

# **Staplefield Wetland Creation**

Construction Environmental Management Plan February 2024 This page left intentionally blank for pagination.

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# **Staplefield Wetland Creation**

**Construction Environmental Management Plan** 

February 2024

## **Issue and Revision Record**

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# Acronyms

| Description                                | Abbreviation |
|--|--------------|
| Construction Environmental Management Plan | СЕМР         |
| Environmental Management System            | EMS          |
| Great Crested Newt                         | GCN          |
| Integrated Constructed Wetland             | ICW          |
| Local Wildlife Sites                       | LWS          |
| Personal Protective Equipment              | PPE          |
| Pollution Prevention Guidelines            | PPG          |
| Public Right of Way                        | PRoW         |
| Root Protection Areas                      | RPA          |
| Site Waste Management Plan                 | SWMP         |
| Total Phosphorus                           | ТР           |
| Tree Preservation Order                    | ТРО          |
| Wastewater Treatment Works                 | wtw          |
| Written Scheme Investigation               | WSI          |

# **1** Introduction

#### 1.1 Project Background

As part of the UK Government's Water Industry National Environment Programme 3 for England, Southern Water identified an opportunity to explore alternative Asset Management Plan 7 (AMP7) wastewater management options to meet proposed phosphorus permits. Southern Water is required to demonstrate that Staplefield wastewater treatment works (WTW) meets the new permit requirement of 0.5mg/l total phosphorus (TP).

In line with Environment Agency guidance, Southern Water is committed to increasing sustainability by reducing the use of hard infrastructure solutions for improving wastewater treatment at its WTWs. As such, an Integrated Constructed Wetland (ICW) is proposed to be constructed to reduce TP concentrations to a level that would comply with the revised permit.

Mott MacDonald has been commissioned by Southern Water to provide environmental and planning services to support the delivery of a treatment wetland at Staplefield WTW.

The design of the ICW has been developed by VESI Environmental and the construction contractor is Galliford Try.

#### 1.2 The Construction Environmental Management Plan

This Construction Environmental Management Plan (CEMP) has been prepared for the creation of the ICW at Staplefield WTW (hereafter referred to as 'the proposed development') to support a planning application in accordance with the Town and County Planning Act 1990.

The aim of the CEMP is to set out the responsibilities regarding compliance with legislation, and to specify the required mitigation that is to be implemented to minimise environmental impact from the construction stages of the proposed development. The development of the CEMP has been underpinned by organisation policies, including:

- Southern Water Environmental Policy (April 2022) (Appendix A); and
- Galliford Try Environmental Policy Statement (October 2023) (Appendix B).

The CEMP is a 'live' document that is to be reviewed and updated throughout the construction process, such as when additional design or construction information becomes available. Additionally, it is intended that Galliford Try update the CEMP to align with its organisational Environmental Management System (EMS), certified under ISO 14001.

This CEMP is intended to be read and implemented in conjunction with other management plans specific to the proposed development, including:

- Arboricultural Method Statement (within the Staplefield Wetland Creation Arboricultural Report, Ref:639529-MM-N-RPT-0021);
- Written Scheme of Investigation for Archaeological Evaluation and Mitigation (WSI) (Ref: 240007)
- Construction Management Plan (Ref: 752214-UAX-ZZ-ZZ-CD-EN-00001);
- Landscape Management Plan (Ref: 752214-UAX-ZZ-ZZ-EV-EN-00001);
- Southern Water Environmental Management System Manual Odour and Air Quality Management (2017);

- Staplefield Invasive Non-Native Species Method Statement (Ref: 639529-MM-N-MS-0001); and
- Site Waste Management Plan (to be prepared by Galliford Try).

Several environmental studies have been undertaken which have been used to inform this CEMP. Environmental risks and management measures outlined in these documents have been incorporated into the CEMP, although the original documents should be reviewed for further information. These are:

- Staplefield Wetland Creation Air Quality Assessment (Ref: 639529-MM-N-RPT-0026);
- Staplefield Wetland Creation Arboricultural Report (Ref: 639529-MM-N-RPT-0021);
- Staplefield Wastewater Treatment Works Preliminary Ecological Appraisal (Ref: 639529-MM-N-RPT-0005);
- Staplefield Wetland Creation Ecological Impact Assessment (Ref: 639529-MM-N-RPT-0024);-MM-N-RPT-0024);
- Staplefield Wastewater Treatment Works Bat Preliminary Roost Assessment and Emergency Survey Report (Ref:639529-MM-N-RPT-0006);
- Staplefield Wastewater Treatment Works Great Crested Newt Report (Ref: 639529-MM-N-RPT-0009);
- Staplefield Wetland Creation Historic Environmental Desk Based Assessment (Ref: 63952-MM-N-RPT-0012); and
- Staplefield Wetland Creation Landscape and Visual Appraisal (Ref: 639529-MM-N-RPT-0027).

#### 1.3 **Project Details**

Key project details associated with construction of the proposed development are outlined in Table 1.1.

| Information category                | Details  |  |
|-------------------------------------|--|--|
| Project                             | Staplefield Wetland Creation   |  |
| Proposed Construction Start<br>Date | May 2024   |  |
| Proposed Completion Date            | December 2024  |  |
| Location (Easting/Northings)        | TQ 27959 27401 (centre of proposed ICW)  |  |
| Client                              | Southern Water   |  |
| Client Representative               | Details to be inserted   |  |
| Principal Contractor                | Galliford Try  |  |
| Contractor Representative           | Details to inserted  |  |
| Local Authority                     | West Sussex County Council 01243 777100  |  |
| Working Hours                       | Normal working hours (7:30am – 6:00pm weekdays, 9:00am – 1:00pm Saturdays). No works on Sundays and bank holidays. |  |

#### Table 1.1: Project details

#### 1.4 Location of the Proposed Development

The existing WTW is situated adjacent to the River Ouse, approximately 500m south of the village of Staplefield in West Sussex, RH17 6ES. The grid reference of the centre of the current WTW is TQ 27963 27395. The existing land use of the proposed development site and

surrounding area is arable farmland. The WTW treats wastewater from Staplefield and the surrounding area before discharging the treated effluent to the River Ouse to the south of the existing site.

The main elements of the ICW will be located within the adjacent field to the east of the WTW, currently characterised by farmland under private ownership. Other ancillary elements will be located within the current operational WTW, and within the field adjacent to the east of the WTW. Some additional elements, which include the flood mitigation area and an area for a temporary construction compound, will be located to the south of the ICW and in the field to the north west of the WTW respectively. The site boundary of the proposed development, including the location of the construction compound and works access tracks, is shown in Appendix C.

The closest residential receptor to the site is an isolated dwelling located approximately 135m to the north east. A listed building is located approximately 220m to the north west and a Public Right of Way (PRoW) is located approximately 125m to the north. The surrounding area is agricultural farmland with scattered trees and hedgerows defining field margins which can provide habitat for protected species. Additionally, the proposed ICW is located within the High Weald National Landscape (previously referred to as an Area of Outstanding Natural Beauty, AONB).

#### 1.5 Description of the Proposed Development

#### 1.5.1 Overview

The design of the proposed development is provided in Appendix D. Key elements of the design are outlined in this section.

- The ICW, which is formed of:
  - four above ground wetland cells comprising of wetland vegetation and water to a depth of approximately 0.5m, lined with low permeability site-won clays to avoid leakage into ground below;
  - grassland embankments to an approximate height of 2m in between the wetland cells; and
  - landscaping comprising of reinstatement of trees and short sections of hedgerow removed during construction and meadow grassland encompassing the rest of the field and.
- Various ancillary, including:
  - below ground pumping station within the existing footprint of the WTW to pump wastewater to the head of the new ICW;
  - below ground pipes to transfer wastewater from the existing WTW to the ICW, between cells, and back into the WTW again to connect to the existing final effluent outfall;
  - gravel tracks and a carpark for maintenance within the area of the ICW.

The new ICW will be accessible for maintenance via the existing WTW access tracks to the B2114 Cuckfield Road.

The proposed development will also include a new above grounflood mitigation area to compensate for the loss of flood storage within the current agricultural field, the size of which has been designed based on flood modelling.

#### 1.5.2 Construction of the Proposed Development

Construction of the proposed development will use standard techniques. Key activities include:

- excavation of the wetland cells using 8-tonne tracked excavators under the supervision of a banksperson up to 2m below ground level at the deepest point;
- transportation of material between the excavation and the designated stockpile area by 6tonne dumper trucks;
- cut and cover excavation and installation of the pumping station and associated pipework; and
- landscaping and planting around the ICW cells and areas disturbed during the works including tree planting, hedgerow planting and grass seeding.

Activities outlined here are based on information provided by Galliford Try at the time of writing. If these activities are to change, mitigation provided in Section 4 is to be reviewed and updated by the Galliford Try Environmental Advisor as appropriate.

## 2 Environmental Management

#### 2.1 Galliford Try Environmental and Sustainability Policies

Galliford Try's Environmental Management System (EMS) is accredited to ISO 14001: 2015. Through this EMS, environmental impacts of Galliford Try's activities will be identified, managed and mitigated. The construction of the proposed development will be undertaken in accordance with the EMS.

