

Construction Environmental Management Plan

The Ramsbury Manor Estate, White's Hill, Ramsbury, SN8 2RG

October 2025

Executive Summary

1. This Construction Environmental Management Plan outlines the ecological considerations applicable to the site and provides recommended mitigations in line with current guidance and legislation.
2. The grassland within the proposed working area will be maintained a short sward until the start of construction to prevent the ingress of protected species. Where areas of longer vegetation, including hedges, shrub and trees, are located, a phased habitat manipulation preceded by a fingertip search will be carried out, with an ecological watching brief provided during the stripping of topsoil. Any piles of vegetation / deadwood present will be carefully dismantled by hand.
3. Clearance of vegetation including trees and scrub should be avoided outside of the bird breeding season (1 March - 31 August, inclusive) to avoid impacts on nesting birds. If habitat works must occur within the breeding bird season, then the area must undergo a breeding bird survey conducted by a suitably qualified ecologist immediately prior to vegetation removal.
4. Three trees on site, labelled trees TN14, TN15 and TN16 in the Preliminary Ground Level Roost Assessment Report (document ref: RM-20210806), were found to have moderate potential to support roosting bats. Prior to any tree works commencing¹ that could potentially affect the Potential Roost Features (PRF) identified, an Arboreal PRF inspection will be required to closely inspect the feature for the presence of bats. If bats are discovered at any stage of the inspection, then a European Protected Species Mitigation License (EPSML) will need to be applied for and granted prior to any works commencing that could potentially disturb the roost.
5. Phase 2 bat surveys conducted on the site found roosting bats to be present within buildings B3, B3.2, B5 and B9 (see figures 2 and 3). A CL21 Bat Low Impact Class License will need to be applied for and granted for Buildings B5 and B9 prior to any construction works. A precautionary approach is required for the dismantling of B3.1, as there is potential to disturb roosting bats in the confirmed roosts within B3 and B3.2. The separation of Building 3.1. from buildings 3 and 3.2 and the destruction of buildings B5 and B9 will be done under strict ecological supervision.
6. The lighting strategy for the site must be adhered to in order to prevent disturbance to wildlife, in particular bats, around the site.

¹ See Tree Removal Plans in Arboricultural Method Statement by SJA Trees submitted with this discharge of condition application (document ref: SJA ams 25425-01) – a total of 29 trees are to be removed, with 3 groups of trees to be partially removed and 3 trees to be pruned.

Introduction

7. Wiltshire Council granted planning permission reference PL/2022/04972 on 6 October 2023 at The Ramsbury Manor Estate for:

Partial demolition and redevelopment of the estate yard to provide an Exhibition Centre, demolition of existing cottage and provision of a new Staff Accommodation and Operational Hub, the creation of a new Estate Yard, ancillary car park and associated lodge, and associated access, tree planting, landscaping, lighting and site infrastructure to support The Ramsbury Manor Foundation's Plans for education and conservation, and the sustainable ecological management of The Ramsbury Manor Estate, including facilitating use by school children, students and the general public.

8. That application was then varied in July 2025 (planning permission reference PL/2025/03125). It is this permission that will be implemented and so this document has been prepared to discharge condition 7 of that permission, which reads:

Prior to the commencement of works, including demolition, ground works / excavation, site clearance, vegetation clearance and boundary treatment works, a Construction Environmental Management Plan (CEMP) shall be submitted to and approved in writing by the local planning authority. The Plan shall provide details of the avoidance, mitigation and protective measures to be implemented before and during the construction phase, including but not necessarily limited to, the following:

- a) Adequate measures during construction to control pollution to existing watercourses and groundwater.*
 - b) Identification of ecological protection areas/buffer zones and tree root protection areas and details of physical means of protection, e.g. exclusion fencing.*
 - c) Working method statements for protected/priority species, such as nesting birds, bats, hazel dormouse, badger, hedgehog and common reptiles / amphibians.*
 - d) Mitigation strategies already agreed with the local planning authority prior to determination, such as for bats; this should comprise the pre-construction / construction related elements of strategies only.*
 - e) Work schedules for activities with specific timing requirements in order to avoid / reduce potential harm to ecological receptors; including details of when a licensed ecologist and/or ecological clerk of works (ECoW) shall be present on site.*
 - f) Key personnel, responsibilities and contact details (including Site Manager and ecologist / ECoW).*
- Development shall be carried out in strict accordance with the approved CEMP.*

9. The Construction Environmental Management Plan is a living document and regular reviews will be undertaken. This document will be shared with all

relevant stakeholders (including sub-contractors) to ensure that the environmental requirements are communicated effectively. The details of this document should be considered compulsory unless otherwise stated. All stakeholders should combine this document with their existing site policies and procedures.

10. The Construction Environmental Management Plan aims to:

- identify key stakeholder requirements;
- ensure compliance by all stakeholders (landowners, developers, contractors, etc.) with all relevant legislation;
- effectively minimise any potential adverse effects on the environment, designated sites and protected species during construction; and
- provide site specific method statements to avoid, minimise and mitigate construction effects on the environment, designated sites and protected species.

11. Environmental objectives for the construction phase of the works will include, but may not be restricted to:

- no light, noise, airborne or waterborne pollution incidents;
- minimizing disruption to neighbours;
- protecting all protected species and habitats on site; and
- enhancing the site for protected species and habitats.

Project Description

12. This Construction Environmental Management Plan (CEMP) has been prepared with input from Davidson-Watts Ecology, Kingfisher Ecology, SJA Trees, AFA Consulting Engineers, Peregrine Bryant Architecture and Conservation, Greenwood Projects and Gracechurch Town Planning, as well as The Ramsbury Manor Foundation itself. The CEMP underpins the construction and environmental processes employed throughout the redevelopment of the existing estate yard to provide an exhibition centre, creation of a new estate yard, car park and associated works, approved by Wiltshire Council under the reference PL/2022/04972, and then varied by reference PL/2025/03125.
13. The document is designed to provide the Principal Contractor with the following information:
 - background information about the Site and scope of this CEMP, including the likely scope of works;
 - likely operations to be undertaken as part of the proposed development that will or may impact upon wildlife;
 - environmental protection measures to be implemented as part of the scheme including fencing, supervision, and pollution controls; and
 - roles and responsibilities of the Principal Contractor to ensure effective implementation of this CEMP.
14. The site is The Ramsbury Manor Estate, White's Hill, Ramsbury, Wiltshire, SN8 2RG. The Estate is bordered to the north and east by White's Hill; to the west by the Axford Estate and to the south by the countryside.
15. The Estate is subject to the following planning designations:
 - the majority of the Estate is a Grade II Registered Park and Garden;
 - Ramsbury Manor is a Grade 1 listed building;
 - the East Gate and Lodges to the Estate are Grade II* listed;
 - the stables, the bridge and weir, are both Grade II listed;
 - the North Wessex Downs National Landscape;
 - the River Kennet is a designated Site of Special Scientific Interest;
 - the Plantations to the south of the Estate are County Wildlife Sites; and
 - there are several public footpaths crossing the Estate.
16. The approved development is for:

Partial demolition and redevelopment of the estate yard to provide an Exhibition Centre, demolition of existing cottage and provision of a new Staff Accommodation and Operational Hub, the creation of a new Estate Yard, ancillary car park and associated lodge, and associated access, tree planting, landscaping, lighting and site infrastructure to support The Ramsbury Manor Foundation's Plans for education and conservation, and the sustainable ecological management of The Ramsbury Manor Estate,

including facilitating use by school children, students and the general public.

17. That application was then varied in July 2025 (planning permission reference PL/2025/03125).
18. A provisional programme of works has been included but it is anticipated that an update of this document may be required as the scope of works is refined. It is anticipated that works will comprise the:
 - construction of the new estate yard;
 - creation of the new car park;
 - creation of the new access;
 - demolition of existing estate yard buildings;
 - construction of the staff accommodation and operational hub;
 - construction of the exhibition centre;
 - landscape and planting; and
 - during the works, a temporary compound to include:
 - portable buildings to be used as offices, welfare and toilet facilities;
 - containerised storage areas;
 - parking for construction and worker vehicles;
 - temporary hardstanding;
 - temporary gated compound; and
 - wheel washing facilities.
19. Methods likely to be required during construction phases include, but may not be limited to:
 - vegetation clearance;
 - installation and subsequent removal post completion of construction fencing (e.g. tree protection fencing);
 - ground and excavation work including topsoil stripping;
 - soil stockpiling and storage;
 - building demolition;
 - installation of foundations, below ground structures and base and wearing courses for roads, parking and pathways;
 - excavation and laying of new storm and foul drainage;
 - construction of buildings - shell and core;
 - installation of new building services and associated plant;
 - internal fit out, joinery, finishes and decorative works;
 - importation of material and construction of new access and parking areas; and
 - demobilisation from the site – removal of contractor's compound and equipment.
20. Plant used for the scheme is likely to comprise conventional vegetation clearance, demolition, earthworks, and highways construction plant. Wherever practicable the smallest machinery possible will be used.

