in an area sheltered on top and three sides. ● For cement delivered in bulk, store in a closed silo fitted with an audible high-level alarm which is interlocked with the material filling line such that an audible alarm is triggered and the material filling stops within one minute. ● Do not overfill silos used for the storage of cement

Issue(s) to Control	Best Practices to be Adopted
Trackout	● Provide vehicle washing facilities at every vehicle exit point. ● Pave the access road with concrete, bituminous materials, hard core or metal plates, and kept clear of dusty materials; or ● Spray the access road with water; ● Keep the portion of any road leading only to a construction site that is within 30 m of a discernible or designated vehicle entrance or exit clear of dusty materials. ● "Use water-assisted dust sweeper on access and local roads, if required ● Avoid dry sweeping of large areas ● Ensure vehicles entering and leaving site are covered to prevent escape of materials ● Record all inspections of haul routes and any subsequent action in a site log book ● Inspect haul routes for integrity and instigate necessary repairs to the surface as soon as reasonably possible

6.0 NOISE, VISUAL AND VIBRATION

Noise and visual disturbance can have a range of impacts upon ecology dependent upon the sensitivity of the species, the nature and duration of the noise and the timing of the disturbance. Noise associated with vegetation stripping will only be a temporary disturbance and is considered to only contribute to a very small proportion of the cumulative potential for wildlife disturbance associated with these activities. In addition to this, all works are expected to be restricted to daylight hours and therefore are unlikely to disturb nocturnal wildlife.

Activities associated with high levels of anthropogenic noise can re-structure animal communities (Barber et al. 2009). Reproductive, territorial, alarm and contact calls are forms of acoustical communication that noise can impact (Barber et al. 2009). This can result in a number of issues such as increased predation, and therefore death and injury, and decreased reproductive efficiency. These can both result in decreased numbers of certain species.

The site contains areas of potential nesting bird habitat within the woodland and linear features around the site boundaries. Acoustic masking resulting from increasing background sound levels will reduce the number of individual birds that utilise communication networks and could have consequences for reproductive processes. For example, songbirds show greater nest desertion and abandonment within 100m of noise disturbance. Therefore **Table 5** provides methods of reducing noise and vibrational disturbance.

Table 5. Practical measures and sensitive working practices to reduce noise during construction.

Issues(s) to Control	Best Practices to be Adopted
General Noise Control Measures	● Avoid simultaneous operation of noisy equipment. ● Shut down all plant and equipment in intermittent use between work periods or throttled down to minimum idling speed. ● Located plant known to emit noise strongly in more than one direction oriented to direct noise away from sensitive habitats. ● Locate noisy equipment and plant as far away from sensitive habitats as is practically possible. ● Maintenance and servicing of equipment and vehicles in accordance to manufacturers recommendations especially for noise mitigation components e.g. retaining silencers and mufflers supplied with construction equipment. ● Appropriate working hours, considered to be 07:00 to 18:30 Monday to Friday and 08:00 to 13:00 on Saturdays, with no external working outside these hours or on Sundays and Bank Holidays without prior agreement from the LPA.

Issues(s) to Control	Best Practices to be Adopted
	• Ensure the use of quiet working methods, the most suitable plant and reasonable hours of working for noisy operations, where reasonably practicable • Locate noisy plant and equipment as far away from dwellings as reasonably possible and, where practicable, carry out loading and unloading in these areas • Screen plant to reduce noise when this cannot be done by increasing the distance between the source and the receiver (e.g. by installing noisy plant and equipment behind large site buildings) • Orientate plant that is known to emit noise strongly in one direction so that the noise is directed away from dwellings, where possible • Close acoustic covers to engines when they are in use or idling • Lower materials slowly, whenever practicable, and not drop them
Powered Mechanical Equipment from General Construction Works	Select quiet equipment whenever possible: • Silenced/super silenced compressors or electric compressor (when mains power available); • Machines fitted with mufflers and damping collars where available
Material movement	• Drop heights of unloading materials from HGVs will be kept to a minimum.
Lighting	• Works will only be undertaken during suitable hours and with works completed within appropriate time to reduce disturbance to birds, [REDACTED] and bats. • Lighting will be located and directed or screened so that it does not cause undue intrusion to nearby occupied residential properties or ecologically sensitive areas.
Fencing	• Temporary fencing or barriers will be used around the area of impact on site to limit disturbance outside of the construction area and protect the retained habitats on site; to both protect and limit any disturbance to the following protected species

7.0 HAZARDOUS SUBSTANCES

A number of hazardous materials are associated with construction projects. Not only can this lead to contaminated soil, but as was established in **Section 4.0** the site is particularly vulnerable to issues with run off with risk of hazardous substances. **Table 6** contains a variety of procedures to prevent ecological implications from hazardous substances.

