
Priory Farm Solar Array- Alternative Cable Route
Construction Environmental Management Plan (CEMP) :
Biodiversity



Document Control				
Project Name:		Priory Farm Solar Array- Alternative Cable Route		
Project Number:		AxisL-043-003724		
Report Title		Construction Environmental Management Plan(CEMP) : Biodiversity		
Issue	Date	Notes	Prepared	Reviewed
V1	10/09/2025	Draft for Client Comments /input	A Littlechild <i>BSc (Hons)</i> Senior Ecologist	J. Stevens <i>BSc (Hons)</i> Principal Ecologist
V2	15/10/2025	First issue	E Phillips <i>MSc</i> <i>Senior Ecologist</i>	J. Stevens <i>BSc (Hons)</i> Principal Ecologist

This report has been prepared in accordance with the terms and conditions of appointment [on request]. Avian Ecology Ltd. (6839201) cannot accept any responsibility for any use of or reliance on the contents of this report by any third party.

CONTENTS

1 INTRODUCTION1

1.1 Background.....1

2 PROPOSED WORKS2

3 CONSTRUCTION MANAGEMENT & RESPONSIBILITIES2

3.1 Overview.....2

3.2 Developer / Owner2

3.3 Contractor2

3.4 Site Manager (Principal or EPC Contractor).....3

3.5 Communication of Construction Environmental Management Plan3

3.6 Ecological Clerk of Works.....4

4 PRE-CONSTURCTION SURVEYS4

5 CONSTRUCTION BIODIVERSITY MANAGEMENT PLAN4

5.1 Overview.....4

5.2 Noise and Vibration (Construction Works).....5

5.3 Air Quality.....5

5.4 Water Quality and Drainage5

5.5 Wildlife and Biodiversity6

5.6 Materials and Waste.....12

ANNEX 1: OUTLINE REASONABLE AVOIDANCE MEASURES (RAMS) METHOD STATEMENT13

1 INTRODUCTION

1.1 Background

1.1.1 This Construction Environmental Management Plan (CEMP): Biodiversity has been prepared in relation to the consented grid connection cable route ('the Proposed Development') for the Priory Farm Solar Array (North Hertfordshire District Council ref. 21/03380/FP) on land in and around Little Wymondley, Stevenage at central grid reference TL 2121 2744.

1.1.2 The Proposed Development was granted on 8th July 2025 (North Hertfordshire District Council ref. 24/02333/FP). The CEMP provides information to fully discharge condition 4 of the permission, which states:

No development shall take place (including ground works or vegetation clearance) until a construction environmental management plan (CEMP: Biodiversity) has been submitted to and approved in writing by the local planning authority. The CEMP (Biodiversity) should be informed by the 2024 Ecological Assessment and include the following:

- a) Risk assessment of potentially damaging construction activities.*
- b) Identification of "biodiversity protection zones".*
- c) Practical measures to avoid or reduce impacts during construction to include Reasonable Avoidance Measures (RAM's) for Herptiles and Hedgehogs.*
- 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.

1.1.3 This document also provides the management framework required for the planning and implementation of construction activities in accordance with the biodiversity mitigation commitments which are outlined within the Ecological Assessment Report (EAR)¹.

1.1.4 The purpose of this CEMP is to set out suitable measures to avoid the risk of adverse impacts sensitive ecological receptors, identify biodiversity protection zones and ensure legal compliance in relation to protected habitats and species. It describes the checks and monitoring that will be implemented to ensure works are being undertaken in accordance with these requirements, together with measures to ensure that appropriate corrective actions or mitigation measures are taken where necessary.

1.1.5 The Site Manager and all site personnel will be responsible for the implementation of the CEMP. They will comply with all conditions of the consent and the relevant provisions contained in the reports submitted in accordance with those conditions. The CEMP will be monitored regularly throughout the works.

¹ Avian Ecology Ltd (2025). Priory Farm Solar Array- Alternative Cable Route. Ecological Appraisal Report.
Priory Farm Solar Array- Alternative Cable Route
Ecological Input into the Construction Environmental Management Plan

- 1.1.6 This CEMP is to be read in conjunction with the EAR, in addition to the Soil Management Plan² (SMP), which is to be implemented in areas of protected sites (Wymondley Transforming Station Local Wildlife Site (LWS)) and priority habitats along the route (lowland meadows and arable field margin).
- 1.1.7 This CEMP should also be read in conjunction with the approved planning drawings of the Proposed Development.