21. The construction programme will be phased as follows:
- Phase 1 – commence construction of new estate yard – Quarter 2 2026
 - Phase 2 – commence construction of new access and ancillary car park – Quarter 1 2028
 - Phase 3 – demolition of existing estate yard buildings;
 - Phase 4 – construction of staff accommodation and operational hub; and
 - Phase 5 – construction of exhibition centre.
22. The anticipated proposed start date for this programme is Spring 2026, the target date of completion will be updated to reflect the progress of each phase. This programme will be maintained and updated by The Ramsbury Manor Foundation throughout the life of the project as further information becomes available. Once available, dates will be conveyed to the Contractor Environmental Manager, Ecologist, Parish Council, nearby properties, local schools and any other relevant party.

Environmental Policy and Legislation

23. Each participating organisation will work with respect to their organisations environmental and sustainability polices. At site, all visitors will comply with The Ramsbury Manor Foundation's health, safety, and environmental rules. The Ramsbury Manor Foundation's Environmental Policies will be posted on the Health, Safety and Environment notice boards within the site compounds, office, and communal areas.
24. All mitigation and environmental control measures identified within the CEMP have been derived from relevant best practice guidance, policies and legislation relating to the specific technical area addressed. The list provided is not exhaustive and The Ramsbury Manor Foundation and Contractor Environmental Manager are responsible for maintaining this list and undertaking a review for updates and changes prior to the construction start date.
25. The Ramsbury Manor Foundation must comply with all relevant legislation that is current at the time of the Contract and make updates to the CEMP and the site training and notice boards when any new environmental legislation comes into force.
26. The development must be carried out in strict accordance with the documents listed in the decision notice for planning permission reference PL/2025/03125.
27. The Ramsbury Manor Foundation will be responsible for managing the site in keeping with any planning consent and conditions. The programme for delivery must include discharging pre-commencement planning conditions prior to works commencing and pre-occupation and fulfilling any associated mitigation actions.
28. In order to ensure compliance with the environmental requirements identified in the CEMP and to encourage continual improvement in environmental performance, The Ramsbury Manor Foundation will develop and maintain an Environmental Policy. The aims of the policy will be to:
 - meet the requirements of all relevant environmental legislation, consents, agreements, planning permissions, authorisations, and commitments;
 - ensure that all environmental undertakings and obligations of the Contractor are fulfilled;
 - adopt working methods that achieves good environmental practice on site;
 - ensure that sub-contractors and suppliers are aware of the very specific environmental constraints and opportunities of the site, and follow any necessary procedures in order to ensure good environmental practice;
 - identify the responsibilities of staff and sub-contractors in achieving good environmental practice on site; and
 - mitigate against the effect of the construction works on residents, highway users and the general public.

29. The Ramsbury Manor Foundation will be required to publicise a summary Environmental Policy statement to all site personnel and the general public.
30. The Ramsbury Manor Foundation will be required to obtain and implement all permits, consents, and licences necessary during the construction phase.

Type of Licence	Issuing Authority	Requirement
CL21 Low impact Bat Licence or Bat Earned Recognition (BER) licence	Natural England	Day roosts for common pipistrelle, soprano pipistrelle, brown long-eared bat and serotine will be destroyed. The Ramsbury Manor Foundation will appoint an appropriately experienced and licenced bat ecologist to obtain the relevant licence to permit the legal destruction of the roosts.
Discharge Consent	Environment Agency	A water discharge activity includes discharging trade effluent, or anything which is poisonous, noxious, or polluting.
Noise: Control of Pollution Act Section 61 Consent	Local Planning Authority	In advance of start date for construction, consultation required to agree hours of working. The Local Authority monitors construction activities to minimise pollution caused by noise. With a Section 61 complaints can be dealt with more effectively as the limitations have been agreed.
Waste Carrier Licence	Environment Agency	The Ramsbury Manor Foundation are to ensure their selected waste disposal contractor holds a Waste Carrier Licence. Waste Carriers to supply completed Transfer Notes for any collections and removals of waste from site. These must be kept for 2 years.
Hazardous Waste Producer Registration	Environment Agency	Only applicable in the event of hazardous waste removal e.g. asbestos. Annual registration. Completion of the Consignment Notes for the removal of Hazardous Waste by The Ramsbury Manor Foundation and Carrier. These must be kept for 3 years. Where required specialists to be contracted, e.g. asbestos removal.
Table 1: Permits, Consent and Licences		

Management of Construction Activities

31. The CEMP will form part of the construction contract for the site. Overall implementation of the CEMP will be the responsibility of The Ramsbury Manor Foundation. Environmental support and monitoring of construction activities will be supervised by the Contractor Environmental Manager and, where required under licence or in following a precautionary working method statement by a suitably qualified and licenced ecologist (Ecologist). Table 2 identifies individual responsibilities for each technical area.
32. All contractors and visitors to the site will be made aware of the Environmental policy and the controls applicable to their presence and activities on site including but not limited to:
 - Method Statements;
 - Risk Assessments;
 - Site Induction which includes Environment Briefings; and
 - Toolbox Talks.
33. The Site Manager will be responsible for monitoring communications between all relevant parties to the project ensuring that all environmental matters to the project are discussed and managed and observation of the communications will be recorded and agreed with the Contractor Environmental Manager.
34. Relevant site layout and location plans detailing the location and construction of the site compound, storage locations and car parking are to be displayed on an information board at the site entrance.

Site Induction

35. All site personnel including sub-contractors will be made aware of their responsibilities under the CEMP, and its appropriate implementation. A Site Induction will be provided by the Site Manager to all personnel at the start of the development programme, and to each visitor on an as needed basis. The induction will include the topics; general, health and safety (H&S) and environment, which are detailed in the following sections.
36. The current Site Induction will be modified to create a bespoke induction unique to the operations associated with the development.
 - Security: It is the responsibility of The Ramsbury Manor Foundation to ensure security at all times, including securing of vehicles and buildings. Employers and Employees alike will be expected to carry out daily checks of their areas to ensure no breaches have occurred.
 - Rules for Contractors and Subcontractors Document: This document sets out the standard and principals that all contractors working for The Ramsbury Manor Foundation must adopt.
 - Manual Handling: All manual handling should be minimised where possible. Mechanical aids should be adopted where avoidance of manual handling is not possible and loads should be risk-assessed before

attempting to move it. As a rule of thumb, the safe limit is considered to be 25kg for men and 16kg for women. Ensure suitable lifting procedures are adopted, in line with The Ramsbury Manor Foundation's rules.

- Working at Height: All working at height activities must be risk-assessed and carried out by competent trained staff.
- Driving: A speed limit of 5mph (in pedestrianised areas) and a 15mph (in non-pedestrianised areas) will be imposed within the proposed working area.
- Signage: All signage is to be understood and obeyed in accordance with classification, i.e. Mandatory, Prohibition, Information, Warning, Danger, Hazard and Emergency. Contractors are also asked to be vigilant and report any damages or missing signage back to the Site Manager.
- Welfare: Welfare facilities available include: toilets and mess room with basic facilities for making hot drinks and for heating food. The Ramsbury Manor Foundation must ensure the areas are left clean and tidy after use and report any defects to the Site Manager.

37. Personnel will be required to sign a record of their Site Induction and these will be kept on file.
38. The Ramsbury Manor Foundation will be required to ensure their current H&S Estate Management Policy includes for all necessary policy and procedures in connection with all appropriate duties under the CDM Regulations 2015. The Ramsbury Manor Foundation will appoint a Principal Designer and CDM Coordinator to act on their behalf during the design and construction phases of the project.
39. The procured Main Contractor (for the works) will ensure an appropriate person is appointed as H&S Manager who will be responsible for enforcing health and safety measures during demolition and construction phases. A site-specific Construction Phase Health and Safety Plan will be prepared, reviewed and adopted by the Site Manager before works commence.
40. In line with Main Contractors H & S Plan, all personnel and visitors to the site will be given H&S training as part of their site induction which will include specific measures appropriate to the site and need for appropriate PPE etc.
 - H&S Policy: The Policy is displayed on all The Ramsbury Manor Foundation's properties and is to be understood and followed by all Company Employees and Contractors. Any misunderstanding or disagreements must be brought to the attention of the Estate Manager & Client Project Manager.
 - First Aid & Accident Investigation: A First-Aid kit should be located at the site office. Minor incidents should be dealt with using these kits. In the case of a more severe incident, the person should be evacuated to the nearest local hospital with A&E facilities being the Great Western Hospital, Swindon. In the case of a major incident, the person(s) should be evacuated by Ambulance via an emergency 999 telephone call. Mobile phone coverage at the site may be erratic.

- COSHH: Contractors will comply with the requirements of the COSHH regulations 2002 and relevant sub sections.
 - Personal Protective Equipment (PPE): There is a mandatory requirement on all Estate staff, visitors and contractors to wear the correct PPE at all times when accessing any construction site. This includes a hard hat, hi-vis Jacket/Bib and boots or shoes with toe protection. Dependant on the activity undertaken or area to be visited, gloves, masks, gas alarms, breathing apparatus, goggles and ear-defenders may be required.
41. As part of this induction, a specific session will be dedicated to the ecology of the site lead by the Contractor Environmental Manager, with input from the appointed Ecologist, where required. The aim of this session/training is to make all personnel working on the site fully aware of the ecological sensitivities of the site and surrounding habitats, and the restrictions imposed on working arrangements to safeguard protected species.
 42. The Ramsbury Manor Foundation will oversee the management of the Scheme. The Project Manager will delegate site supervision roles such as the Environmental Management and procure specialist environmental consultants to supervise, monitor or check The Ramsbury Manor Foundation's Environmental Method Statements and sensitive activities prior to the commencement of works.
 43. The environmental roles and responsibilities of the construction team are described in the section below:

Project Manager:

- oversee the timings and contractual responsibilities of the Contractor;
- act as one of the principal contacts for the Contractor and Site Manager; and
- act as a client (The Ramsbury Manor Foundation) representative.

