

MEMO REPORT. CEMP – B

Construction Environmental Management Plan – Biodiversity

Project	Hoover Site, Merthyr Tydfil
Planning reference	P/25/0165 and discharge application P/26/0039
Client	Walters Land Limited
Document type	Construction Environmental Management Plan – Biodiversity (CEMP-B)
Author	David Price and Scott Bailey, Sylvan Ecology
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1 Introduction

This Construction Environmental Management Plan – Biodiversity (CEMP-B) has been prepared for the proposed redevelopment of the former Hoover Site at Pentrebach Road, Pentrebach, Merthyr Tydfil. It sets out the ecological and environmental measures to be implemented during demolition, ground reclamation, remediation, site preparation and construction works to avoid, reduce and manage potential adverse effects on habitats, protected species, designated sites and other sensitive ecological receptors.

The CEMP-B has been prepared to address Condition 21 of planning permission P/25/0165, which requires a risk assessment of potentially damaging construction activities; identification of ecologically sensitive areas and invasive non-native species locations; precautionary working method statements for relevant species; sensitive working practices and timing controls; and identification of the person responsible for ensuring compliance.

This CEMP-B is intended for use by the Principal Contractor, subcontractors, the ECoW and specialist consultants throughout enabling, remediation and construction works. Sections 4 and 6 summarise the principal risks, controls and responsibilities, while Sections 7 to 9 provide the detailed working methods, monitoring requirements and emergency procedures that apply on Site.

2 Description of the Development Project

The proposed development comprises demolition, ground reclamation and remediation of the former Hoover Site, followed by comprehensive redevelopment to create a new neighbourhood. The outline proposals include up to 441 new homes, approximately 1.5 hectares of employment land, a community hub, community heat hub, metro station and transport hub, open space, active travel routes, informal recreation areas, SuDS attenuation features and associated highway and infrastructure works.

The Site is centred at approximately OS grid reference SO 05768 04156, with the nearest postcode CF48 4TU. It comprises one large former industrial site and two smaller secondary areas. The main area is dominated by large buildings, hardstanding and smaller ancillary structures, with boundary habitats including scattered broadleaved trees, scrub and semi-improved grassland. The former cricket club area includes amenity

grassland, bare ground, buildings, scrub, woodland and introduced shrubs. The Cardiff to Merthyr railway line lies immediately west of the Site, with the River Taff beyond it.

3 Site Baseline

The Site is considered to be of low to moderate ecological value overall. Habitats within and adjoining the construction boundary include broadleaved woodland, trees, scrub, hardstanding, bare ground, amenity grassland, semi-improved grassland and introduced shrub. These habitats may support common and widespread species, while trees and habitats immediately beyond the Site boundary may also be directly or indirectly affected by construction activity, including where offsite root protection areas extend into the working area.

Ecological information used to inform this CEMP-B includes the Preliminary Ecological Appraisal for the Hoover Site, bat survey reporting, bat tree survey information, arboricultural information, the Green Infrastructure Statement, the INNS technical note, consultation comments from Merthyr Tydfil County Borough Council's ecologist and relevant planning condition requirements.

3.1 Designated Sites and Habitats of Principal Importance

Desk study information identified one statutory designated site and multiple non-statutory SINC's within 2 km of the Site. The River Taff SINC lies close to the western boundary, separated from the Site by the railway line. Habitats of Principal Importance identified within the wider ecological context include lowland mixed deciduous woodland, wet woodland and rivers. These features must be protected from indirect effects such as dust, lighting, pollution, runoff, accidental damage and disturbance.

3.2 Protected and Notable Species

The Site supports or has potential to support nesting birds, gulls nesting on buildings, common amphibians, hedgehog and other wild mammals. Although grassland, scrub, hedgerow margins and boundary habitats provide some potentially suitable reptile habitat, the likelihood of reptiles being present on the Site is considered low. Dormouse is considered unlikely to be present and great crested newt is not considered likely to be a constraint based on the available information. Invasive non-native species have been recorded on or near the Site, including Japanese knotweed, Himalayan balsam, cotoneaster, montbretia, snowberry, cherry laurel, Wilson's honeysuckle and bamboo.

