

Brooks

Ecological

An Origin Enterprises Company



Construction Environment Management Plan CEMP (Biodiversity)

Main Avenue, Kirklees

Strata Homes/Thirteen Group Ltd

ER-7172-09

Report Reference:	Construction Environment Management Plan CEMP (Biodiversity)
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Date:	19/11/2025

The information which we have prepared and provided is true and has been prepared and provided in accordance with the CIEEM's Code of Professional Conduct. We confirm that the opinions expressed are our true and professional bona fide opinions. This report does not constitute legal advice.

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Introduction

This document is produced to show how the proposed development can be built out without impacting on important ecological features.

This document is produced with reference to British Standard 42020 Clause 10.2 Construction Environment Management Plan (CEMP).

The purpose of a CEMP (Biodiversity) is to identify risks to biodiversity during the construction phase, evaluate the level of risk and supply methods for the management of these.

In producing this plan, the following information sources are referred to:

- Preliminary Ecological Appraisal Report, Brooks Ecological ER-7172-01A September 2024
- Arboricultural Method Statement AWA Tree Consultants REF: AWA6332AMS November 2024

Responsible Persons & Lines of Communication

An Ecological Clerk of Works (ECoW) will be appointed by Strata Homes/Thirteen Group Ltd (the Developer) prior to any activity commencing on site.

The Developer will formalise lines of communication with the ECoW establishing who within their operation is responsible for actions on site prior to any work commencing. These links will be maintained until such a time as a Site Manager is appointed and assumes this responsibility.

The Developer is responsible for maintenance of protection and exclusion fencing, however the ECoW will check fencing on each visit and immediately bring issues to the attention of the Project Manager or Site Manager

The Developer is responsible for compliance with regulations, legal consents, planning conditions, environmental procedures and contractual agreements and the issuing of periodic reports on success and compliance. These periodic reports will feedback into the CEMP for the subsequent phase(s) and the Developer will ensure the results of this review are effectively communicated to on-site staff.

The Role of an Ecological Clerk of Works

The ECoW will be a suitably trained and experienced professional ecologist who is a member of the Chartered Institute of Ecology and Environmental Management (CIEEM).

The ECoW will carry out all ecological surveys and watching briefs.

The ECoW will deliver a tool box talk to site workers prior to any clearance commencing.

The ECoW will make periodic monitoring visits to check the integrity of any fencing and monitor site activities (pollution control). On each visit to the site, the ECoW will monitor the activities and assess for compliance with this CEMP (Biodiversity).

A Site Inspection Certificate will be issued to the Developer following this with any recommendations highlighted. The Developer will take all measures necessary to comply with the recommendations. ECoW visits will be carried out according to Site conditions The Site Manager will call the ECoW to site as soon as any of the following emergency events occur:

Encountering protected species

Should any protected species (or nesting birds) be encountered during any phase the ECoW will be consulted. Any advice provided to ensure that wildlife offences are not committed will be followed. This could include curtailing works in part or all the site until appropriate species mitigation, licensing or agreed avoidance measures be secured.

Damage to retained habitats

The Site manager will follow the advice of the ECoW to ensure that the careful like for like restoration of habitats damaged is enacted in the first available season. This may include replanting, re-seeding and appropriate establishment management.

Spillage of chemicals

The Site Manager will follow the CEMS produced by the main contractor for the Site.



On this site higher value wildlife habitat exists in boundary areas of retained trees and grassland.



A Preliminary Ecological Appraisal Report, undertaken in June 2024 by Brooks Ecological, assessed the Site as containing unmanaged habitats of moderate ecological value.

The tree mature trees and hedgerow surrounding the green lane to the north extend beyond the Site's boundaries. There is potential for this and the other boundary trees and hedgerow habitats to be adversely impacted by development activities.

The key recommendation's from the Brooks Ecological PEA are that the CEMP will detail the following protection measures:

- Location of Biodiversity Protection zones or fences.
- Dealing with known or discovered invasive species.
- Pre- or during- clearance ecology checks for protected species.
- Protected/notable species method statements where licensing is not needed.
- Nesting bird management.