Table 6. Practical measures and sensitive working practices involving hazardous substances.

Issue(s) to Control	Best Practices to be Adopted
Containers	• Use containers designed to minimise spills. • Ensure that containers used are appropriate to the substances contained (e.g. do not react with the substance, resistant to corrosions). • Ensure that containers are maintained in good conditions and securely closed. • Locate secondary containment store as far away from environmentally sensitive areas and water discharge points as possible. • Store goods away from heavily trafficked areas to avoid container damage. • In each storage area: • Ensure that only the substance(s) specified are stored. • Provide secondary containment or drip trays, and impermeable floor and bunding. • Prevent unauthorised access by providing locks to the storage areas.
Prevention	• Drip trays will be used under mobile plant machinery.
Cleaning up minor spills	• Each vehicle will have a spill kit for dealing with minor spillages. • Use sand, saw dust, or spill kit to absorb the spill and prevent it from spreading. • Dispose of the contaminated absorbent material as chemical waste. • Ensure that saw dust, spill kits, etc are readily accessible and of enough quantity.
Inspection and Maintenance	• Periodically inspect, and where necessary test, the condition of storage drums, tanks and pipelines (especially flanges and gaskets) • Inspect and maintain all plant and equipment to prevent leakage of chemicals/fuel.
Major Spills*	• Contain the spill to minimise reduce land contamination and pollution of nearby watercourse. • Inform the Project Manager immediately. • The Project Manager shall arrange for appropriate removal and disposal of the chemicals by authorised organisations, and determine if other parties (e.g. Environment Agency) need to be informed.
General Disposal	• Any hazardous waste will be stored separately and removed by an appropriately licensed contractor for disposal at a licensed site. No waste will be burnt on site.

** Spills on the worksite are likely to be hydraulic oil or engine oil spilled from plant items. If a spillage occurs the following procedure is to be followed:*

- *Immediately identify the spilled material and notify the Site Management Team. The Site Managers are to notify the Project Manager.*
- *Contain the spill as soon as possible so it doesn't spread. Refer to Material Safety Data Sheets (MSDS) for personal protective clothing needed.*
- *If containment is required, contain using earth mound and/or absorbent socks/spill kit. If you can't do this let your Supervisor know.*
- *Use the relevant clean up procedure as instructed by the MSDS.*
- *Once the spill has been contained, your Supervisor will arrange removal and disposal as soon as possible. Dispose of material using a licensed contractor and keep records of disposal on site.*
- *Complete an Incident Reporting Form (form F03) and forward it to the Project Manager.*

8.0 WASTE DISPOSAL

Construction projects will typically create a certain amount of waste that must be removed from the site. The principal waste on site will likely be aggregates from excavation, as well as some waste from construction materials. This waste must be stored and disposed of safely and adequately to prevent harm to the environment. **Table 7** contains a variety of procedures to prevent ecological implications from waste disposal.

Table 7. Practical measures and sensitive working practices involving waste disposal.

Issue(s) to Control	Best Practices to be Adopted
Excavation and aggregates waste	● Excavated material to be loaded directly onto vehicles where possible for use within the project or to be removed from site ● Where direct transfer to vehicle is not possible, storage time on site to be minimal and must be sensitively removed to ensure no mammals are using it as shelter (e.g. Hedgehogs) or populated by additional species such as reptiles / amphibians ● Records will be kept of waste material on site and waste material removed from site
Other construction waste	● Sort the waste using their respective European Waste Catalogue (EWC) code ● Waste storage in suitable container (e.g. designated skips) to ensure protection from damage or contamination ● Any Hazardous materials must be disposed of properly as described in Section 7.0
Waste Reduction	● Use the Waste Hierarchy to promote disposal as a last resort: ● Prevention/Reduction ● Re-use: Where safe some products may be used again for the same or different purpose ● Recycling and compost ● Energy recovery ● Disposal – Only if none of the above options are appropriate, waste should be disposed of ● Every effort to make use of waste produced from landscaping and incorporate broken bricks and off cuts into the landscaping in suitable areas
Canteen and staff waste	● Designated receptacles will be provided on site to allow for segregation and storage of individual waste from staff (i.e. food, drinks, packaging) ● Container size and collection frequency to be suitable for the number of staff present on site at any given time
Litter	● Boundary fencing will be erected around the site to prevent windblown litter or waste from polluting the wider environment. <i>It is recommended that frequent walkovers of the surrounding retained habitats are undertaken and any litter present is removed from the habitat and disposed of appropriately.</i>

