HAREFIELD HOSPITAL

CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN (BIODIVERSITY)

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DOCUMENT HISTORY

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Declaration of compliance with professional code of ethics or conduct
The information which we have prepared and provided is true and has been prepared and provided in accordance with the Chartered Institute of Ecology and Environmental Management's Code of Professional Conduct. We confirm that the opinions expressed are our true and professional bonafide opinions.

All reasonable efforts have been made to comply with current legislation and best practice, including BS 42020:2013, the Environment Act 2021 (Schedule 7A: Biodiversity Gain), the National Planning Policy Framework (2023), CIEEM EclA Guidelines (2018, updated 2022), and relevant Natural England guidance.

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EXECUTIVE SUMMARY

Client	NHS, Royal Brompton and Harfield Hospitals, Part of the Guy and St. Thomas NHS Foundation Trust
Consultant	Bradley Murphy Design Ltd.

SITE

Location	Harefield Hospital, Harefield, UB9 6JH
National Grid Reference	Approx. centre: TQ 05267 90758
Over-view	The northern extent of the Site comprises a small area of deciduous woodland, developed land and modified grassland.
Landscape context	The Site is situated within the village of Harefield. The Site is bound by Rickmansworth Road to the east and further hospital grounds to the north, south and west. Residential development is present within Harefield Village.

DEVELOPMENT & PLANNING BACKGROUND

Proposed works	Expansion of an existing area of plant including generators and related equipment, which consists of the loss of an area of deciduous woodland.
Planning stage	Full Planning Application

ECOLOGICAL BACKGROUND

General	A Preliminary Ecological Assessment of the Site was undertaken by Greengage in 2024 (Ref: Greengage Preliminary Ecological Assessment).
Most recent baseline	In September 2025, Greengage undertook an Ecological walkover to review and update the habitat types and conditions as well as protected species matters. Ref: Greengage Preliminary Ecological Assessment.

CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN

Objectives

1. To summarise the ecological baseline of the zone of influence associated with the construction works.
2. To summarise anticipated impacts based on known works details (where appropriate/available specific works timeframes and working methods will be detailed).
3. To detail mechanisms and add any area/time specific details by which the necessary mitigation outlined in the more strategic documents are implemented to:
    a. ensure effective implementation of ecological protection measures
    b. minimise harm and negative impacts to wildlife and habitats currently occurring on site.

RECOMMENDATIONS

The following Ecological Features must be considered during the construction stage to ensure favourable and enhanced conservation status during and post development:

- Amphibians (common only);
- Birds;
- Bats;
- Stag Beetle;
- Reptiles;
- Badger;
- Hedgehog;
- Other fauna.

CROSS-DISCIPLINE APPLICABILITY

This document is relevant to the following design team disciplines:

- Architects
- Drainage engineers
- Highways
- Landscape architects
- Lighting designers.

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APPENDICES

TABLES

1. INTRODUCTION

1.1 Background Information

1.1.1 Bradley Murphy Design Ltd. (BMD) was commissioned by NHS, Royal Brompton and Harfield Hospitals, Part of the Guy and St. Thomas NHS Foundation Trust in October 2025 to provide a Construction Environment Management Plan (CEMP) – Biodiversity for their site: Harefield Hospital, Harefield– hereafter referred to as 'the Site'. The Site is approximately centred on national grid reference TQ 05267 90758. A plan depicting the Site's location is provided in the Appendix.

1.2 Proposed Development

1.2.1 Expansion of an existing area of plant including generators and related equipment, which consists of the loss of an area of deciduous woodland.

1.3 Site Context

1.3.1 The Site is situated within the village of Harefield, and the wider Site comprises of Harefield hospital. The Site is bound by Rickmansworth Road to the east and further hospital grounds to the north, south and west. Residential development is present within Harefield Village.

1.3.2 The Site is situated 3.7km south of Rickmansworth and 3.6km North of Denham. Generally, the immediate surroundings are fairly rural with agricultural land, grassland and woodland present. Urban areas are situated in the wider landscape of towns including residential, transport and industrial development.

1.4 Ecological Context

1.1.1 A Preliminary Ecological Assessment (PEA) was undertaken by Greengage in 2024 with an updated site walkover in September 2025. The Site was comprised of a small block of lowland deciduous woodland, developed land and modified grassland.