In addition, Galliford Try has several environmental and sustainability policies that will be adhered to during the construction of the proposed development, as outlined below.

Galliford Try's Environmental Policy Statement (Appendix B) commits to ensure visible leadership, a positive environmental culture, positive reporting, compliance, performance measurement and taking action.

The policy demonstrates continual improvement in its practices by outlining the following objectives for 2023/2024:

- Environmental Incident Campaign upskill, raise awareness, and improve our environmental reporting;
- Produce and issue guidance for net zero site set up; and
- Produce a biodiversity strategy.

Galliford Try has several other policies relating to environment and sustainability that are relevant construction of the proposed development, namely:

- Biodiversity Policy;
- Sustainability Policy;
- Energy Policy; and
- Responsible Sourcing Policy.

These policies can be found here: Governance and policies | Galliford Try.

#### 2.2 Southern Water Environmental Policy

Southern Water's policy on the Environment outlines practices that aim to improve environmental management to enhance performance. These practices will be adhered to by the Contractors during the construction phase of the proposed development. For the full policy statement, see Appendix A.

Key points of the policy are to:

- Conform to obligations by meeting or exceeding the environmental requirements of legislation, regulation and standards;
- Prevent pollution, eliminate serious pollution incidents and contain the environmental impact of our activities; and
- Deliver nature-based solutions and environmental net-gain, contributing to the recovery of nature.

In addition to this, Southern Water has a Biodiversity Policy (April 2021)<sup>1</sup> and a Carbon Policy (undated)<sup>2</sup> that will guide construction of the proposed development.

#### 2.3 Consents and Licences

The proposed development is subject to several consents and licences that are required to be in place prior to the commencement of works. These are listed in Table 2.1, along with the status as at the date of this CEMP.

No works requiring consents or licences are to be undertaken until the appropriate consent or licence is in place. The conditions attached to any consent or licence are to be explained to the relevant staff and records held in the site office. Communication of consents or licences are needed as part of any site induction as stated in Section 5.

Copies of consents and licences obtained throughout the lifecycle of this project, either by Mott MacDonald or the design/contractor team, shall be submitted to Southern Water.

#### Table 2.1: Summary of consents required for construction of the proposed development

| Consent Title  | Relevant Authority            | Status                   | Planned<br>Submission Date |
|--|-------------------------------|--------------------------|----------------------------|
| Planning Permission  | West Sussex County<br>Council | Mott MacDonald to submit | February 2024              |
| Flood Risk Activity Permit                                   | Environment Agency            | Mott MacDonald to submit | February 2024              |
| Great Crested Newt (GCN)<br>Licence (Organisational Licence) | Natural England               | Southern Water to submit | ТВС                        |
| Discharge Permit for discharging to ground for dewatering    | Environment Agency            | Galliford Try to submit  | TBC                        |

#### 2.4 Roles and Responsibilities

The roles and responsibilities associated with implementation of this CEMP are set out below.

#### 2.4.1 Southern Water

- Appoint the contractor (Galliford Try).
- Initial review of this CEMP to confirm it is suitable for the project and the proposed construction works.
- Provide an oversight role by carrying out periodic checks of environmental performance (both through review of Galliford Try's audit findings, any incident reports and periodic audits).
- Undertake appropriate due diligence regarding environmental consents.

#### 2.4.2 Galliford Try Project Manager

- Appoint a competent team suitable to implement the CEMP.
- Provide the Galliford Try Environmental Advisor and the Galliford Try Site Supervisor appropriate resources to implement the environmental management measures detailed within the CEMP.

<sup>&</sup>lt;sup>1</sup> Our policy on Biodiversity, Southern Water (2021), <u>biodiversity-policy-final-v1-approved-april-2021.pdf</u> (southernwater.co.uk)

<sup>&</sup>lt;sup>2</sup> Our policy on Carbon, Southern Water, <u>carbon-policy-2021-final.pdf</u> (southernwater.co.uk)

- Ensure processes and procedures are in place to implement the CEMP, including training for all site personnel.
- Support the Galliford Try Environmental Advisor to promote a culture of good environmental practice across the project.
- Check the carrying out of regular, periodic testing of environmental incident response procedures on site.
- Provide all consent documentation to Southern Water.
- Periodically report to Southern Water on performance against objectives and targets (Section 7) and any environmental incidents (Section 8).
- Advise Southern Water immediately of any environmental incidents in accordance with emergency response procedures (Section 8).

#### 2.4.3 Galliford Try Environmental Advisor

- Review and update the CEMP periodically throughout construction, including at different stages, when the construction methodology has changed, or if a previously unidentified environmental constraint has been identified.
- Develop, update and implement an environmental site induction for all site personnel, ensuring it covers all issues outlined within this CEMP and keep training records (see Section 5).
- Promote the CEMP and good site working practices with regard to environmental management.
- Check all management measures are in place, implemented and effective as detailed within this CEMP.
- Check that all works are being carried out in accordance with environmental consents and report any breach to the Galliford Try Project Manager.
- Undertake regular audits of the construction works and site and report back to the Galliford Try Project Manager (outlined in Section 6).
- Support the project to meet environmental and sustainability objectives and targets. Track, review and update as required (see Section 7).
- Raise corrective actions, as necessary, and follow up to ensure they have been appropriately closed out.
- Review and update environmental toolbox talks periodically as required (see Appendices E, F and G for examples).
- Seek advice from environmental specialists as required, including the Arboriculturist and Project Ecologist/ECoW.
- Table 2.1Be the key point of contact for any environmental incidents that occur on site, including liaising with the authorities (such as the Environment Agency).
- Report any environmental incidents to the Galliford Try Project Manager.

#### 2.4.4 Galliford Try Site Supervisor

- Support the Galliford Try Environmental Advisor by promoting a culture of environmental good practice on site.
- Liaise with the Project Ecologist/ECoW to ensure the project does not incur significant adverse effects on the environment.

- Undertake weekly on and off-site inspections for any environmental issues (such as dust build up as outlined in Section 4.2), implement corrective action and log.
- Ensure all site personnel receive the correct site induction and training, have the correct Personal Protective Equipment (PPE) and keep the appropriate records for inspection.
- Deliver toolbox talks and the messages clearly visible on site.
- Clearly display Environmental Constraints Map (see Appendix H) on site.
- Provide the names and contact details of the responsible persons accountable for environmental issues (Galliford Try Site Supervisor) are placed around the site boundary and in clear view to the public.
- Ensure the appropriate environmental incident response procedures are in place and check that equipment such as spill kits is available in appropriate locations and displayed clearly on site (outlined in Section 8).
- Ensure construction activities occur safely, efficiently and in accordance with all relevant guidance.
- Develop and modify procedures as the project evolves.
- Periodically test environmental incident response procedures.
- Adhere to management plans (outlined in Section 1.2).

#### 2.4.5 All Site Workers

- Comply with environmental good practice.
- Comply with all relevant method statements, consents and procedures detailed in this CEMP.
- Comply with environmental incident response procedures: Stop, Contain, Clean up and Report all environmental spillages to the Galliford Try Site Supervisor.
- Wear correct PPE in accordance with manufacturers guidelines.
- Where an unforeseen risk to the environment occurs, or if there are any environmental near misses or incidents, stop all work and advise the Galliford Try Site Supervisor and Galliford Try Environmental Advisor.
- If any mammals or protected species are encountered, stop all work and advise the Galliford Try Site Supervisor and Galliford Try Environmental Advisor.
- Maintain good housekeeping standards.
- Follow any other instruction from the Galliford Try Environmental Advisor.

#### 2.4.6 Project Ecologist/Ecological Clerk of Works (ECoW)

- Be present on site at the start of the works to complete the required environmental induction training and toolbox talks to all personnel. These toolbox talks are to be clearly displayed in the site offices and included as part of any site induction (see Appendix E, F, G).
- Observe construction activities, particularly during the initial phases of vegetation clearance and earthworks, during any habitat creation operations, within areas where protected species have been identified and near the watercourse.
- Stop works if a potential threat to the environment is identified.

- Communicate any concerns/comments to the Galliford Try Environmental Advisor and the Galliford Try Site Supervisor to determine the most appropriate course of action to complete the proposed work in a manner that does not significantly negatively impact the environment.
- Implement conditions of the GCN licence, once in place.

#### 2.4.7 Appointed Arboriculturist

- Inspect and sign off the alignment of protective barriers prior to works beginning on the proposed development.
- Supervise all works within the Root Protection Areas (RPA) of retained trees on site and during the realignment of barriers when access to a RPA is required, outlined within Appendix I.
- Inspect retained trees on site once works are complete to identify any signs of intolerance to the change in conditions, the effect of the proposed development and any accidental damage to retained trees and identify the need for further tree works in addition to those originally specified at the outset of the project.

#### 2.4.8 Construction Waste Manager

- Oversee procurement of materials to prevent bulk buying, instead items to be bought as required. This reduces instances of over-buying as well negate the requirement for large areas or storage space.
- Implement Site Waste Management Plan (SWMP) and review on a periodic basis.
- Upon completion of project activities, a final walkover must be undertaken and all evidence of activities (debris, litter, brash matting and temporary bridges) is to be removed.