9.0 RISK ASSESSMENT

Table 8 below demonstrates the applicable risks and associated residual risks once the measures detailed in **Sections 4.0 – 8.0** have been implemented.

Table 8. Risk Assessment.

Environmental Aspect	Risk			Total	Residual Risk (after control measures)			Total
	O	D	C		O	D	C	
Water								
Pollution Run-off	3	5	10	80	1	2	10	30
Introduction of INNS into the marine environment	2	5	10	70	1	2	10	30
Dust/Air Quality								
Vehicular Movements	2	3	8	40	1	2	8	24
Stockpiles	2	3	8	40	1	2	8	24
Hazardous Substances								
Spills / Contamination	4	5	8	72	2	3	8	40
Waste	3	4	8	56	1	2	8	24
Designated Sites deterioration								
Damage to habitats outside works area	3	3	8	48	1	3	8	32

Likelihood of Occurrence (O)		+ Likelihood of Detection (D)		X Severity of Consequence (C)	
Criteria	Rank	Criteria	Rank	Criteria	Rank
V High	5	V High	1	V High	10
High	4	High	2	High	8
Moderate	3	Moderate	3	Moderate	6
Low	2	Low	4	Low	4
V Low	1	V Low	5	V Low	2

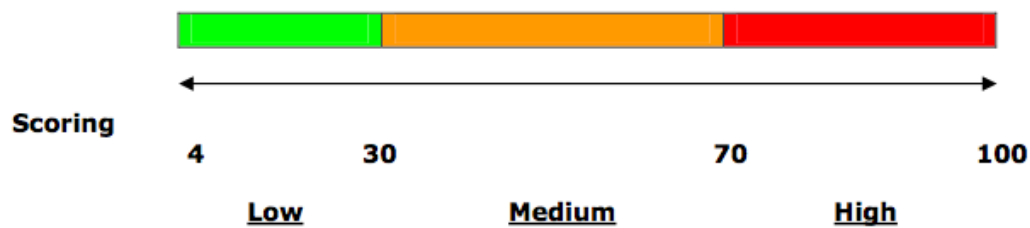
Significance Rating

Figure 10 shows that once all practical measures and sensitive working practices have been implemented all significance ratings are reduced to at least medium and are therefore acceptable to proceed.

Figure 10. Residual significant rating and associated remedial action.

Residual Risk/Significance Rating	Remedial Action
Low	No further mitigation required/ Periodic Monitoring required
Medium	Acceptable – Continued monitoring/control and review
High	Not Acceptable – Further mitigation required

10.0 RESPONSIBILITY

The CEMP will be distributed to the project team, including sub-contractors, to ensure that the environmental requirements are communicated effectively. **Table 9** below describes the different roles and associated responsibilities throughout the construction period.

Table 9. Key roles and responsibility.

Role	Appointment by (Name inserted as appropriate)	Responsibilities
Project Manager	<i>To be confirmed</i>	- Responsible for ensuring all developers comply with environmental legislation - Overall responsibility for the implementation of this CEMP
Site Manager	<i>To be confirmed</i>	Routine compliance with the CEMP particularly with concern to activities on site, shall be the responsibility of the site manager primarily. In addition to the above, the site manager will be responsible for: - Implementation and monitoring of this CEMP and the guidance therein. - Ensuring subcontractors comply with the CEMP. - Ensuring site-specific training for staff and operatives (a) Health and Safety (b) Environmental sensitivities (c) Environmental protection measures - Review all risk assessments and method statements and ensure an appropriate toolbox talk programme is developed and effectively communicated. - Review, monitor, and maintain subcontractor RAMS. - Ensuring applicable toolbox talks are provided. - Logging Complaints and Incidents - Ensuring their contact details are prominently displayed on the site compound and entrance hoarding.
Site Management Team	<i>To be confirmed</i>	- Responsible for delivering the site inductions of environmental aspects - Toolbox talks to all contractors to ensure implementation of good practice - Assist Site Manager in weekly site audits