2 PROPOSED WORKS

- 2.1.1 The Proposed Development requires the use of equipment, tools and machinery to install the cable along the route and also requires washing down of tools, equipment and work surfaces that might contain contaminants. Suitable mitigation and protection measures will be implemented to ensure no impacts are associated with these tasks for construction.
- 2.1.2 It is anticipated that construction will comprise solely of the installation of a new cable along the Site red line boundary. Associated temporary construction works may include:
- Portable buildings/vehicles to be used as offices, welfare and toilet facilities;
 - Wheel washing facilities; and,
 - Temporary gated compounds.

3 CONSTRUCTION MANAGEMENT & RESPONSIBILITIES

3.1 Overview

- 3.1.1 This section details the responsibilities of the various roles involved in the construction of the Proposed Development. All those involved have responsibility for ensuring compliance with the CEMP.

3.2 Developer / Owner

- 3.2.1 AGR Solar 4 Limited (the 'Developer/ Owner') will appoint a Principal/ engineering, procurement and construction (EPC) contractor under the Construction (Design and Management) Regulations 2015. The Principal/ EPC contractor will be responsible for undertaking relevant environmental tasks as detailed within this document prior to, during and upon completion of the construction works.
- 3.2.2 The Developer / Owner will be responsible for obtaining all necessary consents, licences and permissions for their activities as required by current legislation governing the protection of the environment.

3.3 Contractor

- 3.3.1 The appointed Contractor will consider all of the mitigation measures and best practice construction methods detailed within this CEMP in their design and in any detailed environmental plans as required by the Contract.

² Avian Ecology Ltd (2025). Priory Farm Solar Array- Alternative Cable Route. Soil Management Plan.

3.4 Site Manager (Principal or EPC Contractor)

- 3.4.1 The appointed Site Manager (Principal or EPC Contractor) will be responsible for protecting project personnel and the general public during the construction works. Their responsibilities will also include relevant safeguards in relation to wildlife and ecology as set out in this CEMP and SMP.
- 3.4.2 Appropriate induction training will be given to all persons visiting and working on the Site and the Contractor and any subcontractors will fully comply with the site rules.
- 3.4.3 The Site Manager (will be responsible for any environmental incident over and above basic spill kits. The Site Manager (Principal or EPC Contractor) will outline to site staff who their professional responder is and ensure their availability 24 hours a day, 7 days a week.
- 3.4.4 All standard safety procedures, as laid down in the appropriate guidelines for the type of work, will be adhered to at all times. To prevent vandalism and accidental harm to people and wildlife, the Site and associated plant and machinery will be secured during non-working hours.
- 3.4.5 The Site Manager will ensure that measures are in place to allow all vehicles to safely enter and exit the Site, whilst strictly adhering to the limits of the Site red line boundary. Upon exit, all required machinery will be fully sheeted and pass through a wheel washing installation prior to departure.
- 3.4.6 During construction, phase segregation of waste (earth, general etc) disposal will be via an approved contractor and documents (waste transfer notes) will be employed. Please refer to **Section 5.6** for more details.
- 3.4.7 On completion of construction works, all plant, surplus materials, rubbish and temporary works will be removed and the Site left in a clean, safe and tidy condition.
- 3.4.8 All necessary and reasonable measures will be taken to minimise fire risk and comply with the requirements of the local fire authority. Open fires are prohibited at all times and there will be no burning of rubbish on Site.

3.5 Communication of Construction Environmental Management Plan

- 3.5.1 The Site Manager (Principal or EPC Contractor) will manage and co-ordinate on-site environmental activities and act as a point of contact for local residents to ensure that any concerns are resolved quickly and efficiently. The Site Manager (Principal or EPC Contractor) will be responsible for inductions and briefing all staff and visitors; meeting environmental and ecological obligations; resolving, reporting and monitoring any environmental incidents; and ensuring waste management procedures are followed.
- 3.5.2 The requirements of the CEMP and other environmental responsibilities will be communicated to employees and sub-contractors by:
 - Site Induction;
 - Risk Assessment & Method Statements for works likely to pose environmental issues;
 - Toolbox talks; and,
 - Environmental Monitoring and reporting (by site team).
- 3.5.3 The Site induction will include the basic responses to an environmental spill, and the Site Manager (Principal or EPC Contractor) will ensure that all Site working area have an environmental spill kit which are to be easily accessible.