# **3 Key Environmental Constraints**

The key environmental constraints of the site are summarised in Table 3.1 to provide the site team with an understanding of the key issues. A map showing the key environmental constraints on site is included in Appendix H.

| Environmental<br>Aspect            | Key Constraints  |
|------------------------------------|--|
| Aspect<br>Air Quality and<br>Odour | <ul> <li>There are no designations for air quality within 1km of the site, including Air Quality Management Areas.</li> <li>The nearest receptors to the site that could be impacted by air quality include: <ul> <li>Isolated residential properties, the closest of which is located approximately 135m north east of the site;</li> <li>Commercial premises, the closest of which are located approximately 130m north east and 220m north west of the site;</li> <li>Users of a PRoW which runs parallel north of the existing site, approximately 125m north of the of the site and a PRoW 230m south west of the site ; and</li> <li>Ecological receptors listed below.</li> </ul> </li> </ul> |
|                                    | are covered to reduce potential odour emissions. The receptors susceptible to odour impacts are located over 100m from the existing WTW. The ICW is set to accept treated effluent of the same quality that is currently released into the River Ouse which does not generate any odour impact.  |
| Arboriculture                      | <ul> <li>There is a group of trees protected by a Tree Preservation Order (TPO) approximately 360m south-east of the site.</li> <li>The site is characterised by farmland and managed grassland, bordered by hedgerows and scattered trees along the border. The trees along the boundary are not protected by TPO.</li> <li>A dead tree with ash dieback sits on the western boundary of the site, shown as tree number 11 in Appendix I.</li> </ul>  |
| Ecology                            | <b>Designated Sites</b><br>The site is located within the Impact Risk Zone of Cow Wood and Harry's Wood Site of<br>Special Scientific Interest approximately 1,980m north of the site. Orange Gill and<br>Homestead Wood Local Wildlife Sites (LWS) is located approximately 1.8km to the north<br>west and The Hanger LWS is located approximately 2km south west of the site.  |
|                                    | Protected Species  |
|                                    | Roosting Bats<br>Several trees bordering the southern and western boundary of the site were identified as<br>having potential for roosting bats. During bat surveys, bat activity was recorded along the<br>tree line to the south of the site, bordering the River Ouse. However, no confirmed bat roosts<br>were identified.   |
|                                    | Great Crested Newt   |
|                                    | Based on surveys in 2022, GCN were known to be present in a pond approximately 50m to the east of the site.  |
|                                    | Some areas of the site, such as around the arable field margins, provide suitable terrestrial habitat for GCN.   |
|                                    | Otter<br>Following surveys carried out in 2022, otter are known to be present within the local areas to<br>the site. Surveys indicated that otter commute along the River Ouse, as spraints and<br>potential otter couches were identified.  |

| Environmental<br>Aspect | Key Constraints   |
|-------------------------|---|
|                         | Hazel Dormouse  |
|                         | Surveys were undertaken throughout 2022 and returned no positive result for hazel dormouse.   |
|                         | <i>Badgers</i> Some areas of the site, such as the arable field edges, provide suitable habitat for badger.   |
|                         | Invasive Species<br>Two stands of Himalayan balsam, an invasive plant species, are located adjacent to the site<br>along the banks of the River Ouse. One of these stands is located approximately 100m to<br>the south west, with a second stand located approximately 100m to the east of the site. |
|                         | <i>Reptiles</i><br>Suitable habitats within the site, including modified grassland, other natural grassland and hedgerows.  |
|                         | Breeding Birds<br>Some areas of the site, such as the hedgerows, provide suitable habitat for breeding birds.   |
| Historic<br>Environment | There are 15 statutory listed buildings within 500m of the site, all of which are Grade II listed.<br>The closest listed building is Little Ashford, located approximately 220m north west of the site.   |
|                         | Staplefield Conservation Area is located approximately 385m north of the site and covers the village of Staplefield, where seven of the Grade II listed buildings are located.<br>There are eight non-designated heritage assets within 500m of the site, three of these being                        |
|                         | within 20m of the site. These are:  |
|                         | <ul> <li>Two WWII Type 24 Pillboxes, one of which is within the site along the northern<br/>boundary and one is located approximately 30m to the west of the site;</li> </ul>   |
|                         | <ul> <li>Holmsted Forge, adjacent to the site to the south east; and</li> </ul>   |
|                         | <ul> <li>Two WWII Anti-Tank Blocks, approximately 20m to the south east of the site.</li> </ul>   |
| _and Quality            | The site is located within a rural landscape. The ground has the potential to contain materials associated with historical WTW operations and farm operations, such as inorganic fertilisers and pesticides.  |
|                         | There is one historical landfill located approximately 445m to the north-west of the site.<br>There are no active landfill sites within 1km of the site.  |
| _andscape and<br>/isual | The site is located within the High Weald National Landscape (previously AONB) and the High Weald National Character Area. There are no protected views defined within the High Weald National Landscape (previously AONB) Management Plan.   |
| Noise and<br>/ibration  | The site is located partially within, and directly adjacent to, an operational WTW surrounded by open farmland and small country roads. Noise levels are likely to be low.  |
|                         | Nearby sensitive receptors to noise and vibration include:  |
|                         | <ul> <li>Isolated residential, the closest located approximately 135m north east of the site;</li> <li>Commercial premises, the closest located approximately 130m north east and 220m</li> </ul>   |
|                         | <ul> <li>north west of the site;</li> <li>Users of a PRoW which runs parallel north of the existing site, approximately 125m south of the site and a PRoW 230m south west of the site;</li> </ul>   |
|                         | <ul> <li>Ecological receptors; and</li> <li>Heritage assets.</li> </ul>   |
| Traffic, Transport      | The operational WTW is accessed via an access track off the B2114 Cuckfield Road.   |
| and Access              | A summary of anticipated traffic movements during ICW construction are detailed below:  |
|                         | <ul> <li>Construction plant deliveries (Low loaders) – 5 to 7 trips per week, 14 return trips;</li> <li>Welfare and compound deliveries (8 wheelers) – 5 to 7 trips per week, 14 return trips;</li> </ul>   |

| Environmental<br>Aspect           | Key Constraints   |  |  |
|-----------------------------------|---|--|--|
|                                   | <ul> <li>Fuel deliveries (6 wheelers) - 0 to 2 trips per week, 16 return trips;</li> </ul>  |  |  |
|                                   | - Waste collection (Vans and small lorries) - 0 to 2 trips per week, 16 return trips;   |  |  |
|                                   | <ul> <li>Staff vehicles (Vans and cars) – 30 to 50 trips per week, 740 return trips;</li> </ul>   |  |  |
|                                   | <ul> <li>Generic material deliveries (8 wheelers) – 0 to 3 trips per week, 20 return trips;</li> </ul>  |  |  |
|                                   | <ul> <li>Materials for access track delivery (8 wheelers) - 8 to 10 trips per week, 30 return<br/>trips; and</li> </ul>   |  |  |
|                                   | <ul> <li>Earthworks fill material delivery (if spoil on site is deemed unusable for re-use and<br/>import is necessary), (8 wheelers) – 40 to 50 trips per week, 134 return trips.</li> </ul> |  |  |
|                                   | Traffic movements totalling to 984.   |  |  |
|                                   | A PRoW is located approximately 125m north of the site.   |  |  |
| Water Resources<br>and Flood Risk | The River Ouse is located adjacent to the southern boundary of the <b>site</b> . The River Ouse has a Water Framework Directive rating of Moderate for ecology.                               |  |  |
|                                   | The geology beneath the site is characterised as a Secondary A Bedrock Aquifer and<br>Secondary A Superficial Deposits Aquifer.   |  |  |
|                                   | The site is located partially within Flood Zone 2, with areas directly adjacent to the River<br>Ouse designated as Flood Zone 3.  |  |  |

# 4 Project Specific Environmental Management

#### 4.1 Introduction

This section outlines the environmental management measures that are to be implemented for the proposed development. The implementation of these measures should support the project to be carried out in accordance with good practice guidance and legislative requirements and should mitigate or reduce the potential for environmental impact.

#### 4.2 Air Quality

#### 4.2.1 Construction Vehicle/Machinery and Sustainable Travel

- Site staff to travel to site together where practicable to minimise vehicle movements to and from site.
- Minimise the use of diesel- or petrol-powered generators and use mains electricity or battery powered equipment where practicable.
- Switch off vehicle and machinery engines when stationary no idling vehicles.
- Signpost and implement a maximum speed limit of 15mph on surfaced and 10mph on unsurfaced haul roads and work areas.

#### 4.2.2 Communications, Incidents and Complaints

- Display the head or regional office contact information, name and contact details of person(s) accountable for air quality and dust issues on the site boundary, the Galliford Try Site Supervisor.
- Record any dust and air quality complaints, identify cause(s), take appropriate measures to reduce emissions in a timely manner, and record the measures taken.
- Make the complaints log available to the local authority when requested.
- Record any exceptional incidents that cause dust and/or air emissions, either on- or off- site, and the action taken to resolve the situation in the logbook.

