

CEMP - B

Project	Hoover Site	Date	11 December 2025
Note	Construction Environmental Management Plan	Ref	T211
Author	David Price		

Introduction

This technical note details a construction environmental management plan. The purpose of the management plan is to negate any potential impacts on site from the proposed construction works for the proposed redevelopment of the Hoover Site at Merthyr Tydfil.

Predicted impact

Providing the recommended mitigation measures are adopted, relevant nature conservation legislation will not be contravened, ecological impacts of the development will be reduced to a minimum and ecological issues are not, based upon the available information, anticipated to preclude the sites development.

Timing

To minimize any potential environmental impact on protected species, no work will be undertaken after dark and no floodlights will be installed on site.

Nesting birds

Rationale

The Site offers various bird nesting habitats, including trees, scrub, and grassland. All birds, including their nests, are protected under the Wildlife and Countryside Act 1981 (as amended). The following steps will prevent disturbance to nesting birds.

Method A: August to February inclusive

Vegetation clearance can proceed unsupervised, but all operatives shall remain vigilant and if any evidence of nesting bird activity is observed, works will cease in that area until further advice can be sought from the ECoW.

Method B: March – July

It is recommended that clearance of nesting bird habitat should be undertaken in the period August to February inclusive. Should it prove necessary to remove any breeding bird habitat during the breeding season, the area should be checked in advance for the presence of birds' nests. Once checked, if there is no evidence of breeding birds, clearance work should be completed within 48 hours of inspection. If any active nests are found in this area, then works must cease, and an appropriate buffer zone should be established. This buffer must be left intact until it has been confirmed that the young have fledged, and the nest is no longer in use.

Schedule 1 birds

As Schedule 1 bird species are afforded a greater level of legal protection against disturbance, if any active nests are recorded, either during the pre-construction survey or at any time during works, measures to avoid disturbance will be taken.

Reptiles

Rationale

Reptile and amphibians typically hibernate at/or beneath ground level where temperatures are more constant. The majority of on-site reptile habitat will remain intact, that said, the new access route is scheduled to pass through areas of hedge with its adjacent grasslands. Reptiles are mainly affected during vegetation clearance and civil works such as building tracks and demolition. They may also fall into open excavations.

Method A: Mid-March to October inclusive

It is not necessary to entirely and permanently remove reptiles from the site, only to ensure that injury is not caused to individuals by the works. It is likely that reptiles will forage around the Shrubs and scrub around the perimeter of the site.

A simple means of making the site unsuitable for reptiles is habitat manipulation. All grassy areas suitable for reptile basking and foraging affected by the proposed works (regardless of their location) should be strimmed to ground level (under supervision by a suitably qualified ecologist) to make them unsuitable for reptiles and all suitable refugia removed. A strimming regime over 2 weeks would discourage reptiles from work areas so that they avoid injury during works. Once the area has been strimmed to ground level and all potential refugia removed then reptiles are extremely unlikely to be present in the area and works can proceed.

Method B: November to mid-March inclusive

- Clearance of only areas of sub optimal habitat shall be permitted between November and mid-March.
- The ECoW shall confirm that the habitat has sufficiently low-negligible potential for hibernating reptiles.
- Vegetation shall be strimmed/cut down to ground level using hand tools to make the area unsuitable for reptiles emerging from hibernation to move into.
- Operatives shall remain vigilant so that, in the unlikely event that any inactive reptiles are found work must cease in that area and the ECoW shall be contacted immediately.

Wild Mammals

Rationale

There is a risk of mammals passing through the Site to become entrapped in trenches and pits, precautions will be taken during construction works to avoid this in order to prevent injury.

Working Method

It is recommended that good building practices are adopted during the construction phase to safeguard any individual animals which venture onto the proposed development area. Such practices would include covering of all deep holes and trenches overnight and/or the provision of planked escape routes for any trapped wildlife.

Bats

Rationale

All British bat species are listed in Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) and under Schedule 2 of the Conservation of Habitats and Species Regulations 2017 as European protected species.

This makes it an offence to:

- Deliberately capture, injure or kill a bat;
- Intentionally or recklessly disturb a bat in its roost or deliberately disturb a group of bats;
- Damage or destroy a bat's roosting place (even if bats are not occupying a roost at the time);
- Possess or advertise, sell or exchange a bat (dead or alive) or any part of a bat;
- Intentionally or recklessly obstruct access to a bat roost.

Working Method

Trees or groups of a Category PRF-I grade should be considered as constraints and any impacts on these trees should be mitigated.