- 3.5.4 All environmental incidents will be reported and recorded and a full investigation will be completed where appropriate, and corrective action applied. Records will be kept for all environmental occurrences including but not restricted to potential hazards, near misses, incidents and complaints.

3.6 Ecological Clerk of Works

- 3.6.1 A suitably qualified and experienced Ecological Clerk of Works (ECoW) will be appointed to provide ecological and environmental advice during construction. The ECoW will monitor construction to ensure compliance with the CEMP and help to reduce risks and delays. Any breaches of the CEMP will be reported to the Site Manager (Principal or EPC Contractor) who will have the authority to stop works.

4 PRE-CONSTRUCTION SURVEYS

- 4.1.1 This section details the surveys that will be conducted prior to the start of construction. These surveys will inform the requirement for mitigation to be implemented during construction.

- 4.1.2 The pre-construction surveys to be undertaken include:

- A survey of the Wymondley Transforming Station LWS, to identify any specific notable plant or priority species which could be avoided by construction works or translocated elsewhere within the LWS (See approved Soil Management Plan (Condition 6)³;
- An update walkover survey of the entire Site if construction works commence after July 2026. The survey would include a habitat and condition assessment validation survey, to verify habitats on Site have not substantially changed and to check for the presence of any non-native invasive species;
- A badger survey to check for active or any newly constructed setts (i.e. setts that may be constructed between the initial baseline surveys, undertaken in April 2024, and the construction start date) within at least 30m of construction areas within the Site. This will include a review and appraisal of the identified setts detailed within the EAR;
- A nesting bird check of any vegetation to be removed (if clearance to be carried out within the breeding bird season March-August, inclusive);
- A ground level tree assessment (GLTA) for roosting bats in advance of any tree removal, if required (although not expected); and,
- An ECoW check for protected species, including brown hare leverets, hedgehog, amphibians and reptiles prior to any vegetation removal (including areas of long grassland e.g. lowland meadows), as part of works under a Reasonable Avoidance Measures (RAMs) Method Statement (see **Annex 1**).

5 CONSTRUCTION BIODIVERSITY MANAGEMENT PLAN

5.1 Overview

- 5.1.1 This section details the required measures to ensure adequate protection, mitigation and compensation for protected species, priority species and priority habitats.

³ Avian Ecology (2025) Priory Solar Alternative Cable Route: Soil Management Plan
Priory Farm Solar Array- Alternative Cable Route
Ecological Input into the Construction Environmental Management Plan

5.2 Noise and Vibration (Construction Works)

- 5.2.1 During construction activities, noise and vibration will be minimised wherever possible. Manufacturers' recommendations with regards to vibration levels from machinery shall be adhered to. All plant will be properly maintained and contractors will comply with the terms laid down in the approved Code of Practice Order 2015 and BS 5228: Part 1: Noise Control on Construction and Open Sites.
- 5.2.2 All plant and machinery in use shall be properly silenced and maintained in accordance with the manufacturers' instructions.
- 5.2.3 The following actions will be implemented to manage noise levels:
- Noise rating of equipment will inform equipment selection (where it is necessary to use equipment with high noise levels, mitigation measures will be adopted, e.g. limited times of operations);
 - All plant and equipment will be suitably sited, operated and serviced in order to minimise noise and vibration; and,
 - All plant will be turned off when not in use.

5.3 Air Quality and Dust

- 5.3.1 With the exception of vehicular movements on Site and associated construction machinery, it is not anticipated that there would be any other emissions to air caused by the construction works. However, during ground works there is potential for dust to be generated (at a local level), due to small scale excavation and storage of soils, laying of gravel for the temporary construction compound and movement of vehicles and plant around the Site.
- 5.3.2 To minimise the potential for aerial dust to be generated from construction activities (as well as soils being transported onto the local road network, appropriate wheel cleaning facilities shall be deployed where necessary (such as water bowsers).
- 5.3.3 Signage will be provided directing vehicle operatives to use the facilities and appropriate methods (such as silt traps and cut off drains) will be used as necessary ensure that any contaminants do not enter the environment or overflow back into the Site or onto neighbouring land, in particular neighbouring designated sites as identified within the EAR.