Estate Manager:

- oversee the accessibility and maintenance of the Estate grounds;
- act as one of the principal contacts for the Contractor and Site Manager; and
- act as a client (The Ramsbury Manor Foundation) representative.

Principal Contractor:

- act as main contact for matters relating to site issues, which will be reported to the Project Manager;
- responsible for identifying a Contractor Environmental Manager for the project
- act as an example and champion all areas of environmental management;
- ensure the effective implementation of the CEMP through the availability of appropriate resources and ensure all legal requirements are delivered; and

- ensure necessary training is given to personal to ensure necessary levels of environmental competence.

Site Manager:

- act as an example and champion all areas of environmental management;
- ensure the effective implementation of the CEMP through the availability of appropriate resources and ensure all legal requirements are delivered;
- regularly review the CEMP throughout construction to ensure it remains relevant to the project and is effective in identifying and managing environmental risks;
- ensure that the Site is safe and that hazards are identified and secured;
- ensure that all documentation referencing environmental procedures and policy are relevant and up- to date and included within the CEMP;
- manage all necessary documentation to demonstrate compliance with appropriate legislation for the required period;
- ensure correct procedures are followed in case of an environmental incident; and
- work closely with Contractor Environmental Manager and the Ecologist to ensure that the relevant approved licence is applied in full. In instances where timings will need to be altered these will need to be communicated as soon as possible to the Contractor Environmental Manager and the Ecologist to allow time for the necessary works to be completed.

Construction Supervisors:

- ensure that the CEMP is implemented on Site on a day-to-day basis;
- act on and investigate any environmental incidents and report findings to the Site manager;
- conduct and document weekly environmental inspections;
- ensure that “Toolbox Talks” are being delivered to the Site workforce; and
- implement and maintain environmental controls and standards on the Site.

Site Staff and Sub-Contractors:

- comply with environmental information given in the Site Induction;
- ensure they are fully aware of the environmental procedures in place and if they have any questions, they should be directed towards the Site Manager;
- ensure all construction activities are carried out in line with the procedures detailed in the CEMP; and
- report any environmental incident to the Site Manager.

Contractor Environmental Manager:

- ensure that all site personnel adhere to the construction/habitat protection and habitat manipulation activities in accordance with the measures set out in the CEMP and seeking advice from the Project Manager or the Ecologist if there is any doubt about a particular activity that has potential to damage habitat or protected species;
- co-ordinate and manage all the environmental activities during the construction works. The duties associated with this role include:

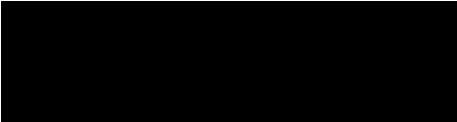
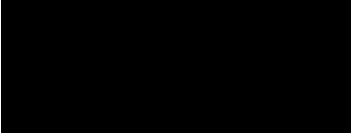
- review and update construction method statements, work instructions and other specialist procedures,
- identify environmental competence requirements for all staff and ensure delivery of environmental training to the project team,
- review and improve method statements for environmental aspects prior to works starting,
- monitor construction activities to ensure that identified and appropriate control measures are effective and ensure compliance with the CEMP,
- act as main point of contact between the regulatory authorities and the project on environmental issues,
- monitoring of the programme for the environmental works, and the provision of status reports as necessary,
- provision of advice and liaison with construction teams to ensure that environmental risks are identified, and appropriate controls developed which are identified within method statements,
- carry out or delegate weekly inspections for exclusion zone fencing and pollution control measures,
- assist with the development and undertaking of training for site staff and maintain a training record where necessary,
- management of the environmental monitoring programme,
- undertake an environmental audit of any subcontractors and suppliers,
- assist in responding to complaints; and
- in the event of an environmental incident ensure correct procedures are adhered to.

Ecologist/Ecological Clerk of Works (ECoW):

- The ecologist will be suitably qualified and experienced, and licensed/accredited where necessary when advising or supervising works that affect protected species.
- The Ecologist will be the central point for all ecological issues liaising as appropriate with the Project Manager and the Contractor Environmental Manager to ensure the delivery of this CEMP.
- The Ecologist will be responsible for:
 - delivery of toolbox talks at appropriate stages, as identified by the construction team;
 - supervision of habitat clearance works and demolition;
 - provision of licensed specialists for works with protected species;
 - liaising with Natural England in line with mitigation licence requirements;
 - reporting back any issues and provision of advice on how to rectify these; and
 - provision of ongoing ecological advice.
- The Ecologist should be provided with revised programme of works as and when available to determine watching brief requirements and associated ecological issues and to enable advice to be provided where sensitive ecological windows are not being achieved.

Contact Details and Protocol for Reporting Incidents

44. In the event of an emergency, the Site Manager should be contacted in the first instance. Relevant procedures will then be advised, or the matter referred to the Contractor Environmental Manager and the Ecologist, if appropriate. The key project roles for The Ramsbury Manor Foundation are listed in Table 2. This list will be maintained and updated by The Ramsbury Manor Foundation throughout the life of the project.

Role	Name	Contact
Client	The Ramsbury Manor Foundation	c/o Project Manager
Project Manager	Jeremy Stone	Greenwood Projects 
Estate Manager	Adam Flett	The Ramsbury Manor Foundation 
Principal Contractor	TBC	TBC
Site Manager	TBC	TBC
Designer	TBC	TBC
CDM Coordinator and Principal Designer	TBC	TBC
Construction Supervisors	TBC	TBC
Contractor Environmental Manager	TBC	TBC
Ecologist/ECOW	Matt Zeale	Davidson-Watts Ecology Ltd 
Table 2: General Site Contacts List		

Agreed Working Hours

45. Construction works will be kept to:
- Monday to Friday – 08:00 – 18:00;
 - Saturday – 08:00 – 13:00; and
 - Sunday and Bank Holidays - No working

Communication Strategy for CEMP

46. The Site Manager will distribute a telephone number for the site team. As a minimum, this will be on the site notice board.
47. The CEMP will be distributed to the project team, including subcontractors, to ensure that the environmental requirements are communicated effectively. Key activities and environmental sensitive operations will also be briefed to staff and subcontractors. Project, client, and company environmental policies shall be displayed on site.
48. 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).
49. 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 offices have an environmental spill kit which are to be easily accessible.
50. 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. Where construction activities result in a complaint being made to the site operatives the customer contact will be reported to the LPA.
51. Once recorded and reported The Ramsbury Manor Foundation will liaise with the local planning authorities to develop mitigation measures and discuss and address any residual issues once the actions have been implemented.
52. Careful monitoring of complaints received, including recording details of the location of the affected party, time of the disturbance and nature of the disturbance can assist with managing the works to reduce the likelihood of further complaint.
53. Contact details for the site office and Site Manager will be publicised in advance of the works using appropriate measures including site signage, notice boards or by letter.

Environmental Management, Mitigation and Monitoring

54. This section identifies the key environmental aspects that are to be managed during construction of the proposed development.

Protected Species

55. The following mitigation measures and methods must be followed throughout the project works to prevent harm to protected species:
- where ground maintenance such as grass cutting or cutting back of tall ruderal and woody vegetation will occur, the work may cause harm to protected species including reptiles, amphibians, breeding birds, dormice, hedgehogs, and protected flora;
 - topsoil stripping may also cause harm to protected species including badgers and stag beetles and other burrowing mammals;
 - prior to any works commencing the area to be cleared must be carefully checked by a suitably qualified Ecologist to check for the presence of protected species; and
 - only after the Ecologist is satisfied that the area is clear of protected species (or in the case of protected flora, the area is marked) can vegetation clearance can commence.
56. It is recommended that the areas of grassland within the proposed working area are grazed until the start of construction to maintain a short sward and discourage the ingress of protected species. Prior to construction, the area should be stripped of its topsoil and the designated topsoil storage bund must have an exclusion fence erected around it to prevent ingress of reptiles and amphibians (herptiles).
57. **Preferred Methods of Vegetation Clearance:** Vegetation clearance will be done in a phased approach, a method known as a 'Phased Habitat Manipulation.' Vegetation clearance should be done by mechanical hand tools such as strimmers / brush cutters, or by rotary mower where the cutting deck is able to be raised to a minimum of 12-20cm from the ground. Hedges can be reduced using hedge cutters and chainsaws. Topsoil should be stripped by machines with a wide bucket with long tines. A grading bucket is only acceptable when there are overriding safety concerns from underground services. The grading bucket must have its blade positioned at a 90° angle to the ground and carefully pulled back to allow the substrate to crumble and allow any animals to disperse. All areas should be checked by the Ecologist prior to and after work commencing in order to check the area for protected species.
58. **Vegetation Clearance - Herptiles:** When maintaining grassland and tall ruderal or non-ruderal vegetation in order to make areas unsuitable for reptiles, a 2-phase cutting approach is required as a persuasive technique that will allow any reptiles present to move away from the area, this is known as a 'Phased Habitat Manipulation'. A careful fingertip search will precede any vegetation cutting to check for the presence of protected species. The first phase is an initial cut to approximately 12-15cm, the area should then be left for a minimum

of several hours (to be instructed by the ecologist) to allow reptiles to move away from the area. The second phase cut must be preceded by a careful fingertip search by the Ecologist checking the area for any remaining reptiles. Any reptiles discovered will be carefully translocated to the designated receptor site for the project. Once the area has been checked then the short cutting can commence

