CONSTRUCTION ECOLOGICAL MANAGEMENT PLAN (CEMP): BIODIVERSITY

RADWELL BURY FARM BESS, HERTFORDSHIRE

prepared by

CLARKSON & WOODS
ECOLOGICAL CONSULTANTS

commissioned by

BALANCE POWER PROJECTS LTD.

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CONSTRUCTION ECOLOGICAL MANAGEMENT PLAN (CEMP):

BIODIVERSITY

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The information, data and advice which has been prepared and provided is true, and has been prepared and provided in accordance with the Chartered Institute of Ecology and Environmental Management's (CIEEM) Code of Professional Conduct. We confirm that the opinions expressed are our true and professional bona fide opinions. This report and its contents remain the property of Clarkson and Woods Ltd. until payment has been made in full.

1 INTRODUCTION

1.1.1 Clarkson and Woods Ltd. were commissioned by Balance Power Projects Ltd. to prepare a Construction Environmental Management Plan (CEMP: Biodiversity) for the approved Radwell Bury Farm Battery Energy Storage System (BESS) in Hertfordshire.

1.1.2 This document has been prepared to inform the discharge the following planning condition:

North Herts Council (Application No: 24/02713/FP) - Condition 11

No development shall take place (including ground works or vegetation clearance) until a Construction Environmental Management Plan (CEMP: Biodiversity), as informed by recommendations made in the September 2024 Ecological Impact Assessment, has been 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 "buffer zones" to be informed by a pre-construction badger survey completed by an experienced ecologist within 6 weeks prior to the commencement of construction

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 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 minimise the impact of the construction process on the biodiversity and ecology of the site, in line with Policy NE2 and NE4 of the Local Plan.

1.1.3 The preparation of this CEMP has been informed by the Ecological Impact Assessment written for the Site (Clarkson & Woods Ltd., V3.0, September 2024).

1.2 Scope

1.2.1 The purpose of this CEMP is to:

- Identify known risks to protected and notable species, and to preserve the integrity and/or the function of habitats within the construction phase;
- Enable the implementation of the mitigation outlined in the approved Ecological Impact Assessment;
- Identify ecologically sensitive areas and indicate where protective buffers/fencing is required;
- Clearly set out when and where ecological supervision will be required;
- Identify roles and responsibilities for undertaking this protective/mitigation work during the construction phase.

1.2.2 This CEMP follows the guidelines set out within the Biodiversity – Code of Practice for Planning and Development, British Standard 42020:2013.

1.2.3 A separate Landscape and Ecological Management Plan (LEMP) has also been prepared for the Site, which covers the continued protection, management and enhancement of the ecological receptors, as well as habitat creation prescriptions, during the operational phase of the development.

2 RESPONSIBLE PERSONNEL & LINES OF COMMUNICATION

2.1 Client/Developer (European Energy UK Limited)

2.1.1 Balance Power Projects Ltd. are to be responsible for the implementation of this CEMP: Biodiversity through the construction phase of the development and shall liaise with the Ecological Clerk of Works (ECoW) to commission and arrange an ecologist's input or site attendance, where required. They will also liaise with the Site Manager(s) to notify them of any works affecting ecology.

2.1.2 Should management responsibilities of the site change, new personnel will be made aware of and action the objectives of this CEMP.

2.2 Site Manager

2.2.1 The Site Manager (to be assigned by Balance Power Projects Ltd.) shall be responsible for the implementation of the prescriptions detailed in this CEMP during the construction phase. The Site Manager will be provided with a copy of this CEMP and liaise with Balance Power Projects Ltd. and the ECoW throughout the construction phase of the development to ensure that the stipulated measures are being implemented correctly.

2.2.2 Should site personnel change, new personnel will be made aware of and action the objectives of this CEMP.

2.3 Ecological Clerk of Works (ECoW)

2.3.1 The ECoW will be a line of enquiry for issues requiring ecological expertise during the construction phase of the development. The ECoW shall assist and advise the developer (Balance Power Projects Ltd.) and the Site Manager, as required, in their adherence to the requirements of this CEMP.