5.4 Water Quality and Drainage

- 5.4.1 During construction, the Contractors will implement working methods to protect surface water and groundwater resources (and associated habitats and species) from pollution, in line with current guidance and good practice⁴.
- 5.4.2 Waste/earth storage areas will be designated to minimise areas prone to contamination, such as the Ash Brook. Waste/earth storage will be limited to areas strictly within the Site red line boundary.
- 5.4.3 Where there is increased risk of contained spillage, additional precautions will be taken which are detailed further below. Fuels, lubricants and chemicals will be stored in accordance with the appropriate Environment Agency Environmental Management Guidance (such as Control of

⁴ Environment Agency. (2024). *Protect groundwater and prevent groundwater pollution*. Retrieved from <https://www.gov.uk/government/publications/protect-groundwater-and-prevent-groundwater-pollution/protect-groundwater-and-prevent-groundwater-pollution> (accessed March 2025).

substances hazardous to health (COSHH) guidelines)⁵ with an impermeable base and suitable bunding to prevent discharge.

- 5.4.4 All works will be undertaken in a manner to ensure that existing watercourses and drainage ditches are not polluted, dirtied or obstructed during the construction period.
- 5.4.5 If any pollution occurs, then the Site Manager (Principal or EPC Contractor) shall advise the Environment Agency and the Local Planning Authority immediately and take prompt action to minimise the impact and prevent re-occurrence. A common cause of pollution from sites is through vandalism. Therefore, the Contractor shall ensure that working areas of the Site are adequately protected by the provision of secure fences, locked accesses and security where possible.
- 5.4.6 The measures adopted during the proposed works will include (but not limited to):
- Waste/earth storage areas to be designated to minimise areas prone to contamination;
 - Fuels, lubricants and chemicals will be stored in a place containing an impermeable base and suitable bunding in accordance with current legislation;
 - Spill kits will be available on Site to ensure that any accidental spillage can be promptly dealt with;
 - Working areas of the Site will be secured at all times and staff will be trained and made aware of the actions to take in the event of a spillage of potential contaminants. Emergency procedures to be implemented in the event of a spillage or leakage of any polluting material such as fuel, oil or silt-laden drainage will be in place on Site;
 - Public roads and footpath accesses will be regularly maintained and cleaned so they are kept free from deposits in order to prevent silt, oil or other materials entering any drain or watercourse;
 - Wheel cleaning facilities shall be properly managed and maintained to ensure that they remain effective for their purpose; and
 - Dewatering activities (including from trenches if high groundwater) will discharge to settlement tanks prior to discharge to a surface water sewer to minimise risk of sedimentation to downstream watercourses.
- 5.4.7 Surface water runoff and drainage management measures form part of the embedded design with measures to prevent silt-laden or polluted runoff during construction to facilitate the cable installation. Where reasonably practical, the follow measures shall be undertaken:
- Phasing of construction where possible to minimise compaction of the soil during the works;
 - Constructed using low ground pressure equipment off the tracks, and establishing access rules to minimising repeat trafficking of routes; and,
 - Regular monitoring of watercourses/ditches to identify any issues relating to runoff and silt to allow immediate contingency control measures to be set in place.
- 5.4.8 Foul / potentially contaminated waters arising from construction activities shall be appropriately collected / treated.

5.5 Wildlife and Biodiversity

- 5.5.1 Measures outlined within the EAR and SMP, as well as those summarised below shall be followed to protect wildlife and biodiversity to ensure that construction activities do not harm protected species or their habitats and to ensure compliance with the Wildlife and Countryside Act 1981 (as amended), the Protection of Badgers Act 1992 and the 'Habitat Regulations' (Conservation of Habitat and Species

⁵ Available online at: <https://www.legislation.gov.uk/uksi/2002/2677/regulation/7> (accessed February 2025).

Regulation 2017 (as amended) and Conservation of Habitats and Species Amendment (EU Exit) Regulations 2019).

Good Practice to be Employed

- 5.5.2 Site staff will be briefed during a site induction on the requirements regarding the environmental good practice on the Site, including the protection of retained vegetation. Briefings and training will be repeated as required for new starters on the Site and / or refreshed through toolbox talks or similar when onsite conditions or special measures are changed or updated.
- 5.5.3 Standard measures to ensure runoff control and pollution prevention will be implemented; these measures will safeguard habitats within and adjacent to the Site and their associated species.

