

Thorney Lane, Iver

Construction Environmental Management Plan (CEMP) - Biodiversity

Final

P01330/Version 2.0

Client: Thorney Lane LLP

Date: 17 February 2025

DOCUMENT CONTROL

Report prepared for:

Thorney Lane LLP

Main contributors:

Kate Arsac England, BSc (Hons) MSc

Assistant Ecologist

Tessa Pepler BSc (Hons) MSc MCIEEM

Principal Ecologist

Reviewed by:

Liz Johns BSc (Hons) CEnv MCIEEM MRSB

Director

Issued by:

Tessa Pepler BSc (Hons) MSc MCIEEM

Principal Ecologist

Green Tree House, 11 St Margaret's St, Bradford on Avon, Wiltshire, BA15 1DA
T: 01225 723652 | E: info@johnsassociates.co.uk | W: www.johnsassociates.co.uk

DOCUMENT REVISIONS

Version	Details	Date
V1.0	Draft CEMP issued to Client for review	13 January 2025
V2.0	Draft CEMP issued to Client for review following amendments.	3 February 2025
V2.0	Final CEMP issued to Client for submission.	17 February 2025

Third party disclaimer

Any disclosure of this report to a third party is subject to this disclaimer. The report was prepared by Johns Associates at the instruction of, and for use by, our client named on the front of the report. It does not in any way constitute advice to any third party who is able to access it by any means. Johns Associates excludes to the fullest extent lawfully permitted all liability whatsoever for any loss or damage howsoever arising from reliance on the contents of this report. We do not however exclude our liability (if any) for personal injury or death resulting from our negligence, for fraud or any other matter in relation to which we cannot legally exclude liability.

TABLE OF CONTENTS

1	INTRODUCTION	3
1.1	Background	3
1.2	Purpose of this Report.....	4
1.3	Personnel	4
1.4	Other Relevant Documents.....	4
1.5	Structure of the CEMP.....	4
1.6	Habitat Monitoring and Management Plan.....	5
2	METHOD OF WORK	6
2.1	Construction Method	6
2.2	Site Equipment and Maintenance Plan.....	7
2.3	Contingency Plan	7
2.4	Accident Plan	7
2.5	Complaints Procedure.....	7
2.6	Staff Competency and Training Records.....	8
2.7	Keeping Records.....	8
2.8	Review of Management Systems.....	8
2.8.1	Project Specific Review Document	8
2.9	Making the Management System Available	9
3	ECOLOGICAL FEATURES	10
4	POTENTIAL IMPACTS	13
5	ECOLOGY – IN ADVANCE OF WORKS	14
5.1	Risk Assessment of Construction Activities.....	14
5.2	Site Demarcation/Biodiversity Protection Zones	14
6	PREPARATION OF THE CONSTRUCTION SITE/ENABLING WORKS	17
6.1	Roles and Responsibilities.....	17
6.2	Ecological Watching Brief	17
6.3	Ecological Clerk of Works	17
6.4	General Precautionary Measures.....	17
6.5	Habitats.....	18
6.5.1	Woodland and Trees	18
6.5.2	Grassland, Ruderal Vegetation and Scrub - OMHPDL.....	18
6.5.3	Ponds and Ditches	19
6.6	Protected Species.....	19
6.6.1	Bats.....	19
6.6.2	Herptiles (Reptiles and Amphibians	19
6.6.3	Nesting Birds	20
6.6.4	Hedgehog.....	20
6.6.5	Invertebrates.....	20
7	ECOLOGICAL CONSTRAINTS SUMMARY TABLE AND SCHEDULE OF WORKS.	21
	APPENDIX A – UKHAB BASELINE PLAN	
	APPENDIX B – UKHAB PROPOSED DEVELOPMENT PLAN	
	APPENDIX C – PROTECTED SPECIES AVOIDANCE & MITIGATION METHOD STATEMENT	
	APPENDIX D – LOCATION OF HERAS FENCING	

APPENDIX E - ECOLOGICAL SCHEDULE OF WORKS 2025

1 INTRODUCTION

1.1 BACKGROUND

This Construction Environmental Management Plan (CEMP: Biodiversity) has been prepared by Johns Associates Ltd on behalf of Thorney Lane LLP to satisfy the requirements of pre-commencement Planning Condition 9 issued by Buckinghamshire Council in relation to permission PL/22/1710/FA granted for a new access road to Thorney Business Park, new estate road to the remaining industrial site, pedestrian route and cycleway, new landscaping, associated groundworks, drainage, services, lighting and removal of existing access road. Planning Condition 9 is reproduced below:

"No development shall commence until a Construction and Environmental Management Plan has been submitted to and approved in writing by the local planning authority. Thereafter the development shall be carried out in accordance with the approved details. The Plan shall include / provide for:

- a) the parking of vehicles of site operatives and visitors; the loading and unloading of plant and materials; the storage of plant and materials used in constructing the development;*
- b) measures to control the emission of dust and dirt during construction;*
- c) details of protective measures (both physical measures and sensitive working practises) to avoid impacts during construction;*
- d) A timetable to show phasing of construction activities to avoid periods of the year when sensitive wildlife could be harmed (such as when badgers, reptiles and amphibians are active and during bird nesting seasons);*
- e) Persons responsible for:*
 - i. Compliance with legal consents relating to nature conservation;*
 - ii. Compliance with planning conditions relating to nature conservation*
 - iii. Installation of physical protection measures during construction;*
 - iv. Regular inspection and maintenance of the physical protection measures and monitoring of working practices during construction;*
 - v. Provision of training and information about the importance of Environment Protection measures to all construction personnel on site.*

Reason: To safeguard the environment and in the interests of the structural integrity of the waterway and to ensure the proposed works do not have any adverse impact on the safety of waterway users and the integrity of the Slough Arm of the Grand Union Canal. ensure that development is undertaken in a manner which ensures important wildlife is not adversely impacted."

This Construction Environmental Management Plan (CEMP: Biodiversity) provides a methodology for the protection of ecological receptors during the permitted works at Thorney Business Park, Thorney Lane North, Iver, Buckinghamshire, SL0 9HE.

This CEMP will be a live document. It will be updated during the life of the project to ensure it remains suitable and relevant to effectively deliver the project's ecological commitments.

Construction will be undertaken by an appointed contractor for and on behalf of Thorney Lane LLP.

1.2 PURPOSE OF THIS REPORT

The CEMP provides details of the control measures and procedures that Thorney Lane LLP will implement to avoid and mitigate the construction impacts on the environment at the Site and surrounding areas.

The primary objective is to guide the implementation of effective ecological management during the construction activities. This can be broken down further:

- To comply with relevant environmental and nature conservation legislation, duties and obligations, together with planning conditions and avoid prosecutions for the contravention of environmental law and regulations;
- To maintain and raise awareness with all contractors of their environmental responsibilities throughout the construction phase by means of construction 'toolbox talks'; and
- To effectively integrate ecological considerations into all aspects of decision-making during the construction phase.

This document should be treated as a live document with reviews being carried out at set intervals and new information added as appropriate.

1.3 PERSONNEL

This report has been written by Kate Arzac England BSc (Hons) MSc, Assistant Ecologist at Johns Associates and Tessa Pepler BSc (Hons) MSc MCIEEM, Principal Ecologist and Ecology Team Leader at Johns Associates. The report was reviewed by Liz Johns BSc (Hons) MSc CEnv MCIEEM MRSB, Director at Johns Ecology.

1.4 OTHER RELEVANT DOCUMENTS

This CEMP should be read in conjunction with the following current documents:

- J01330 Habitat Management and Monitoring Plan (HMMP) (Johns Associates, 9 January 2025)
- J00896 Ecological Impact Assessment Report (Johns Associates, 1 August 2022)
- Landscape Framework Plan (Adams Habermehl, 0849.1.1, April 2022)

The drawings and documents contained in Appendices A – C of this document:

- Appendix A – J00896-002 UKHab Baseline Plan (Johns Associates, 28 April 2022)
- Appendix B – J00896-003 UKHab Post Development Plan (Johns Associates, 28 April 2022)
- Appendix C – Protected Species Avoidance and Mitigation Strategy (Johns Associates, 9 January 2025)
- Appendix D – Location of Heras Fencing to Protect Adjoining Habitats (Johns Associates, 3 February 2025)

1.5 STRUCTURE OF THE CEMP

This CEMP is divided into the following sections:

- Section 1: Introduction including the objectives of this CEMP and reference to other relevant approved documents and plans.
- Section 2: Methods of work, contingency plans, accident plans, management systems.
- Section 3: Ecological features.
- Section 4: Potential impacts.