#### 4.2.3 Preparing and Maintaining the Site

- Plan site layout so that machinery and dust causing activities are located away from receptors, as far as is possible.
- Erect solid screens or barriers around dusty activities or the site boundary that are at least as high as any stockpiles on site.
- Fully enclose site or specific operations where there is a high potential for dust production and the site is actives for an extensive period.
- Remove materials that have a potential to produce dust from site as soon as possible, unless being re-used on site.
- Cover, seed, or fence stockpiles to prevent wind whipping.

#### 4.2.4 Construction

- Do not manage waste by burning.
- Only use cutting, grinding, or sawing equipment fitted or in conjunction with suitable dust suppression techniques such as water sprays or local extraction, e.g., suitable local exhaust ventilation systems.
- Avoid scabbling (roughening of concrete surfaces) if possible.
- Provide an adequate water supply on the site for effective dust/particulate matter suppression/mitigation, using non-potable water where possible and appropriate.
- Store sand and other aggregates in bunded areas and are not allowed to dry out, unless this
  is required for a particular process, in which case ensure that appropriate additional control
  measures are in place.
- Cover skips.
- Ensure equipment is readily available on site to clean any dry spillages and clean up spillages as soon as reasonably practicable after the event using wet cleaning methods.

#### 4.2.5 Measures Specific to Track Out

- Avoid dry sweeping of large areas.
- Ensure vehicles entering and leaving sites are covered to prevent escape of materials during transport.
- Record all inspections of haul routes and access tracks and any subsequent action in a site logbook.
- Implement measures to reduce the potential for mud and dust to be carried onto surrounding
  roads after leaving the site. These may include a wheel washing system or sweeping of the
  public road adjacent to the main entrance of the site.

#### 4.3 Arboriculture

 Undertake all works in accordance with the Arboricultural Method Statement provided in the Staplefield Wetland Creation Arboricultural Report (Ref: 639529-MM-N-RPT-0021). This is to be supervised by the appointed Arboriculturist.

#### 4.4 Ecology

#### 4.4.1 General Measures

- The Project Ecologist/ECoW is to be present on site at the start of the key works to complete toolbox talks. Clearly display toolbox talks in the site offices and include as part of any site induction (see Appendix E, F and G for examples).
- Implement general pollution prevention measures, detailed in Section 4.9.3, to reduce the potential for pollution and damage to ecologically sensitive areas.
- Cover any excavations left open overnight. If they cannot be covered, provide an earth ramp, small ladder or similar to allow any trapped animals the opportunity to escape.
- Replace all removed vegetation on completion of the works in accordance with the Landscape Management Plan (Ref: 752214-UAX-ZZ-ZZ-EV-EN-00001).
- Notify the Galliford Try Environmental Advisor if any protected species or mammals are encountered on site. Specific measures for protected species are outlined in the sections below.

#### 4.4.2 Great Crested Newts

 Undertake works in accordance with the Southern Water Services Ltd Organisational License for GCN (Ref: WML–OR33).

#### 4.4.3 Roosting Bats

- Do not undertake any works at night.
- Do not shine any light directly at features of bat roost potential (see Appendix H for the location of these features). This includes any lighting that may be required for security.
- Do not remove any trees that have been identified as having potential for roosting bats and implement suitable protection measures around the Root Protection Area (RPA) of these trees, with fencing and signage, creating a buffer from the active construction area.

#### 4.4.4 Otter

- Carry out all works to the south of the current access road, adjacent to the River Ouse, under the watching brief of the Project Ecologist/ECoW, including works to install construction boundary fencing.
- Do not undertake any works at night.

#### 4.4.5 Breeding Birds

- During bird breeding season (March to August inclusive), any tree surgery including trimming
  of small overhanging branches, or works to hedgerows, must proceed after a check for the
  presence of breeding birds by the Project Ecologist/ECoW.
- If any signs of breeding birds are found, stop works and make contact with the Galliford Try Environmental Advisor. Set an exclusion zone around the nest until the young have left the area. The size of the exclusion zone is dependent on the species identified.

#### 4.4.6 Badger

- Undertake a check of all areas for signs of newly excavated badger setts less than 48 hours prior to the commencement of works. This check is to be carried out by the Project Ecologist/ECoW. If any signs of badger setts be identified, further actions may result such as applying for a European Protected Species licence.
- If any signs of badger are encountered during the works, stop works, and make contact with the Galliford Try Environmental Advisor.

#### 4.4.7 Hazel dormouse

• Carry out any works to hedgerows under a watching brief by the Project Ecologist/ECoW.

#### 4.4.8 Reptiles

- Carry out any vegetation removal in a phased manner under the supervision of the Project Ecologist/ECoW.
- Remove any potential reptile habitat between April and the end of October, whilst reptiles are active.
- If any reptiles are encountered during the works, stop works in that area and contact the Galliford Try Environmental Advisor for further actions.

#### 4.4.9 Invasive Species

- Undertake all works in accordance with Staplefield Invasive Non-Native Species Method Statement (Ref: 639529-MM-N-MS-0001).
- Implement good biosecurity measures on and off site to avoid spreading any invasive species.

#### 4.5 Historic Environment

- Carry out archaeological mitigation in accordance with the archaeological WSI produced by ASE. This investigation will clear all of the archaeological remains within the south east corner of the development area, and upon completion, will allow construction works to begin. There is also one trench to excavate on the western edge of the development area.
- Site team to be aware of the location of the nearby heritage assets (see Appendix H).
- Do not go near or enter any heritage assets, which sit outside the site boundary, including south of the River Ouse.
- Minimise construction activity and do not lay down materials near the western edge of the site boundary near the location of the ditched boundary (MM18) containing a partially buried Type 24 WWII pillbox.
- Outside of the area subject to the WSI, if any finds of archaeological or historical significance are uncovered during the works, stop construction and make contact with the Galliford Try Environmental Advisor who will need to notify the West Sussex County Archaeologist.

#### 4.6 Land Quality

#### 4.6.1 Human Health

- Train all site workers to recognise and appropriately respond to potential land quality issues. Training is to include the location of site welfare facilities, and where appropriate, use of decontamination units.
- All site workers are to have the appropriate PPE (e.g. high visibility clothing, safety boots, hard hat, safety glasses, gloves). These are to be detailed within a health and safety plan.
- The site is to be well fenced and kept secure to prevent trespass by members of the public.
- Implement robust environmental incident response procedures (e.g. with respect to unexploded ordinance, previously unidentified contamination or structures), which are periodically tested and reviewed (see Section 8). In the event of previously unidentified conditions being encountered (e.g. underground storage tanks, chemical drums), works are to be suspended, the works area evacuated, and specialist advice obtained via the Galliford Try Environmental Advisor. Where appropriate, carry out risk assessments and implement additional control measures prior to any works recommencing.

#### 4.6.2 Contamination Prevention

- Manage all fuel on site in accordance with Environment Agency's Working at construction and demolition sites: Pollution Prevention Guidelines (PPG)6<sup>3</sup>.
- Store fuel and chemicals in designated areas with potentially contaminating substances stored on drip trays or in double skinned bunded tanks which hold 110% of the capacity of the chemicals stored. Arrangements need to be in place to deal with any rainwater ingress into the bund.

<sup>&</sup>lt;sup>3</sup> Working at construction and demolition sites: PPG6, Pollution Prevention Guidelines, Environment Agency (2012).

- Secure any fuel storage from theft.
- Spill kits to be readily available in appropriate locations to deal with spillages to ground.
- Avoid re-fuelling on site where possible. All re-fuelling is to be via a mobile bunded bowser equipped with a spill kit and bunding. No refuelling or fuel storage to take place within 10m of a watercourse or surface water drain and is only permitted to be undertaken in daylight hours.
- Store any potentially contaminated spoil/waste appropriately to contain the contamination (bunded, in a dry, elevated area sufficiently far enough away from watercourse or surface drain) and remove from site as soon as practicable by a suitable waste carrier and with the appropriate waste licences in place.
- Store excavated materials that demonstrate visual or odour evidence of contamination in covered skips, or on a sheeted stockpile placed on hardstanding or impermeable sheeting pending its removal or treatment.
- Contaminated material is not to be mixed with uncontaminated material during the site works.
- If dewatering from contaminated areas is required, measures are to be agreed between the Galliford Try Environment Advisor and the Environment Agency and consents/agreements obtained as required in advance of dewatering.
- Implement good construction site control measures to reduce dust, such as damping down and wheel washes (see Section 4.2).

#### 4.6.3 Measures for Earthworks

- Inspect excavations for signs of contaminated material.
- If any suspected contaminated material is uncovered, cease works within proximity of the contamination, report to the Galliford Try Environmental Advisor to seek advice from a land contamination specialist prior to further movement.

#### 4.7 Landscape and Visual

- Erect site hoarding around construction areas to reduce visual impacts of the works.
- Inspect site hoarding regularly and keep in a suitable condition to reduce the visual impact to surrounding receptors.
- Prevent work from being carried out at night, this limits the need for additional lighting.
- Utilise directional lighting (if lighting is required) to reduce spill into the surrounding area.
- Reinstate vegetation removed as soon as reasonably practicable in accordance with the Landscape Management Plan (Ref: 752214-UAX-ZZ-ZZ-EV-EN-00001).