		• Monitor sub-contractors work for compliance • Manage Considerate Constructors Scheme compliance
Principal Contractor	<i>To be confirmed</i>	• Assist Site Manager in preparation of the CMS • Prepare site specific Risk Assessments and Method Statements taking into account all environmental issues
Contractor/Sub-Contractors	<i>To be confirmed</i>	• Ensure workforce is fully aware of the environment issues and are implemented • Take appropriate action to rectify any non-conformance
Community Liaison Officer	Site Manager	• Responsible for public liaison and handling complaints
Technical Coordinator	Ellie Peploe	• The Technical coordinator will be responsible for the distribution of the approved CEMP to the project team.
Ecological Works	Ecosupport Ltd 01329 832 841	• Responsible for providing ECoW as needed, EPS works, protected species mitigation and adherence to CEMP / Updated PEA recommendations.

10.1 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 an Ecologist, during which information on all protected areas will be given and the sensitivity of the site for a range of protected species. 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.

Training will be recorded in the Project records by each Developer.

10.2 Communication

During the construction phase, internal communication will include regular progress meetings, which should cover training undertaken, progress reports, inspections, audits and non-conformance and objective / target achievement, including reporting on environmental performance along with other forms of communication (**Table 10**).

External communication, including site visits by the Ecologist, and liaison with statutory authorities will be overseen by the Project Manager.

Table 10. Communication throughout construction.

Means	Frequency	Purpose/Action	Responsible Party
Site Environmental Log Book	Continually	Written record of what has been observed and done related to environmental issues, including implementation status of mitigation measures.	Project Environmental Officer
Site meeting	Monthly	Face-to-face communications between construction and client.	Project Environmental Officer
Environmental briefing / training session	Quarterly	Briefing or Training on environmental issues to key site staff and staff of subcontractors.	Project Environmental Officer
Environmental Complaint Log	When necessary	To handle and respond environmental complaints.	Project Environmental Officer

10.3 Line of Communication Regarding Ecological Issues

Prior to work 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 protected habitats retained on site, and adjacent to, site. 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/advise is needed, the Project Manager will be consulted. They will then contact the ECoW who will visit the site and advise accordingly.

10.4 Complaints and Incidents

Complaints and incidents are to be directed to the Community Liaison Officer. If the Community Liaison Officer is unavailable, the next most senior member of staff is to record. Records may be made in person at the site office, in writing or by email.

Details concerning the event are to be logged in a spreadsheet which will contain the headings:

Date	Person recording	Incident or Complaint	Details
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No restriction on who may file a complaint or incident is to be placed.

All records are to be monitored and investigated by the project team. If corrective measures are necessary, these are to be recorded in a separate worksheet. Confirmation that corrective measures have ameliorated the situation should be sought from the stakeholder submitting the concern.

An Ecologist acting as the Ecological Clerk of Works (ECoW) will be required on a number of occasions. All workers will be aware of their responsibility to protect ecological features on site and the Project Manager will have the contact details of the ECoW so that in the eventuality that additional advice is needed, they can contact them swiftly.

All stakeholders have a responsibility to ensure that the requirements documented in the CEMP are upheld. Where a subcontractor or supplier or similar is appointed, the appointee will be responsible for distributing the CEMP to the appointed party.

11.0 CONCLUSION

Ecosupport Ltd were commissioned by Vistry to produce a Construction Environmental Management Plan (CEMP) for the development of the site known as 'Imberhorne Farm' in East Grinstead. This was requested to satisfy the discharge of condition 31 of the planning approval (DM/23/2699). This report outlines the measures to be undertaken prior to, during and post-construction, and at which time of year, in order to ecologically protect the habitats and species on-site.

12.0 REFERENCES

ARG (2010) Amphibian & Reptile Groups of the UK, ARG Advice Note 5, Great Crested Newt Habitat Suitability Index, May 2010

Bat Conservation Trust (BCT) and Institute of Lighting Professionals (ILP) (2023) *Bats and Artificial Lighting at night*.

Bullion, S., Wolton, R. & White, I. (2025) *Hazel Dormouse Conservation Handbook – Third edition*. The Mammal Society. ISBN: 978-1-0687982-3-8

Collins, J. (ed.) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines 4th Edition.