4 Risk Assessment of Potentially Damaging Construction Activities

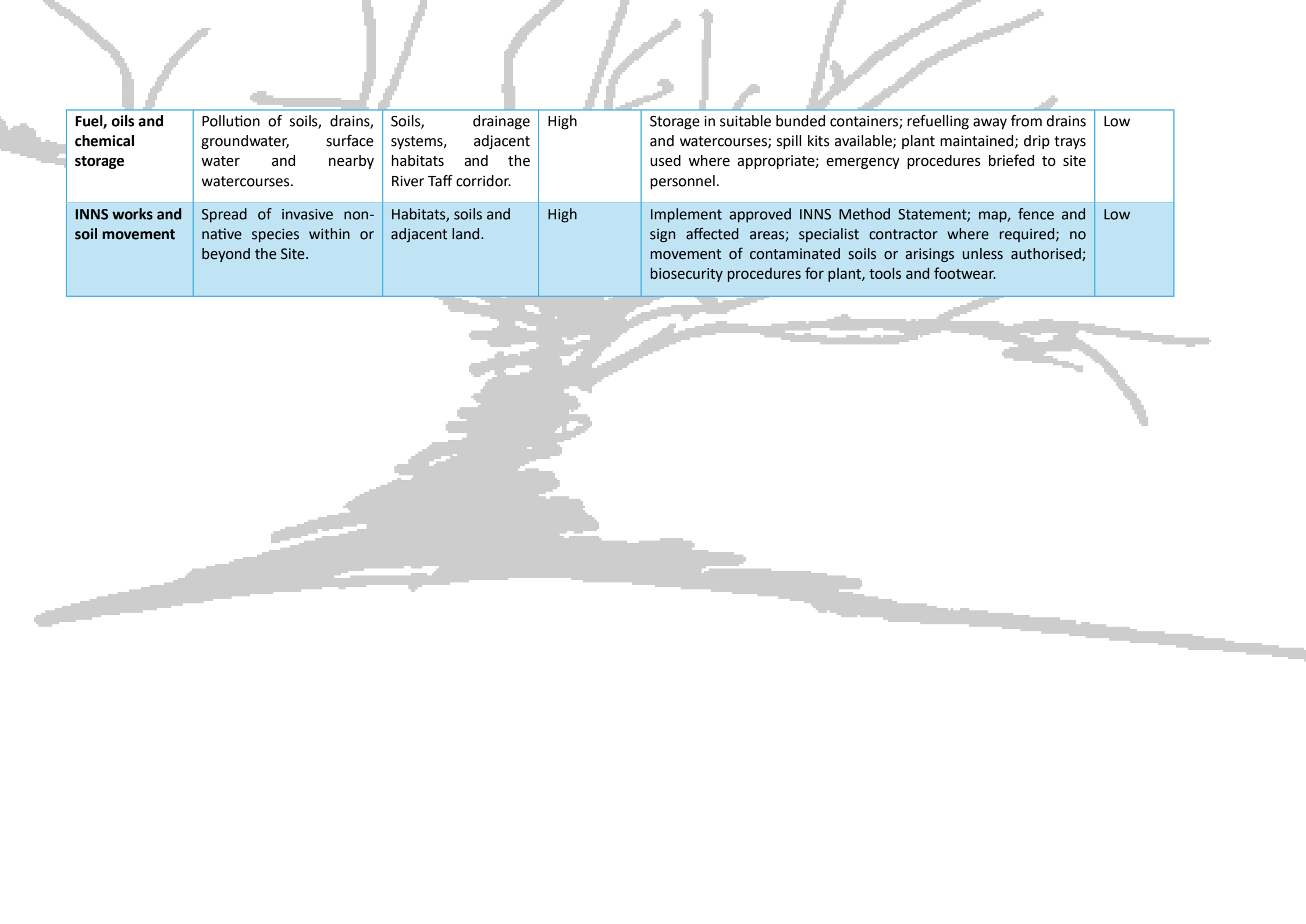
The following risk assessment identifies construction activities that could affect ecological receptors and summarises the controls required to reduce those risks. It should be read alongside the detailed method statements in Section 7, the action plan in Section 6 and the relevant supporting survey reports.