- Section 5: Ecology – in advance of works
- Section 6: Preparation of the construction site/enabling works
- Section 7: Ecological constraints summary table and schedule of works.

1.6 HABITAT MONITORING AND MANAGEMENT PLAN

A Habitat Management and Monitoring Plan (HMMP) (Johns Associates Ltd, 9 January 2024) for the Site will be submitted to discharge Planning Condition 5 for the Site.

2 METHOD OF WORK

2.1 CONSTRUCTION METHOD

Works will be conducted following CIRIA (2001) C532: Control of water pollution from construction sites.

A training aid will be used to provide practical advice regarding managing construction works on site to minimise environmental impacts following CIRIA (2015) C741: Environmental Good Practice on Site.

Any required tree works will be carried out by a qualified and experienced arboriculturist in accordance with British Standard 3998:2010 – Recommendations for Tree Work; and The Industry Code of Practice for Arboriculture Tree Work at Height, May 2020, produced by the Arboricultural Association which outlines the relevant legislation and working practices.

Access to be undertaken on defined access routes to prevent erosion, damage to existing habitats and to reduce soil compaction, particularly close to trees and hedgerows.

The temporary site compound area to accommodate temporary welfare facilities, the storage of plant and materials used in constructing the development, the parking of vehicles of site operatives and visitors and the loading and unloading of plant and materials; will be located on existing hardstanding within the existing business park area away from habitats of ecological value.

Ground works will commence following completion of a reptile translocation strategy is completed (contained in Appendix C).

Vegetation and surrounding habitats will be protected as necessary by appropriate fencing and maintained as functional habitat. Appendix D provides the location of heras fencing that will span the redline development area to protect adjacent habitats. A precautionary method of works for herptiles and other species such as nesting birds and hedgehog will be followed (Appendix C). An ecological clerk of works (ECoW) will be present on Site at key stages to ensure that vegetation and surrounding habitats are protected and retained. The use of toolbox talks will help to ensure that all personnel working on Site are informed of the necessary measures required to protect the surrounding habitats and species.

Prior to the commencement of site preparation works, (including any required vegetation clearance), temporary protective fencing will be erected around the site in order to contain the construction works and to protect immediately adjacent habitats. The fence will be installed outside the root protection zones of retained boundary woodland with a buffer of 5 m or the RPA, whichever is greatest. The fencing will be erected in accordance with BS 5837:2012.

There is no construction lighting permitted at the Site after dusk to maintain dark corridors for foraging/ commuting bats and other nocturnal animals (particularly along woodland edge habitats).

Any substances that are hazardous to health are to be addressed under COSHH. Such materials to be stored securely and appropriately to prevent/ reduce workers exposure to hazardous substances and to minimize the potential for accidental spillages into the local environment.

Any waste will be disposed of following the necessary best practice guidance relevant to the type of waste. This will include the removal of Japanese knotweed *Reynoutria japonica* from the Site prior to construction works commencing.

Temporary fencing will be installed to demarcate tree root protection areas (RPA) and 'biodiversity protection zones'/buffer areas. To minimise any potential impacts on habitats or wildlife a trained ecologist will be present on Site for key works, including site preparation (including soil stripping), the installation of fencing to protect the RPAs

of trees and hedgerows to be retained, and vegetation clearance. This will ensure that the necessary steps are taken to prevent any unnecessary damage occurring to habitats and species.

2.2 SITE EQUIPMENT AND MAINTENANCE PLAN

The Site infrastructure and machinery being used will be maintained in accordance with the main contractor's standard site and equipment maintenance plan. All plant and equipment to be inspected prior to use and prior to commencement of each shift: fluid levels and battery charge to be checked as appropriate. The initial check of plant delivered to Site to be recorded, and plant checks are to be recorded on daily/weekly maintenance inspection reports.

All plant and equipment to be maintained in working order following the contractors plant department maintenance regime. New plant to be accompanied by an EU declaration of conformity. Defective plant is not to be used: damage/defects to plant are to be recorded and communicated to the plant department. Machinery will be used and maintained according to the manufacturers or suppliers' recommendations.

2.3 CONTINGENCY PLAN

All re-fueling to be carried out in flat areas of ground with appropriate drip trays and NOT within the curtilage of any retained habitats or within 10 m of any ditches or ponds. Fuel spillage kits are to be located on Site to capture fuel/oil in the event of breakdown/failures in pipelines or accidental spillages from plant/machinery when in operation.

2.4 ACCIDENT PLAN

Accidents or events that could result in pollution will be carefully planned for and managed to avoid significant effects.

All staff and subcontractors to be inducted upon entering the Site. The induction will communicate the constraints of the Site, and the protocols to be followed. All works to have a specific method statement and risk assessment compiled and communicated to personnel prior to commencement on Site. Risk assessments to consider the probability of adverse effects, and the measures employed to mitigate.

The works manager is to review the conditions on Site prior to each shift and convey any hazards and mitigating measures to be employed to all personnel.

In the event of breakdowns of plant, spill kits to be deployed to capture leaks of fuel and oil. Where possible, plant that has failed will be removed from the vicinity of the works. Where this is not practical, bunds will be formed around plant, with sandbags, to create a separation from adjacent habitats.

Fire extinguishers and fire blankets to be located within the cabins of plant, and in the Site compound, to be deployed in the event of a fire, where it is safe to do so.

Equipment to be mobilized when not in use and parked in the Site compound outside of working hours. Cabin windows to be shuttered/protected as necessary to mitigate against vandalism.

Contact telephone number for emergency services and the environment agency to be posted within the Site cabin.

In the event of an emergency, all personnel on Site to move to a muster point located in the main compound, over 100m from the works. The Site 'signing-in' book to be used to account for all personnel on Site.

2.5 COMPLAINTS PROCEDURE

Protocol

Action

- | | |
|---|----|
| 1. Record event | |
| 2. Implement any immediate Health and Safety and injury interventions | SM |
| 3. Advise line manager | SM |
| 4. Prepare written statement | SM |
| 5. Take photographs | SM |
| 6. Advise relevant parties | LM |
| 7. Review incident | LM |
| 8. Prepare conclusion report, with recommendations/actions | LM |
| 9. Distribute report to relevant parties | LM |
| 10. Final review of actions | DM |

Key

SM Site Manager

LM Line Manager

DM Divisional Manager

2.6 STAFF COMPETENCY AND TRAINING RECORDS

Appointed contractor to implement a continuing development program to maintain appropriate and up-to-date competence of staff and operatives.

2.7 KEEPING RECORDS

The Site Manager will operate a 'Construction Site Safety File' which embodies all records to be kept on Site. All records will be made available to Buckingham Council on request. The ecological clerk of works (ECoW) will keep records of all work supervised on Site, to include date of supervision and works carried out, with photographic evidence for submission to Buckingham Council as required.

2.8 REVIEW OF MANAGEMENT SYSTEMS

2.8.1 Project Specific Review Document

Contract Protocol

1. Ensure approved risk assessment and method statements (RAMS) are in place.
2. Ensure pollution mitigation measures are in place.
3. Undertake daily checks.
4. Review as required.
5. Record changes in method in RAMS.
6. Records to be kept with Site manager/ECoW

Post Contract Protocol

1. Site Manager/ ECoW prepare project specific review document.
2. Assess all pollution risks.
3. Address risks in project specific RAMS and issue for comment and approval.

2.9 MAKING THE MANAGEMENT SYSTEM AVAILABLE

Contractor staff will have access to and understand any sections of the management system that relates to their work.

Buckinghamshire Council is able to ask to see the management system at any time and it will be made available to its officers.

The contractor will explain to people in the surrounding area how it will manage its activities and comply with the requirements of the planning permission if they request this information.

3 ECOLOGICAL FEATURES

The following ecological features have been identified within the Site. This information is taken from an updated Extended UKHab Survey on 17 July 2024 to ascertain any changes in on-Site ecological conditions.