HGBI (1998) Evaluating Local Mitigation / Translocation Programmes: Maintaining Best Practice and Lawful Standards

ILP / BCT (2023) Guidance Note 08/23: Bats and Artificial Lighting at Night

Mitchell Jones, A.J., (2004) Bat Mitigation Guidelines, English Nature

[REDACTED]

Reason, P.F. and Wray, S. (2023). UK Bat Mitigation Guidelines: a guide to impact assessment, mitigation and compensation for developments affecting bats. Chartered Institute of Ecology and Environmental Management, Ampfield.

The Ecology Partnership (2018). *Imberhorne Farm, West Sussex. Updated Preliminary Ecological Appraisal*.

The Ecology Partnership (2021). *Imberhorne Farm, West Sussex. Further Updated Preliminary Ecological Appraisal*.

UKHab Ltd. (2023). *UK Habitat Classification – Habitat Definitions Version 2.0 (July, 2023)*

APPENDIX I - DISTRICT LEVEL LICENSING CERTIFICATION

NatureSpace Great Crested Newt District Licensing Scheme

Certificate

**A CERTIFICATE DOES NOT PERMIT LICENSABLE WORKS TO COMMENCE. A FORMAL AUTHORISATION FROM MID
SUSSEX DISTRICT COUNCIL TO WORK UNDER THEIR DISTRICT LICENCE MUST BE OBTAINED PRIOR TO
COMMENCEMENT.**

Date of certificate issue: **11th September 2025**

Development title: **Land at Imberhorne Farm**

Developer name: **Mr Damon Turner (Welbeck Strategic Land II LLP)**

Development location (8 figure grid reference): **TQ 3656 3868**

Development address: **Land at Imberhorne Farm, East Grinstead, West Sussex, RH19 1TX**

Planning application reference: **DM/23/2699**

Development plan reference: **"Land at Imberhorne Farm: Impact plan for great crested newt District
Licensing (Version 1)", dated 10th April 2024**

This certificate confirms that the above development (as proposed in the assessed development proposals on plan "Land at Imberhorne Farm: Impact plan for great crested newt District Licensing (Version 1)", dated 10th April 2024) has been evaluated by NatureSpace Partnership and (if/when planning approval has been granted) can be covered under the District Licence (WML-OR136, or a 'Further Licence').

This proposed development has been evaluated in relation to the terms and conditions of the District Licence and to the NatureSpace great crested newt strategy and no further compensation actions are required by the developer.

Once the planning authority has granted the developer an authorisation to cover works under their District Licence for great crested newts, licensable works may proceed at the site. The authorisation is a written letter, signed by the planning authority's signatory, and it forms a separate document to the planning permission Decision Notice.

Under the requirements of the District Licence, the planning permission must include the following planning conditions and informatives:

Planning No development hereby permitted shall take place except in accordance with the terms and conditions of the Council's Organisational Licence (WML-OR136, or a 'Further Licence') and with the proposals detailed on plan "Land at Imberhorne Farm: Impact plan for great crested newt District Licensing (Version 1)", dated 10th April 2024.

Reason: In order to ensure that adverse impacts on great crested newts are adequately mitigated and to ensure that site works are delivered in full compliance with the organisational licence (WML-OR136, or a 'Further Licence'), section 15 of the National Planning Policy Framework, Circular 06/2005 and the Natural Environment and Rural Communities Act 2006.

Planning condition: No development hereby permitted shall take place except in accordance with Part 1 of the Great Crested Newt Mitigation Principles, as set out in the District Licence (WML-OR136, or a 'Further Licence'), and in addition in compliance with the following

- Works which will affect likely newt hibernacula may only be undertaken during the active period for amphibians.
- Capture methods must be used at suitable habitat features prior to the commencement of the development (i.e. hand/destructive/night searches), which may include the use of temporary amphibian fencing, to prevent newts moving onto a development site from adjacent suitable habitat, installed for the period of the development (and removed upon completion of the development).
- Amphibian fencing and pitfall trapping must be undertaken at suitable habitats and features, prior to commencement of the development.

Reason: In order to ensure that adverse impacts on great crested newts are adequately mitigated and to ensure that site works are delivered in full compliance with the Organisational Licence (WML-OR136, or a 'Further Licence'), section 15 of the National Planning Policy Framework, Circular 06/2005 and the Natural Environment and Rural Communities Act 2006.