#### 4.8 Noise and Vibration

- Adhere to the working hours of 7:30am 6pm weekdays; 9am 1pm Saturdays; and no work on Sundays or bank holidays.
- Minimise the use of generators where practicable, such as through connection to the mains electricity.
- Locate and orientate generators, pumps and site plant to minimise noise impacts where practicable including consideration of location with respect to screening features such as within sound dampening containers and at a distance from nearest receptors.

- Control noise at source by selecting suitable plant; using acoustic enclosures in accordance with BS 5228-1:2009+A1:2014<sup>4</sup> for significant noise sources; avoid revving engines; switching off equipment when not in use; keeping haul roads and access tracks well maintained; regular and effective maintenance of plant and machinery.
- Minimise reversing, and therefore the sounding of audible reversing alarms.
- Shut down or throttle down vehicles and plant to a minimum in the intervening periods between work.

#### 4.9 Water Resources and Flood Risk

#### 4.9.1 Flood Risk

- Do not store materials and plant within the flood zone as this could increase the risk of surface water flooding in other areas (see Appendix H).
- Ensure that the construction plant and equipment can be quickly removed from the site in the event of flooding during construction.
- Reinstate existing ground levels following above ground works to avoid increasing the risk of flooding.
- Sign up for flood warnings using the GOV.UK website (<u>https://check-for-flooding.service.gov.uk/alerts-and-warnings</u>). In the event of a flood warning, immediately stop all site work.

#### 4.9.2 Surface Water/Groundwater Pollution Prevention

- Undertake all works adjacent to the River Ouse in accordance with the Flood Risk Activity Permit (to be prepared, see Table 2.1).
- Establish exclusion zones adjacent to the River Ouse and establish the site so activities such as use of plant and machinery, refuelling, storage of materials are located away from the watercourse. Only activities under consent are allowed within 10m of the watercourse.
- Locate wheel wash facilities on a hard tarmac or aggregate surface on the main entrance/exit points to the construction site or public highway to reduce the potential for silt or sediments to enter roads and into surface water and drains. Monitor the wheel wash system and clean out debris with a loading shovel or bucket on a weekly basis, or more regular if required.
- Wash concrete mixing plant or ready-mix delivery vehicles in impermeable lined skips, a minimum of 10m away from any watercourse or drainage feature. Discharge of wash water must be treated prior to any discharge in accordance with the consents.
- Keep areas of bare soil or topsoil stockpiles to a minimum and cover to prevent runoff. Reseed cleared land and topsoil stockpiles early where practicable, to minimise exposed soil and sediment flow.
- Dewater excavations in accordance with the Ground Water Discharge Permit (to be prepared, see Table 2.1).
- Store construction plant/materials on hard-standing surfaces where possible.
- Place spill kits near watercourses or drainage features, and sufficiently stock and re-stock immediately following use.

<sup>&</sup>lt;sup>4</sup> BS 5228-1:2009 Code of practice for noise and vibration control on construction and open sites Noise (+A1:2014) British Standards Institution

- Regularly clear any existing drains of vegetation and sediment that could impact its ability to function.
- All site personnel to be familiar with and apply the relevant industry good practice. A good source of these is the Environment Agency PPG<sup>5</sup>. Although these have been removed from circulation, they provide good guidance that can be followed on site. Other PPGs relevant to the proposed development include:
  - PPG1: Understanding your environmental responsibilities
  - PPG5: Works on or water
  - PPG7: Refuelling facilities
  - PPG13: Vehicles washing and cleaning
  - PPG20: Dewatering ducts and chambers
  - PPG22: Dealing with spills.

<sup>&</sup>lt;sup>5</sup> Pollution Prevention Guidelines: [ARCHIVED CONTENT] Environment Agency - Pollution prevention advice and guidance (PPG) (nationalarchives.gov.uk)

## 5 Training Awareness and Competency

#### 5.1 Introduction

Specific training needs are to be identified and provided for all personnel involved in project activities that have the potential to adversely impact the environment. Training to identify the importance of adhering to the contents of the CEMP and the potential consequences of departing from specified methods of work. This includes all sub-contractors entering the site as part of the works.

#### 5.2 In-house Training and Site Inductions

A requirement for site teams to receive a site induction involving environmental awareness training, as a minimum, on topics such as company environmental policies; environmental constraints on site; risks associated with the construction activities; relevant legislation; and incident response.

#### 5.2.1 Toolbox Talks

On site toolbox talks are to form part of site inductions for all staff. The Galliford Try Site Supervisor and the Galliford Try Environmental Advisor may also include specific toolbox talks in daily briefings when certain activities are taking place.

Toolbox talks relevant to this project include:

- Spill control;
- Protected species (such as GCN, bats, reptiles and breeding birds) (see Appendix E, F and G);
- Segregation and storage of waste;
- INNS management and biosecurity/Himalayan balsam;
- Plant and machinery wash down;
- Water resource and flood risk including water discharge and silt management;
- Dust and air quality;
- INNS management;
- Historic environment;
- Land quality;
- Landscape and visual;
- Arboriculture;
- Climate change; and
- Noise and vibration.

# 6 Monitoring

Monitoring is required to be carried out as per the schedule in Table 6.1.

#### Table 6.1: Monitoring

| Type of<br>monitoring                                    | Responsibility  | Duration and frequency   | Purpose   |
|--|---|--|---|
| Site set up  | Galliford Try Project<br>Manager<br>Galliford Try Site Supervisor<br>Galliford Try Environmental<br>Advisor | 1-2 weeks following site set up  | To verify that environmental measures<br>have been appropriately established<br>on project start-up   |
| Daily inspection   | Galliford Try Site Supervisor<br>or nominated representative  | Daily for duration of<br>construction activities   | Brief morning walk around the site<br>perimeter and throughout the site to<br>identify any issues that have arisen<br>overnight such as a breach in the<br>boundary fence, animals in<br>excavations, signs of contamination<br>and sediment controls that need<br>cleaning out |
| Weekly<br>inspection                                     | Galliford Try Site Supervisor<br>Galliford Try Environmental<br>Advisor                                     | Weekly for duration of<br>construction activities  | Thorough site walk around to check<br>that mitigation is in place and<br>performing as intended   |
| Monthly<br>inspection of<br>records                      | Galliford Try Environmental<br>Advisor  | Monthly for duration of construction   | <ul> <li>Check that records are in place, including:</li> <li>Consents and permits</li> <li>Training records</li> <li>Record of inspections and audit reports</li> <li>Any complaints recorded and closed out</li> </ul>  |
| Conditions<br>based inspection                           | Galliford Try Site Supervisor<br>or nominated representative  | Ad hoc when safe,<br>during or immediately<br>following extreme<br>weather conditions<br>such as heavy rain or<br>high winds, or<br>following a security<br>breach | <ul> <li>Thorough walk around the site and surrounding the site to check that:</li> <li>Mitigation is in place and performing as intended</li> <li>Dust, waste or materials have not been carried outside the site causing pollution, harm or nuisance</li> </ul>               |
| Specialist<br>supervision of<br>construction<br>activity | Galliford Try Project<br>Ecologist/ECoW<br>Arboriculturist<br>Appointed Archaeologist                       | As required during<br>vegetation clearance,<br>excavation or other<br>activity as specified by<br>the Galliford Try<br>Environmental Advisor                       | To provide specialist environmental<br>supervision for the activity to<br>implement mitigation and comply with<br>the conditions of consent. Provide<br>toolbox talks as relevant   |
| Southern Water audits                                    | Southern Water  | As requested by<br>Southern Water  | Audit to assure compliance  |
| Authority visit  | Authorities including the<br>Environment Agency, West<br>Sussex County Council                              | As required  | In accordance with any consent<br>conditions, or to investigate a<br>complaint or environmental incident  |

#### 6.1 Internal Audits

Any non-conformances or corrective actions shall be identified through audits, monitoring results, site inspections or as a result of significant environmental incidents.

Depending on the severity of the environmental issue, the Project Ecologist/ECoW and Galliford Try Site Supervisor is required to determine the most appropriate course of action.

All non-conformances and corrective actions are to be recorded within the Site Management System. Any required actions shall be appropriate to the scale of the anticipated or actual environmental impact. It is the responsibility of the Galliford Try Environmental Advisor to oversee that the required corrective actions are implemented and reported to the Galliford Try Project Manager.

As a minimum the non-conformity reporting approach must be able to:

- Identify the root cause of the issue;
- Identify appropriate mitigating actions/procedures;
- Identify preventative actions against any recurrences; and
- Assign responsibility for implementing the corrective action and timeframe in which it must be closed out.

The Project Manager and Galliford Try Site Supervisor reserves the right to remove from site immediately any person whose acts or omissions in their opinion constitutes a danger to people, environment, or property. Any person who does not comply with environmental rules and arrangements detailed in this CEMP are in the first instance to receive a written warning from the nominated person and any subsequent misdemeanours is to provoke the removal of the person from site.

Any corrective actions recorded need be closed out within the given timeframe. Those items not closed out completely shall be carried forward to the next inspection until they are closed out. If the deficiency persists or is a serious breach, then the Galliford Try Project Manager has the responsibility to take further actions to oversee that the matter is closed out.