Habitats

- **Other Neutral Grassland (Open Mosaic Habitats on Previously Developed Land (OMHPDL) Priority Habitat)** – The grassland was tending to ruderal and scrub vegetation with common nettle *Urtica dioica*, spear thistle *Cirsium vulgare* and teasel *Dipsacus fullonum* and scattered bramble *Rubus fruticosus* agg., willow *Salix* sp. and hawthorn *Crataegus monogyna* scrub and pioneer silver birch *Betula pendula* trees encroaching into the grassland throughout the Site. The grassland was short due to being grazed by rabbit *Oryctolagus cuniculus* and the time of year surveyed (March). Yorkshire fog *Holcus lanatus* and annual meadow grass *Poa annua*, were dominant, with occasional ragwort *Senecio jacobaea*, cock's-foot *Dactylis glomerata*, ground ivy *Glechoma hederacea*, creeping cinquefoil *Potentilla reptans*, rough meadow grass *Poa trivialis* and ribwort plantain *Plantago lanceolata*.
- **Other Neutral Grassland, Seasonally Wet (OMHPDL Priority Habitat)** – The ground had been levelled to the west of the Site and there appeared to be an imported and compressed substrate contributing to the wet waterlogged nature of the ground due to the lack of drainage. The ground was dominated by moss and wet with few botanical species present at the time of survey. Rough meadow grass, festuca *Festuca* sp. and hard rush *Juncus inflexus* throughout. Creeping cinquefoil, ribwort plantain, yarrow *Achillea millefolium*, selfheal *Prunella vulgaris*, bristly oxtongue *Helminthotheca echinoides*, pearl wort *Sagina procumbens*, common centaury *Centaureum erythraea* and tufted vetch *Vicia cracca* covered a lot of the grassland. There were small areas of common nettle encroaching into the marshy grassland.
- **Ruderal Vegetation (OMHPDL Priority Habitat)** – A large bund with ruderal vegetation was located in the western corner of the Site. Species included teasel, greater burdock *Arctium lappa*, common nettle, ragwort, cow parsley *Anthriscus sylvestris*, daisy *Bellis perennis*, great willowherb *Epilobium hirsutum*, hemlock *Conium maculatum*, pineapple weed *Matricaria discoidea*, tufted vetch, hoary mullein *Verbascum pulverulentum*, creeping thistle *Cirsium arvense* and creeping cinquefoil. The edge of the bund had a small area of silver birch. There was a line of ruderal vegetation to the north of the bramble scrub along the access road to the business park to the east of the Site. Species recorded included common nettle, bramble, buddleia, golden rod, teasel, creeping thistle, ragwort, burdock and bittersweet. There was an area of ruderal vegetation along Thorney Lane North and the eastern boundary of the Site which comprised nettle, burdock, teasel, hogweed, creeping thistle, mugwort, bristly sow thistle and hedge mustard.
- **Mixed Scrub (OMHPDL Priority Habitat)** – There were areas of mixed scrub dominated with hawthorn, blackthorn *Prunus spinosa*, goat willow *Salix caprea* and common osier *Salix viminalis*. To west of the Site was a thicket of mixed scrub comprising willow, hawthorn, elder *Sambucus nigra*, goat willow and hawthorn. There was goat willow along the bund along the edge of the industrial estate and an area of buddleia was present on the corner join between the right-angled bunds. Bramble scrub was located to the east of the Site with small blackthorn and hawthorn shrubs and young deciduous trees including elder, alder *Alnus glutinosa* and sycamore *Acer pseudoplatanus*. Continuous scrub lined the southern boundary of the Site which comprised mainly bramble with areas of hawthorn, blackthorn, cherry *Prunus* sp., goat willow, oak, sycamore and buddleia *Buddleia Davidii* scrub, to the west of the Site the southern boundary scrub was dominated by bramble. Mixed scrub dominated by hawthorn, blackthorn, bramble and willow was scattered throughout the marshy grassland and other neutral grassland within the Site. Other young tree species within the scrub included silver birch, willow sp., elder, ash, buddleia and sycamore.

- **Ditches** – Wet trenches were located to throughout the site. The trenches were man-made (smaller ones possibly to construct bike ramps) and the majority with vertical cut sides and grassland, woodland or scrub habitat up to margins. The trenches in the marshy grassland and woodland to the west of the Site were bordered by soft and hard rush along it in the centre of the Site.
- **Other Broadleaved Woodland** – The woodland within the Site was in poor condition and comprised willow, elder, silver birch, oak *Quercus robur*, dogwood *Cornus sanguinea*, crack willow *Salix x fragilis* and blackthorn and hawthorn. The woodland was very scrubby with fallen trees and tree debris. There were numerous small oak trees along the boundary of the woodland.
- **Standard Trees** – A more mature silver birch tree was located to the east of the site. Two white willows were located within an area of scrub to the east of the Site. A weeping willow *Salix babylonica* and a common lime *Tilia x europaea* tree were located to the south of the industrial site.
- **Waterbodies** – Outside of the Site boundary; a pond to the west of the Site had Juncus and bulrush, the water quality looked to be of moderate quality and moorhen *Gallinula chloropus* were present. Young willow trees were growing out of the water around the edges and buddleia surrounded the west of the pond. Marshy grassland extended approximately 8 m to the east of the pond. The balancing pond outside of the Site boundary and adjacent to the industrial estate was inaccessible at the time of survey due to heavy scrub.
- **Hardstanding** – The industrial estate within the western section of the Site comprised hardstanding.
- **Buildings** – There was one industrial building to the west of the proposed Site within the industrial estate. All other built structures were of temporary nature e.g. mobile buildings and containers.

Species/Species Groups

- **Bats** – The woodland, woodland edge, scrub, ruderal, pond and grassland habitat within the proposed Site had a moderate suitability to be used by foraging and commuting bats. No trees within the Site had PRFs suitable for roosting bats. The buildings had no PRFs suitable for roosting bats.
- **Reptiles and Amphibians** – The matrix of grassland, woodland edge, ruderal and scrub habitats within the Site are highly suitable for common reptile species e.g. common lizard *Zootoca vivipara*, slow worm *Anguis fragilis* and grass snake *Natrix natrix*. A reptile survey using 110 artificial refugia conducted by AA Environmental in May 2020 recorded a small population of slow worm (4 individuals) and a medium population of grass snake (6 individuals) with common toad also recorded. An updated reptile survey conducted by Johns Associates in October 2024 found that the slow worm population had increased to a 'good' population size.
- **Nesting Birds** – The woodland and scrub habitat within and adjacent to the Site and improved grassland provides suitable nesting and ground nesting habitat for a range of common breeding birds. Species recorded during the Site visits on and adjacent to the Site included a ring-necked parakeet *Psittacula kramera* (non-native), robin *Erithacus rubecula*, blackbird *Turdus merula*, magpie *Pica pica* and house sparrow. AA Environmental recorded the following species on the wider Site, presumed to be breeding: Great spotted woodpecker *Dendrocopos major*, starling *Sturnus vulgaris*, moorhen and long-tailed tit *Aegithalos caudatus*. Additional species recorded included blackbird, blackcap *Sylvia atricapilla*, buzzard *Buteo buteo*, carrion crow *Corvus corone*, chiffchaff *Phylloscopus collybita*, collared dove *Streptopelia decaocto*, dunnock *Prunella modularis*, garden warbler *Sylvia borin*, goldfinch *Carduelis carduelis*, bullfinch, jay *Garrulus glandarius*, linnet, blue tit *Cyanistes caeruleus*, grey heron *Ardea cinerea*, stock dove *Columba oenas*, great tit *Parus major*, green woodpecker *Picus viridis*, lesser black-backed gull *Larus fuscus*, magpie, marsh tit *Poecile palustris*, pied wagtail *Motacilla alba*, red kite *Milvus milvus*, robin, song thrush *Turdus philomelos*, swallow *Hirundo rustica*, whitethroat *Curruca communis*, wood pigeon *Columba palumbus* and

wren *Troglodytes troglodytes*. One Schedule 1 bird species, the red kite, was recorded on site, with four 'red listed' birds also recorded, including marsh tit, song thrush, linnet and starling.

- **Hedgehog** – The grassland, ruderal, scrub and woodland habitats provide suitable breeding and foraging habitat/shelter for hedgehog *Erinaceus europaeus*. It is considered that hedgehog is likely to inhabit or forage within the proposed Site.
- **Other Mammals** – Rabbit holes were present throughout the Site and the scent of fox *Vulpes vulpes* was also recorded.
- **Invertebrates** – The mosaic of marshy grassland, other neutral grassland, ruderal, scrub and woodland habitats at the Site supported a fairly large and diverse invertebrate fauna. The Pantheon analysis conducted by Colin Plant Associates in 2018 indicated that the most valuable assemblages were those associated with dead wood, marshland and the arboreal tree canopy; however, it was considered that the values may have been overinflated and the short sward and bare ground assemblage may also be of importance which received a low Pantheon weighting. The wetland areas in the west of the site and the open areas in the central region are the most intrinsically important for invertebrates. By contrast the eastern sector is of lower importance.

Non-Native Invasive Species

Japanese knotweed is present within and adjacent to the construction area. This is a Schedule 9 species on the Wildlife and Countryside Act 1981 (as amended) and spread of this species must be expressly avoided. The species must be removed from the Site prior to construction commencing.