Informative: It is recommended that the NatureSpace Best Practice Principles are taken into account and implemented where possible and appropriate.

Informative: It is essential to note that any works or activities whatsoever undertaken on site (including ground investigations, site preparatory works or ground clearance) prior to receipt of the written authorisation from the planning authority which permits the development to proceed under the District Licence (WML-OR136, or a 'Further Licence') are not licensed under the great crested newt District Licence. Any such works or activities have no legal protection under the great crested newt District Licence and if offences against great crested newt are thereby committed then criminal investigation and prosecution by the police may follow.

Informative: It is essential to note that any ground investigations, site preparatory works and ground / vegetation clearance works / activities (where not constituting development under the Town and Country Planning Act 1990) in a red zone site authorised under the District Licence but which fail to respect controls equivalent to those detailed in the planning condition above which refers to the NatureSpace great crested newt mitigation principles would give rise to separate criminal liability under the District Licence, requiring authorised developers to comply with the District Licence and (in certain cases) with the GCN Mitigation Principles (for which Natural England is the enforcing authority); and may also give rise to criminal liability under the Wildlife & Countryside Act 1981 (as amended) and/or the Conservation of Habitats and Species Regulations 2017 (as amended) (for which the Police would be the enforcing authority).

The licence requires authorisations to specify which activities and operations are permitted from the list in Annex B of WML-OR136.

In this case, the **licensed activities and operations will be as follows: A5, A6, A7, A8, A11**

The following Protocol conditions will apply: P1, P2, P3, P4, P5, P6, P8, P11, P12

Please see Annex 1 for full details of these activities and operations.

Once authorised, developers working under the District Licence also should note:

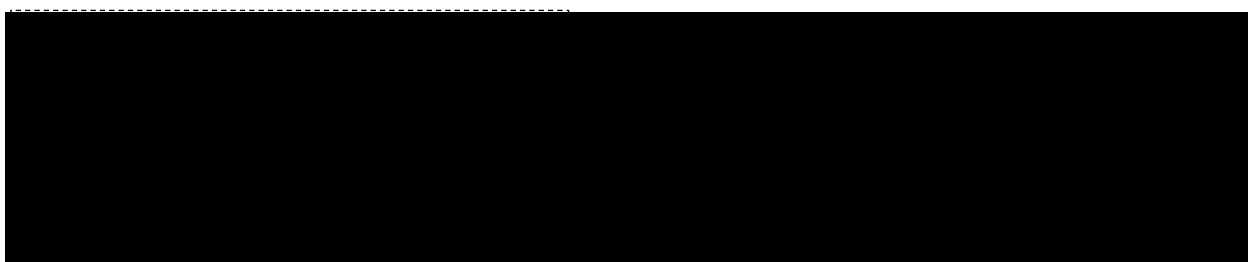
- 'Authorised developers' authorise (in writing) additional persons (e.g., employees, contractors) to act as 'Accredited Agents' under the District Licence;
- Authorised developers must ensure that all persons using the licence (including any Accredited Agents) must possess appropriate knowledge, training and experience to undertake licensed activities in accordance with the District Licence and accepted best practice;
- Developers must maintain a record of activities carried out under the District Licence and a list of any persons you authorise to act as 'Accredited Agents' - and provide a record of these activities and persons to Mid Sussex District Council or NatureSpace Partnership in a timely manner;
- It is a condition of any authorisation under the District Licence that reasonable requests for permission to access the site will be granted to employees and representatives of the Planning Authority and or Natural England for monitoring purposes;
- It is recommended that the attached Best Practice Principles are followed for all works on site.

Licensable acts which will be made lawful when an authorisation for the proposed development is issued under the District Licence:

Capture; Possess; Transport; Disturb; Killing & injuring; Damage & destroy resting places.

NATURESPACE PARTNERSHIP**SIGNED** (on behalf of **Nature Space Partnership**)

by



PROJECT OFFICER

SENIOR OFFICER

Important:

This certificate is not an authorisation to work under a District Licence. Authorisations are issued separately by the Licensee (Mid Sussex District Council), in writing once the development has been granted a valid planning permission.