Designated Sites

- 5.5.4 The Site does not form part of any statutory designated site for nature conservation and no statutory designated sites will be directly affected by the Proposed Development.
- 5.5.5 The Site is located partially within one non-statutory designated site, Wymondley Transforming Station Local Wildlife Site (LWS). It lies in the westernmost extent of the cable route red line boundary, where the cable will connect with the existing transforming station. The LWS is designated for grassland indicators associated with a poor, stony substrate on chalk. For further information on the LWS, please refer to the Soil Management Plan (SMP)⁶. The location of the LWS in context of the Site RLB is shown on **Figure 1** in the SMP.
- 5.5.6 Works to be carried out in this area include laying a new cable from the exiting substation across the LWS via open trench techniques (900mm wide and 1m deep) and then under the perimeter woodland via Horizontal Directional Drilling (HDD). The HDD entry/exit pit is anticipated to measure approximately 3m x 2m, and is located adjacent to an associated working area which measures approximately 40m by 23m. No permanent, above ground infrastructure is required.
- 5.5.7 The use of HDD avoids direct potential impacts on the woodland aspect of the LWS and impacts upon open mosaic of habitat which contains chalk grassland indicator species will be short term and mitigated for via the implementation of a soil management plan.
- 5.5.8 The LWS located on and adjacent to the Site will be retained and protected during works. Awareness of this site will be included within the Site induction. Temporary Heras fencing, or similar, will be first be installed before construction starts to demarcate the extent of the Site boundary, this will prevent any encroachment of works beyond the Site boundary. Clearly delineated working areas will be made to avoid further disturbance to the LWS. For further information on works within the LWS, please refer to the SMP.
- 5.5.9 In terms of remaining sites and habitats beyond the Site boundary, there will be no direct effect on habitats or land take within sites in the wider landscape. Standard good practice pollution prevention and surface water runoff control measures will be implemented throughout the program of works to avoid indirect impacts on any designated sites, habitats and species present in the wider environment.

Habitats

- 5.5.10 Habitats of high ecological value within the Site comprise open mosaic habitat (within the LWS), deciduous plantation woodland, the Ash Brook, mixed scrub and lowland meadows in the western

⁶ Avian Ecology Ltd (2025). Priory Farm Solar Array- Alternative Cable Route. Soil Management Plan.

half of the cable route, with arable field margin and native hedgerow with trees also present in the eastern half of the cable route.

- 5.5.11 Adjacent, offsite habitats to the Site with high ecological value includes further areas of the above habitats, plus areas of priority habitat deciduous woodland and a mature treeline which runs parallel to both the red line boundary and the Ash Brook for a c.280m stretch along the western half of the cable route.
- 5.5.12 Lowland meadows, lowland deciduous woodland, open mosaic habitat, arable field margin and native hedgerow are UK Biodiversity Action Plan (UK BAP) priority habitats and are protected under the Natural Environment and Rural Communities (NERC) Act (2006).
- 5.5.13 Sensitive on-Site and offsite adjacent habitats will be clearly marked out and awareness of these will be included within the Site induction. Temporary Heras fencing, or similar, will be erected first before construction starts to prevent the encroachment of works beyond the Site boundary. The temporary fencing will also demarcate important habitats (such as woodland, Ash Brook and lowland meadows) located within and adjacent to the Site to avoid disturbance to UK BAP habitats and associated designated Wymondley Transforming Station LWS. Wherever possible, timed and phased works shall be implemented to limit disturbance across the Site.
- 5.5.14 HDD will be employed underneath two sections of the Site; one in the western extent of the cable route, underneath broadleaved woodland, mixed scrub and the Ash Brook, with the other located underneath the Ash Brook where it is culverted under Stevenage Road.
- 5.5.15 The HDD will be at a depth of 3m underground, ensuring impacts on the broadleaved woodland is avoided as much as possible on the perimeter of the LWS. The cable is being installed below the rhizosphere of woodland, ensures no trees will have to be removed to facilitate the cable and other ground level impacts are nil. The use of HDD also results in no significant impacts on the area of mixed scrub and the relevant sections of the Ash Brook, avoiding any direct or indirect impacts to the watercourse, including potential pollution run off during the course of the works in these areas.
- 5.5.16 With regards to the remainder of the cable route that crosses higher value habitats of open mosaic of habitats, lowland meadows and arable field margins, direct impacts cannot be completely avoided, however they have sought to be mitigated for via the implementation of a SMP. For further details, please refer to the SMP.
- 5.5.17 The cable route follows the offsite section of Ash Brook for a large portion of the route in the western half, however it will be restricted to the public footpath that is present along its length, which lies within 5m from the bank top. Suitable measures will be implemented to prevent any pollution events into the watercourse. This will include silt fencing on the downgradient side of the trenching, cut off drains on the upgradient side and any stockpiling of excavated material to be away from the watercourse. Additional standard good practice measures will be employed to ensure runoff control and pollution prevention to protect aquatic/bankside habitats both on Site and in the wider Ash Brook network.
- 5.5.18 Any appropriate consents (e.g., Ordinary Watercourse consents), if required, will be obtained from the relevant authority prior to any works.
- 5.5.19 Where the cable route crosses the small section of native hedgerow with trees at the eastern most extent of the cable route, broken trench techniques will be used underneath the hedgerow to connect to the southern boundary of the main Priory Farm Solar Array site. This technique involves using hand dug pits either side of the hedge and installing the cable by hand beneath the hedge roots to avoid hedgerow removal and retain the feature post development.
- 5.5.20 Hedgerows, treelines, woodland and individual trees within and/or adjacent to Site will be retained and protected on the Site with the Proposed Development's cable route exploiting existing footpaths