4 POTENTIAL IMPACTS

Potentially damaging construction related activities are listed below. These are based on the potential construction impacts listed by CIEEM, 2018 (2018 Guidelines for Ecological Impact Assessment in the United Kingdom) and are considered to be those relevant to the Site and the development works:

- Vegetation and habitat clearance including tree felling and use of herbicides
- Access and travel on/off Site including temporary access routes for construction vehicles
- Areas for plant maintenance and storage of materials
- Movement of materials to/from or within a site
- Ground excavation, infilling and landscaping
- Infilling of ponds (outside of site boundary)
- Dust generation
- Soil stripping
- Environmental incidents e.g. spillages, and emissions
- Noise
- Lighting
- Pollution/silt runoff
- Runoff containing contaminants or sediments

5 ECOLOGY – IN ADVANCE OF WORKS

5.1 RISK ASESMENT OF CONSTRUCTION ACTIVITIES

Ecological survey results (as set out in the Ecological Impact Assessment, 1 August 2022 and through the updated extended UKHab and reptile survey conducted in 2024) confirm that the Site supports ecological features of importance including those with legal protection. A summary of the risk assessment of construction activities is set out in Table 1 and draws on information contained in the report referenced above and the results of an update walkover survey conducted by an ecologist from Johns Associates Ltd on 17 July 2024 and 9 September 2024, thereby focusing the measures to protect and enhance biodiversity on those activities where important receptors are present/potentially present and where the potential consequences are high. Residual risks, based on a combination of the likelihood and consequence after mitigation is implemented, is also set out in Table 1.

5.2 SITE DEMARCATION/BIODIVERSITY PROTECTION ZONES

Prior to the commencement of Site preparation works, (including vegetation clearance), temporary protective fencing will be erected around the Site in order to contain the construction works and to protect immediately adjacent habitats from accidental damage through unauthorised access by plant, machinery and personnel. The fencing will be installed outside of the root protection zones of retained trees. The fencing will be erected in accordance with BS 5837:2012.

Table 1: Construction Related Control Measures

Receptor	Hazard	Integrated Control Measures	Residual Risk
Woodland, Trees, Scrub, Ruderal Vegetation, Grassland, Ponds and Ditches	There is the potential for accidental damage to these habitats arising from construction activities, including unauthorised access, dust and surface water emissions, and waste/rubbish deposition.	<ul style="list-style-type: none">Ecological Toolbox Talk prior to the commencement of worksAdoption of construction best practice measures to prevent pollutionUse of trained and experienced contractorsProtection of RPAs through standard BS5837 signed fencing and a buffer of 5m or the RPA, whichever is greatest	Low
Bats	Vegetation management/change as well as introduced lighting could result in modification of bat activity, which could have implications on the viability of local populations. Habitat management/clearance will result in a decrease in foraging and commuting habitat.	<ul style="list-style-type: none">Ecological Toolbox Talk prior to the commencement of worksSite demarcation fencing/root protection fencing to prevent accidental disturbance/damage and to protect existing commuting/ foraging habitatRetention of trees outside site red line boundary.Avoidance of aboricultural works to trees outside of site boundary and protection of RPA through standard BS5837 signed fencing and a buffer of 5m or the RPA, whichever is greatestAvoidance of construction lighting. No lighting to remain on overnight	Low

Receptor	Hazard	Integrated Control Measures	Residual Risk
Common Reptiles and Amphibians (including GCN)	Vegetation removal and construction activities in certain areas has a high potential to result in killing/injury offences. Habitat management/clearance will result in a loss in foraging/overwintering habitat.	<ul style="list-style-type: none"> • Reptile translocation programme to off-site receptor sit combined with vegetation manipulation from the south to the north of the Site to concentrate reptiles out of the red line boundary. • Translocation programme to be completed and signed off by the ECoW prior to any soil movements occurring. • Vegetation to be kept short prior to soil works commencing. • Precautionary Working Method Statement for Herptiles to be implemented • Ecological Toolbox Talk prior to the commencement of works • Site demarcation fencing/root protection fencing • Protection of RPAs of trees outside the red line boundary through standard BS5837 signed fencing and a buffer of 5m or the RPA, whichever is greatest • Appropriate storage of materials • Trenches either not left open overnight or a 45-degree plank left in as a means of escape • Appropriate storage of materials and materials to be covered to prevent animals using it as a refuge 	EWQ
Nesting Birds	Vegetation removal/ management/ change could affect the availability of habitats to foraging/ nesting birds. Construction activities could result in the risk of accidental disturbance of nesting birds/loss of adults/young/eggs. Habitat management/ enhancement will result in an increase in foraging and nesting habitat and enhancement of existing habitat areas.	<ul style="list-style-type: none"> • Ecological Toolbox Talk prior to the commencement of works • Site demarcation fencing/root protection fencing • Retention and protection of trees outside the site boundary • Majority of woodland and scrub clearance to be conducted prior to March 2025 where there is no suitability for reptiles. • The remaining vegetation clearance to be conducted inside of the breeding bird season (breeding season is 1 March to 31 August inclusive) will be inspected first for nesting birds by an ECoW. • Appropriate storage of materials and materials to be covered (not with netting) to prevent birds using it for nesting. 	Low

Receptor	Hazard	Integrated Control Measures	Residual Risk
Mammals (including Hedgehog)	Vegetation removal and construction activities in certain areas has the potential to result in killing/injury offences. Habitat management/enhancement will result in an increase in foraging/overwintering habitat.	<ul style="list-style-type: none"> • Ecological Toolbox Talk prior to the commencement of works • Site demarcation fencing/root protection fencing • Protection of RPAs through standard BS5837 signed fencing and a buffer of 5m or the RPA, whichever is greatest • Reasonable avoidance measures to include: no earth works to take place during winter in suitable hibernation habitat; ECoW inspection prior to works taking place • Appropriate storage of materials • Trenches either not left open overnight or a 45-degree plank left in as a means of escape • Appropriate storage of materials and materials to be covered to prevent animals using it as a refuge 	Low
Invertebrates	Accidental damage to habitats, pollution, vegetation management/ change and habitat fragmentation could affect local invertebrate populations. Habitat management/ clearance will result in a decrease in onsite foraging resources.	<ul style="list-style-type: none"> • Site demarcation fencing/ root protection fencing • Protection of RPAs through standard BS5837 signed fencing and a buffer of 5m or the RPA, whichever is greatest • Translocation of suitable inert invertebrate habitat to the off-site compensation area. 	Low
Japanese knotweed (JKW)	Spread of JKW within and off-site.	<ul style="list-style-type: none"> • Updated Japanese knotweed survey • Heras fencing installed around JKW areas • Removal of JKW and disposal as controlled waste. 	Low
OMHPDL	Loss of OMHPDL	<ul style="list-style-type: none"> • Suitable inert OMHPDL will be translocated with the substrate, top soil and vegetation present to the off-site compensation area to help to create the off-site habitat to a better condition in a quicker amount of time. 	Low

6 PREPARATION OF THE CONSTRUCTION SITE/ENABLING WORKS

6.1 ROLES AND RESPONSIBILITIES

The Site Manager will have daily oversight and responsibility for the implementation of all works. A suitably experienced Project Ecologist will be employed to provide initial guidance and induction through a toolbox talk and to undertake periodic inspections to confirm the protective fencing remains intact and that all mitigation and enhancement measures are implemented as well as undertaking any post-construction monitoring.

The Site Manager will report to the relevant person within Thorney Lane LLP as the construction phase proceeds.

The Project Ecologist will confirm with the Site Manager and Thorney Lane LLP to confirm when the reptile translocation programme has been signed off. The Protected Species Avoidance and Mitigation Strategy is provided in Appendix B to this report.

The Japanese

6.2 ECOLOGICAL WATCHING BRIEF

A tool-box talk will be provided by the appointed Ecologist to all contractors working on Site to explain the ecological considerations and all protection measures to be implemented. A register will be taken of all attendees, and an information folder will be left for subsequent Site contractors who do not attend the initial toolbox talk. Fact sheets for species will be provided and installed in welfare buildings to provide additional sources of reference information.

The details of the appointed Ecologist will be kept on Site at all times. Should a protected species be encountered at any time, works will cease, and advice will be immediately sought from the Ecologist.

6.3 ECOLOGICAL CLERK OF WORKS

An ECoW will be present on Site when it is deemed appropriate throughout the pre-construction and construction period. The Site Manager should work and liaise closely with the Project Ecologist and ECoW to ensure the ECoW is present on Site as necessary.