District Licence expiry date note:

The District Licence (WML-OR136) is held by the Planning Authority, which is able to issue authorisations to developers with planning approval. All references to WML-OR136 within this document refer to the latest version of the licence as issued by Natural England. At the time of writing, this is referenced WML-OR136 (Version 1) issued on 22nd October 2023. The current District Licence is set to expire on 21st October 2028, at which point it will be renewed. The current 5-year limit on licence duration means that authorising documents will need to be amended as and when the licence is reissued by Natural England. The licence conditions expressly provide for 'Further Licences', and NatureSpace will manage the updating of this certificate and any authorisation documents at the appropriate time.

Planning Appeals:

In the event that the proposed development is refused, and a subsequent appeal made to the Planning Inspectorate, the District Licence documents will need to be reconfirmed by NatureSpace and then submitted to PINs as part of the appeal documentation. The applicant should contact NatureSpace in the event of an appeal to expedite this. Failure to do so could mean that the development would not be able to receive authorisation under the District Licence if approved at appeal.

Enquiries:

For any enquiries relating to this report please contact NatureSpace Partnership:

Email: info@naturespaceuk.com

Tel: 01865 688307

Website: <https://naturespaceuk.com/>

For any enquiries relating to District Licensing, please contact either NatureSpace Partnership, your planning authority or Natural England - gcndll@naturalengland.org.uk

Annex 1. Activities, Operations and Protocols under a District Licence

The District Licence contains a 'Protocol for activities and operations affecting great crested newts within the licensed area' (see Annex B of the licence) – which contains a list of activities, operations, and licensable acts. The full list in the District Licence does not apply in every authorisation under the District Licence. This report details the activities, methods and acts which would be permitted for the proposed development, based on the impacts as assessed.

Permitted activities and operations under the District Licence (subject to receiving planning approval and written authorisation from the planning authority):

- A5 Capture, exclusion, and relocation of great crested newts from terrestrial habitat (by hand, hand searches of suitable features and/or destructive searches, night/torch searching, exclusion fencing (including upright and one-way temporary amphibian fencing),). NB: This includes fence installation and removal.
- A6 Relocating great crested newts at imminent risk of harm on Development Land (by hand, hand searches and/or destructive searches)
- A7 Site clearance - including removal of vegetation, hard- standing, buildings and landscaping
- A8 Removal of rubble and log piles and other potential hibernacula
- A11 Construction activities

Protocols

Annex B of the District Licence is a 'Protocol for activities and operations affecting great crested newts within the licensed area' and includes a number of additional 'Protocol conditions'. The full list does not apply in every authorisation under the District Licence. This report details the 'Protocol conditions' which would apply to this site, based on the impacts as assessed.

Protocol conditions (which would apply upon authorisation):

- P1 Before any works commence on a site in the Red Zone all those persons involved with the licensable works are to be briefed by someone suitably experienced by way of a 'tool box talk' on:
- a. how to identify great crested newts
 - b. what to do should great crested newts be found, including good working practices and
 - c. what is and is not permitted under the licence.
- P2 Certain activities permitted by this licence require ecological expertise. Activities subject to this condition can only be carried out by an ecologist with an appropriate Great Crested Newt Survey Licence or under the direct supervision of such a person.
- P3 Where licence or protocol conditions refer to publications, licence users are expected to refer to the most up to date iteration available. Natural England can direct users to the relevant iterations.
- P4 The biosecurity guidelines in Amphibian Disease Precautions: A guide for UK fieldworkers, Advice Note 4 (available from www.arguk.org) must be observed by all licence users.
- P5 Great crested newts must not be relocated outside the Licensed Area, over a distance greater than 1 kilometre or beyond a significant physical barrier to dispersal without the permission of Natural England.
- P6 Any animal listed in Schedule 9 Part 1 (but not Part 1A or 1B) of the 1981 Act which is a species which is not ordinarily resident in England in a wild state, that is caught in a trap set under this licence must not be released or allowed to escape back into the wild; it must be humanely despatched, unless a specific licence to release that species has been obtained, or alternative advice has been provided by Natural England.
- P8 Persons capturing newts under this licence are expected to follow the advice on welfare considerations for capture programmes in the 'Great Crested Newt Mitigation Guidelines' available from Natural England.



- P11 Great crested newts are not to be translocated to Compensation Land or other locations within the Licensed Area unless the terrestrial and/or aquatic habitats are suitable for great crested newts. The suitability of the site is to be confirmed by a suitably qualified person (e.g., an ecologist with a great crested newt survey licence).
- P12 Any licensable activities in the red zone must be carried out in accordance with the approved Great Crested Newt Mitigation Principles.

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