Table 1 Ecological constraints (relevant to Phase 2)

Habitat/ Feature	Protected/ Notable species
Retained trees	Badger
Retained grassland	Nesting birds (on-Site)
Lighting (on and off Site)	Bats

Impacts

Impacts on biodiversity features and associated fauna fall into the following broad categories:

- Vegetation clearance;
- Soil stripping;
- Re-spreading soil and stored materials; and
- Noise generation and disturbance.

Construction Stages

i) Site clearance and soil stripping

Trees and woody vegetation are usually removed by a forestry or arboricultural contractor using either a large driven mulching machine which chops arisings and incorporates with the soil, or locally by hand machinery with material being chipped and spread, piled or removed.

Large excavators scrape back soil to create clear development platforms. Topsoil is taken by dumper to soil stores on Site, where it can be left for many months before being reused on Site.

This phase presents the greatest risk to nesting birds and the health of retained hedgerows and trees.

ii) Installing drainage

Creating drainage will require localised vegetation clearance away from the development platforms. Machinery will excavate trenches for pipes and the trenches will be backfilled and seeded. This process is anticipated to be completed within 1 month of commencing.

iii) Installing roads and sewers

This is normally completed by a contractor digging into the cleared development platforms as the first construction activity.

iv) Building out cleared plots

Creation of show home, then phased construction of plots according to market demand in approximately 2-3 years.

Typical activities which require Ecological Clerk of Works (ECoW) overseeing are likely to be; clearing any remaining bird nesting habitat or clearance of soil stores (which could have been used by fauna such as badger /fox).

Risk Assessment of Potentially Damaging Development

Moderate Risk

Injuring / killing fauna during Construction

Although no field signs were discovered on-Site during the survey work, there is the potential for notable species such as hedgehogs, badgers and common amphibians to be active within the Site. If present, there is a danger of injury or death. Reasonable precautions should therefore be undertaken during phase 1 works.

Control 1: Reasonable Working Precautions

During initial Site clearance works, at least one substantial log pile (measuring at least 2m x 2m x 1m) will be created in the south of the Site, behind TPF. This feature is denoted on the plan opposite.

Prior to any construction works commencing, the ECoW will deliver a toolbox talk to the Site Manager, with this information then being disseminated out to all contractors working on Site via the Site Induction process.

The Toolbox talk will outline the species / groups that could reasonably be expected to occur on Site during construction (i.e. hedgehogs, common amphibian), with a clear identification/ information sheet provided that will be pinned up in a prominent location on the Notice Board.

Information will be provided about where these species/groups could be expected to be found on Site (i.e. under stored equipment/ material). If found, and if safe to do so, contractors will be asked to move animals out of the construction zone, and release them into one of the pre-made log piles. Where this is not possible to do safely, the ECoW will be invited to visit Site to effect the translocation.

Any pits or trenches created with vertical, or steep sides will be filled in or covered at the end of each working day. Where this is not feasible, some form of escape will be provided, such as fitting an earth or scaffold board ramp. These pits will then be inspected by the Site Manager first thing the next morning, and any wildlife relocated to the log piles.



Risk Assessment of Potentially Damaging Development

High Risk

Destroying bird nests

Works which require the removal of trees and scrub and rough grass present a high risk of affecting nesting birds contrary to the Wildlife and Countryside Act (1981). The whole site has potential for nesting birds to be present.

Control 2 : Timing and Survey

The site will be cleared outside of the bird nesting season (in period October-February).


Control 3 : Survey

Where this is not possible or sections have been missed and need to be cleared in the period March to September the ECoW will carry out nesting surveys of the vegetation to be affected. The area illustrated right is subject to this control.

If nests are found these will be demarcated on the ground and works will avoid them until birds have fledged or abandoned the nest. An ecologist inspection report will be produced before works continue.