The ECoW will assume the following responsibilities:

- A pre-construction Site walkover will be undertaken by the ECoW to ensure baseline conditions have not changed.
- Ensure all works comply with relevant wildlife legislation and that the CEMP is adhered to throughout the construction phase.
- Review and update the CEMP with the developer, contractor and if necessary, the local planning authority to ensure continued protection during the construction phase.
- Support the delivery and installation of mitigation, compensation and enhancement measures and provide technical expertise to contractors where appropriate.
- Be the main point of contact for ecology related issues during the construction phase providing regular advice and guidance where necessary and appropriate.

6.4 GENERAL PRECAUTIONARY MEASURES

A range of general precautionary measures and construction best practice mechanisms will be implemented during the construction phase and will include the following to ensure the protection of the species known to be present/potentially present on site:

- Any trenches or excavations to be covered overnight, or a temporary ramp installed, to provide any animals that may enter these features a means of escape.
- Any trenches or excavations should be checked each morning prior to the recommencement of works.
- Any open or exposed pipe work should be capped to prevent any animals gaining access.
- Construction materials stored at the Site overnight or for long periods of time should be kept on hard standing or raised off the ground e.g. on pallets to reduce the likelihood of the materials being utilised by animals.
- Oils, fuels and chemicals are to be stored in sealed containers in suitable locations on Site. They must not be left out overnight. Suitable drip-trays will be used. Storage areas will be sited away from all waterbodies/ditches. Leaking or empty oil drums will be removed from site immediately and disposed off via a licensed waste disposal contractor.
- Control of sediment and runoff will be managed with the principles set out in the CIRIA SuDS Manual. Sediment controls will be set out in the Contractors Construction phase plan and will be subject to weekly checks.
- The contractor will minimise the amount of land disturbed at any time to reduce the potential for run-off to enter retained ponds and ditches.
- Working areas will be competed and vegetation established as soon as works are complete and the area/time ground is left bare and disturbed should be minimised.
- Appropriate best practice dust suppression and noise mitigation measures will be implemented on Site throughout construction to ensure habitats and species are protected.
- No artificial construction lighting will be installed during the construction phase to maintain dark corridors around the boundaries of the Site.

6.5 HABITATS

6.5.1 Woodland and Trees

Retained woodland habitat and trees will require protection during the construction phase of the development. Tree protection fencing around the RPAs will be installed along with appropriate signage prior to the commencement of works.

Heras fencing (or similar) will be installed to prevent accidental damage and accumulation of rubbish/waste for the duration of the construction works. Should any works unexpectedly be required to individual trees within or adjacent to the Site boundaries, further advice will be sought from the ECoW and such works conducted by trained and experienced contractors in accordance with BS5837:2012.

An ecological toolbox talk will be conducted prior to the commencement of works and certain tasks e.g. within proximity to mature/ veteran trees will be supervised by an experienced ECoW.

6.5.2 Grassland, Ruderal Vegetation and Scrub - OMHPDL

Areas of grassland, ruderal and scrub habitat to be retained and any newly created habitats will be protected for the duration of the proposed works through the establishment of 'biodiversity protection zones'. These will be fenced using Heras fencing or similar to prevent unauthorised access by machinery and plant and appropriate signage will be erected highlighting the purpose of the zones.

An ecological toolbox talk will be conducted prior to the commencement of works to ensure all contractors are aware of the purpose of the biodiversity protection areas.

The inert OMHPDL within the Site will be transported to the offsite area and deposited throughout it along set routes to reduce soil compaction. Areas of the substrate will be deposited and then spread out in a rough circular area at the end of the defined routes into the site which all link from one main route into the off-site area.

6.5.3 Ponds and Ditches

Waterbodies will remain protected throughout the construction period from sedimentation and/or accidental pollution by installing and maintaining fenced buffer zones to prevent access into these areas by machinery and to maintain a suitable distance between these sensitive ecological receptors and the construction works. Implementation of good construction working practices following standard guidance e.g. CIRIA's Environmental Good Practice on Site Guidance (C741) will be required.

6.6 PROTECTED SPECIES

An Ecologist or ECoW will be present on Site during all periods of work that have the potential to impact protected species. If any protected species are encountered during the works and the Ecologist or ECoW are not present, all works will stop immediately and the Project Ecologist or ECoW contacted for advice. No works will recommence until this has been approved by the Project Ecologist or ECoW.

6.6.1 Bats

Bats are a European Protected Species and as such are provided a high level of protection under the Conservation of Habitats and Species Regulations (2019) (As amended) (EU Exit).

Woodland habitat, and trees will require protection during construction works. No additional arboricultural works are proposed to be conducted on trees within or adjacent to the Site. The Root Protection Area (RPA) of the trees will be protected following British Standard (BS) 5837 by installing suitable fencing to prevent accidental damage for the duration of the construction works.

There is a recorded noctule *Nyctalus noctule* roost in a willow tree outside of the Site boundary. No tree removal outside of the site boundary must occur without approval from the Project Ecologist.

Should any works unexpectedly be required to trees, further advice will be sought from the ECoW and works will be carried out in accordance with BS5837:2012.

No construction lighting will be used during the construction phase.

6.6.2 Herptiles (Reptiles and Amphibians)

Reptile and amphibian species have been recorded onsite, including slow worm, grass snake, common toad and smooth newt.. The pre-commencement herptile translocation programme, vegetation manipulation and clearance programme (Appendix C) must be completed within the red line boundary prior to any soil works on site. The programme will continue in the north of the site for the rest of until October 2025 or when 5 days of no reptiles being encountered have occurred within the site.

There is considered to be a risk to herptiles during construction works from accidental injury to individuals or damage to areas of suitable herptile habitat during the construction works through accidental damage to the grassland, tall ruderal vegetation and areas of scrub.

The suitable retained herptile habitats to the north of the construction area are to be retained will be protected by a buffer of 5m to 10m during the construction works. The RPA of trees will be protected following BS 5837 by suitable fencing to prevent accidental damage for the duration of the construction works. Should any works unexpectedly be

required within biodiversity protection zones, further advice will be sought from the ECoW and should any vegetation be required to be cleared; the ECoW will inspect it immediately prior to the works for reptile and other species.

6.6.3 Nesting Birds

The woodland, scrub, grassland and tree have the potential to be used by nesting birds during the breeding bird season (March to August inclusive).

The retained woodland edges and trees will be protected by a buffer of 5m or the RPA, whichever is greatest during the construction works. The RPA of trees will be protected following BS 5837 by suitable fencing to prevent accidental damage for the duration of the construction works. Should any works unexpectedly be required within the buffer zones, further advice will be sought from the ECoW.

Woodland and scrub that has no suitability to support reptiles will be cleared in February 2025. The remaining vegetation will be cleared in a phased approach from April to June 2025. The ECoW will inspect it within 24 hours of clearance for evidence of nesting birds. Should nesting birds be present, a suitable disturbance buffer will be implemented around the nest and no disturbing works will be conducted under after the young have fledged the nest and the nest is confirmed by the ECoW to be inactive.

A Precautionary Working Method Statement for Protected Species (see Appendix C) will be implemented during the pre-commencement and construction phases as necessary.

6.6.4 Hedgehog

There is a high likelihood of hedgehog and other mammals being present onsite.

There is considered to be a risk to mammals during construction works from accidental injury to individuals or damage to areas of suitable mammal habitat during the construction works through accidental damage to the grassland, tall ruderal vegetation and areas of scrub.

The suitable habitats to be retained will be protected by a buffer of 5m to 10m during the construction works. The RPA of trees will be protected following BS 5837 by suitable fencing to prevent accidental damage for the duration of the construction works. Should any works unexpectedly be required within biodiversity protection zones, further advice will be sought from the ECoW and should any vegetation be required to be cleared; the ECoW will inspect it immediately prior to the works for mammals.

Should hedgehog be encountered by the ECoW or site operatives during the translocation and vegetation clearance works they will be moved to the off-site compensation area.

6.6.5 Invertebrates

The mosaic of marshy grassland, other neutral grassland, ruderal, scrub and woodland habitats at the Site support a fairly large and diverse invertebrate fauna. The wetland areas in the west of the site and the open areas in the central region were considered the most intrinsically important for invertebrates by Colin Plant Associates in 2018.

Retained habitats will be protected by a buffer of 5m to 10m during the construction works for the duration of the proposed works to establish biodiversity protection zones. Should any works unexpectedly be required within biodiversity protection zones, further advice will be sought from the ECoW.

Suitable inert OMHPDL habitats for invertebrates will be translocated to the off-site compensation area prior to and during the construction work phase.