59. **Topsoil Clearance - Herptiles:** The works will begin with topsoil stripping under strict ecological supervision. It is necessary to carry out topsoil stripping at times of the year when reptiles are active, i.e. between March / April and October / November depending on favourable weather conditions (temperatures above 7°C). The upper layer (15cm minimum or the depth of the topsoil is preferred) of topsoil will be stripped by machines with a wide bucket with long tines (to minimise injury to reptiles). A grading bucket is only acceptable when there are overriding safety concerns from underground services. The grading bucket must have its blade positioned at a 90° angle to the ground and carefully pulled back to allow the substrate to crumble and allow any animals to disperse. The pace of clearance must be slow enough to prevent injury to reptiles and allow sufficient time for any buried animals to be uncovered. Uncovered reptiles will be captured by hand by an ecologist and moved to the receptor site, which will remain undeveloped and will be managed sympathetically for reptiles (i.e. management of scrub encroachment) to ensure a sustainable population. At the end of each day, topsoil must be checked for reptiles and compacted (or removed from site) to make that area inhabitable for reptiles. The ecologist will guide the work.
60. In order to prevent ingress of herptiles into the working area, herptile exclusion fencing will be put up between the working area and areas of suitable herptile habitat, as shown in figure 1.

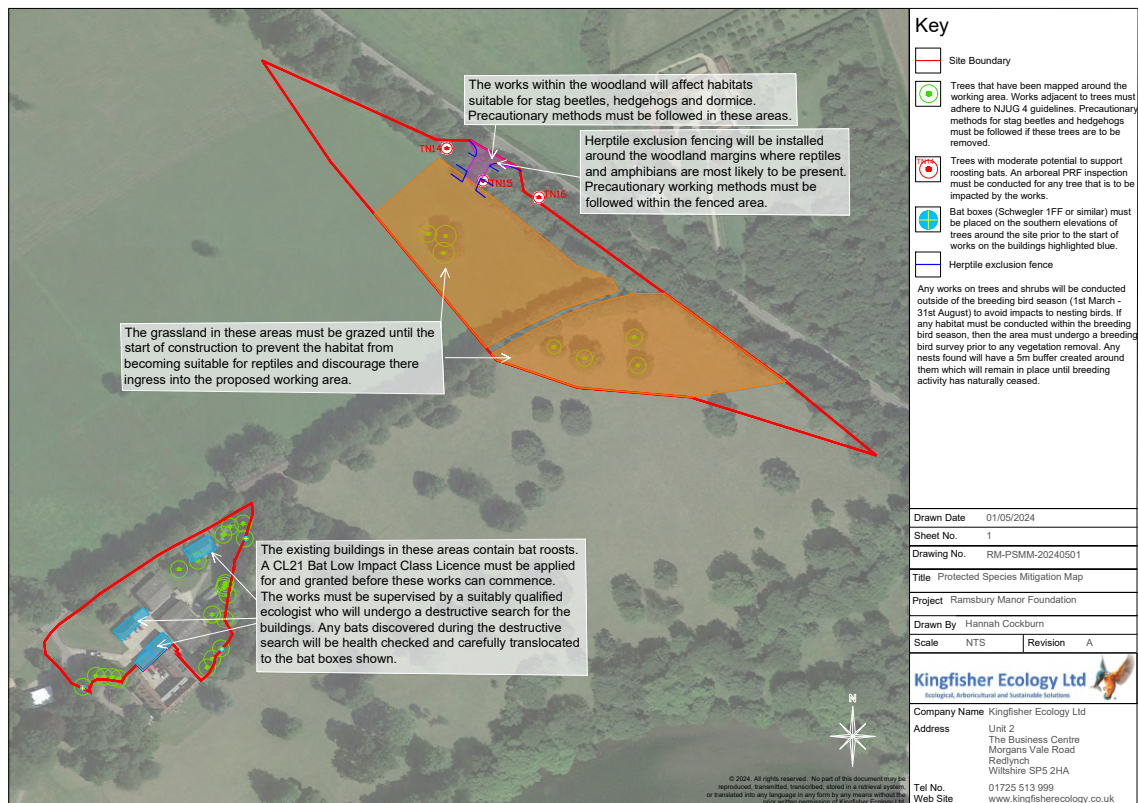


Figure 1 – Sensitive Ecological Features on Site

61. **Vegetation Clearance – Hedgehogs:** When maintaining scrub, tree roots with cavities and spoil heaps (wood / brush piles and composting areas) there may be potential for hedgehogs to be present. It is essential that all scrub, tree roots with cavities and spoil heaps (wood / brush piles and composting areas) are carefully dismantled to prevent crushing of hedgehogs that may be present. Any hedgehogs encountered will be health checked and translocated to the designated receptor site for the project. A careful fingertip search will precede any vegetation cutting to check for the presence of protected species. The first phase is an initial cut to approximately 15cm, the area should then be left for a minimum of several hours (to be instructed by the ecologist) to allow hedgehogs to move away from the area. The second phase cut must be preceded by a careful fingertip search by the Ecologist checking the area for any remaining hedgehogs. Any hedgehogs discovered will be health checked and carefully translocated to the designated receptor site for the project. Once the area has been checked then the short cutting can commence.
62. **Topsoil Clearance - Stag Beetles:** If topsoil is to be removed where there is dead and rotting wood buried or partially buried wood particularly within or adjacent to woodland, scattered trees and hedgerows, there may be potential for stag beetle eggs and larvae to be present. It is essential to remove any stag beetle eggs or larvae present to a designated receptor site for the project, an exercise called a 'translocation'. The receptor site (within a suitable woodland or hedge) will consist of a dug-out hole with dead and rotting wood placed inside for the stag beetles to feed on. The hole must be carefully backfilled so that the eggs and / or larvae are not crushed. The works will begin with topsoil stripping under strict ecological supervision. The upper layer (15cm minimum or

the depth of the topsoil is preferred) of topsoil will be stripped by machines with a wide bucket with long tines. A grading bucket is only acceptable when there are overriding safety concerns from underground services. The grading bucket must have its blade positioned at a 90° angle to the ground and carefully pulled back to allow the substrate to crumble and allow any animals to disperse. The pace and method of clearance must be suitable to allow the crumbling of soil to expose eggs and larvae with minimal mortalities. Uncovered eggs and/or larvae will be captured by hand by an ecologist and moved to the receptor site, which will remain undeveloped and will be managed sympathetically for stag beetles (i.e. installation of loggeries and breeding boxes) to ensure a sustainable population. The Ecologist will guide the work.

63. **Vegetation Clearance - Nesting Birds:** Clearance of vegetation including trees, hedges and scrub should be avoided during the bird breeding season (1st March- 31st August, inclusive) to avoid impacts on nesting birds. If vegetation clearance must be conducted within the bird breeding season, then the area must undergo a breeding bird survey conducted by a suitably qualified ecologist immediately prior to vegetation removal. If any ground nesting birds or birds nesting in trees, stands of nettles, brambles or other woody vegetation are discovered, then a 5m buffer zone around the nest site must be created and no works should be done within the buffer zone until all chicks have fledged and / or breeding bird activity has naturally stopped. Breeding bird activity is considered as all activity that contributes to nest building through to when chicks have fledged and all breeding bird activity has stopped with the nest being abandoned for the season, this will be confirmed by the Ecologist.
64. **Vegetation Clearance - Dormice:** Dormouse presence / absence surveys were previously conducted on the site, and no dormice were found². The following method statement must be followed as a precaution in the unlikely event dormice are discovered within the working area:
- The removal of all affected habitats suitable for dormice will be carried out by destructive search supervised by an ecologist in order to safely check for dormice.
 - All suitable habitat woody vegetation (e.g. hedgerows) will be carefully searched for nests prior to clearance.
 - Small trees and scrub will be cut to approximately 40cm above the ground by hand (bow or chain saw) and removed (by hand). Where appropriate, large trees and bushes will be carefully felled in sections and lowered to the ground by rope. All cut material will be searched and removed carefully to protect any dormice on the ground.
 - The grubbing up of stumps / root balls will be completed under strict ecological supervision as the final stage at least 24 hrs after the initial cutting to 40cm.
 - In the unlikely event that dormice (or nests) are found during the destructive searches, all works must be suspended until a European Protected Species Mitigation Licence can be obtained. When under an approved European Protected Species Mitigation License (EPSML),

² See Dormouse Survey Report forming part of original application (document ref: RM-20220119-DM).

dormice will be captured by hand and, after being checked for injuries, transported immediately in large cotton drawstring BTO bird holding bags by an ecologist to the nearest suitable habitat (i.e. nest boxes within the nearest retained hedge). Alternatively, if the dormouse is within a nest, then it will be transported within the nest.

- Once the supervising ecologist is satisfied that all vegetation that may provide opportunities for dormice to build nests has been safely removed, or made unsuitable for habitation, the remaining works will proceed.
- Contractors and other unlicensed personnel are strictly forbidden from handling dormice. However, if a dormouse is found injured it should be taken to a veterinary surgeon immediately.