Construction activity	Potential impact	Receptors	Risk without mitigation	Mitigation and control measures	Residual risk
Site clearance and vegetation removal	Loss of habitat, destruction of nests and injury to reptiles, amphibians or small mammals; accidental damage to offsite or boundary ecological features.	Nesting birds, reptiles, amphibians, hedgehog, scrub, grassland and boundary habitats.	High	Clearance outside the nesting bird season where practicable; ecological inspection within 48 hours where clearance is required during the nesting season; phased vegetation clearance; reptile precautionary working method statement; toolbox talks; ECoW supervision of sensitive clearance; demarcation and protection of offsite and boundary ecological features.	Low
Building demolition	Loss or disturbance of building-nesting birds, including gulls. Bat surveys were undertaken and no bats or bat roosts were found.	Nesting birds and gulls.	High	Bat surveys were undertaken and no bats or bat roosts were found. Demolition shall proceed in accordance with the survey recommendations; nesting bird checks shall be completed and exclusion buffers established where active nests are present.	Low
Tree felling and pruning	Loss of nesting habitat, disturbance to bats, discovery of previously unidentified roost features, and damage to offsite trees or roots extending into the Site.	Bats, nesting birds, boundary trees and offsite trees with root protection areas extending into the Site.	Medium	Tree works shall be preceded by checks by a suitably qualified ecologist. PRF-I trees shall be inspected before felling or pruning. All tree works, construction exclusion zones, protective fencing, appropriate barriers and warning signs shall be implemented in accordance with the recommendations and drawings contained within the BS 5837 arboricultural survey report.	Low
Noise and vibration from demolition,	Disturbance, displacement or interruption of nesting, roosting, foraging and commuting behaviour;	Nesting birds, bats, wild mammals, adjacent railway	Medium	Restrict the noisiest works to agreed daytime hours where practicable; use well-maintained plant, effective silencers and acoustic screening; avoid unnecessary idling and impulsive noise; select lower-noise and lower-vibration methods where feasible; programme particularly noisy	Low

machinery and piling	potential effects on wildlife using adjacent habitats.	habitat and the River Taff corridor.		activities to minimise prolonged disturbance; and obtain ECoW advice where works could affect active nests, bat roosts or other sensitive ecological receptors.	
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Construction activity	Potential impact	Receptors	Risk without mitigation	Mitigation and control measures	Residual risk
Excavation, remediation and earthworks	Entrapment or injury of reptiles, amphibians, hedgehog and other mammals; runoff and sediment release; damage to offsite trees, roots or adjacent habitats.	Reptiles, amphibians, hedgehog, wild mammals, offsite and adjacent habitats, and water receptors.	High	Daily inspection of excavations; covers or escape ramps to be provided; no open pipework left uncapped; segregation of clean and dirty water; pollution prevention controls; ECoW advice where works approach offsite habitats or sensitive boundaries.	Low
Construction traffic and plant movement	Collision with wildlife, disturbance, dust, soil compaction and accidental damage to offsite or boundary ecological features.	Wild mammals, reptiles, birds, adjacent habitats and offsite boundary features.	Medium	Designated haul routes; low Site speed limits; banksman control where needed; driver awareness; and clear demarcation and protection of offsite trees.	Low
Dust generation	Smothering of vegetation, degradation of adjacent habitats and effects on the River Taff corridor.	Boundary vegetation, woodland, River Taff SINC and adjacent habitats.	Medium	Damping down during dry conditions; sheeting of loads; wheel cleaning; prompt removal of dusty deposits; speed controls; inspection and monitoring of dust during sensitive works.	Low