1.1.2 No significant evidence of protected species was observed, although the woodland was identified as a UK priority habitat. The assessment concluded that the development posed minimal risk to biodiversity, and no further surveys were recommended. Full details were included in the Preliminary Ecological Assessment, Harefield Hospital (Greengage, 2025).

1.4.1 Key findings from the September 2025 assessment are summarised within Section 2, Table 2.1 below.

1.4.2 The existing mitigation measures outlined in the 2025 Preliminary Ecological Appraisal remain appropriate, and pre-works checks will be required before construction activities commence to ensure compliance with relevant wildlife legislation.

1.4.3 This CEMP should be read alongside the approved Habitat Management and Monitoring Plan (HMMP; BMD.25.0201.RPE.MP.002.HMMP) to ensure consistency between construction-phase protection and long-term ecological management

1.5 Compliance with Guidance, Policy and Legislation

1.5.1 An overview of national planning policy and wildlife legislation relating to the ecological features relevant to the scheme is provided in Appendix A.

1.5.2 The protocols, evaluations and recommendations contained within this report were made in accordance with these policies and legislation and with reference to BS42020:2013: Biodiversity – Code of Practice for Planning and Development.

1.5.3 This document has also been prepared with reference to the Environment Act 2021 (Schedule 7A: Biodiversity Gain), the National Planning Policy Framework (2025), and the Institute of Lighting Professionals' Guidance Note 08/23 (Bats and Artificial Lighting in the UK) to ensure current best-practice compliance

2. ECOLOGICAL BASELINE

1.6 Summary of Most Recent Baseline

1.6.1 Table 2.1 provides a summary of conclusions drawn from the most recent ecological surveys.

Table 2.1 Conclusions of Most Recent Ecological Assessments: September 2025 (Greengage)

Assessment	Conclusions of relevance to the Site
Amphibians (including great crested newt).	Local records of GCN were returned by GiGL within Greengage Preliminary Ecological Assessment. Habitats on Site have potential to support Great Crested Newt (GCN) however, due to the distance and presence of physical barriers to dispersal present between potential breeding waterbodies and the Site, the likelihood of them occurring on the Site is very low.
Badgers	Mammal burrows which may be attributable to badger were identified within the woodland during the 2024 survey. During the 2025 badger survey, these burrows remained disused, with entrances blocked by vegetation and some partially collapsed. Additional mammal holes assessed outside the Site boundary also showed no evidence of activity. It is considered likely that badger would commute, forage and potentially have setts within the woodland.
Bats – Activity	Local records of a number of bats were returned by GiGL within Greengage Preliminary Ecological Assessment. Species included; Myotis bat species *(Myotis* sp.), Daubenton's bat *(Myotis daubentonii),* noctule *(Nyctalus noctula),* common pipistrelle *(Pipstrellus pipistrellus),* Nathusius's pipistrelle *(Pipistrellus nathusii),* soprano pipistrelle *(Pipistrellus pygmaeus)* and brown long-eared bat *(P/ecotus auritus).* The woodland on Site provides some suitability for foraging and commuting bats; however, the area to be removed is small and its loss is not considered likely to significantly impact the local bat population or lead to fragmentation of habitat.
Bats – Roosts	Most of the trees recorded within the Site held negligible potential for roosting bats. It is considered possible, however, that mature trees on Site or within the Zone of Influence may possess potential roosting features for bats. Pre-works surveys will be necessary prior to tree removals.
Birds	Bird species returned by GiGL included swift *(Apus opus),* tree sparrow *(Passer montanus),* house sparrow *(Passer domesticus),* starling *(Sturnus vulgaris),* song thrush *(Turdus philomelos),* tawny owl *(Strix aluco),* red kite *(Milvus milvus)* and skylark *(Alauda arvensis).* The Site is considered to support a breeding bird population of Site value only. The woodland provides nesting opportunities for common bird species.
Habitats (Phase 1 Habitat Survey)	Habitats present within the Site include developed land, modified grassland and lowland deciduous woodland. The woodland is classified as Priority Habitat recorded within the Site, It is understood at the time of writing that the woodland is subject to removal and will replaced on at least a like-for-like basis through purchase of offsite credits
Invertebrates	The woodland on-site is small and lacking diversity, however, it does hold potential for Stag Beetle, which has been recorded 500m from the Site.