65. **Destructive search - Badger Setts:** No badger setts have been found on the site to date. If badger setts are discovered within 30m of the proposed working area, then the Ecologist must be contacted for further advice.
66. **Bats - Tree Works:** Three trees on site close to the proposed working area to have moderate potential to support roosting bats, trees TN14, TN15 and TN16³. Prior to any tree works⁴ commencing that could potentially affect the Potential Roost Features (PRF) identified, an Arboreal PRF inspection, using a Mobile Elevated Work Platform (MEWP), will be required to closely inspect the feature for the presence of bats. If bats are discovered at any stage of the inspection, then a European Protected Species Mitigation License (EPSML) will need to be applied for and granted prior to any works commencing that could potentially disturb the roost.
67. **Bats - Buildings:** Phase 2 bat surveys were conducted on the buildings to be affected by the proposed works in 2018 and 2021, and it was found that roosting bats are present within buildings B3, B3.2, B5 and B9 (Figures 2 and 3).

³ See the Preliminary Ecological Appraisal and Preliminary Ground Level Tree Assessment forming part of the original application (document ref: RM-20210806-PEA).

⁴ See Tree Removal Plans in Arboricultural Method Statement by SJA Trees submitted with this discharge of condition application (document ref: SJA ams 25425-01) – a total of 29 trees are to be removed, with 3 groups of trees to be partially removed and 3 trees to be pruned.

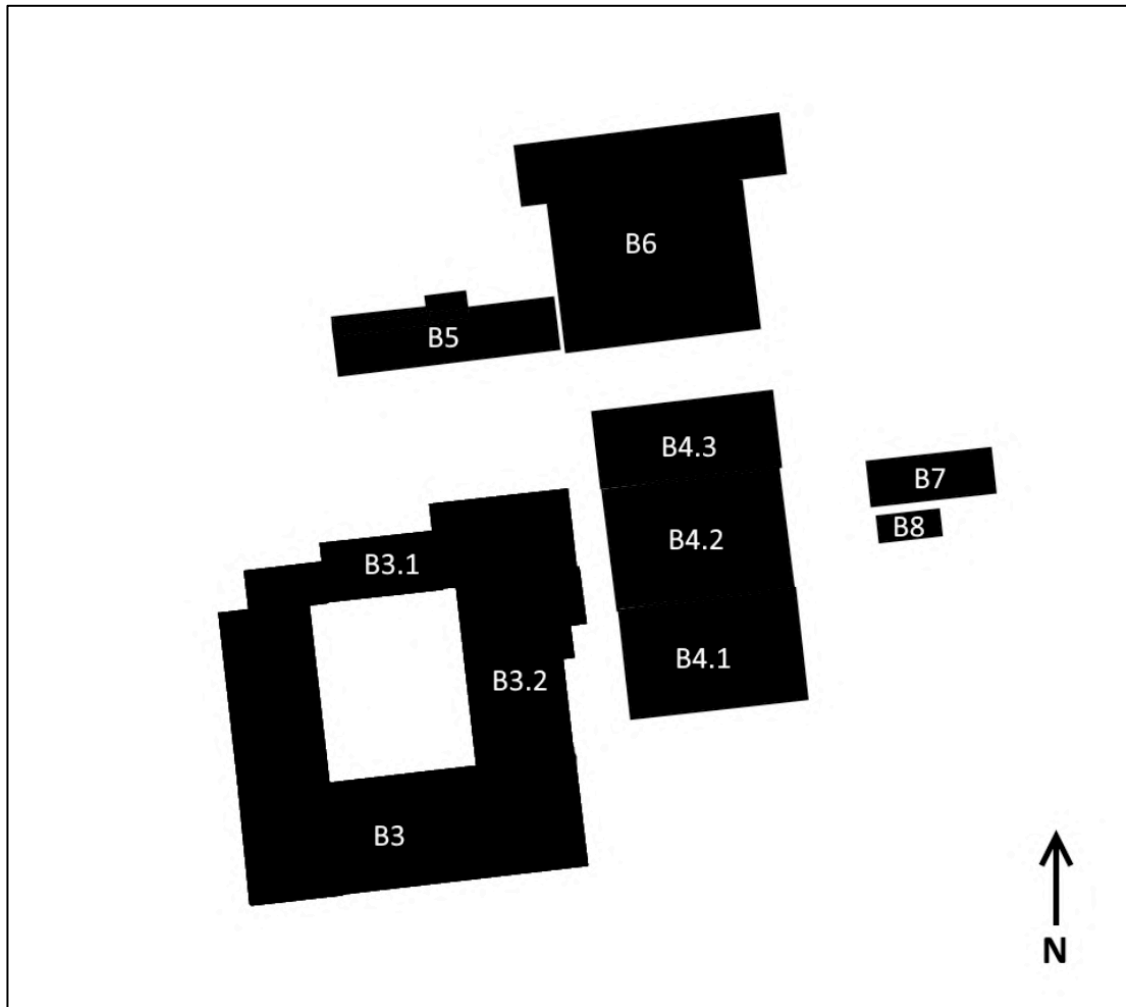


Figure 2 – Buildings to be affected by proposed works – Stables and outbuildings



Figure 3 – Buildings to be affected by proposed works – Cottage and barn

68. The Garages and Storage building labelled as B3.1 is attached to the side of the Stables (B3) and the Storage Building (B3.2). There is also a separate garage (B5) and cottage (B9). Due to the presence of a common pipistrelle, soprano pipistrelle and serotine day roost in B5 and a brown long eared bat day roost in B9, which will be destroyed by the proposed works, a CL21 Bat Low Impact Class Licence (BLICL) or Bat Earned Recognition (BER) licence will need to be applied for and granted for Buildings B5 and B9 prior to any construction works. Due to the potential for disturbance to bat roosts in B3 and B3.2 during the demolition of B3.1, the licence should also cover this. The separation of Building 3.1. from buildings 3 and 3.2 and the destruction of buildings B5 and B9 will be done under strict ecological supervision as follows:

- A cautious destructive search will be undertaken for buildings B3.1, B5 and B9 during good weather conditions with no rain or high winds. The destructive search will be preceded by a thorough inspection of all bat features by a suitably experienced and licenced bat ecologist using a high-powered torch, bat detector and endoscope in order to search for any bats present, and a toolbox talk given by the bat ecologist to all contractors involved in the demolition work to ensure the working methods are compliant with the licence.
- If bats are found to be present, they will be carefully captured by hand and placed into a lined and ventilated container. Any bats captured in the structure will be carefully identified, checked for injuries, sexed, and translocated to bat boxes already positioned on the adjacent trees within the curtilage of the property.
- All tiles will be carefully lifted vertically and turned to check for roosting bats beneath. All wooden battens will need to be carefully prised away from the roof membrane and wood roof frame and the battens and roof membrane carefully removed to expose the roof void beneath. Only once all roost features have been exposed and all bats translocated by hand or naturally dispersed, the works can continue unsupervised.
- Three Schwegler 1FF Bat Boxes or similar will be positioned on trees adjacent to the structures before works begin. Any bats captured during the destructive search will be placed in the bat boxes with the entrances blocked until the end of the day when the entrance block will be removed, and the bats allowed to emerge freely.
- A bespoke bat loft will be incorporated into the newly built estate yard as illustrated in Appendix 1. Should it be necessary to use any wood timber treatments in the areas of known bat roosts, only approved treatments may be used. Guidance on their use in the 'Bat Workers Manual', Chapter 10 must be followed. Breathable roofing membranes should not be used in any part of the roofs where bats can come into contact with the roofing membrane unless the membrane has a certificate to prove that it passes a snagging propensity test. Bitumastic 1F felt is the preferred roof membrane where bats are present. Alternatively, a breathable roofing membrane could be used where it has a certificate to prove that it has passed a snagging propensity test.
- An experienced or licenced bat ecologist will also monitor the progress of the dismantling of B3.1 to ensure no vibration occurs that will disturb roosting bats in the adjacent stables. Once the structures of B3.1 have

been separated from B3 and B3.2 and the supervising ecologist is satisfied that there is no further potential to create vibration to B3 or B3.2 then the remaining parts of building 3.1 can be dismantled without ecological supervision.

- The destructive search will be undertaken during the late Autumn and Winter months when bats are likely absent from the roof void. All works will be conducted in this time to minimise disturbance during the bats' active season.
- Due to the careful timing of works and the characterisation of the roosts by the Phase 2 bat surveys, it is likely that only a few bats may be present. The species and number of bats that may be present during the works are not expected to exceed:
 - 3-6 common pipistrelle bats
 - 1-3 soprano pipistrelle bats
 - 1-3 brown long eared bats
 - 1-3 serotine bats
- In the unlikely event that any further species are encountered other than those covered by the licence, all work will cease, Natural England consulted, and the licence amended accordingly. Any bat found to be injured will be passed to a bat carer as necessary.

69. The lighting strategy outlined must also be followed to prevent disturbance of bats on the site.

70. Should any protected species be encountered in the absence of an ecologist, work should stop immediately and the ecologist for this project contacted.

Light Pollution

71. Temporary lighting of the site will be required during the winter months to facilitate safe working. During this period, external lighting will be required at specific locations including the access to each temporary compound, compound car park, specific work sites and their access routes.