2.3.2 Ecological queries should be directed to Clarkson & Woods Ltd. Where another ecological consultancy is employed to fulfil this role, any ecologist must be suitably qualified, have at least two years' experience and be in receipt of suitable training in how the responsibilities of the ECoW are to be discharged.

2.4 Contact Details

	Name	Phone	Address
Main Contractor	Balance Power Projects Ltd	0151 958 0431	107 Leaside, St. Helens WA9 5GG
ECoW	Clarkson & Woods	01934 712500	Overbrook Business Centre, Poolbridge Road, Blackford, Somerset BS28 4PA
Nearby Wildlife Rescue Centre	Wildlife Rescue & Ambulance Service	07970 141282	Trent park, Cockfosters Rd, Barnet EN4 0PS
Pollution Incident Contact	Environment Agency Incident Hotline	Incident Hotline: 0800 807060	

3 OBJECTIVES

3.1.1 This CEMP sets out management prescriptions to safeguard ecological features within the Site during the construction phase.

3.1.2 The objectives below will be addressed through the Method Statements (MSs) provided in Section 4. The method statements will be implemented by the Site Contractors and ECoW (as required), who will action this CEMP during the construction phase of the development. The following broad objectives have been identified:

- **Objective 1: To protect retained habitats within and surrounding the Site from damage and unnecessary disturbance during construction**

  A variety of valuable habitats were identified within/adjacent to the construction area including arable field margins, woodland, hedgerows, and ditches. These habitats will generally be retained and protective measures will be put in place to ensure no direct or indirect impacts occur on valuable landscape/habitat features during the construction phase.

- **Objective 2: To ensure badgers and their setts are adequately safeguarded during construction**

  Determination and implementation of appropriate "buffer zones" of setts during construction, alongside additional precautions.

- **Objective 3: To ensure other protected and notable species are adequately safeguarded during construction**

  Appropriate precautions will be required to ensure any adverse effects are avoided to a number of protected and notable species which may be using the fields and boundary habitats within the site. These include bats, dormouse, nesting birds, and reptiles.

- **Objective 3: To monitor the site and assess the adherence and success of the implemented protective measures**

  Periodic monitoring will ensure that the construction site is being managed in line with the CEMP: Biodiversity, and will inform any requirement for remedial action where necessary.

4 BIODIVERSITY WORKING METHOD STATEMENTS

4.1.1 Adherence to the method statements detailed below will ensure that construction activities follow best practice measures relating to biodiversity, and will contribute to achieving the Objectives of the Plan set out in Section 3.

4.1.2 The method statements below have been set out in discrete sections to allow them to be extracted and passed on to relevant contractors or filed/placed on a notice board on site, if required.

4.1.3 Periodic review of the Method Statements will be undertaken, informed by monitoring by the Site Contractors and the ECoW, to ensure that the recommendations remain relevant and any required remedial action is taken. Should any changes in construction methodology or protective measures be required, this CEMP will be amended.

METHOD STATEMENT No.1: Toolbox Talk	
Project Name	Radwell Bury Farm BESS
Personnel Required	Construction Company/ECoW
Description of Work	Toolbox talk to be delivered regarding ecological constraints.
Purpose	To ensure species and retained habitats are protected during construction and site personnel are aware of their responsibilities in this regard.

Prior to the commencement of works on site, an initial toolbox talk will be provided by the ECoW to the contractors. The toolbox talk will include details of this CEMP, highlighting ecological features within the Site and immediately adjacent, including the sensitive habitats and protected/notable species potentially present. It will detail protection measures required during construction, methods to avoid harm, the role of the ECoW and site personnel during clearance works, and what to do if an animal is found during works.

In the event a change in personnel on the site occurs during construction, the toolbox talk will need to be provided to them and may be delivered by the ECoW or Site Manager. The Site Manager will be responsible for relaying information within the toolbox talk to all site staff during their initial site inductions.

In the event a change in site management personnel occurs during construction or a significant pause in works, a toolbox talk will need to be repeated by the appointed ECoW. The Site Manager(s) should inform the ECoW of any forthcoming management changes or breaks in the construction programme.