Construction activity	Potential impact	Receptors	Risk without mitigation	Mitigation and control measures	Residual risk
Artificial lighting at night	Disturbance or displacement of bats and other nocturnal wildlife.	Bats, insects, River Taff corridor and boundary habitats.	High	No night working; no unnecessary floodlighting; directional and task-specific lighting only where essential; lighting to avoid spill onto boundary vegetation, adjacent habitats and the River Taff corridor; lighting strategy to be reviewed by competent specialists where required.	Low



Fuel, oils and chemical storage	Pollution of soils, drains, groundwater, surface water and nearby watercourses.	Soils, drainage systems, adjacent habitats and the River Taff corridor.	High	Storage in suitable bunded containers; refuelling away from drains and watercourses; spill kits available; plant maintained; drip trays used where appropriate; emergency procedures briefed to site personnel.	Low
INNS works and soil movement	Spread of invasive non-native species within or beyond the Site.	Habitats, soils and adjacent land.	High	Implement approved INNS Method Statement; map, fence and sign affected areas; specialist contractor where required; no movement of contaminated soils or arisings unless authorised; biosecurity procedures for plant, tools and footwear.	Low

5 Site Clearance and Reinstatement of Boundary Features

No Biodiversity Protection Zones will be established within the Site. The full Site, including the existing boundary features, must be made accessible for the contaminated land remediation works. Consequently, all areas within the Site boundary will be cleared in accordance with the approved works programme and the ecological precautionary measures set out in this CEMP-B.

Following completion of the contaminated land remediation works and associated construction activities, the boundary features will be reinstated as part of the improved landscape works. The landscape works will include wildlife corridors designed to provide habitat connectivity through and around the Site. The location, extent, composition, planting specifications and implementation requirements for the reinstated boundary features and wildlife corridors are shown on the Landscape Plan, which should be read alongside this CEMP-B.