for a large proportion of the western section. Additional protections relating to habitats include implementing tree protection measures in line with *BS 5837:2012: Trees in relation to design, demolition and construction*, with measures including root zone protection and clear instructions on the location of materials storage areas away from trees and their root protection zones.

- 5.5.21 The Proposed Development has been designed to avoid on-Site woodland and hedgerow removal, plus offsite woodland and individual tree removal. Any necessary habitat impacts have been designed to be temporary and mitigated for via different construction techniques, helping to safeguard retained terrestrial habitats within the Site, and within the surrounding environment.
- 5.5.22 There will also be clear delineation of working areas and access routes for vehicles entering the Site and instructions on these shall be provided to all site construction staff and delivery personnel prior to arriving on site.
- 5.5.23 Standard good practice measures to ensure runoff control and pollution prevention (such as dust mitigation measures) will be implemented across the entire length of the cable route; these measures will safeguard habitats within the Site and protect off-site habitat which might otherwise be affected.

Birds

- 5.5.24 Retained boundary habitats such as onsite woodland and hedgerow, alongside offsite boundary habitats such as treeline and woodland along the Ash Brook will be protected throughout works through installation of the perimeter fencing, which will be installed prior to the start of construction.
- 5.5.25 Construction works may involve very localised and negligible short-term disturbance in the form of HDD cable installation under the Ash Brook with adjacent mixed scrub and woodland habitats. It may also involve localised and temporary disturbance to open habitats suitable for birds within the red line boundary, arable and lowland meadow fields along the route.
- 5.5.26 Site clearance works should be undertaken outside of the breeding bird season in so far as reasonably practical. The breeding bird season is generally considered to be 1st March to 31st August inclusive. Where this cannot be avoided, the appointed ECoW will undertake a pre-site clearance survey to identify the presence of any wild bird nests being built or in use (including those of ground nesting birds such as skylark).
- 5.5.27 Only once the ECoW is satisfied that an offence under Part 1 of the Wildlife and Countryside Act 1981 (as amended) will not occur, may works proceed. If a nesting species is identified, a suitable work exclusion zone will be established around the nest site where required, until it is no longer active, in line with best practice guidance and in consultation with the ECoW.
- 5.5.28 During operation, disturbance will be minimal and limited to unexpected maintenance activities.

Bats

- 5.5.29 No buildings or trees with bat roost potential were identified within the cable route red line boundary, however thirteen mature shrubs and trees along the boundaries of Site were identified as offering bat roost potential.
- 5.5.30 All bat roost potential trees lie offsite will be retained and protected throughout works. Protection of onsite hedgerow and offsite mature trees adjacent to the cable route will safeguard potential roost sites and maintain foraging and commuting opportunities. Trees identified with roosting suitability from the initial Ground Level Tree Assessment (GLTA) in 2024 will not to be impacted by the Proposed Development.
- 5.5.31 Although not anticipated, should any trees be proposed to be affected (for example limb pruning to facilitate the construction machinery), then an updated GLTA will be undertaken in advance of any

removal. If any tree to be impacted is considered to support potential roosting bats, then a suitable check for roosting bats will be conducted. If bats are confirmed to be roosting within any tree suspected to be impacted by the proposed works, the data gathered would be used to inform potential design amendments in order to avoid or reduce impacts, or failing that, support a licence application to Natural England to destroy/disturb the bat roost.

- 5.5.32 Works will be undertaken during daylight hours as far as possible. Minimal lighting is required during construction and none expected for the operation of the Proposed Development, but any required will be employed in a sensitive manner and directed away from boundary and surrounding habitats such as treelines, woodland and Ash Brook to maintain bat foraging and commuting routes as dark corridors. This will be achieved in line with BCT guidance (2023) *Bats and Artificial Lighting at Night*⁷.