Reporting Requirements	ECoW to log the toolbox talk and confirm in writing that it has taken place. Site manager to keep a log to ensure all contractors have received the toolbox talk.

METHOD STATEMENT No.2: Installation of Biodiversity Protection Zone (BPZ) Fencing

Project Name	Radwell Bury Farm BESS
Personnel Required	Construction Company / ECoW
Description of Work	BPAs to be maintained through provision of fencing according to BS 5837: 2012
Purpose	To ensure impacts on habitats and species are avoided as far as possible during construction works

The BPZs will prevent construction activities from resulting in physical damage to areas of sensitive habitat and species outside of the construction area. BPZs will vary based on each habitat type/ feature to be protected, as detailed in the table below.

The design of the development Site is such that buffer zones of between 10-30m from sensitive habitats and features have been incorporated into the site layout. The buffer widths correspond to the ecological value of each habitat and/or its sensitivity to potential impacts. Therefore, construction-phase biodiversity protection fencing should be installed in line with these buffer extents.

In addition, areas of retained habitat will be protected from damage during the construction phase through the establishment of the security fencing at construction outset, on the perimeter of the array areas. This will avoid impacts such as soil compaction and facilitate the establishment of habitats such as diverse grassland within these areas post-construction.

BPZ fencing will be installed as a priority during the mobilisation and preparation tasks in the construction phase. This will either comprise temporary 'Heras'-style fencing or, where applicable, the operational security fence would serve the dual purposes of construction-phase protection and ongoing site security.

Fencing will be in accordance with British Standard 5837: 2012 Trees in relation to design, demolition and construction – Recommendations and will be marked with weather-proof signage (minimum A4 size) stating "Biodiversity Protection Zone – Keep Out".

Where permanent hedgerow removal is required (for example, where an access track crosses through a hedgerow), BPZ fencing will be installed comprising two short lengths of Heras-style fencing (each approximately 2-4 panels, depending on the presence/width of boundary habitats as directed by the ECoW) installed at right angles on either side of the hedgerow to stop any encroachment beyond the immediate working area (see Figure 1 below). The objective of this BPZ fencing is to ensure that only the minimum required length of hedgerow removal is undertaken, as well as to protect the remaining sections of hedgerow from further damage/degradation, through the expansion of the working area beyond that which is required to complete the works.

The fencing will be installed in accordance with Appendix A, prior to the commencement of ground works. Temporary fencing will remain in place until the development is completed and all site machinery and materials removed from site. No site personnel or machinery shall enter the BPZs and no equipment will be stored therein for the duration of construction. The only exceptions will be where access for essential/unavoidable operations have been discussed and agreed in advance with the ECoW, and where suitable ecological mitigation measures are in place to facilitate the works.

The maintenance of the BPZs and condition of fencing will be inspected by an ECoW on installation to ensure it complies with the correct specification and is installed in the correct locations. Thereafter the fencing will be subject to regular checks as per **Method Statement No.8.** It will be the responsibility of the Site Manager to ensure the fence is appropriately maintained throughout the construction phase.

Reporting Requirements	Ecological Inspection Proforma (EIP) to be provided by the ECoW as evidence of compliance inspection. EIP to be retained as evidence of installation of fencing as per this Method Statement.

METHOD STATEMENT No.3: Protection of Nesting Birds	
Project Name	Radwell Bury Farm BESS
Personnel Required	Construction Company / ECoW
Description of Work	Any hedgerow habitat suitable for nesting birds will first be inspected by an ecologist, if this is to be impacted during the nesting season
Purpose	To avoid harm to nesting birds, their eggs and young

Toolbox Talk

Prior to construction activities commencing, an toolbox talk will be delivered by the ECoW to all Site personnel as per **Method Statement No.1**. This talk will provide information relating to the relevant legislation pertaining to breeding birds. It will also provide an overview of the mitigation measures to be implemented as per this Method Statement. Any subsequent toolbox talks relating specifically to nesting birds, may be delivered by the ECoW or Site Manager.