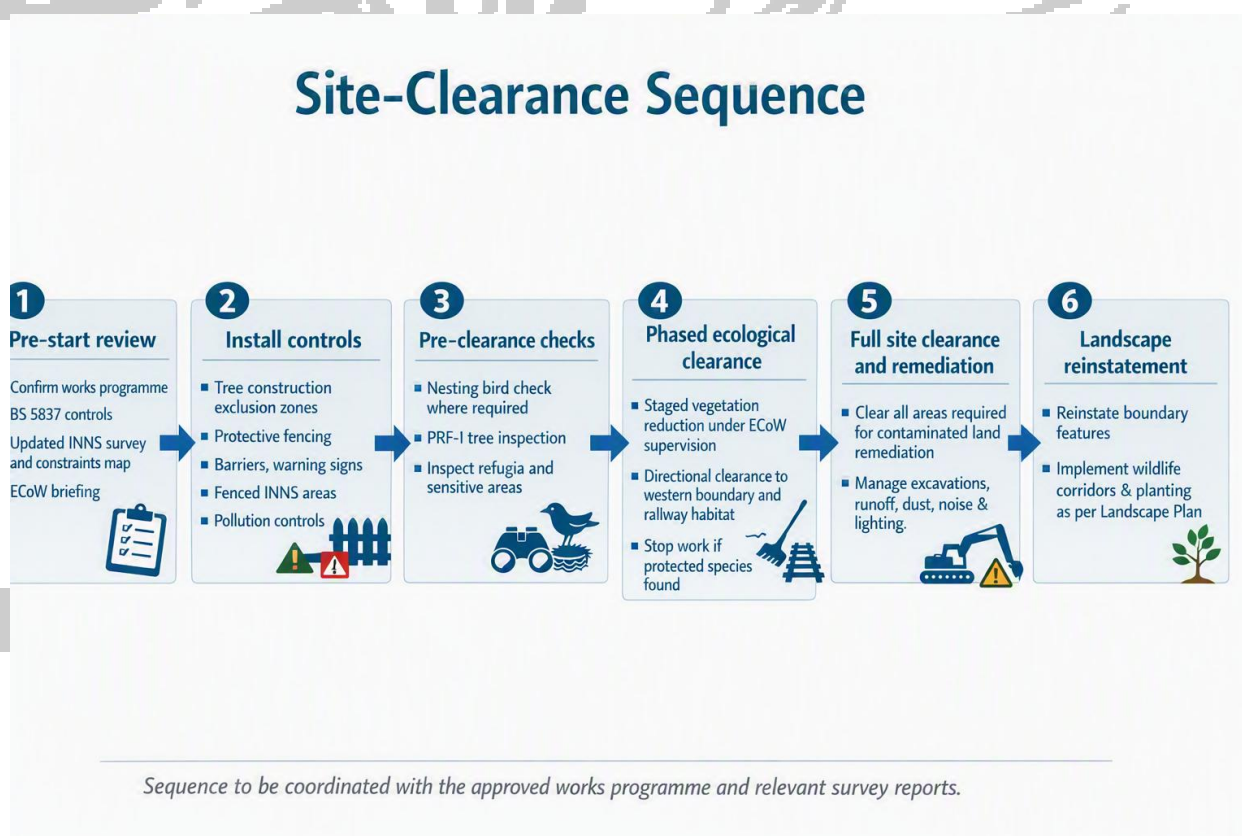


Figure 1. Site-clearance sequence.

6 CEMP-B Action Plan

Task	Action	Responsibility
Pre-commencement	Appoint a suitably experienced ECoW; review current ecological documents; confirm the works programme; identify sensitive works; brief the Site team; confirm INNS locations and controls; and mark all required construction exclusion zones, protective fencing, barriers and warning signs in accordance with the BS	Principal Contractor, Client and ECoW

	5837 arboricultural survey report and the updated INNS constraints map.	
Site setup	Confirm that compounds, haul routes, storage areas and welfare facilities avoid offsite root protection areas, sensitive boundaries, adjacent habitats and INNS areas. Install protective fencing, barriers and signage before works begin.	Principal Contractor with ECoW advice
Vegetation clearance	Undertake clearance outside nesting bird season where practicable. If within March to August, complete nesting bird checks no more than 48 hours before clearance. Apply reptile and amphibian PWMS and maintain supervision where required.	Principal Contractor and ECoW
Demolition	Bat surveys have confirmed no presence of bats. ECoW to be contacted should anything arise during demolition.	Principal Contractor, demolition contractor and ECoW
Earthworks and remediation	Inspect excavations daily, provide escape ramps or covers, manage sediment and runoff, maintain pollution controls and prevent accidental encroachment into offsite root protection areas, and fenced INNS areas.	Principal Contractor
INNS control	Implement the approved INNS Method Statement. Fence and sign affected areas, prevent unauthorised movement of contaminated soils or plant material and apply biosecurity procedures.	Principal Contractor and specialist INNS contractor

7 Method Statements

7.1 Pollution Prevention

All equipment, materials, fuels, oils and chemicals shall be stored securely away from watercourses, drains, surface-water pathways and sensitive habitats. Fuel and oil shall be held in sound, well-maintained tanks or containers; lubricants and waste oils shall be stored within sealed bunds and removed by an appropriately licensed waste carrier. Refuelling shall not take place within 50 m of a watercourse and shall be confined to designated impermeable areas, using drip trays where appropriate. Plant shall be maintained in accordance with manufacturers' guidance, with machinery stored to minimise rain wash-off. Tool and equipment washing shall be undertaken only in designated contained wash areas away from drainage and water features, with residues removed from site appropriately. Spill kits and absorbent materials shall be readily available, and site staff shall be briefed in emergency response procedures. Dust shall be controlled through damping down, wheel cleaning, sheeting of loads, speed controls and prompt clearance of deposited materials. Any pollution incident shall be reported immediately to the Site Manager and ECoW; where required, Natural Resources Wales shall be notified using its environmental incident number, 0300 065 3000.