If trees of a Category PRF-I grade are scheduled to be felled and/or subject to surgery, as per current best practice guidance, the trees will be thoroughly inspected prior to felling, inspection would encompass climb and inspect surveys, using endoscope and torch, assuming it is safe to do so; and possibly detector surveys. and a watching brief of all works that could impact the tree will be undertaken. Should features suitable for multiple bats be found, then additional survey work would be required

In the unlikely event that bats are confirmed to be roosting within the surveyed trees, the felling of the tree(s) in question may need to be carried out under licence from NRW. Full planning permission for the development must be in place (and all relevant conditions must have been discharged) before the licence from NRW will be granted.

Mitigation

To mitigate the loss of PRF-I trees, a total of nine 2F Schwegler Bat Boxes will be added to retained trees on site prior to felling works.

INNS

Rationale

There are invasive species on site, works have the potential to spread

Working Method

A suitably qualified and licenced contractor will be employed to remove all INNS, and an INNS supervisor will be attached to the project. An ecology walkover was undertaken in order to map out all INNS present, to see if species have spread or new species have colonised. Once the areas where there is INNS present have been identified, they will be fenced off and appropriate signage installed highlighting its presence prior to starting on site. More detail can be found within the *Removal of INNS – Method Statement*.

Pollution Control

Rationale

Construction activities can lead to pollution from oils, chemicals, or dust, which may harm soil, groundwater, surface water, and habitats both on-site and nearby due to pollutant transport by water and air.

An independent Environmental Clerk of Works (ECoW) will supervise onsite operations to ensure that contractors adhere to their respective environmental management plans and recognized best practice standards.

Working method

Chemicals and fuels

The following general pollution control guidelines are to be observed:

- All equipment, materials and chemicals shall be stored away from any watercourses.
- Chemicals, fuel and oil shall be stored in strong, well-maintained tanks to minimise risk of bursting or leakage.
- Oil and lubricants shall be stored within bunded containers and waste oils shall be stored in the construction compound in an above ground tank within a sealed bund and disposed of in accordance with the relevant regulations.
- which impose legal requirements for its movement, recovery and disposal. Refuelling shall not take place within 50m of a watercourse.

- Emergency procedures shall be prepared and pollution control equipment, such as “spill kits” and absorbent granules provided to relevant Site personnel. Drip trays will be provided for static machinery at appropriate locations.
- All plant used during the construction and operational phases of the development shall be maintained as per manufacturers guidelines and inspected as per best practice to ensure that they are in suitable condition and fit for purpose.
- Machinery shall be appropriately stored at all times to minimise rain wash off of oils etc.
- Maintenance of construction plant shall be carried out in designated areas. These will provide an impermeable surface away from any watercourse or drainage. Pre-determined wash areas at the Site compound, sited away from the surface water feature on Site, shall be used for cleaning of tools and equipment. The wash areas will be monitored and emptied regularly; waste shall be removed off site and disposed of by a licenced waste carrier.

The contractor shall be aware of any relevant regulations including but not limited to the Environmental Permitting (England & Wales) Regulations 2010, and The Control of Pollution (Oil Storage)(England) Regulations 2001, and ensure compliance with all applicable regulations.

Site works

At the start of works, an induction or ‘tool-box talk’ will be provided to construction/ clearance workers by the Ecological Clerk of Works (ECoW) appointed to oversee works. This will include details to be taken to protect protected species during works, their legislative protection, appearance, potential habitat on site and the procedure to be followed should any of these species be found during works.

A suitably qualified ecologist will attend site to inspect potentially sensitive areas immediately before work impacting on these areas begins.

Monitoring and Supervision

Environmental monitoring is to be employed on this site. The ECoW will deliver a toolbox talk to every contractor before work starts, make sure the precautionary methods of work are fully put into practice, and oversee the installation and implementation of all biodiversity and ecological measures. This will involve regular site visits by the ECoW and completion of standard pro forma that is signed by site manager (or representative) and the ECoW. A final sign-off visit will be carried out at the end of the development and a formal letter sent to both the client and Council indicating an end to the monitoring and ceasing the responsibility of the ECoW. The frequency of the visits will be dictated by the ECoW; visits may increase during particularly sensitive periods or be reduced when the clerk deems risks to be minimal.