Hedgerows

During the construction phase, any removal of vegetation that is suitable for nesting, i.e. hedgerows, should ideally be conducted outside the bird nesting season (which is usually March to August inclusive, but seasonally variable dependent on climate). However, in the event works are required during this period, an inspection to confirm the absence of nesting birds must first be carried out by a suitably experienced ecologist (or the ECoW) to ensure that offences relating to nesting birds are not committed.

A check of any hedgerow for nesting birds must be carried out no more than 48 hours prior to their removal. If an active nest is found, a suitable exclusion zone (to be determined by the ecologist but minimum 5m) will be implemented around the nest to protect it until completion of nesting. The exclusion zone will be demarcated by barrier tape or appropriate temporary fencing by the ECoW (e.g. High Visibility Netlon or Heras) along with notices informing site staff that the excluded area must not be disturbed. A brief proforma report will be issued to the site manager/foreman immediately following the inspection which will detail the findings, any constraints, and confirmation of actions required.

The ECoW will monitor the nest periodically and determine when the chicks have fledged so the exclusion zone can be removed. In the unlikely instance that an active bird nest is subsequently identified during site clearance in the absence of an ecologist, activity must cease immediately and advice sought from the ECoW.

Open Fields

The open fields will continue to be managed up until commencement of construction to ensure they remain unsuitable for ground nesting birds. The field may be retained in arable cultivation or ground vegetation maintained to no higher than 50mm. Should the field be unmanaged at the commencement of construction (if during the bird nesting season), a walkover survey by the ECoW may be required to inspect the Site for ground nesting birds. Where ground nesting birds are encountered the ECoW will advise on an appropriate exclusion buffer until chicks have fledged.

Reporting Requirements	ECoW to provide summary report of findings and confirmation that buffers can be achieved.

METHOD STATEMENT No.4: Protection of Badgers	
Project Name	Radwell Bury Farm BESS
Personnel Required	Construction Company / ECoW
Description of Work	A pre-commencement badger walkover survey will be conducted by an experienced ecologist to map badger activity and ensure that potential impacts on badgers are identified and mitigated if required
Purpose	To avoid harm to badgers as a result of construction activities which would constitute an offence under the Protection of Badgers Act 1992.

Update Badger Walkover Survey

As badgers can excavate new setts in a relatively short time, an update survey for badger setts within the site prior to construction commencing will be necessary. This will specifically focus on all habitats potentially suitable for sett excavation by badgers within the site, in particular hedgerows and field margins. The survey will pay close attention to areas of known badger activity (from previous ecological surveys of the site), as well as locations which will be subject to habitat loss or land use change, as badger setts in these locations would be most susceptible to impacts during the construction phase.

The survey will be carried out by an appropriately qualified ecologist (ECoW) with prior experience of surveying for badgers.

The survey will be carried out no more than six weeks prior to the commencement of construction activities. The Site Manager(s) will liaise with the ECoW to ensure that this survey is completed in good time ahead of works commencing.

The survey will look for evidence of badger activity within the Site, and will record the location of and type of all setts, as well as their activity status. Where necessary, should any new setts be identified, the Biodiversity Protection Zone Fencing as detailed in **Method Statement No.2** will be adapted to incorporate a revised buffer zone around the identified entrances. Typically, 'outlying' setts require a minimum 10m buffer, while 'subsidiary', 'annexe' and 'main' setts require a minimum 20-30m buffer. The ECoW will advise on the necessary buffer and fencing alignment. Should any setts be found within the construction zone a temporary exclusion buffer will be required until such time that licensed sett exclusion and removal can occur (once approved by Natural England).

The results of the survey will be communicated to the Site Manager(s), along with any necessary recommendations for revised buffers, precautionary working methods and ECoW supervision, or sett exclusions under a mitigation licence from Natural England, as required.

Mitigation Strategy during Construction

Badger setts are known to be present within the site and the site fencing will be located 30m from sett entrances to ensure that they are protected during construction works. This no-works buffer will be demarcated by the ECoW with posts and flagging and will be discussed with the site manager. Should it be essential, the buffer may be reduced to 10m depending on the status off the sett, which must be in agreement with the ECoW. The installation of security fencing will be used to ensure that the minimum 10-30m buffer is maintained.