# 7 Environmental and Sustainability Objectives and Targets

Environmental and sustainability objectives and targets have been set for the proposed development. These are detailed in Table 7.1. Objectives 1-4 are based on Galliford Try commitments.

| ID | Objective   | Associated Galliford Try Targets   |  |
|----|---|--|--|
| 1  | Waste diverted from landfill % (including soils and stones)                       | 85%  |  |
| 2  | Waste diverted from landfill % (excluding soils and stones)                       | 90%  |  |
| 3  | Total waste generated (including soils and stones) tonnes per £100k project value | 40 tonnes  |  |
| 4  | Total waste generated (excluding soils and stones) tonnes per £100k project value | 9 tonnes   |  |
| 5  | No environmental harm   | No pollution incidents.  |  |
| 6  | Limit nuisance caused to surrounding receptors                                    | <ul> <li>Receive no more than one complaint from surrounding receptors on air quality per month; and</li> <li>Receive no more than one complaint from surrounding receptors on noise and vibration per month.</li> </ul> |  |
| 7  | Carry out all works in accordance with<br>consents                                | No breach of consent or warnings or penalty from consenting authorities.   |  |

#### Table 7.1: Environmental and Sustainability Objectives and Targets

## 8 Incident Response

#### 8.1 Introduction

The emergency response procedure outlines the recommended actions in the case of an environmental incident. Following the below procedure will mitigate:

- Injury/loss of life to employees, visitors and the public;
- Damage to equipment and machinery; and
- Harm to the environment.

As the proposed development is near a watercourse, significant adverse effects on aquatic receptors are of the most concern.

#### 8.2 Environmental Guidance

- Incident reporting, recording and investigation is to always align with the requirements
  outlined in the Galliford Try STD-HSS-A01. All incidents, including environmental incidents,
  are to be dealt with in accordance with the emergency response procedure and are to
  always be recorded in Galliford Try's ActivSHEQ database which is the 'Accident Book' for
  the project, as well as investigated and lessons learned captured and implemented to avoid
  recurrence.
- Significant near misses have to be treated in the same manner as an incident with appropriate investigations undertaken.
- It is the responsibility of all staff to stay vigilant and to follow the emergency response procedure in an emergency situation.

#### 8.3 Emergency Response Procedure

- 1. Stop the work immediately and secure the area.
- 2. Inform the Galliford Try Site Supervisor and record as much information as possible.
- 3. If there's an immediate threat to human health or property, such as toxic fumes or large chemical spill, contact the emergency services.
- 4. For spillages:
  - a. Contain, if safe to do so;
  - b. Clean up the spill, the contaminated land and other materials affected using the spill kits. This may require a specialist sub-contractor to carry out this work; and
  - c. Dispose of contaminated materials safely with a licenced waste contractor using the watertight bins provided.
- 5. Report incident to Southern Water.
- 6. Report a pollution incident, damage or danger to the environment to the Environment Agency (on their incident hotline 0800 807060); and
- 7. Following the incident:
  - a. Investigate to identify the root cause;
  - b. Review the need to change equipment, procedures and processes; and
  - c. Brief the team on the outcome, learning and any changes as a result of the incident.

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# A. Southern Water Environmental Policy



# Our policy on the **Environment**

Our vision is clear. We want to create a resilient future for all our customers in the South East. The environment, and our role in protecting and enhancing it, are at the heart of this.

We will develop and deliver this Environmental policy with the aim of continually improving our environmental management to enhance our performance in line with customer and stakeholder expectations.

All employees share the responsibility for environmental management and performance.

- Jui Us

Ian McAulay Chief Executive Officer

April 2022 Version 11 What we will do:

- Reflect the needs and views of our customers and stakeholders in developing and delivering this policy.
- Conform to our compliance obligations by meeting or exceeding the environmental requirements of legislation, regulation and our adopted standards.
- Prevent pollution, eliminate serious pollution incidents and contain the environmental impact of our activities.
- Provide sustainable and reliable services that minimise emissions, taking into account the opportunities to mitigate and offset the impact of climate change.
- Be a good and trusted neighbour and be a steward for the environment wherever we operate.
- Incorporate sustainable development principles to balance economic, environmental and social aspects in our business decisions.
- Embed natural capital into our decision making to ensure we are making best value decisions that deliver public value.
- Deliver nature-based solutions and environmental net-gain, contributing to the recovery of nature.
- Improve biodiversity within our landholdings and wider area through the implementation of the aims within our Biodiversity Policy.
- Reduce the procurement of plastics within our business processes through the implementation of the aims within our Plastics Policy.

- Reduce carbon emissions through implementation of the aims within our embedded Carbon Policy.
- Promote the purchase and use of materials in a way that minimises potential environmental effects.
- Minimise waste by first considering prevention, then preparation for re-use, recycling and finally recovery.
- Embed an environmental mindset across the business to ensure we have the skills, knowledge and plans to improve our environmental performance.
- Deliver assets that maintain sound environmental performance, protecting biodiversity and natural ecosystems during asset delivery.
- Continually improve our performance by maintaining our Environmental Management System to the ISO 14001 standard.
- Report high quality information on our environmental performance on our website, including any key strategies for our environmental ambition and improvement programmes.
- Ensure we meet or exceed environmental performance reporting requirements.
- Engage and collaborate with our stakeholders to achieve our vision.



# B. Galliford Try Environmental Policy Statement



Galliford Try is committed to protecting the environment, by adopting sustainable resourcing and consumption practices and taking measures to mitigate carbon production and climate change to protect our environment and biodiversity.

### **Our Leaders will ensure:**

|                                       | Visible leadership and collaboration with all of our stakeholders to meet their needs and to improve our performance.               |
|---------------------------------------|---|
|                                       | A positive environmental culture by investing in our Challenging Beliefs, Affecting Behaviour programme.                            |
|                                       | All employees are aware of and understand their environmental responsibilities, including effectively mitigating risk.              |
|                                       | Positive reporting of environmental hazards, risks and opportunities is encouraged without reprisal.                                |
| A A A A A A A A A A A A A A A A A A A | Suitable resources, facilities and finances provided.   |
| <u>آبار</u>                           | Relevant environmental training, instruction and information is provided.   |
| 2                                     | Environmental support and advice are provided at all stages of a project, to protect the environment e.g., pollution prevention.    |
| 4                                     | Compliance with all statutory provisions and industry best practices.   |
| ×                                     | Regular measurement of our performance to identify continual improvement.   |
| Ŷ                                     | Annual leading and lagging indicators are set and communicated.   |
| $\overline{\checkmark}$               | Suitable actions taken following any incidents or non-conformances.   |
| Ð                                     | Our Policy Statement is reviewed at least annually or following any change and is communicated and available to interested parties. |
|                                       |   |

These commitments are supported by the arrangements included in our business management systems (BMS), our Energy, Biodiversity and Responsible Resourcing Policies.

#### **Objectives 23/24**

- Environmental Incident Campaign upskill, raise awareness and improve our environmental reporting
- Produce and issue guidance for net zero site set up
- Produce a biodiversity strategy.

Signed for and on behalf of the Executive Board:

Mar X.

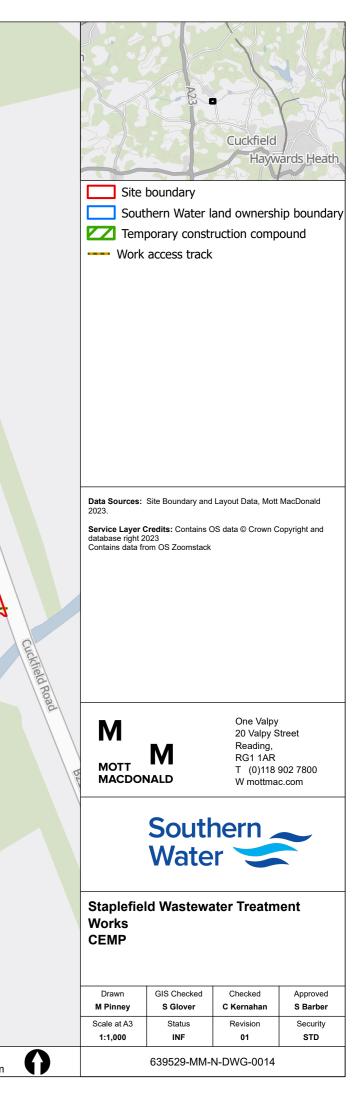
Bill Hocking, Chief Executive Galliford Try Holding Plc