7.2 Potential Water Pollution

The River Taff lies close to the western Site boundary, separated from the Site by the railway line. It could be affected indirectly if contaminated or sediment-laden runoff enters drains, groundwater or surface-water pathways. Potential sources include contaminated land remediation, excavation, dewatering, exposed soils and stockpiles, concrete or cement washout, fuels, oils, chemicals, silt, contaminated dust and firefighting

water. Before these activities begin, the Principal Contractor shall identify drainage routes and outfalls and implement a surface-water and pollution-control plan. Clean water and potentially contaminated water shall be kept separate. Contaminated water shall be contained, tested where necessary and treated or removed by an appropriately licensed contractor. No water shall be discharged to a drain, sewer, watercourse or the ground without the required approval or consent. Stockpiles, fuels, chemicals, refuelling areas and concrete washout facilities shall be located away from drains and flow paths and provided with suitable impermeable surfaces, covers, bunding, drip trays or secondary containment. Silt fences, settlement tanks, filter systems, drain covers or other suitable controls shall be installed where required and maintained throughout the works. Weather forecasts shall be monitored, and exposed ground and runoff controls shall be inspected before and after heavy rainfall. Water leaving the working area shall be checked for visible silt, sheen, discolouration, odour or other evidence of contamination. If pollution is suspected, the affected activity and any discharge shall stop immediately. The source shall be contained, drains and flow paths protected, and the Site Manager and ECoW informed. Natural Resources Wales and other relevant bodies shall be notified where required. Works shall not recommence until corrective measures have been implemented.

7.3 Trees and Tree Protection

All tree works and tree protection measures shall be implemented in accordance with the recommendations, specifications and drawings contained within the BS 5837 arboricultural survey report. This shall include the establishment and maintenance of construction exclusion zones, protective fencing, appropriate barriers and warning signage before relevant works commence. The fencing, barriers, signage and construction exclusion zones shall remain in place and be maintained for the period specified in the BS 5837 survey report, unless otherwise agreed in writing. No storage, plant movement, excavation, level changes, service installation, fires, chemical storage or other construction activity shall take place within a construction exclusion zone except where expressly permitted by the BS 5837 survey report. Any proposed alteration to the tree works, construction exclusion zones or associated protection measures shall be discussed with and approved by the project arboriculturist before the alteration is implemented. Where an alteration could affect ecological features, the ECoW shall also be consulted.

7.4 Bats

All British bat species are protected by law. Buildings and trees at the Hoover Site have been considered in relation to roosting, foraging and commuting bats. Trees categorised as PRF-I shall be treated as constraints. Before felling or pruning, they shall be thoroughly inspected by a suitably qualified ecologist, using a climb-and-inspect survey, endoscope, torch and, where necessary, detector survey, subject to safe access. A watching brief shall be maintained for works capable of affecting such trees. If features suitable for multiple bats are identified, further survey may be required. If a bat or suspected roost is found, works in the vicinity shall stop immediately and the licensed bat ecologist shall provide advice; confirmed roost impacts may require an NRW licence. Nine Schwegler 2F bat boxes shall be installed at suitable locations agreed with the ECoW before relevant felling works. Artificial lighting shall be avoided at night where practicable and, where essential, shall be directional and designed to avoid spill onto boundary habitats and the River Taff corridor.