7 ECOLOGICAL CONSTRAINTS SUMMARY TABLE AND SCHEDULE OF WORKS.

7.1 SUMMARY OF CONSTRAINTS

The following list provides a summary of the ecological constraints at the Site:

- Open Mosaic Habitats on Previously Developed Land (OMHPDL) – Priority Habitat
- Protection of retained on-site and off-site habitats from damage and pollution
- Herptile translocation
- Japanese knotweed avoidance and removal
- Protection of hedgehogs
- Avoidance of trees with roosting bats (outside of site boundary).

Appendix E provides the 2025 schedule of Ecological works for the Site.

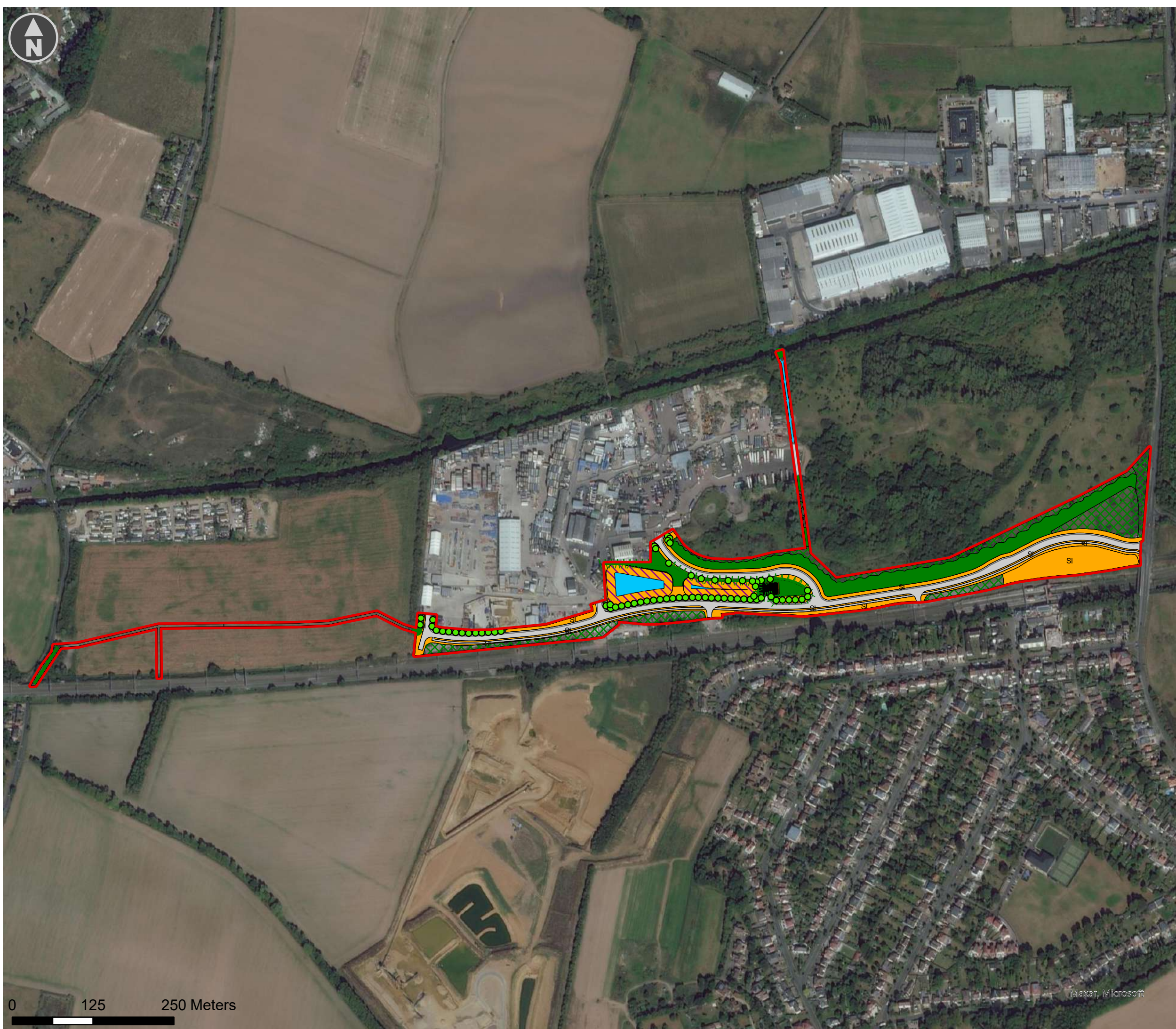
APPENDIX A – UKHAB BASELINE PLAN



- Site Boundary
- A2.2. - Scattered Scrub
- A3.1 - Broadleaved tree
- Target Note
- Line of trees
- G2 - Running water
- J2.1.1 - Intact hedge - native species-rich
- Trenches
- A1.1.1 - Broadleaved woodland - semi-natural
- A2.1 - Scrub - dense/continuous
- B4 - Improved grassland
- B5 - Marsh/marshy grassland
- B6 - Poor semi-improved grassland
- C3.1 - Other tall herb and fern - ruderal
- G1 - Standing water
- J1.2 - Cultivated/disturbed land - amenity grassland
- J3.6 - Buildings
- J5.1 - Hardstanding

CLIENT	Thorney Lane LLP		
PROJECT	Thorney Lane, Iver - Ecological Impact Assessment (EclA) and BNG Metric 3.0		
TITLE	P1 Habitat Survey		
SCALE @ A3	CREATED BY	CHECKED BY	
1:5,500	JS	TP	
REFERENCE	ISSUE/REVISION	DATE	
J00896-002		28/4/2022	

APPENDIX B – UKHAB PROPOSED DEVELOPMENT PLAN



- Site Boundary
- Trees
- Line of trees
- G2 - Running water
- J2.1.1 - Intact hedge - native species-rich
- A1.1.1 - Broadleaved woodland - semi-natural
- A2.1 - Scrub - dense/continuous
- B2.2 - Neutral grassland - semi-improved
- B4 - Improved grassland
- B5 - Marsh/marshy grassland
- B6 - Poor semi-improved grassland
- G1 - Standing water
- J3.6 - Buildings
- J5.1 - Hardstanding

CLIENT	Thorney Lane LLP		
PROJECT	Thorney Lane, Iver - Ecological Impact Assessment (EcIA) and BNG Metric 3.0		
TITLE	Proposed Habitats		
SCALE @ A3	CREATED BY	CHECKED BY	
1:5,500	JS	TP	
REFERENCE	ISSUE/REVISION	DATE	
J00896-003		28/4/2022	

APPENDIX C – PROTECTED SPECIES AVOIDANCE & MITIGATION METHOD STATEMENT

PROTECTED SPECIES AVOIDANCE & MITIGATION METHOD STATEMENT

1 INTRODUCTION

This document has been prepared to provide guidance to Thorney Lane LLP and the construction and vegetation clearance contractors with respect to the proposed works in order to protect important ecological receptors (reptiles, amphibians, nesting birds and associated habitats) and to avoid the risk of any potential legal offence with respect to legally protected species being committed. It outlines a methodology to be followed prior to works to ensure every reasonable practical measure has been taken to avoid the risk of direct harm to protected species.

The Strategy is required due to the identification of habitats on Site that have the potential to support protected species. The habitats on-site that are suitable to support protected species or are themselves protected include:

- The mosaic of grassland, marshy grassland and scrub habitat (Priority Habitat NERC Act 2006: Open Mosaic Habitat on Previously Developed Land)
- Grassland
- Scrub
- Woodland
- Deadwood
- Rubble/brick/brash piles

The following species are confirmed to be present within the Site. Appendix A provides the legislation covering species that may be present or are known to be present on the Site:

- A large population of slow worm *Anguis fragilis* (Priority Species NERC Act 2006).
- A medium population of grass snake *Natrix natrix* (Priority Species NERC Act 2006).
- A medium population of smooth newt *Lissotriton vulgaris*.
- Common toad *Bufo bufo* (Priority Species NERC Act 2006).

The scrub, woodland, pond and grassland habitats within the Site also support nesting birds between March and September inclusive. The following birds have been recorded at the Site:

- Bullfinch *Pyrrhula pyrrhula pileate* (Priority Species NERC Act 2006).
- Linnet *Linaria cannabina* (Priority Species NERC Act 2006) (Red List Birds of Conservation Concern).
- Red kite *Milvus milvus* (Wildlife and Countryside Act 1981 (as amended), Schedule 1)
- Marsh tit *Poecile palustris* (Red List Birds of Conservation Concern).
- Song thrush *Turdus philomelos* (Red List Birds of Conservation Concern).
- Starling *Sturnus vulgaris* (Red List Birds of Conservation Concern).