Reviewed: 5 October 2023

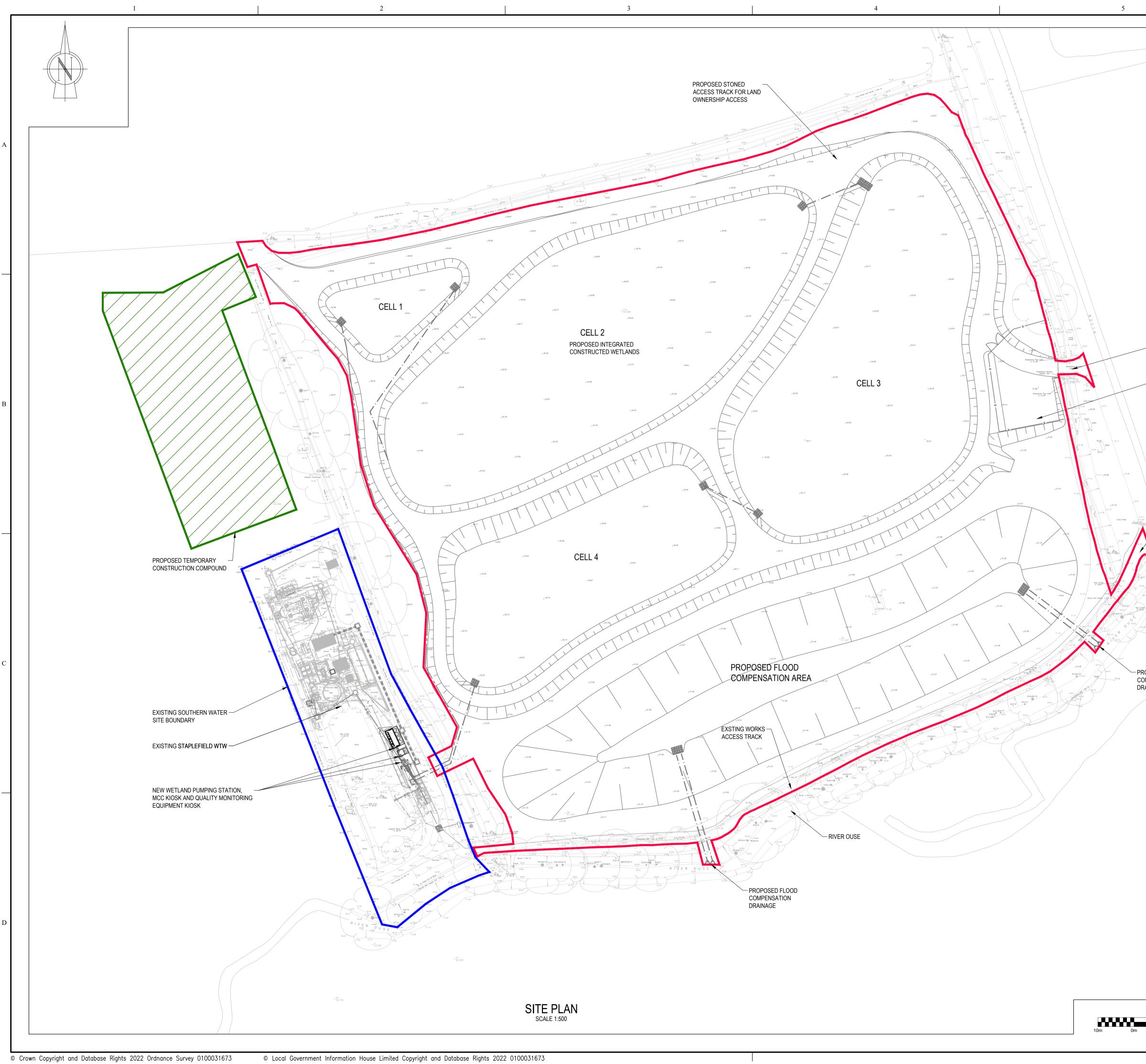
This Policy applies to all employees and contractors working for Galliford Try Holdings plc and INCLUDES, Morrison Construction Limited, Galliford Try Construction Limited (previously known as Galliford Try Building Limited), Galliford Try Infrastructure Limited, Galliford Try Facilities Management Limited, Rock & Alluvium Limited, Oak Specialist Services Limited. Lintott Control Systems Limited, Ham Baker Engineering Limited and all subsidiaries

# C. Site Boundary of Proposed Development and Location of Construction Compound





# D. Design of the Proposed Development



|  |             |   |            |              |            | 6          |  |   |                    | _     |  |
|--|-------------|---|------------|--------------|------------|------------|--|---|--------------------|-------|--|
| }  |             | NOTES   |            |              |            |            |  |   |                    |       |  |
|  |             | 1. ALL DIMENSIONS IN METRES AND ALL LEVELS IN METRES AOD, UNLESS NOTED OTHERWISE.                           |            |              |            |            |  |   |                    |       |  |
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| -  |             |   |            |              |            |            |  |   |                    |       |  |
| PROPOSED STONED<br>WETLAND PARKING AREA  | A           |   |            |              |            |            |  |   |                    |       |  |
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| EXISTING WORKS ACCES<br>POINT OFF B2114  | CURRE       |   |            |              |            |            | ATIC                                   | DN  |                    |       |  |
|  | Authorized  | Stage   | Compi      | ele - C      | onstru     | CUON       |  |   |                    |       |  |
| 137<br>3146<br>2019.7  |             |   |            |              |            |            |  |   |                    |       |  |
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| ROPOSED FLOOD  |             |   | 0.00       |              | 0.01       | - DO (     |  |   |                    | 200mm |  |
| RAINAGE  | 20/11/23    | SR<br>SR  | SJN<br>SJN | MB<br>TB     | SJN<br>SJN | P01<br>P02 | S3<br>S3                               | REVIEW AND COMMENT                              |                    | 1200  |  |
|  | 19/01/24    | SR  | SJN        | MB           | SJN        | C01        | 53<br>S4                               | REVIEW AND COMMENT                              |                    | 1     |  |
|  | DATE        |   | СНКД       |              |            | REV        | STS                                    | REASON FOR ISSUE                                |                    | 1     |  |
|  |             |   |            |              | 1          | L          |  | Southern House                                  | Ô                  |       |  |
|  |             | Southern<br>Water Water Double (01903) 264444   |            |              |            |            |  |   |                    |       |  |
|  |             |   |            | <b>V V (</b> | au         | 71         |  | BN13 3NX<br>telephone (01903<br>fax (01903) 691 | ) 264444<br>1435   | 150   |  |
|  |             |   | 0          | C            |            |            |  |   |                    |       |  |
|  |             | GTb   |            |              |            |            |  |   |                    |       |  |
|  | Galli       | Galliford Try Construction Limited<br>and Binnies UK Limited  |            |              |            |            |  |   |                    |       |  |
|  |             | Joint Venture,<br>Lewes Road, Falmer,<br>Brighton, East Sussex,   |            |              |            |            |  |   |                    |       |  |
|  | PROJECT TIT | BN1 9PY   |            |              |            |            |  |   |                    |       |  |
|  |             | STAPLEFIELD WTW   |            |              |            |            |  |   |                    |       |  |
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|  | DRAWING TIT | ΊF  |            |              |            |            |  |   |                    | ┟     |  |
|  |             |   |            | Ρ            | LAN        | NING       | 6 AP                                   | PLICATION                                       |                    | ╞     |  |
|  |             | SITE BOUNDARY PLAN  |            |              |            |            |  |   |                    |       |  |
|  |             | 20  |            |              |            |            |  |   |                    |       |  |
|  | SITE UNIT   |   |            |              |            |            | SITE UNIT MASTER<br>NO. 101/6/ SIZE 01 |   |                    |       |  |
|  | MNEMONIC    |   |            |              |            |            |  | 1464  | <sup>SIZE</sup> A1 |       |  |
|  | PRN         | 7522 <sup>,</sup>   | 14         |              |            | SCAI       |  | :500  | status<br>A5       |       |  |
| 10m 20m 30m  | S.W. DRAWIN |   |            |              |            |            | -                                      |   | REVISION           |       |  |
| Scale 1:500  |             | 752214-MWX-ZZ-00-DR-C-00100 C01   |            |              |            |            |  |   |                    | 0     |  |

## E. Toolbox Talk – Breeding Birds



## TOOLBOX TALK: Breeding birds

More than 400 species of bird are regularly recorded in the UK. Different species have different preferences for nesting habitat.

Woodland, scrub, hedgerows and structures provide optimum nesting opportunity for breeding birds.

Evidence suggests that the site of proposed works may support breeding birds.

## **LEGISLATION**

Under UK law (Wildlife and Countryside

Act, 1981) it is an offence to:

- intentionally kill, injure or take any wild bird;
- to take, damage or destroy the nest (whilst being built or in use) or eggs of any wild bird;
- to possess a wild bird (dead or alive) or their eggs.
- Some species receive additional protection from disturbance under Schedule 1 of the Act.

If you suspect there is a bird's nest present within the works area, STOP ALL INVASIVE WORKS and contact the site Ecologist or the Environment Team IMMEDIATELY via

DO NOT RISK BREAKING THE LAW

Penalties for breaking the law can include large fines, imprisonment and the seizure of equipment.

### ESSENTIAL PRE-WORKS CHECK

It is essential that prior to any works involving clearance or disturbance of vegetation a check for birds nests must be undertaken.

### A CHECK FOR BIRDS NESTS WILL NEED TO BE UNDERTAKEN IMMEDIATELY BEFORE THE COMMENCEMENT OF WORKS AND ON EVERY DAY THAT WORKS ARE TO TAKE PLACE.

# F. Toolbox Talk – Badgers



## TOOLBOX TALK: Badgers

Badgers live in underground setts made up of tunnels and chambers visible as single, or groups, of holes. These holes are at least 25 cm wide and 20 cm high. (an entrance to a sett is illustrated overleaf). Badgers are nocturnal animals so you are unlikely to see them during the day.