72. Light pollution is often caused by the way light is emitting from lighting equipment. Choosing appropriate equipment and carefully mounting and directing it can make a significant difference to minimising the impact.

73. The lighting strategy provided by Delta Green Environmental Design (2023) includes directional lighting that will not impact any biodiversity enhancements or existing habitats on the site. Light sources such as Light Emitting Diodes (LEDs) will be used as the light emitted is more directional with a warm white, narrow, instant beam. Security lighting will be timed and activated by motion sensors to reduce light pollution. All bollard lighting will be 1000mm high and downward facing. All lighting will ensure that boundary vegetation is not illuminated and there will be no illumination above the horizontal plane.

74. In determining the lighting arrangement on site, consideration will be given to residents and other sensitive receptors that may experience an adverse impact due to light pollution.

75. Where possible a daylight only construction schedule will be adopted to minimise adverse lighting. The following measures will be implemented during the construction works:
- any lighting will be positioned and directed so that light is directed onto the area of works only, without spillage. There will be no upward lighting;
 - external lighting shall only be used at specific locations including the access to each temporary compound, compound car park, specific work sites and their access routes. There shall be no use of general site flood lighting;
 - use of light will be task specific, directional lighting in order to reduce any potential impact on residential or ecological receptors;
 - dim or switch off lights where it is safe to do so and when the task is finished;
 - use specifically designed equipment and choose it for the specific tasks;
 - position lights sensibly and shaded to prevent backlighting; and
 - it is not anticipated that any construction works will be carried out at night.

Arboreal Mitigation

76. Trees located around the proposed working area have been surveyed and a mitigation strategy has been produced. The tree protection plans for the site⁵ show where protective fencing will be erected to protect the surrounding trees, where manual excavation is required to minimise damage to tree roots, and where an Arboricultural Watching Brief is required.
77. This fencing will be installed at the commencement of works and prior to any habitat clearance on site, apart from that required to install the fencing. The fencing will be continuous to prevent human or vehicular access. Weatherproof notices will be attached to the protective fencing displaying the words 'Construction Exclusion Zone' with a list of all restrictions. These restrictions must be covered in any environmental toolbox talks.
78. The fencing should be monitored weekly by the contractor's Environmental Manager and any damage or gaps rectified immediately. No works are to encroach past the location of the tree protection fencing, and no materials are to be stored past the fence line.

Air Pollution

79. Any impacts of the Proposed Development on air quality would be associated with the construction phase, and in particular relating to dust generation. Emissions to the air including dust and exhaust fumes can be caused from certain construction activities, including:
- site preparation and restoration after completion;
 - earthworks / excavation / demolition;

⁵ See Tree Protection Plans in Arboricultural Method Statement by SJA Trees submitted with this discharge of condition application (document ref: SJA ams 25425-01).

- materials handling, storage, stockpiling, spillage and disposal;
- construction - use of diesel-powered plant and equipment and;
- construction traffic.

80. The receptors sensitive to air quality include residential properties, schools, nurseries or locations where people can spend more than 8 hours a day and ecological receptors. The study area for human receptors is 350m while for ecological receptors it is 50m.

Environmental Control

81. During the construction works, best practicable means will be employed to ensure that there is no significant adverse impact on sensitive receptors through the following mitigation measures:

- all excavated materials will be stockpiled in spoil heaps no greater than 2.5m in height in order to minimise wind lipping;
- materials including stone aggregates will be stored in specified areas within the working area. Dust management will be controlled by dampening down and good housekeeping;
- wastes will not be burnt on site / fires will be prohibited on site;
- an adequate water supply will be provided on the site for effective dust suppression/mitigation, using non- potable water where possible and appropriate;
- barriers will be erected between the work area and sensitive receptors where considered necessary and at least to the height of any stockpiled material;
- materials will be moved from the storage area and installed as soon as is practical. Prolonged storage is not anticipated;
- excavation works will not to be undertaken on very windy, dry days;
- planning of deliveries and waste collection will avoid stockpiling on site;
- waste skips and lightweight materials will be covered if there is a likelihood of dusts etc. escaping;
- the drop heights of material will be minimised (e.g. Between excavator buckets and dump trucks/skips);
- plant and equipment will have regular servicing;
- sand and other aggregates will be stored in bunded areas and will not be allowed to dry out;
- double-handling of material will be avoided wherever reasonably practical;
- the location of grinding and cutting activities will be considerate and only used when fitted with or in conjunction with suitable dust suppression techniques such as water sprays or local extraction;
- completed earthworks will be sealed or re-vegetated as soon as reasonably possible after completion; and
- site fencing, barriers and scaffolding will be kept clean using wet methods.

82. All the workers on-site will be made aware of potential contamination issues and locations on site and will use best practice techniques during the construction phase.

83. It is possible that areas of localised contamination not identified at the pre-construction phase may be encountered during the site preparation and ground works phases.
84. Land contamination may be indicated by areas of:
- discoloured soil (e.g. chemical residues);
 - fibrous texture to the soil (e.g. asbestos);
 - presence of foreign objects (e.g. chemical/oil containers);
 - evidence of previously worked soil;
 - evidence of underground structures, tanks etc;
 - waste pits;
 - old drain runs, tanks, flues, etc;
 - evidence of liquids or solid wastes; and
 - odour.
85. If any of the above has been discovered, the works will stop immediately and site staff will protect the area. The Environmental Manager and Site Manager will be contacted, so they can advise on further investigation and advice of any additional PPE requirements. The contaminated material will not be moved until formally advised.
86. The operation of construction vehicles and the handling, use and storage of hazardous materials will be undertaken as follows:
- construction vehicles and plant will be regularly maintained and supplied with spill kits and drip trays to reduce the risk of hydrocarbon contamination;
 - refuelling should be undertaken in specified areas where there is non-permeable hard standing.
 - the handling, use and storage of hazardous materials will be undertaken in line with the Environment Agency's Pollution Prevention Guidelines (e.g. PPG2 Above Ground Oil Storage Tanks);
 - adequate bunded and secure areas with impervious walls and floors, with a capacity of 110% of substance volume, are to be provided for the temporary storage of fuel, oil and chemicals on site during construction;
 - development of site pollution control procedures in line with Environment Agency's Pollution Prevention Guidelines, and appropriate training for all construction staff;
 - provision of spill containment equipment, such as absorbent material, on site;
 - where possible, store all construction and oil, fuel and diesel materials as far from the nearby water bodies as possible;
 - contaminated materials shall either be contained on site or removed from site to minimise the risk of spreading the contamination;
 - excavated contaminated ground must be treated or disposed of appropriately (potentially as hazardous waste depending on the waste classification), and relevant documents completed and retained. All controls shall be documented within and communicated through the appropriate method statements and/or toolbox talks;

- avoid stockpiling if material is to be removed from site. Where stockpiling is necessary, the stockpiles will be made on appropriately contained impermeable surfaces and plastic sheeting used to cover and prevent spreading and leaching;
 - in dry or windy weather, assessment for the need to cover the stockpiles with sheeting will be made to prevent carriage of contaminated material in dust form;
 - trucks removing contaminated material will cover the load to prevent spread by road transport; and
 - dispose of contaminated materials using registered waste carriers and duty of care notes.
87. Hazardous materials proposed to be used during the construction works will be identified and an appropriate Control of Substances Hazardous to Health (COSHH) Assessment carried out. The information will be reviewed regularly to ensure that any new substances hazardous to health are identified prior to being brought on to the Site and that suitable arrangements are made for their storage, use and disposal.
88. Supervisors and Safety Managers will also brief the site staff who will be using the substance, on its safe use, disposal and any emergency procedures.
89. The Project Environmental Manager will control and monitor the COSHH system.

Storage of Fuels, Oils and Chemicals

90. Hazardous substances, including contamination, fuels, chemicals, waste, and construction material, will be stored, handled, transported and disposed of, according to relevant legislation and best practice guidance to mitigate spillages and leaks.
91. All chemical containers on site will be correctly labelled, sealed, fit for purpose, protected against unauthorised use and securely stored when not in use to prevent them being damaged or accidentally spilt. Unlabelled containers will be removed from site as hazardous waste and any damaged containers will be repaired or removed from site and replaced.
92. Oils and oil type substances are covered by The Control of Pollution (Oil Storage) (England) Regulations 2001. Construction work will ensure the following:
- a bund must be sufficient to contain 110% of the maximum contents of any oil container of 200 litres or more;
 - storage of fuel and chemicals only within a designated compound, which is at least 10m from any watercourse;
 - spill response kits placed near stores containing liquids and near watercourses;

- where more than one container is stored, the bund should be capable of storing 110% of the largest tank or 25% of the total storage capacity, whichever is the greater;
- tanks, drums or other containers must be strong enough to hold the oil without leaking or bursting;
- the oil container must be positioned away from any vehicle traffic to avoid damage from collision;
- a bund or drip tray must be provided to catch any oil leaking from the container or its ancillary pipework and equipment;
- the bund base and walls must be impermeable to water and oil and checked regularly for leaks. Any containment must also be resistant to attack from the chemicals stored;
- any valve, filter, sight gauge, vent pipe or other ancillary equipment must be kept within the bund when not in use;
- all valves / hoses shall be turned off and securely locked when not in use;
- an above ground oil store or filling location must not be located within 10 metres of a watercourse or 50 metres of a well or borehole;
- drip trays/plant nappies must be used and spill kits and drain covers kept in close proximity. Replenish spill kits when necessary;
- oil and chemical storage areas shall be checked weekly as a minimum or daily following rain;
- bunds & drip trays shall be protected to avoid any water entering them. If full of water, drip trays must be emptied in a suitable manner as agreed with the Site Manager. No contaminated water can in any circumstances enter any drains and if tankered from site, must be removed in accordance with legislation with all necessary permits and licences;
- plant nappies must be used as per manufacturer's guidelines with appropriate liners. Used liners to be disposed of as hazardous waste;
- the site emergency response plan must be available on site;
- a COSHH register will be produced and maintained on site;
- all plant and equipment will be free from leaks and will be checked regularly and maintained as required;
- static plant shall be equipped with integral drip trays or shall be used in conjunction with plant nappies or drip trays;
- waste oils shall be stored as detailed above and disposed of as hazardous waste;
- any soil that becomes contaminated with fuels, oils or chemicals shall be removed from site as hazardous waste and the ground reinstated; and
- all fuels, oils and chemicals will be stored in an Armorgard TransBank TRB3 Flammables Box.