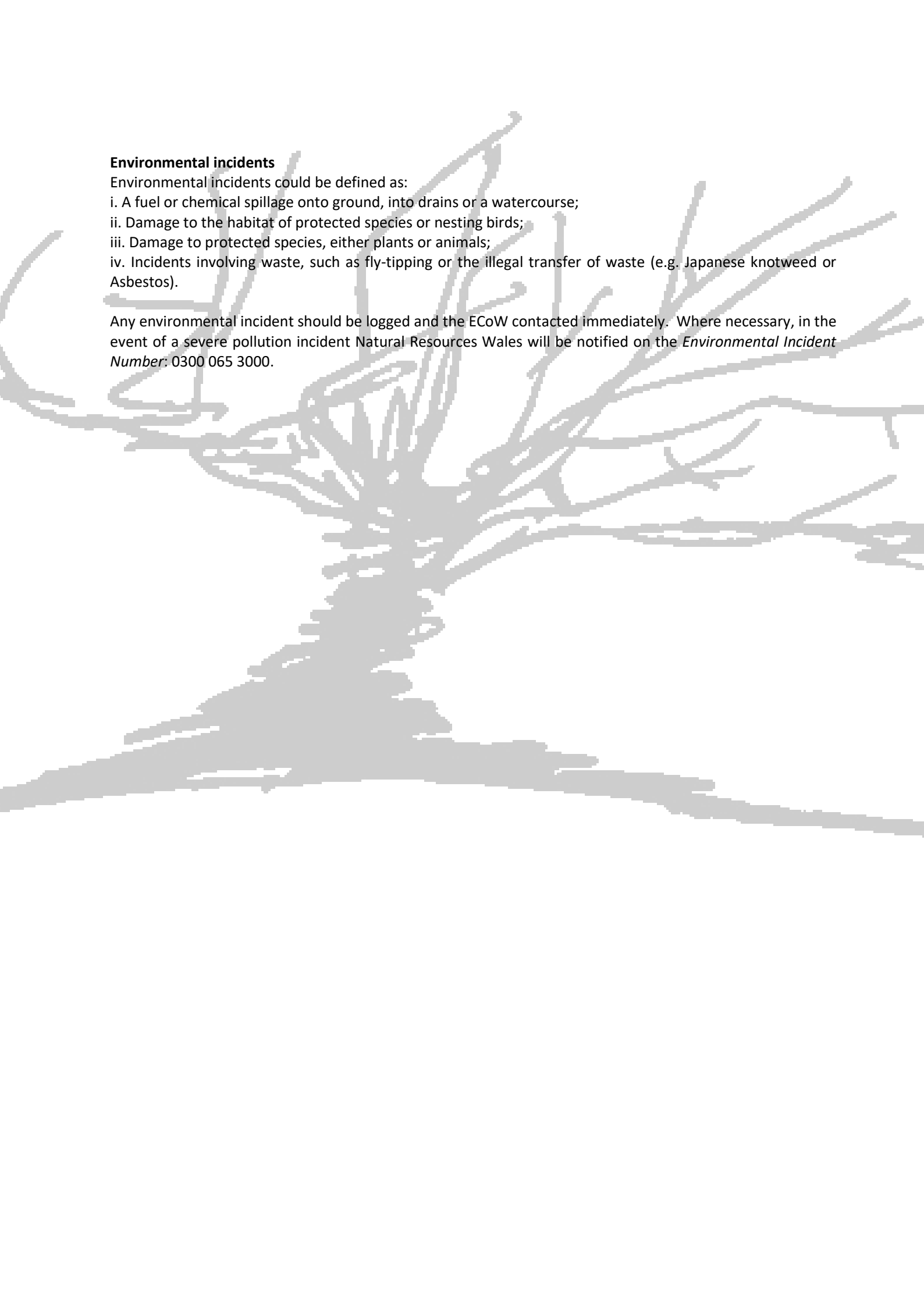
The monitoring visit is to ensure that the approved environmental protection measures are continually adhered to, and if remediation is required that this is promptly addressed and made clear to all parties.

Responsibilities

It will be the responsibility of the main contractor to ensure that the planning conditions attached to planning consent are adhered to at all times and that a monitoring plan in regards to environmental protection is adopted on site. The main contractor will be responsible for contacting the Local Planning Authority at any time issues are raised related to the ecology on site.

Use of subcontractors

The main contractor will be responsible for ensuring sub- contractors do not carry out any process or operation that is likely to adversely impact site.



Environmental incidents

Environmental incidents could be defined as:

- i. A fuel or chemical spillage onto ground, into drains or a watercourse;
- ii. Damage to the habitat of protected species or nesting birds;
- iii. Damage to protected species, either plants or animals;
- iv. Incidents involving waste, such as fly-tipping or the illegal transfer of waste (e.g. Japanese knotweed or Asbestos).

Any environmental incident should be logged and the ECoW contacted immediately. Where necessary, in the event of a severe pollution incident Natural Resources Wales will be notified on the *Environmental Incident Number*: 0300 065 3000.