In areas where vegetation is too dense to allow the ECoW to conclude likely absence of a nest the ECoW will supervise vegetation clearance. Only hand held brush cutters will be used in these areas. The ECoW will direct cutting until such a time that she/he is happy that no nests are present





No Works Area

Bird Nests Present

If you think you need to work here you must seek approval
from the Ecological Clerk of Works on 01943884451

Risk Assessment of Potentially Damaging Development

Low Risk

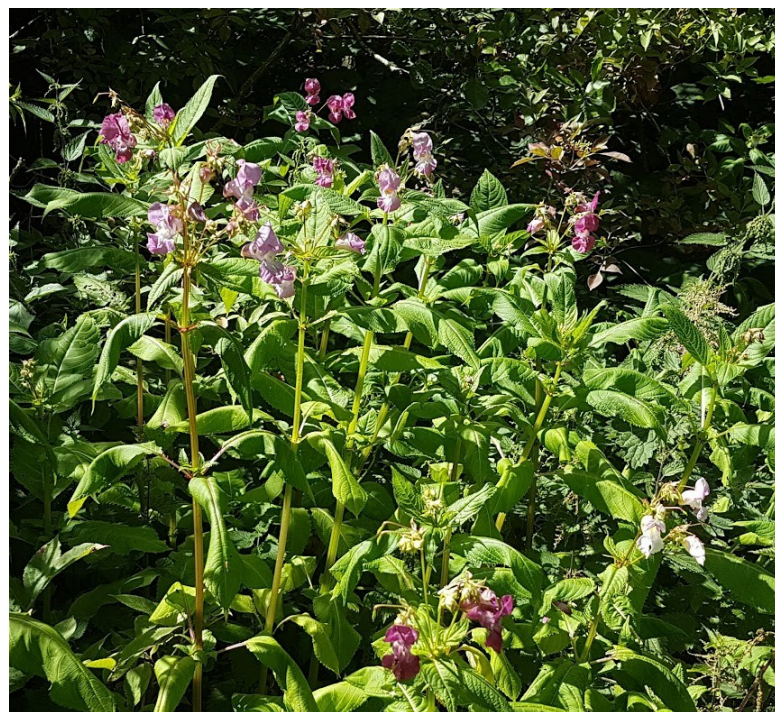
Spreading Invasive Non-native Weeds

Since no invasive plant species have been identified during previous surveys site clearance presents a low risk of spreading invasive non-native weed species as listed under Schedule 9 of the Wildlife and Countryside Act (1981 as amended).

There remains a residual risk of plants remaining undetected or colonising prior to development. This can be mitigated through a pre-commencement survey to check of presence of these plant species.

Control 4 : Pre-start invasive weed checks

Before any ground works commence on the site a check for the presence of invasive plant species will be carried out. This may be combine with other ecological pre-commencement checks. The areas of highest risk are within boundary areas and illustrated right, where the risk of plants being introduced from domestic garden waste and fly tipped material are highest.





No Works Area

Invasive weeds Present

If you think you need to work here you must seek approval
from the Ecological Clerk of Works on 01943884451

Risk Assessment of Potentially Damaging Development

High Risk

Unnecessary damage to trees and hedges (Biodiversity Protection Zone)

Without protection in place development poses a high risk of affecting retained trees and boundary hedges. The areas of mature tree cover and existing hedgerows constitute a Biodiversity Protection Zone that requires protection throughout the construction phase.

Control 5: BS5837 fencing

1. Fencing according to the site's Tree Protection Plan (TPP) will be followed. The figure right shows fence lines from the TPP but is illustrative only.
2. Fencing will be installed prior to site clearance following the plan in the TPP.
3. Fencing position will be checked by the ECoW prior to site soil stripping