No significant changes in the positioning of the security fencing are anticipated following the walkover survey, however, where security fencing requires installation within 10-30m of a newly identified sett, a precautionary method of working will be prepared by the ECoW which may involve ecological supervision of the fencing installation, use of hand tools only or possibly a slight change to the positioning of the fence line.

The figure overleaf shows 20 and 30m buffers of the previously identified sett entrances. BPA fencing at 30m will be installed during construction (per Appendix A). To undertake the proposed scrub planting, which falls within 20m of some sett entrances, the fencing will need to be removed. It is recommended that the BPA fencing is moved to maintain a 20m buffer of the field boundary (and therefore badger setts), and must only take place once all construction activities are complete. This will be updated once the walkover survey has been undertaken, as the attendance of an ECoW ahead of or during these works may be recommended.

If it is considered that impacts to a particular sett cannot be avoided through the use of protective buffers and other measures, then setts may need to be excluded before works can commence within the area. Any such exclusions would need to be undertaken following a period of monitoring by an experienced ecologist, and under a mitigation licence acquired from Natural England. Works permitted under a mitigation licence can only be

undertaken between July – November inclusive, and this would need to be factored into the construction programme. Gaps under the security fencing due to natural undulations in the ground will ensure species such as badger, hedgehog and brown hare can access the interior of the Site during the operational phase of the development. No excavations will be left open overnight without any means of escape to ensure that animals which may be moving across the site during the night do not become trapped. Should any trenches and excavations be required, an escape route for animals (such as a ramp) that enter the trench must be provided, particularly if left open overnight. Ramps should be no greater than 45 degrees in angle. Ideally, any holes should also be securely covered. All excavations left open overnight or longer should be checked for animals prior to the continuation of works or infilling.	
Reporting Requirements	Updates to CEMP: Biodiversity (as required) following update survey within 1 mo. of commencement of construction. All of the above measures will be monitored as per **Method Statement No. 8**, with results and recommendations for any remedial measures required provided in monitoring report outputs.

METHOD STATEMENT No.5: Protection of Other Species

Project Name	Radwell Bury Farm BESS
Personnel Required	Construction Company / Site Manager / ECoW
Description of Work	Protection of species known or likely to be present on the site
Purpose	To ensure that wildlife legislation is not contravened.

Dormouse

Hedgerow losses will be limited to c.20m of the southernmost hedgerow to facilitate the new site access. Prior to any vegetation removal, the ECoW will thoroughly search the vegetation and ground-level features to be removed/ excavated and 2m either side to confirm the absence of any notable species. Although vegetation can potentially be removed at any time of year, it is strongly recommended that such work is restricted to late August to October (inclusive) to prevent conflicts with nesting birds and widespread reptiles. In the event that vegetation clearance takes place during the bird nesting season, this will be preceded by an inspection by the ECoW as per **MS No.3**.

If any dormouse nests (either summer nests or hibernation nests) are found at any point during the supervised work, all vegetation clearance must stop immediately and the ECoW will assess whether a European Protected Species Licence is required or if Natural England need to be informed.

Once vegetation has been searched and the ECoW confirmed the absence of protected species, the vegetation will be cut to just above ground level using hand tools. Disturbance to the ground must be minimised and no roots dug up or compacted at this point to avoid impacts to protected species.

Widespread Reptiles

Field margins and bases of hedgerows may support widespread reptile species, such as slow-worm. Generally these areas are to be retained and protected, and therefore minimal work in these habitats is necessary. Where works to these habitats is required, i.e. hedgerow removal to allow site access, this will be restricted to the months of April-October inclusive to avoid conflicts with other protected species, and will be conducted with an ECoW present.

The section of hedgerow to be removed will need to be cleared in phases, with the hedgerow initially cut down to c.300mm, subject to the measures detailed in MS3. Secondary clearance of vegetation below 300mm will be conducted between the months of April and October when reptiles are not in hibernation. Clearance shall be conducted using a tracked excavator with a toothed bucket under an ecological watching brief.