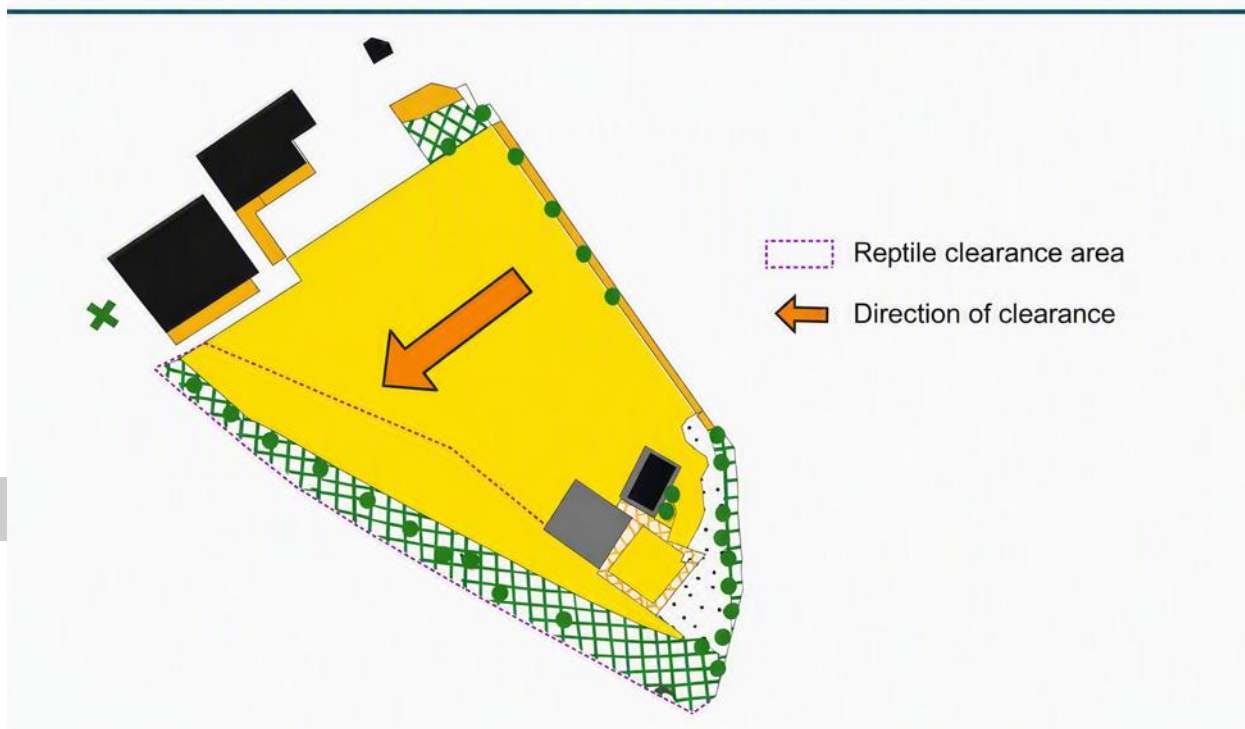
7.5 Nesting Birds

Vegetation clearance, tree works and demolition of buildings suitable for nesting birds should be undertaken outside the main nesting bird season where practicable. If works are required between March and August inclusive, a suitably experienced ecologist shall inspect the affected area no more than 48 hours before works commence. If an active nest is identified, an appropriate exclusion buffer shall be established and retained until the ECoW confirms the nest is no longer active.

7.6 Reptiles and Amphibians

Although grassland, scrub, hedgerow margins and boundary habitats provide some potentially suitable habitat, the likelihood of reptiles being present on the Site is considered low. A precautionary approach shall nevertheless be adopted. Between mid-March and October inclusive, affected grassland shall be reduced in stages under ECoW supervision. Where appropriate, this shall include a controlled strimming regime over approximately two weeks, removal of arisings and careful dismantling of suitable refugia. Clearance shall progress towards the western Site boundary to encourage any reptiles present to move off Site into the adjacent railway habitat. This habitat will provide refuge until the proposed landscaping and wildlife corridors have been implemented and established. Between November and mid-March, clearance shall be limited to areas that the ECoW confirms have low to negligible potential for hibernating reptiles. Vegetation shall be cut to ground level using hand tools, and operatives shall remain vigilant for inactive animals. If a reptile or amphibian is found at any time, works shall stop locally and the ECoW shall be contacted immediately for advice.