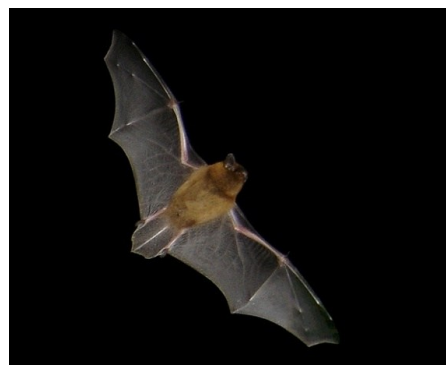


Risk Assessment of Potentially Damaging Development

Moderate Risk

Disturbance to Nocturnal Fauna

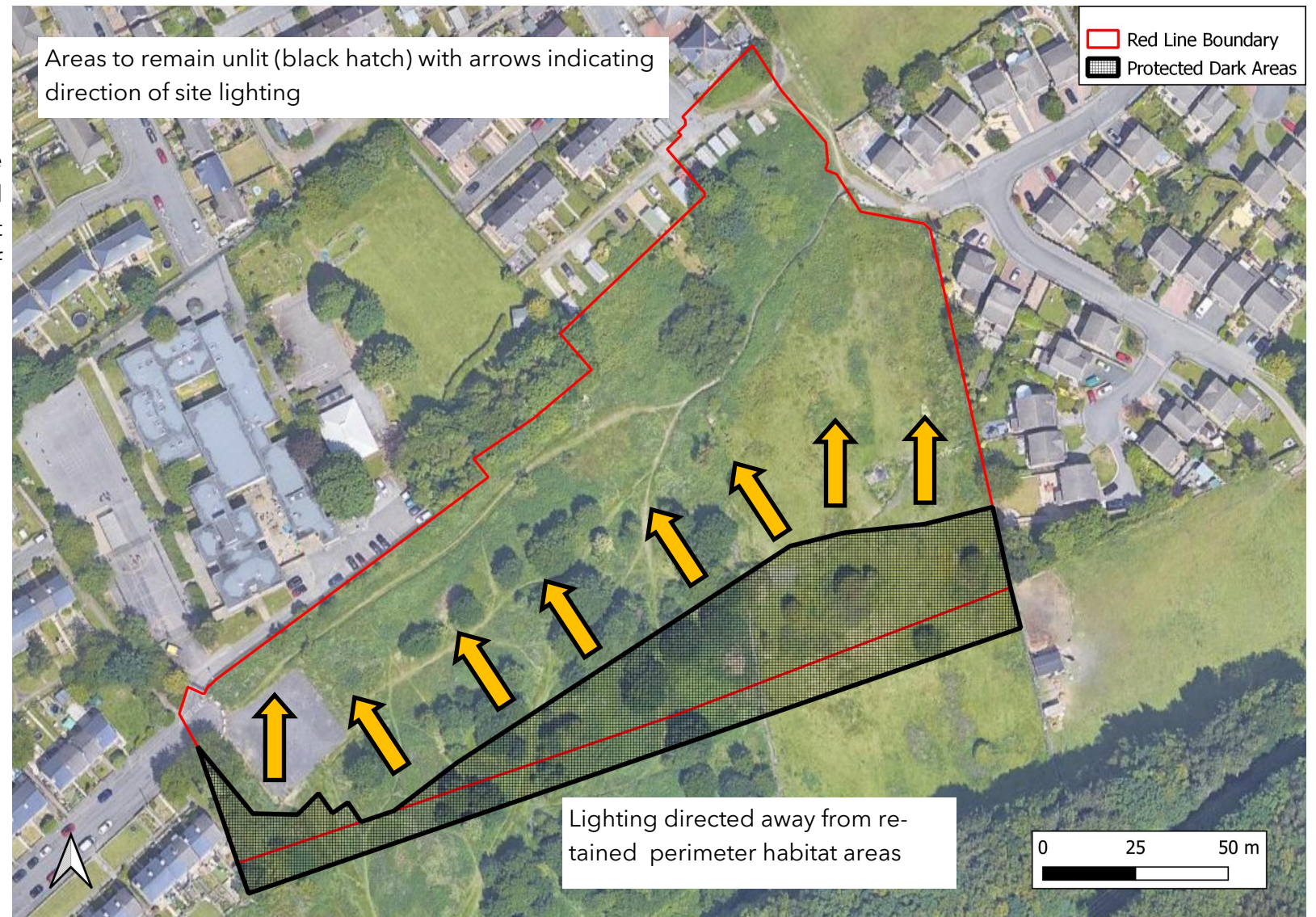
Without precautionary controls in place artificial lighting used during works poses a moderate risk of causing disturbance to bats and other nocturnal animals which are present in peripheral off-site habitat area. In particular, retained trees to the south are more likely to be of value to bat species as foraging and commuting areas where adverse lighting could reduce the value of these habitats to bats and other species.