There is a risk that scrub, woodland and grassland habitats within the Site could support:

- Hedgehog *Erinaceus europaeus* (Priority Species NERC Act 2006).
- Common frog *Rana temporaria*.
- Palmate newt *Lissotriton helveticus*.
- Common lizard *Zootoca vivipara* (Priority Species NERC Act 2006).
- Smooth newt *Lissotriton vulgaris*

Great crested newt *Triturus cristatus* is not present at the Site and poses no constraint to the construction works.

2 GENERAL OVERVIEW

A range of general precautionary measures and construction best practice working methods (CIRIA (2015) C741: Environmental Good Practice on Site) will be implemented during the works and will include the following to ensure the protection of the species which are/may be present on Site:

- No vegetation clearance to occur unless the area has been signed off by the Ecologist.
- A reptile translocation programme must be completed prior to site clearance works commencing.
- A precautionary hand search by the Ecological Clerk of Works (ECoW) of any suitable areas of vegetation to be cleared prior to works commencing will be carried out, followed by a destructive search.
- Following the reptile translocation, grassland throughout the construction area footprint must be maintained at a maximum sward height of 5 cm to ensure it is in unsuitable condition for reptiles and amphibians.
- Any trenches or excavations to be covered overnight, or a temporary ramp installed, (such as a scaffold plank at an angle of no more than 45 degrees), to provide any animals that may enter these features a means of escape.
- Any trenches or excavations should be checked each morning for trapped animals prior to the recommencement of works.
- Any open or exposed pipework should be capped to prevent any animals gaining access.
- Construction materials stored at the Site overnight or for long periods of time should be kept on hard standing or raised off the ground e.g. on pallets to reduce the likelihood of the materials being utilised by animals.
- Oils, fuels and chemicals are to be stored in sealed containers in suitable locations on Site. They must not be left out overnight. Suitable drip-trays with sufficient capacity will be used. Storage areas will be sited away from ponds and ditches.
- Appropriate best practice dust suppression and noise mitigation measures will be implemented on Site throughout construction to ensure habitats and species are protected.

The project ecologist will be present on Site during all periods of work that have the potential to impact protected species or habitats. In the unlikely event that any protected species are encountered during the works and the ecologist or Ecological Clerk of Works (ECoW) are not present, all works must stop immediately and the project ecologist or ECoW contacted for advice. No works can recommence until this has been approved by the project ecologist or ECoW.

3 ROLE OF THE ECOLOGICAL CLERK OF WORKS

An ecological toolbox talk will be delivered prior to any vegetation clearance and construction works commencing by the Ecological Clerk of Works (a Suitably Qualified Ecologist (SQE)), experienced in reptile ecology and the delivery of sensitive vegetation removal.

This Toolbox Talk will cover:

- Purpose of the Toolbox Talk;
- Signing of a Register of Attendees;
- An overview of the ecology, legal protections and offences, habitat requirements and suitable feature of interest associated with the works area;
- Role of the Ecologist/Ecological Clerk of Works;
- Precautionary Measures to be implemented to minimise the risk of harm to important/legally protected species and habitats, as set out in this precautionary Mitigation Strategy;
- What to do in the event a protected species is encountered; and
- Communication/Contact Details.

A hard copy of the Toolbox Talk will be provided and left at the site office with a nominated 'Responsible Person'. If new members of staff/ contractors attend site who were not present at the initial Toolbox Talk, they will not be able to commence work until they have read and understood this document.

4 REPTILE TRANSLOCATION STRATEGY

The Reptile Translocation Strategy outlined below will also protect amphibians and hedgehog.

4.1 HERPTILE EXCLUSION FENCING

Herptile exclusion fencing was installed at the Site on 23 – 27 September 2024. Appendix B provides the location of the fencing.

Areas of vegetation were also cleared to enable access to create borehole trial pits under the supervision of an ECoW from 16 September 2024. Appendix A provides the location of the access routes and the trial pit vegetation clearance. Appendix C Provides the Toolbox Talk provided (excludes nesting birds due to being out of season) and signed Register.

An initial Site inspection was conducted by Tessa Pepler BSc (Hons) MSc MCIEEM on 9 September 2024 to inspect the habitats to be removed and to inform the avoidance of certain habitats by moving the boreholes from areas where the risk to protected species was higher. The vegetation clearance was restricted in the main to shorter areas of grassland and less dense scrub. Clearance of potential refugia e.g. rubble piles was avoided. Appendix D provides details of the vegetation that was recorded at this time.

4.2 HERPTILE SURVEY AND ON-SITE TRANSLOCATION

An update reptile survey was combined with translocating reptiles to the north of the Site for ten days in suitable weather from 2 to 15 October 2024. Appendix E provides the initial survey/translocation results. There were 205 artificial reptile refugia (Type 1 bitumen roofing felt) deployed in the southern section of the Site. In total 13 slow worm were translocated and 84 smooth newt in October 2024. The slow worm population had increased since the original survey conducted by AAE in 2020 to a 'good' population. A medium population of grass snake (6 individuals) was recorded in 2020.

On 3 October 2024 it was noted that members of public that use the Site for recreational use had breached several sections of the reptile fencing. It was concluded that the translocation was not secure at the Site. A new strategy to translocate reptiles from the Site to the off-site compensation area in 2025 was considered to be the best option.

4.3 OFF-SITE TRANSLOCATION

The off-site compensation area will be surveyed for reptiles in late March and April 2025 (weather and temperature dependant). Assuming that the off-site area does not already support a high population of reptiles, reptiles from the development site will be translocated here. The smooth newt will be moved to terrestrial habitat associated with the ponds to the northwest of the Site until new pond habitat has been created in 2025 and established by 2026 in the translocation area when they will be translocated off-site.

Enhancement of the off-site receptor site will be carried out including the creation of 5No. hibernacula, 10No. log piles and 10No. south facing basking banks in 2025. The hibernacula will be constructed from cut timber, brash, inert hardcore, bricks, rocks, grubbed up tree roots or building rubble. Wood chippings or loose topsoil will be incorporated into the construction, to pack some of the larger cavities. The key design features are:

- Location in tussocky grassland
- Larger than 4 m long, 2 m wide, 1 m high
- A sunny position
- A well-drained site, not prone to flooding
- A long bank facing south
- Openings for reptiles to access (do not use pipes which can become blocked).

A pit will be dug with the materials partially buried, gravel and slotted pipes will be added to aid drainage. If the soil is impermeable, the hibernacula will be built above ground. The locations must avoid areas where winter flooding of the structure will occur.

Translocation will commence in April 2025. Daily checks to be undertaken from April to October with April to June and September being the most optimal months. A minimum of 10 capture days will be carried out in optimal weather conditions: air temperature 9 – 18 °C, avoiding rain and wind and at the optimal time: between 08:30 and 11:00 and between 16:00 and 18:30. During hot conditions the checks will be made earlier. Early in the year, midday is the warmest and reptiles are more likely to be encountered around this time. Any reptiles found will be translocated by hand to the northern reptile receptor area.

A minimum of 60 days translocation will be required. Translocation will continue until five consecutive days without finding any reptiles has occurred.

Habitat manipulation will be carried out through cutting areas of high suitability habitat within the site to a lower level (under supervision), to reduce its suitability. This limits the area of attractive habitat within the translocation zone, making it easier to capture the remaining individuals. Clearance will be conducted using handheld trimmers or alternatives but not tracked vehicles (to avoid direct risk of killing or injury to reptiles and amphibians). Prior to the commencement of clearance works, herptile refugia will be inspected by the ECoW and any animals relocated to the receptor area. Refugia will then be removed/relocated before vegetation cutting commences.

The first stage will involve cutting to a height of 15 cm. This will be completed systematically, starting in the south of the Site and moving northwards away from the proposed construction area. Cut vegetation will be raked and removed from the translocation area. The area will then be left to settle for at least 24 hours also allowing reptiles/amphibians to move from this works area. The area will then be inspected by a suitably qualified ecologist. A subsequent cut to 5 cm will then be completed with arisings to be removed.

The area of vegetation clearance will increase throughout the translocation period to ensure the reptiles are concentrated in the north of the site. The mats will also be moved north as areas of vegetation are cleared and left unsuitable for reptiles.

4.4 POST-TRANSLOCATION REPTILE MITIGATION

Vegetation will be maintained with a short sward height until construction works commence.

Should reptiles or amphibians be found unexpectedly during construction works when the ecologist is not on Site, works in that area will cease and the ecologist will be contacted to capture and relocate the animals to the receptor Site.

All construction materials will be stored within areas of hard-standing or on pallets to prevent reptiles/amphibians seeking refuge inside. All exposed footings will be checked prior to filling to ensure that no reptiles/amphibians are present. Any animals found will be relocated to the receptor site.