Reptile Clearance Map



7.7 Wild Mammals

Good construction practice shall be followed to protect hedgehog, badger, fox and other wild mammals. Excavations, trenches and pits shall be covered overnight where practicable or provided with escape ramps. Pipework shall be capped or checked before sealing. Stored materials shall be managed to avoid creating avoidable refuges. If badger setts or protected mammal features are identified, works shall stop locally and advice shall be sought from the ECoW.

7.8 Invasive Non-Native Species

Before any works begin, a suitably experienced ecologist shall complete an updated INNS survey of the Site. The findings shall be used to update the INNS constraints map, showing the current location and extent of all confirmed or suspected stands. Before works commence, affected areas shall be fenced and clearly signed in accordance with the updated map and approved INNS Method Statement. These controlled areas shall be subject to appropriate biosecurity measures, specialist treatment or removal where required, and restrictions on the movement of soils, arisings, plant material, machinery and personnel. Fencing and signage shall remain in place until the relevant treatment or control measures have been completed and the specialist contractor or ECoW confirms that they may be removed. Any newly discovered INNS shall be reported immediately to the Site Manager and ECoW. The map, fencing and work controls shall then be updated before works proceed in the affected area.

8 Implementation, Monitoring and Reporting

The Principal Contractor shall implement this CEMP-B, comply with relevant planning conditions and ensure that all subcontractors understand and follow its requirements. No subcontractor shall undertake an operation likely to affect ecological receptors, offsite root protection areas, adjacent habitats or fenced INNS areas. Before construction or clearance begins, the ECoW shall deliver an induction or toolbox talk covering relevant protected species, legal protection, identification, likely habitats, approved precautionary methods and the stop-work procedure. The ECoW shall inspect potentially sensitive areas immediately before affecting works commence and shall provide ecological advice throughout the works. Monitoring visits shall be undertaken at a frequency proportionate to risk and may increase during demolition, vegetation clearance, INNS works, sensitive boundary works or other periods of elevated risk. Standard monitoring pro formas shall be completed and signed by the Site Manager, or their representative, and the ECoW. At the end of the development, the ECoW shall complete a final sign-off inspection and issue a formal close-out letter to the client and Local Planning Authority confirming completion of ecological monitoring and the end of the ECoW's responsibilities.

The Principal Contractor shall retain records of inductions, toolbox talks, ecological inspections and monitoring visits, photographs, incidents, corrective actions, waste transfer documentation, INNS controls, pollution prevention inspections and correspondence with the client, Local Planning Authority, Natural Resources Wales or other relevant bodies. Non-conformances shall be recorded, investigated and closed out through corrective action agreed by the Site Manager and, where ecological matters are involved, the ECoW.

9 Emergency Procedures

Environmental incidents include fuel or chemical spills to ground, drains or watercourses; damage to protected-species habitat or active nests; injury to protected plants or animals; unauthorised INNS spread; damage to offsite trees, root protection areas or adjacent habitats; and waste incidents such as fly-tipping or unlawful transfer of contaminated material. If a protected species, suspected protected-species feature, active nest, bat roost, pollution incident, INNS spread or other ecological incident is identified, works in the affected area shall stop immediately where safe to do so. The incident shall be logged, the Site Manager informed and the ECoW contacted immediately for advice. The client, Local Planning Authority, Natural Resources Wales or other regulators shall be notified where required. For a serious pollution incident, Natural Resources Wales may be contacted on 0300 065 3000. Works shall not recommence until appropriate protection, mitigation or corrective action has been agreed and implemented.

10 References and Supporting Documents

- Planning permission P/25/0165 and discharge application P/26/0039.

- Hoover Site Preliminary Ecological Appraisal, Sylvan Ecology.
- Hoover Site bat survey and bat tree survey reports.
- Green Infrastructure Statement for the former Hoover Site.
- Tree Survey and Tree Constraints Plan for the Hoover Factory, Merthyr Tydfil.
- INNS technical note / method statement for the Hoover Site.
- Relevant consultation comments from Merthyr Tydfil County Borough Council and Natural Resources Wales.