Badger

- 5.5.33 Signs of badger activity within the wider area was identified, however potential setts were located over 30m from the Site red line boundary. These existing setts are not considered likely to be disturbed by the Proposed Development.
- 5.5.34 A pre-construction badger survey will be undertaken immediately prior to works commencing, to check for any newly constructed setts within at least 30m of construction areas. The check will also assess previously identified setts to determine current badger activity.
- 5.5.35 If baseline conditions have altered and significant disturbance to badgers, or their setts, is considered likely during the Proposed Development's proposed works, one or both of the following options will be incorporated:
- The Proposed Development design will be amended to avoid works which may impact upon badgers and their setts (e.g. alteration of the configuration of panels and/or fencing); and/or,
 - An updated disturbance licence will be obtained from Natural England before construction commences.
- 5.5.36 A precautionary approach will be adopted during construction with RAMs implemented to safeguard any badger that may be active outside normal construction hours, including covering of trenches / excavations and/or suitable escape ramps and reporting to the Site Manager / ECoW of any new setts or suspected new setts.

Otter and Water vole

- 5.5.37 The Ash Brook is considered unsuitable for otter and has sub optimal habitat suitability for water vole, with the results of the water vole survey revealing it does not support a population of water vole.
- 5.5.38 Sections of the Ash Brook within the red line boundary will be retained and protected via HDD so there will be no direct impacts on water vole or their burrows, even if present. Standard pollution prevention measures will be employed to ensure runoff control and pollution prevention to protect the off-site brook sections (which lay nearby the Site and adjacent to the public footpath), and indirect impacts on water vole, in unlikely event they are present.

Amphibians and Reptiles

- 5.5.39 No ponds are present within the Site and all off-Site habitats will be protected from indirect effects with standard good practice pollution prevention and surface water runoff control measures in place.

⁷Bat Conservation Trust and Institution of Lighting Professionals. (2023). *Guidance Note 08/23: Bats and artificial lighting at night*. <https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/> (Accessed 6th June 2024).

- 5.5.40 The implementation of RAMs (see **Annex 1**) will avoid impacts on individual amphibians, reptiles (and other wildlife) potentially present. Should a great crested newt or reptile be found at any point during construction, works within suitable habitat and/or potentially disturbing works in close proximity to the animal must cease immediately and the ECoW will advise on the appropriate actions. RAMS will be employed during vegetation clearance and site preparation works.

Other species

- 5.5.41 The Site and surrounding areas could potentially support species including brown hare and hedgehog. Hedgerow, scrub and woodland habitats could be used by hedgehogs, though these habitats will be retained and protected during construction. Open grassland habitats could be used by brown hare, the small loss of these habitats should be removed under RAMs as above for potential reptile and amphibian species.
- 5.5.42 Should a young brown hare, hedgehog or other notable species (or signs of) be found at any point during construction, works within suitable habitat and/or potentially disturbing works in close proximity to the animal must cease immediately and the ECoW will advise on the appropriate actions. RAMS will be employed during vegetation clearance and site preparation works. Details of the RAMs can be found in **Annex 1**.
- 5.5.43 Standard measures to protect a variety of wildlife such as covering excavations overnight must also be implemented, in line with British Standards BS5837:2012 *Trees in relation to design, demolition and construction*.
- 5.5.44 The small, temporary removal of habitat such as lowland meadow, arable field margin and mosaic of habitat will not have a significant impact on invertebrate species already present and will continue to provide suitable habitat within two years of the development. The retention of woodland, mixed scrub, Ash Brook and hedgerow with trees onsite will likely continue to support a variety of invertebrate species.
- 5.5.45 Wild strawberry present within open mosaic habitat in the LWS is listed as Near Threatened, however it is recorded on a frequent basis within the habitat, and individual plant translocation from the cable route is not considered necessary, as the soil management plan should serve to protect the species in areas due for temporary removal.

Invasive non-native species

- 5.5.46 No invasive non-native plant species were identified within the Site, during baseline surveys.
- 5.5.47 It is an offence to plant or otherwise cause to grow in the wild species listed within Schedule 9; this includes allowing the species to grow/spread, spreading the species or transferring polluted ground material from one area to another. Any waste containing these species can only be removed from site under appropriate waste management documentation (under the Environmental Protection Act 1990).
- 5.5.48 Should any invasive species be encountered or suspected on-Site, prior to or during construction, the advice of a suitably qualified ecologist should be sought, and the appropriate measures taken.