93. For cement and concrete, designated controlled areas shall be used for minimal cleaning of chutes only.

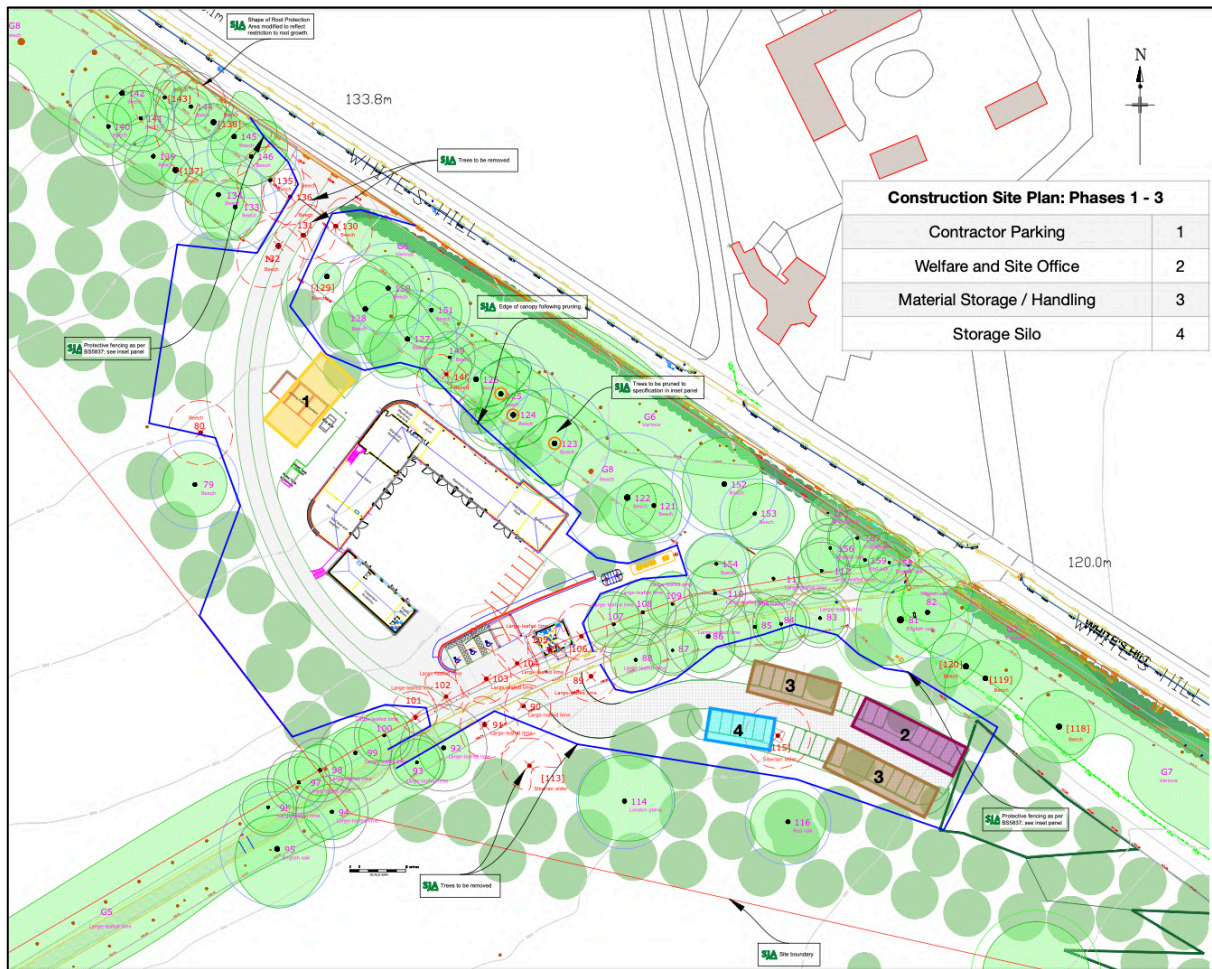


Figure 4 – Construction Site Plan: Phases 1 - 3



Figure 5 – Construction Site Plan: Phases 3 - 5

94. The Environmental Policy and COSHH specifically recommend that the following mitigation measures are implemented during the construction phase:

- Storage of any fuels, oils and chemicals on a bunded area of hardstanding and outside of watercourses and the floodplain. This will be contained in a Armorgard TransBank TRB3 Flammables Box.
- Prevention of any washing of equipment and storage of soil stockpiles within 10m of a watercourse.
- Discharge from soil stockpiles, excavation, dewatering and following pipe sterilisation / cleansing may require treatment and an Environment Agency permit if the material is identified as being contaminated.
- Set procedures to ensure that accidental spill events are dealt with quickly and effectively. This should be described in a Pollution Incident Response Plan.
- The flood risk associated with construction of any ancillary structures within 8m of a main river or ordinary watercourse will be considered in the consenting process.

Waste Management

95. During the construction phases of the Proposed Development, a significant amount of waste will be generated. Specific mitigation and control measures will be developed to minimise environmental impacts, including the preparation of a Site Waste Management Plan (SWMP), which is a mandatory requirement for developments of this size in England.
96. Throughout the construction phase, all waste management activities and responsibilities will lie with the Site Manager. The Site Manager will ensure that all works carried out are in compliance with industry best practice guidelines, including consideration of waste management and environmental management guidance.
97. The Contractor must undertake the following best practice measures:
- design out waste at the initial stage of the project by utilising standardised sizes and materials where possible, and engaging with the designers on the importance of this. This should include working to reduce the wastage rates of the construction waste streams which arise in the greatest quantities and considering options regarding the potential re-use of dredged and excavated material;
 - set targets for waste recovery and recycling to enable those working on the project to have a clear understanding of what is expected;
 - where practicable, use precast concrete and other materials that can be prepared off site (prior to construction of the concrete manufacturing plant) to minimise waste generation on site;
 - not over-order materials and using materials brought to site as efficiently as possible;
 - organising deliveries so materials arrive on site as they are needed to reduce the possibility of damage and wastage occurring;
 - having clearly defined and separated skips on site and a clearly demarked waste area(s); and
 - training staff to understand how they should sort any waste material and providing regular reminders and updates.
98. In addition:
- all waste streams will be stored in designated waste areas awaiting collection by registered waste carriers;
 - all waste will be stored on a low permeability surface;
 - amounts of stockpiled materials will be kept to a minimum where possible.
 - light wastes capable of being windblown will be stored within lidded / netted skips and containers at all times;
 - skips will be labelled with allowable content and any skips containing wastes liable to become windblown or to produce hazardous leachate shall be covered;
 - wastes shall not be stored in corroded or worn containers and should be secure so as to prevent accidental spillage, leakage or the container from being blown over;

- where practical, waste streams will be segregated to facilitate reuse and recycling. Where this is not possible, waste should be sorted at a waste transfer station;
 - waste registrations and permits will be checked for validity against the EA's Public Register page;
 - all Waste Electrical and Electronic Equipment (WEEE) waste shall be kept in separate containers and disposed of at an Authorised and Approved treatment facility;
 - all hazardous waste shall be segregated into appropriate containers and removed to a facility permitted to accept that type of waste;
 - wastes shall not be buried or burnt on site;
 - where it is suspected that a waste contractor is not complying with the legal Duty of Care, follow up checks shall be made. Where it is demonstrated that waste is not being managed in accordance with legislation and where this cannot be rectified, the contract with the waste contractor shall be terminated;
 - where the waste transfer notes supplied by the waste contractor are not sufficient, we may produce our own.
99. Any waste which cannot be used on site will be recycled or disposed of off-site, via a registered carrier to:
- a licensed landfill site; or
 - a licensed transfer station; or
 - a licensed recycling facility, or
 - an exempt site.
100. Any waste disposed of to landfill must be pre-treated first. This is most easily achieved by recycling at least one of the projects waste streams. Licensed landfill sites will not accept waste unless accompanied by a declaration of pre-treatment. A pre-treatment confirmation form fulfils this requirement and must accompany any waste disposed of to landfill.
101. Every proposed destination site will be checked to ensure that a valid permit or waste exemption has been issued by the Environment Agency for the type of waste to be received.
102. Waste management will be monitored throughout the construction phase by the Site Manager. Whenever waste is removed from the site, details will be recorded in a Site Waste Management Plan. The Plan will also be updated at least every six months to show the types and quantities of waste that are re-used, recycled, recovered by any other means, sent to landfill or disposed of by any other means.