Assessment	Conclusions of relevance to the Site
	However, the urban surroundings and small size limits the potential for a diverse invertebrate assemblage.
Reptiles	Local records of slow worm were returned by GiGL within Greengage Preliminary Ecological Assessment with 2km of the Site. Woodland habitats typically don't allow sufficient light penetration for basking reptiles; however the occasional shrub layer present does provide some opportunity for basking and refuge. Despite this, the Site is bound by closely mown areas of grassland and hardstanding which reduces habitat connectivity It is considered possible that the woodland on Site is suitable to support individual reptile species (their presence is assumed rather than confirmed) Although the Site may provide limited foraging or refuge opportunities for individual common reptiles, populations are considered small and localised. Appropriate displacement and phased-clearance methods will therefore be applied under ECoW supervision to ensure compliance with wildlife legislation
Statutory and Non-statutory Nature Conservation Sites	There are no statutory designated sites of nature conservation importance located within the Site itself. The Site lies within 2 km of four statutory designated sites. The Site is situated within the Impact Ris k Zone (IRZs) of two SSSI. The development proposals for the Site do not fall under activities that are identified as potential risks to the integrity of the SSSIs therefore consultation with Natural England is not considered necessary in this circumstance. Medipark Site SINC and Harefield Green Pond SINC lie within 200m of the Site.
Other Species	The Site contains habitat suitable for other species, such as hedgehog, which may utilise the woodland for shelter and foraging.
Data Validity (Surveys)	Survey data collected remains valid for 24 months, based on best practice guidelines from CIEEM (2019). This validity period is accepted because populations of species such as bats, and flora typically remain stable over short time frames. Unless there are significant habitat changes, previous findings remain relevant. Similarly, local records and species data from 2024 remain accurate until 2026, as outlined by CIEEM (2019) guidelines for ecological report writing.

1.7 Further Surveys

1.7.1 No further surveys are considered necessary to inform the Construction Environmental Management Plan (CEMP). This conclusion is based on the findings from the Ecological Assessment conducted in September 2025. The assessment demonstrated that the Site is unlikely to support significant populations of protected species, and the habitats present are of low ecological value. Specifically:

- **Bats**: The majority of the trees on-site have been assessed as having negligible potential to support roosting bats.
- **Reptiles and Invertebrates:** Whilst the Site's small area of woodland can support some individual reptiles or common invertebrates, the habitat on Site is not of sufficient quality or size to support large or diverse populations. The conclusions of previous surveys remain valid, with no evidence of significant reptile or invertebrate activity that would necessitate further investigation.

- **Other Species:** The Site provides some suitable habitat for common species such as hedgehog, badger and common amphibians. However, the presence of these species is not considered significant enough to require additional surveys. The woodland provides limited but sufficient resources for these species, and pre-works checks will address any potential impacts on these animals.

1.7.2 Pre-works Checks Justification:

1.7.3 While no further surveys are required, pre-works checks are necessary to ensure compliance with wildlife legislation and to avoid impacts on any protected species that may move into the area between now and the start of construction. These checks will involve:

- Mature tree features that are to be removed may support bat roosting potential. Additional inspections by a suitably qualified ecologist would be required prior to works commencing. It is understood that where feasible trees will be retained with hedgerow features within the scheme design.
- Walkover to confirm the absence of badger setts on Site.
- Walkover surveys to confirm the absence of nesting birds during the breeding season.
- Checks for reptiles and common amphibians in areas where the habitat may support individual reptiles and amphibians, particularly along the Site peripheries and adjacent to the watercourse corridor.
- Hedgehog and other species checks to ensure no individuals are present in the woodland and grassland areas.

1.7.4 These checks will help ensure that the development proceeds in accordance with the CEMP and in compliance with the relevant wildlife protection laws. The absence of significant ecological constraints on the Site, combined with the pre-works checks, ensures that no additional surveys are required at this stage.

1.7.5 This approach aligns with the guidance from CIEEM (2019) and best ecological practices, ensuring that the Site's ecological conditions are fully understood and that the necessary precautions are in place prior to development.

1.7.6 Findings of all pre-works checks will be recorded by the ECoW in a short factual note or photographic log, retained on file and submitted to the client’s project manager.

3. ECOLOGICAL PROTECTION MEASURES

3.1 Overview

3.1.1 This Chapter details the key ecological control and protection measures to be undertaken to ensure:

- No harm comes to faunal species (unprotected species as well as protected and notable species);
- There is minimal habitat loss and disturbance;
- No harm comes to the adjacent habitats;
- Pollution risk is minimised;
- Ecological best practice is followed;
- Conformity with current planning requirements pertaining to wildlife; and
- No breaches of current wildlife legislation.