5.6 Materials and Waste

- 5.6.1 Materials used on site shall be sustainably sourced where possible. Surplus materials and waste shall be recycled where possible. Material that cannot be reused or recycled will be disposed of in accordance with current legislation⁸.
- 5.6.2 Waste management will be in compliance with the Environmental Protection Act 1990 and in accordance with the 'Waste Management - A Duty of Care - A Code of Practice'⁹.
- 5.6.3 Welfare facilities will be self-contained with all discharge of waste water to sealed tanks which will be regularly emptied off-site in an authorised manner. All other waste will be collected and removed from Site at appropriate intervals to an authorised site.
- 5.6.4 For waste materials that do arise as a consequence of the works, the following measures will be adopted:
- All waste streams will be segregated;
 - All waste will be stored safely and securely to prevent damage to health, or escape into the environment. Consideration will be given to prevent the theft of waste, acts of vandalism and scavenging by animals. Separate containers for different waste will be labelled to avoid confusion;
 - Rubbish will be removed regularly, and the Site will be kept clean and tidy.

⁸ Available online at: <https://www.hse.gov.uk/construction/safetytopics/storage.htm> (accessed February 2025).

⁹ Available online at: <https://consult.defra.gov.uk/waste/the-revised-waste-duty-of-care-code-of-practice/#:~:text=The%20Duty%20of%20Care%20is,waste%2C%20known%20as%20controlled%20waste> (accessed February 2025).

Annex 1: OUTLINE REASONABLE AVOIDANCE MEASURES (RAMS) METHOD STATEMENT

The following Method Statement outlines suitable measures to be implemented during construction works associated with the proposed cable route installation to avoid the disturbance, injury or killing of individual hedgehog *Erinaceus europaeus*, brown hare *Lepus europaeus* leverets, amphibians (including great crested newt *Triturus cristatus*) and common reptile species.

Measures to ensure the favourable conservation status of the species during the proposed development must reflect legislation and guidance application at the time and the construction phase will be undertaken following RAMS under the supervision of an Ecological Clerk of Works (ECoW) as required to provide advice.

These RAMs relate to small scale works within areas of optimal habitat including hedgerows and longer grassland, and should not be employed for larger scale or extensive habitat removal.

Amphibians, Reptiles, Brown Hare Leveret & Hedgehog

Summary of Method Statement

Vegetation clearance or other works that may include removal/ impacts on small areas of hedgerow, and grasslands longer than 15cm in height, will be supervised by a suitably licensed ecologist and/or accredited agent.

Method Statement

This Method Statement will be followed for the construction works and associated minor short-term destructive habitat works within the Site in order to ensure legal compliance and to ensure the objectives are achieved.

The following measures will be adopted throughout the construction period of the Proposed Development:

- Site operatives will be informed by 'tool box' talk of the potential for protected species to occur on-site, what to look out for and what to do in the event that an animal is found.
- Vegetation clearance works will only commence after a careful visual inspection by an ECoW has determined that no animals are present. Vegetation will be reduced (by hand strimmer) to a height of c.150mm prior to ground works commencing to aid visual searches and encourage individuals to temporarily move away from the working areas.
- The proposed timing of the works should avoid the hibernation period (November to February inclusive) in order to prevent disturbance to hibernating animals including amphibians, reptiles and hedgehogs.
- Trenches and excavations will include an escape route for animals that might enter the trench, especially if left open overnight. Ramps should be no greater than 45 degrees in angle and can include wooden planks or ramped earth. Any excavations open for a prolonged period will be covered.
- All excavations left open overnight or longer will be checked for animals prior to the continuation of works or infilling.

- Any excavated material stored overnight will be searched prior to being used as infill.
- Any brash cut down from the Site could be placed in piles within an area suitable, as selected by the ECOW, to create additional hibernacula for both amphibian and reptile species.
- Site specific management practices will be set out within the Construction Environment Management Plan (CEMP) and Soil Management Plan (SMP) must be adhered to during construction to ensure the protection of habitats and species within the Site.

Should a great crested newt, reptile, brown hare leveret, hedgehog or other notable species (or signs of) be found at any point during construction, works within suitable habitat and/or potentially disturbing works in close proximity to the animal must cease immediately and the ECoW will advise on the appropriate actions, including applying for a licence, if required