Water Management and Discharges

103. The objectives are to implement working methods to protect surface and groundwater from pollution and other adverse impacts including change to flow volume, water levels and quality.

104. Site drainage, including surface runoff and dewatering effluents, will be discharged to sewers where reasonably practicable and relevant permissions will be obtained from the sewerage or statutory undertaker.
105. Site drainage will meet the requirements for effluent and flood risk standards required by the sewerage undertaker.
106. All other discharges of water from site, whether to land, water drains, surface water drains or directly to surface waters require prior authorisation from the land owner and the Environmental Agency. Methods for management and monitoring of water discharges and prevention of pollution will be included in method statements.
107. The relevant sections of BS6031: Code of Practice for Earthworks for the general control of site drainage/discharges will be followed.
108. Under no circumstances is discoloured or contaminated water allowed to enter drains. All reasonable precautions shall be taken to prevent contamination of surface waters either directly or indirectly. Contamination includes, but is not limited to:
- oily residues;
 - chemicals and paints;
 - concrete washout water;
 - mud / silty water; and
 - flushing out of pipework during commissioning.
109. General controls will include:
- reasonable attempts shall be made to establish the locations of site drainage and its destination and to record this on the site plan;
 - where possible, water will be prevented from entering excavations;
 - soil stockpiles shall be roll sealed and suitable management techniques shall be employed to prevent silty water run-off;
 - waste water from any wheel wash shall not be allowed to enter site drains that are connected to the foul or surface water drainage systems;
 - ensure that suitable controls such as a filter sock or settlement tanks are in place;
 - ensure that water discharged to land does not directly run into a watercourse and does not pool or scour the surface of the land;
 - silt / sludge that may be contaminated by oil, concrete or other substances shall be disposed of through registered waste contractors;
 - an emergency response plan will be available on each site listing contact details for an emergency spill response contractor.
110. All hazardous substances (including liquids and solids) will be stored within impermeable, bunded areas, to remove the risk of migration to groundwater or a nearby watercourse to the satisfaction of the Environment Agency. The measures proposed in sections Land Contamination, Water Management and Discharges, Flood Risk Management and Waste Management will assist in

avoiding or minimising the potential for contaminants and suspended solids to migrate to surface and groundwater, reduce localised flood risk, and protect water quality and the ecosystems the water resources support.

111. Effective construction management can deliver major savings in water use and the associated costs of energy, water supply and wastewater treatment. This can be achieved without compromising the performance and user acceptability of the project.

112. Typically, the use of water will take place in the following areas:

- Dust suppression:
 - vehicular dust suppression; and
 - stockpiles of soil.
- Cleaning:
 - boot wash; and
 - high pressure washing.
- Domestic and Welfare facilities
 - toilets
 - site offices; and
 - drinking water
- Construction:
 - mortar mixing.

Schedule of Works

113. The Schedule of Works takes into account: seasonal constraints; the expected timetable of works (i.e. when site clearance needs to be undertaken, and when construction works are due to commence); and any other timing considerations.

114. The Schedule of Works below reflects that exact dates for Phases 3 – 5 are not yet known, and the Schedule will be updated with any programming changes as appropriate and circulated to the Environmental Project Management team.

Phase 1 – Construction of New Estate Yard		
Date	Activity	Responsible
<i>Pre-commencement Works</i>		
April 2026	Ecologist to provide initial briefing and toolbox talk to the Contractor Site Manager, Contractor Environmental Manager and Estate Manager. To be repeated as required.	ECO, CSM, CEM, EM
April 2026	Installation of Biodiversity Protection Zone fencing, supervised and sign off by the Arboricultural specialist.	CEM, CSM, EM, ARB

April 2026	Signage to be added for Biodiversity Protection Zones/Construction Exclusion Zones, where required.	CEM, ECO
April 2026	Implementation of Pollution Protection Measures and Contingency	CSM, CEM, EM, ECO
April 2026	Agreement of locations of security lighting or other night lighting to avoid impacts on Biodiversity Protection Zones or other habitats that support protected and notable nocturnal species.	CSM, CEM, EM, ECO
April 2026	Nesting bird survey of trees and shrubs to be removed if commencement in nesting bird season.	ECO
April 2026	Inspection of additional trees to be pruned or removed for roosting bats if needed.	ECO
<i>Active construction period</i>		
April-June 2026	Tree felling, vegetation clearance and topsoil removal following the precautionary methods of working described in this document to minimise risk of harm to protected species.	ECO
April-June 2026	Consult with a bat ecologist prior to any works that may affect potential bat roost features (PRFs) identified on trees.	CSM, CEM, ECO
April 2026 to December 2017	Monitoring of nocturnal lighting scheme – quarterly March to October – where present.	CEM, ECO
April 2026 to December 2017	Weekly monitoring of fencing and signage around Biodiversity Protection/Construction Exclusion Zones	CEM, CSM
April 2026 to December 2017	Weekly monitoring of Pollution Prevention Control with records.	CEM, CSM
April 2026 to December 2017	ECoW toolbox talks and ecological briefings to relevant contractor environmental representatives. To be repeated as required.	CEM, ECO
April 2026 to December 2017	All pollution prevention control measures to be followed during construction period and recorded.	CSM, CS, CEM

Phase 2 – Construction of new access and ancillary car park		
Date	Activity	Responsible
<i>Pre-commencement Works</i>		
January 2028	Ecologist to provide initial briefing and toolbox talk to the Contractor Site Manager, Contractor Environmental Manager and Estate Manager. To be repeated as required.	ECO, CSM, CEM, EM
January 2028	Check Biodiversity Protection Zone fencing, and signage remains in place	CEM, CSM, EM, ARB, ECO
January 2028	Implementation of Pollution Protection Measures and Contingency	CSM, CEM, EM, ECO
January 2028	Agreement of locations of security lighting or other night lighting to avoid impacts on Biodiversity Protection Zones or other habitats that support protected and notable nocturnal species.	CSM, CEM, EM, ECO
January 2028	Inspection of additional trees to be pruned or removed for roosting bats if needed.	ECO
<i>Active construction period</i>		
January-March 2028	Tree felling, vegetation clearance and topsoil removal following the precautionary methods of working described in this document to minimise risk of harm to protected species.	ECO
January-March 2028	Consult with a bat ecologist prior to any works that may affect potential bat roost features (PRFs) identified on trees.	CSM, CEM, ECO
January-March 2028	Monitoring of nocturnal lighting scheme – quarterly March to October – where present.	CEM, ECO
January-July 2028	Weekly monitoring of fencing and signage around Biodiversity Protection/Construction Exclusion Zones	CEM, CSM
January-July 2028	Weekly monitoring of Pollution Prevention Control with records.	CEM, CSM
January-July 2028	ECOW toolbox talks and ecological briefings to relevant contractor environmental representatives. To be repeated as required.	CEM, ECO

January-July 2028	All pollution prevention control measures to be followed during construction period and recorded.	CSM, CS, CEM
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Phases 3 - 5 – Demolition of existing estate yard buildings, construction of staff accommodation and operational hub and construction of exhibition centre		
Date	Activity	Responsible
<i>Pre-commencement Works</i>		
Month 1	Ecologist to provide initial briefing and toolbox talk to the Contractor Site Manager, Contractor Environmental Manager and Estate Manager. To be repeated as required.	ECO, CSM, CEM, EM
Month 1	Installation of Biodiversity Protection Zone fencing, supervised and sign off by the Arboricultural specialist.	CEM, CSM, EM, ARB
Month 1	Signage to be added for Biodiversity Protection Zones/Construction Exclusion Zones, where required.	CEM, ECO
Month 1	Implementation of Pollution Protection Measures and Contingency	CSM, CEM, EM, ECO
Month 1	Agreement of locations of security lighting or other night lighting to avoid impacts on Biodiversity Protection Zones or other habitats that support protected and notable nocturnal species.	CSM, CEM, EM, ECO
Month 1	Nesting bird survey of trees and shrubs to be removed if commencement in nesting bird season.	ECO
Month 1	Inspection of additional trees to be pruned or removed for roosting bats if needed.	ECO
<i>Active construction period</i>		
Throughout	Tree felling, vegetation clearance and topsoil removal following the precautionary methods of working described in this document to minimise risk of harm to protected species.	ECO

Throughout	Consult with a bat ecologist prior to any works that may affect potential bat roost features (PRFs) identified on trees.	CSM, CEM, ECO
Throughout	Monitoring of nocturnal lighting scheme – quarterly March to October – where present.	CEM, ECO
Throughout	Weekly monitoring of fencing and signage around Biodiversity Protection/Construction Exclusion Zones	CEM, CSM
Throughout	Weekly monitoring of Pollution Prevention Control with records.	CEM, CSM
Throughout	ECoW toolbox talks and ecological briefings to relevant contractor environmental representatives. To be repeated as required.	CEM, ECO
Throughout	All pollution prevention control measures to be followed during construction period and recorded.	CSM, CS, CEM

PM – Project Manager
 EM – Estate Manager
 PC – Principal Contractor
 CSM – Contractor Site Manager
 CS – Construction Supervisors
 CEM – Contractor Environmental Manager
 ECO – Ecologist
 ARB – Arboriculturist