Evidence suggests that badgers may be present within the vicinity of the proposed work. Although a badger sett has not yet been discovered onsite, there is potential for badgers to establish a sett during the works and/or for a sett to already be present but undetected under dense scrub or vegetation.

### LEGISLATION

Under UK law (*Protection of Badgers Act 1992*), it is an offence to wilfully kill, injure, take or posses a badger, or attempt to do so, and to intentionally or <u>recklessly</u> damage, destroy or obstruct access to a badger sett, or to <u>disturb</u> a badger while it is occupying a sett. Penalties for breaking the law can include **large fines, imprisonment** and the **seizure of equipment**.



If there is any suspicion that badgers are present within 30m of the site, STOP ALL WORKS and contact the site

Ecologist IMMEDIATELY via

DO NOT RISK BREAKING

Any amount of disturbance of a badger occupying a sett (potentially via noise or vibration) can lead to prosecution.

### WHAT TO DO IF YOU FIND A BADGER SETT

If at any time during the works a potential badger sett is discovered within 30m of the proposed works, all works should halt (when safe to do so) and the Ecologist or Environment Team must be contacted immediately. If there is any doubt, contact the Ecologist or Environment Team.

Make direct contact with an Ecologist. Leaving a message is insufficient you must speak directly to the Ecologist or a member of the Environment Team. They will then be able to advise on legal and most appropriate course of action.

# G. Toolbox Talk – Great Crested Newt



## TOOLBOX TALK: Great crested newts

Great crested newts will utilise ponds and static watercourses to breed. However, adult great crested newt spends the majority of their time out of water where they forage and hibernate within grassland, scrub and woodland.



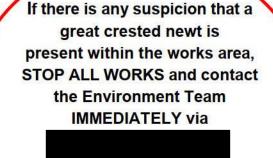
Log piles, rock piles and brash are particularly important habitats for great crested newts.

Evidence from surveys suggests that great crested newts are present within the vicinity of these proposed works.

### LEGISLATION

Under UK and European law (*Wildlife and Countryside Act, 1981, Conservation (Natural Habitats &c) Regulations, 2010)* it is an offence to:

- Intentionally kill, take or injure a great crested newt.
- Possess or control a great crested newt.



DO NOT RISK BREAKING

THE LAW

- Intentionally or recklessly cause damage, destruction or obstruct access to any structure or place used by great crested newts for shelter or protection.
- Intentional or recklessly disturb a great crested newts.

Penalties for breaking the law can include large fines (£5000 per newt), imprisonment and the seizure of equipment.

Works are able to take place as a license to undertake small scale disturbance has been agreed with the statutory authority. Deviation from the scope of works or the killing and injury of great crested newts may result in prosecution.

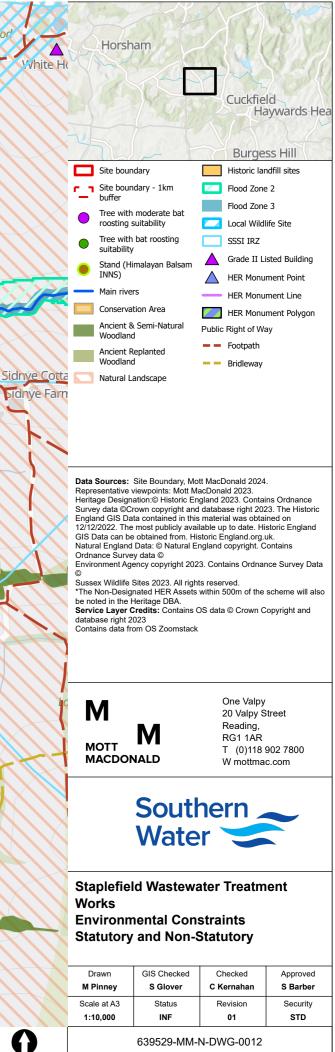
### WHAT TO DO IF YOU SEE A GREAT CRESTED NEWT

If at any time during the works a great crested newt is seen, all works should halt (when safe to do so) and the Ecologist must be contacted immediately. If there is any doubt contact the Ecologist.

# H. Environmental Constraints Map

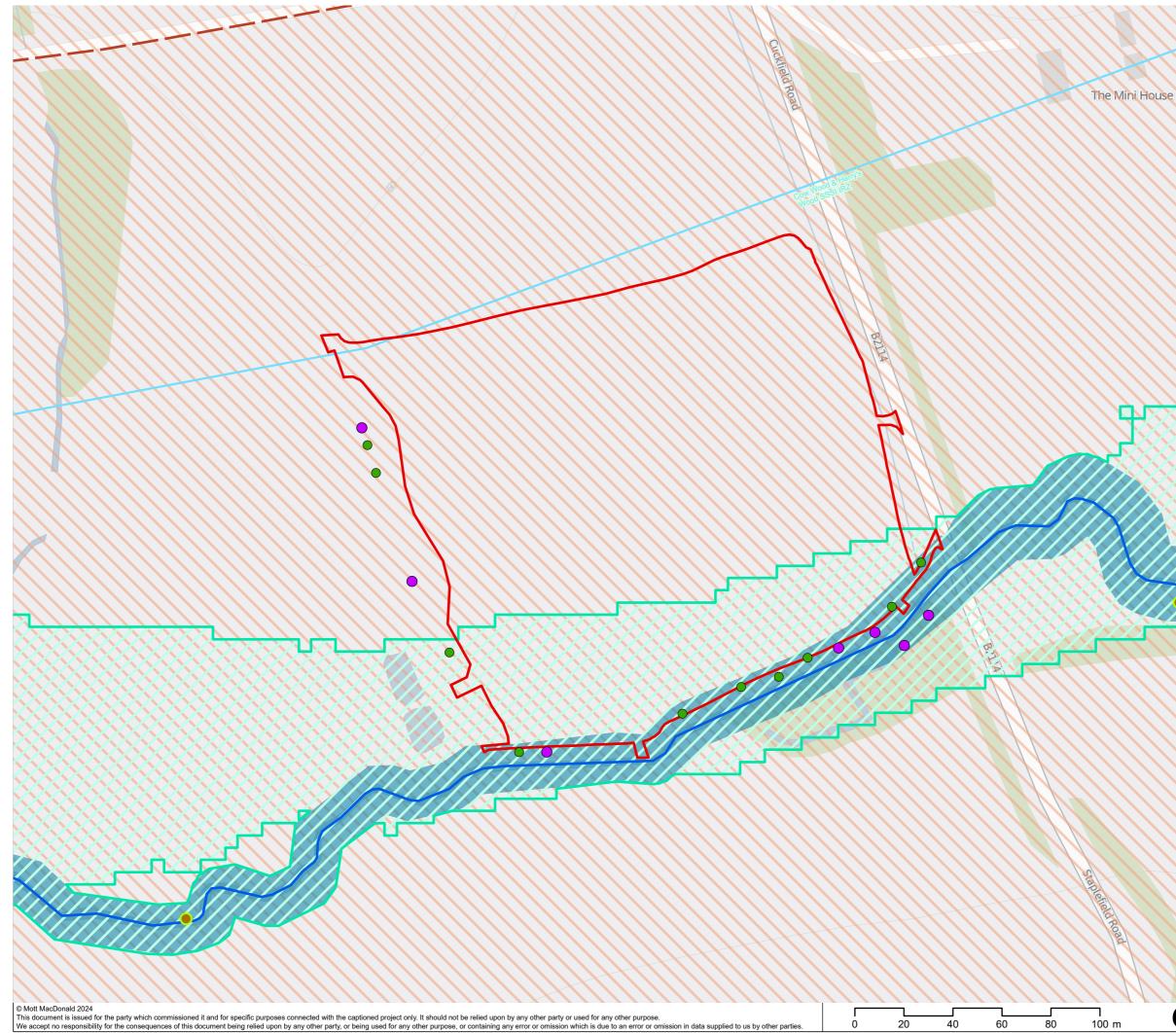


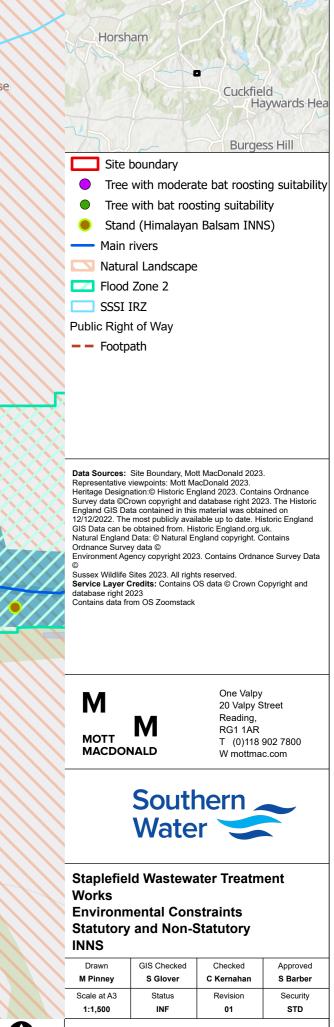
SWS\_Environment | SWS\_Staplefield\_EnvironmentalConstraints | 25 Jan 2024



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## I. Tree Protection Plan





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