Any shelter features found, such as root balls, logs, rocks and rubble/ debris piles, will be lifted by hand or where considered necessary a targeted destructive search.

Should works during winter be absolutely necessary, a full reptile survey must first be undertaken by a suitably experienced ecologist to inform presence/ likely absence of reptiles within suitable habitat associated with the Site. A reptile survey must comprise no fewer than five survey visits (usually seven visits are sufficient to demonstrate the likely absence of reptiles) undertaken during suitable weather conditions, which will vary depending on the time of year. At least half of the survey visits must be undertaken in the spring when reptiles are most likely to be recorded due to higher levels of activity. If no reptiles are recorded during the survey, it may be possible to undertake vegetation clearance during winter months with ECoW guidance (see Dormouse section). This MS would be updated following the results of a survey, should this be necessary.

General

All cut vegetation (brash and clippings) from site clearance will be moved off-site immediately following cutting to minimise the risk of creating habitat features that may attract wildlife into the Site, or may be used to create brash piles within areas of retained habitat. In the event that any reptiles or other wildlife are discovered during site clearance, they shall be caught and relocated to suitable retained habitat around the site. In the event of accidental injury to an animal, Clarkson and Woods and/or local wildlife rescue centre must be called immediately and the appropriate action undertaken (contact details in Section 2 of CEMP: Biodiversity).

Bats All hedgerows and trees will be fenced off using either security or stock proof fencing prior to construction commencing (see Appendix A). This will ensure that trees and hedgerows which may be used by bats and birds are maintained and protected as part of the Biodiversity Protection Zone (see **Method Statement No.3**). The sensitive use of lighting during the construction phase to avoid impacts to bats and other nocturnal animals is provided in **Method Statement No.7**.	
Reporting Requirements	Compliance with GCN Working Areas will be assessed during ecological monitoring visits (**Method Statement No.8** refers), with results provided in monitoring report outputs.

METHOD STATEMENT No.6: Sensitive Lighting Strategy

Project Name	Radwell Bury Farm BESS
Personnel Required	Site Manager, Construction Company
Description of Work	Artificial lighting will be avoided during the summer months and, if needed during winter, will be directed away from retained boundary habitats.
Purpose	To avoid adverse impacts on nocturnal wildlife including bats.

Artificial lighting at night may potentially be utilised during construction across the Scheme where night-time working is unavoidable.

Artificial working-area lighting should be minimised as far as possible between sunset and sunrise between the months of March and October inclusive during the construction phase of the Scheme. This aims to limit the potential for adverse impacts on the above species groups (especially bats) during the times of the year when they are most active and therefore sensitive.

Where lighting is considered essential, construction temporary site lighting in the form of mobile lighting towers will be positioned to ensure that light is directed onto the area of works only with as minimal light spillage onto the hedgerows/woodland as possible. The use of LED lighting and cowls, hoods and other similar screens will be adopted if necessary. Any working-area lighting requirements will be discussed and reviewed with the ECoW.

Any unavoidable artificial lighting during the hours of darkness required within the period March to October inclusive will only be permitted following consultation with the ECoW in order to determine the severity of potential impacts and appropriate mitigation steps, including agreed hours of operation and numbers/specification of luminaires.

Security lighting may be installed in site compounds and permanent structures following consultation with the ECoW to establish appropriate locations. Security lighting will be limited to the minimum number of luminaires required which will be defined by the ECoW and based on the sensitivity of the habitats potentially affected and existing lighting levels. Security luminaires will be motion-sensitive and set on a short (<2 minute) timer and oriented to reduce upward light spill as far as possible (i.e. horizontally oriented) in order to reduce the potential impact on light sensitive species such as bats.

Reporting Requirements	Lighting strategy (if required) to be agreed in writing with the ECoW before use.