Control 6: Lighting plan

A strategic plan to control artificial lighting will provide measures to remove light spill into the zones indicated in the plan right, and maintain these as protected dark zones. Lighting can be controlled through a variety of mechanisms which control the location, height, direction, intensity, duration, frequency and beam of light sources.

1. If the Site is to be trafficked at night or used for operations such as welding at night, perimeter fencing adjacent to the dark zone should incorporate light screening material construction to prevent headlight illumination, or arc lighting.
2. On-site construction lighting to be directed away from the protected dark zones throughout the construction phase through considered placement of lighting towers and use of directional lighting baffles.
3. The Site's Lighting Strategy will demonstrate the avoidance of impacts to these areas during operation, as seen in the figure opposite.



Illustrative example of directed lighting.

Risk Assessment of Potentially Damaging Development

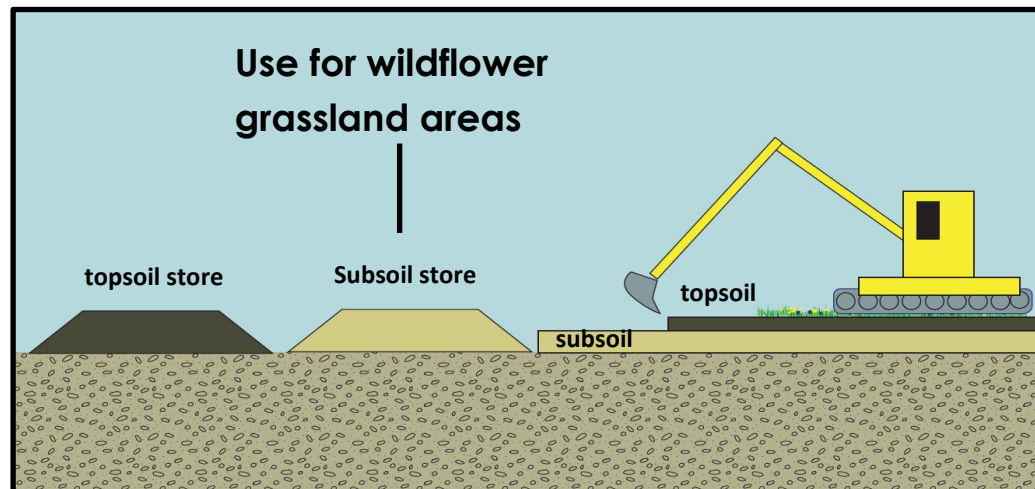
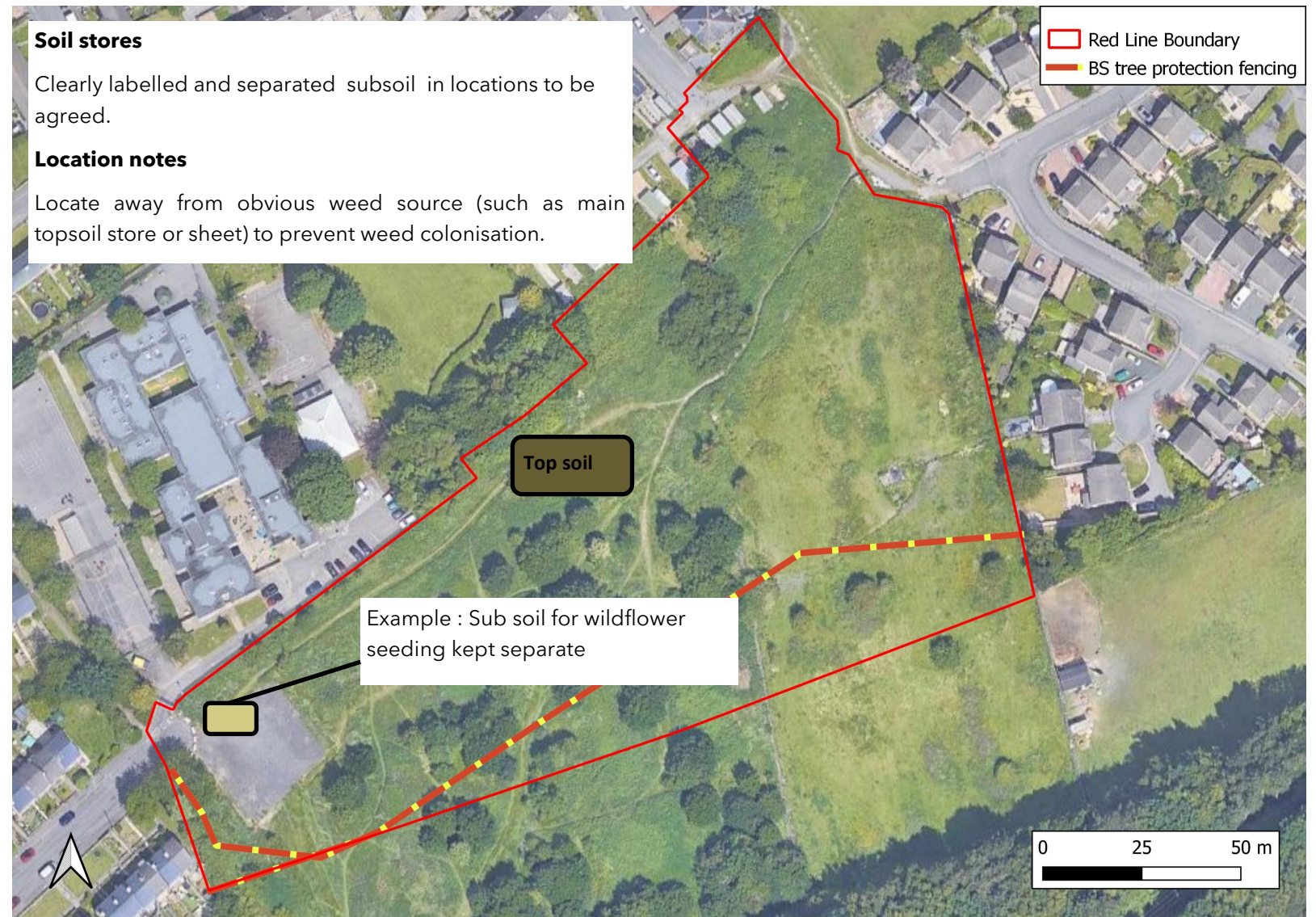
High Risk