5 NESTING BIRD AVOIDANCE STRATEGY

Should works be undertaken during the bird nesting season (March to August inclusive for most UK species), a pre-works inspection by a suitably qualified ecologist (ECoW) will establish whether birds are nesting within the scrub, trees or grassland to be cleared, prior to works commencing. Each area of suitable habitat to be cleared will be watched for several hours to observe birds flying in and out of it with nesting or feeding material in their beaks. The sound of chicks in the nest will also be audible.

If evidence of an active nest is recorded, it will be necessary to postpone clearance works within a suitable radius area to be informed by the ECoW until all chicks have fledged.

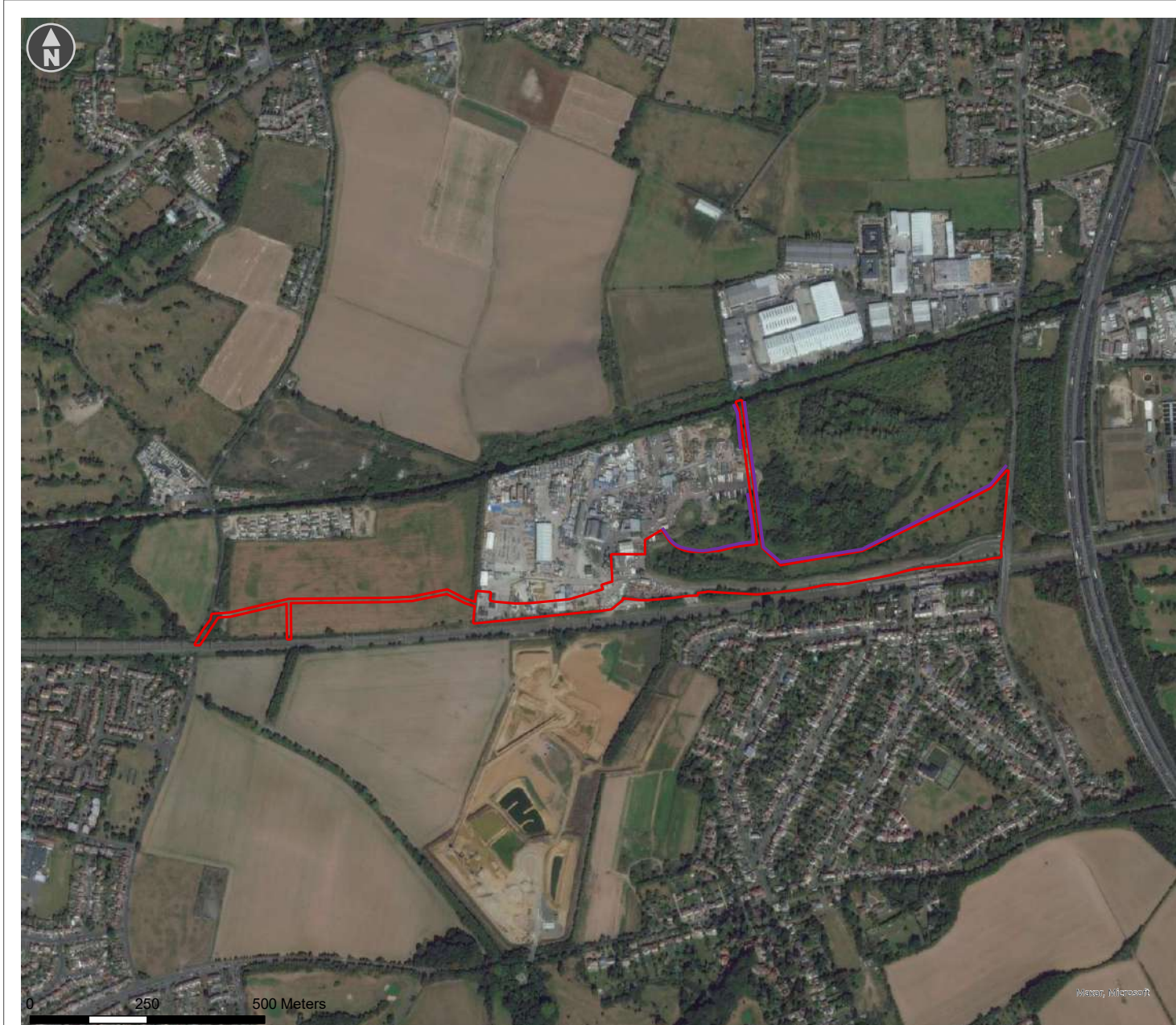
5.1 OTHER POTENTIAL RECEPTORS



The retained habitats at the site including wet ditches and ponds within the wider Site will remain protected throughout the construction period from sedimentation and/or accidental pollution by installing and maintaining fenced buffer zones to prevent access into these areas by machinery and to maintain a suitable distance between these sensitive ecological receptors and the construction works. Implementation of good construction working practices following standard guidance e.g. CIRIA's Environmental Good Practice on Site Guidance (C741) will be required.

6 CONCLUSION

The measures detailed in this Protected Species Avoidance and Mitigation Strategy will minimise the risk to important and legally protected habitats and species, minimise the risk of any legal offence being committed thereby enabling the work to proceed lawfully.

APPENDIX D – LOCATION OF HERAS FENCING



-  Site Boundary
-  Location of Heras Fencing

CLIENT				Thorney Lane LLP	
PROJECT				Thorney Lane, Iver - Ecological Impact Assessment (EcIA) and BNG Metric 3.0	
TITLE				Location of Heras Fencing for Habitat Protection	
SCALE @ A3		CREATED BY		CHECKED BY	
1:7,500		TP		TP	
REFERENCE		ISSUE/REVISION		DATE	
J00896-005				03-02-25	

This drawing is subject to copyright and is not to be reproduced, retained nor disclosed to any unauthorized person either wholly or in part without the consent of Johns Associates. Do not scale from this drawing.

APPENDIX E - ECOLOGICAL SCHEDULE OF WORKS 2025

Schedule of Works SQE = Suitably Qualified Ecologist, GW = Groud Workers. CO = Construction Operatives. X = No. of days work

Scope of Work 2025	Feb	March				April				May				
	01- 31	w/c 03/03	w/c 10/03	w/c 17/03	w/c 24/03	w/c 31/04	w/c 7/04	w/c 14/04	w/c 21/04	w/c 28/04	w/c 05/05	w/c 12/05	w/c 19/05	w/c 26/05
Survey mats out off-site		SQE x 1												
Survey of off-site compensation areas				SWE x 1	SQE x 1	SQE x 2	SQE x 3							
Survey mats out on-site					SQE x 2									
Translocation to herptiles/ fauna to off-site area								SQE x 5	SQE x 5	SQE x 5	SQE x 5	SQE x 5	SQE x 5	SQE x 5
Phased vegetation manipulation and moving southern mats north	CR x 10									CR x 2 10 m	CR x 2 +10 m	CR x2 +10 m	CR x 2 +10 m	CR x 2 +10 m
Construction earth works can commence in each 10 m cleared.											CO 10 m	CO +10 m (20 m)	CO +10 m (30 m)	CO +10 (40 m)

Scope of Work 2025	June					July					August			
	w/c 02/06	w/c 09/06	w/c 16/06	w/c 23/06	w/c 30/06	w/c 07/07	w/c 14/07	w/c 14/07	w/c 21/07	w/c 29/07	w/c 04/08	w/c 11/08	w/c 18/08	w/c 25/08
Translocation to herptiles/ fauna to off-site area	SQE x 5	SQE x 5	SQE x 5	SQE x 5	SQE x 5	SQE x 5	Construction site for road now cleared and translocation of the wider site will continue until the site is clear of reptiles (5 days nil finds)	SQE x 5	SQE x 5	SQE x 5	SQE x 5	SQE x 5	SQE x 5	SQE x 5
Phased vegetation manipulation and moving southern mats north	CR x 2 10 m	CR x 2 10 m	CR x 2 10 m	CR x 2 10 m	CR x 2 10 m	CR x 2 10 m								
Construction earth works can commence in each 10 m cleared.	CO +10 (50 m)	CO +10 (60 m)	CO +10 (70 m)	CO +10 (90 m)	CO +10 (100 m)	CO +10 (110 m)								

Scope of Work 2025		September					October			
	w/c 01/09	w/c 08/09	w/c 15/09	w/c 22/09	w/c 29/09	w/c 06/10	w/c 09/06	w/c 16/06	w/c 23/06	w/c 30/06
Translocation to herptiles to off-site area (wider site)	SQE x 5	SQE x 5	SQE x 5	SQE x 5	SQE x 5	SQE x 5	SQE x 5	SQE x 5	SQE x 5	SQE x 5