METHOD STATEMENT No.7: Pollution Prevention

Project Name	Radwell Bury Farm BESS
Personnel Required	Construction Company
Description of Work	Pollution Prevention Measures
Purpose	To ensure impacts on habitats and species are avoided as far as possible during construction works

To avoid pollution incidents which may impact the retained and bordering habitats, measures to prevent pollution incidents including the safe storage of chemicals and materials shall be implemented.

Any potential contaminants (fuel, oils and chemicals) used during construction will be stored in designated compounds on an impermeable surface, at least 15m from any waterbody. These will be securely locked away when not in use.

Appropriate pollution control measures will be employed in accordance with those outlined in the NetRegs document Guidance for Pollution Prevention (GPP) 5: Works and maintenance in or near water (February 2018). Although not endorsed by the Environment Agency in England (as the EA do not currently provide good practice guidelines following the withdrawal of Pollution Prevention Guidelines (PPG) 5), measures in this document (accessed at: http://www.netregs.org.uk/media/1418/gpp-5-works-and-maintenance-in-or-near-water.pdf) should nevertheless be followed in order to prevent pollution of the nearby waterbodies and ensure any pollution events are dealt with swiftly.

A spill kit must be kept on site with sand, earth or commercial products for the containment of fuel and other material spillages. All staff will receive appropriate training in the use of these kits and are to be made aware of where the kit is stored.

In the event of a spillage of oils or chemicals resulting in contamination of waterbodies or damage to habitats, the following procedure will be adopted:

- The appropriate spill kit is to be deployed immediately and the site manager is to be informed.
- The incident is to be recorded within the site log book.
- In the event of contaminants being discharged directly to water courses, or in the event of significant spillage (in excess of 10 litres), the Environment Agency is to be contacted on the incident hotline 0800 80 70 60.

The ditches at field boundaries will be protected through appropriate buffers of at least 5m between the bank tops and the construction area through the installation of protective fencing prior to construction commencing (**Method Statement No.2** refers).

The construction compounds / DNO cabin will be located at least 20m from ditches and other watercourses. No construction materials will be stored within 20m of a watercourse. Construction of these structures will be confined to dry periods where possible, with no construction taking place during extremely heavy precipitation events. Where there is a risk of silt runoff, prevention measures will be implemented as necessary, which may include the erection of sediment fencing.

Reporting Requirements	Site Manager to keep relevant documents on site and log any pollution incidents.

METHOD STATEMENT No.8: Monitoring

Project Name	Radwell Bury Farm BESS
Personnel Required	Construction Company/ECoW
Description of Work	Periodic monitoring by the ECoW of site condition and correct implementation of Method Statements 1-8
Purpose	To ensure this CEMP (Ecology) is being adhered to and identify any issues as early as possible.

The site manager will conduct a fortnightly check of fences and Biodiversity Protection Zones to ensure that they are functioning as intended and that fences are intact and no material or machinery is present within the Biodiversity Protection Zones. Photos will be provided to the ECoW and main contractor following each inspection. In the event that time-stamped photos are not received, the ECoW will need to attend Site to inspect the fencing.

At the outset and upon completion of construction, the ECoW will inspect the Site to monitor compliance with the CEMP. This will include checking the following:

- Correct installation of fencing;
- Safeguarding of BPZs;
- Hedgerow and ditch condition;
- Implementation of precautionary site maintenance measures;

Following inspections, the ECoW will discuss monitoring outcomes with the site manager and provide a written proforma of findings, identifying any remedial actions and timescales for actions to be implemented. These proforma reports will be made available to the LPA upon request.

Reporting Requirements	Log of monitoring works undertaken.

APPENDIX A: BIODIVERSITY PROTECTION AREA PLAN

See overleaf

Title: Biodiversity Protection Plan

Project: Radwell Bury Farm

Drawing no.: v1 **Date:** 30/06/2026

Legend:

- Red Line Boundary
- Biodiversity Protection Fencing
- ECoW required

Data:
Base Maps: © Crown copyright and database rights 2024 Ordnance

Co-ordinate system: OSGB36 / British National Grid
Scale: 1:1250 @ A3

0 25 50 75 m

CLARKSON & WOODS
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