Failure of made wildflower habitats

Effective habitat creation and reinstatement, depends on correct soil handling procedures. If stripped stores are re-spread without due care it is unlikely to be possible to create target habitats and may lead to degraded and problematic habitats which require significant interventions to rectify. Wildflower grasslands almost all need low nutrient soils so re-spreading topsoil on wildflower grass areas is likely to lead to failure as weeds establish and coarse grassland develops that cannot be easily cut and removed. Wildflower grassland created on correctly handled, low nutrient soils is much more easily managed and will save money and resources.

Control 7: The role of the ECoW

- During site stripping the ECoW will help identify suitable on-site soil/subsoil. This will be stored in a suitable location on site fenced and marked as soil for wildflower grassland. The ECoW will verify this action.
- Prior to spreading this or any replacement soil in areas marked for wildflower grassland the ECoW will be contacted to assess its condition and suitability for use and tested for correct mineral content. The soil will be rejected if it does not meet the correct mineral content or is seen or suspected to be heavily weed or weed seed infested.
- Any replacement brought to site will be subject to the same testing and ECoW approval.



Work Schedule

The work schedule below outlines when the tasks required should be carried out, and whether input is required from the ECoW.

Task	ECoW to direct	ECoW to carry out	At Setting out stage	Prior to any work in identified areas	Other timing considerations
Control 1 Protecting fauna during construction	Yes			Yes	
Control 2&3 Nesting birds survey and controls		Yes		Yes	
Control 4 Invasive Weed checks		Yes		Yes	
Control 5 Tree and Biodiversity Protection Fencing			Yes		During or after controls 1 and 2
Control 6 Lighting Plan controls				Plan in place	Lighting controls adjusted through season as required
Control 7–ECoW advice on meadow soils	Yes		Yes		
ECoW monitoring and reporting.		Yes		Yes	Monitoring visits through construction phase Provide suitable notice to arrange Site visits
ECoW available for unforeseen issues and supervision		Yes	Yes	Yes	