3.1.2 The following mechanisms will ensure implementation of the protection measures:

- **Ecological Management Team** – an Ecological Management Team will be appointed and will include:
  - Ecological Clerk of Works (ECoW) whose role will include but not be restricted to: writing and approving tool box talks and providing ecological guidance to the Site team.
  - Supervision of works in medium to high-risk zones, delivering tool box talks, ensuring ecological protocol are adhered to and raising quality alerts and stop works (if appropriate) for any non-compliance with ecological protocol/permits.

3.1.3 The Ecological Management Team will report directly to the Site Manager and the Principal Contractor. Any ecological non-compliance identified by the ECoW will trigger a 'Stop-Work' notice until corrective measures are agreed with the Project Ecologist and reinstated

3.1.4 New appointments: If any additional appointments are made to the Ecological Management Team or other relevant roles, this document will be updated within four weeks to include the new contact details and any associated roles and responsibilities, ensuring that the contact information remains current and accurate throughout the duration of the project.

3.1.5 It is understood that the measures set out below will be adapted to accommodate the Construction Management Plan (CMP) which details the location of compounds as well as specific construction activities.

3.2 Generic Safeguarding Measures

3.2.1 Ecological tool box talk:

- To be given to all contractors on site during their site induction making them aware of potential for protected/notable habitats and species, the need for protective fencing and

pollution awareness. This should cover species/species groups relevant to the Scheme/locality such as birds, bats, amphibians, otter, hedgehogs, other fauna and retained habitats within the works areas and adjacent areas.

- Following the tool box talk, site contractors should have sufficient knowledge and confidence to provide a watching brief in low-risk areas and during low-risk operations and know when to contact the ECoW for guidance and assistance.

3.2.2 Pollution:

- The former Pollution Prevention Guidelines (PPG) have been withdrawn while they are being reviewed and updated. Until such time as new guidance becomes available, standard industry best practice in relation to construction sites and dust production/water pollution must be adhered. Pollution control will follow the principles in CIRIA C532 (Control of Water Pollution from Construction Sites) and GPP 5 (Works and Maintenance in or Near Water). Measures to include:
  - Throughout the construction period appropriate spill kits to be readily available at all times.
  - Fuel to be appropriately and safely stored to current construction site standard.
  - Dust damping measures.
- Diffuse pollution prevention: Measures should also address the potential for diffuse pollution from surface runoff carrying silt, oil, or other contaminants into on-site and local watercourses. To mitigate this:
  - Silt fences and sediment traps should be installed in areas where runoff is likely to occur, particularly along the watercourse corridor to prevent sediment entering the brook.
  - Regular monitoring of water quality in on-site and nearby watercourses must be conducted to ensure that pollution controls are effective.
  - Vegetative buffer strips and drainage management should be established to capture and filter runoff before it reaches any aquatic environments on-site and adjacent to Site.

3.2.3 These measures ensure a comprehensive approach to managing both point-source and diffuse pollution risks during construction activities.

3.2.4 Works between sunset and sunrise:

- Night-time working should be avoided wherever practicable. Where unavoidable, prior written approval from the ECoW is required and a controlled lighting strategy will be implemented in accordance with ILP GN08:2023. The ECoW will undertake a pre-works assessment to identify sensitive nocturnal species and will supervise critical night operations

3.2.5 Overnight work planning: In cases where overnight work cannot be avoided, approval from the ECoW is required. The following mechanisms will be implemented to ensure ecological protection and compliance with environmental protocols:

- Pre-works ecological assessment: The ECoW will conduct an assessment of the Site prior to any planned overnight works, identifying sensitive ecological areas (such as bat roosts, nesting birds, or habitats supporting nocturnal species) that may be impacted by light, noise, or other disturbances.
- Controlled lighting strategy: A controlled lighting plan will be developed and approved by the ECoW, ensuring that artificial lighting is minimized and directed away from sensitive ecological areas. The use of low-intensity, downward-facing lights, and motion-sensor lighting will be encouraged to reduce the impact on wildlife, especially nocturnal species such as bats.
- ECoW supervision: The ECoW will be on-site during critical overnight work periods to monitor compliance with the approved ecological protection measures. Should any unexpected ecological issues arise (e.g., disturbance to protected species), the ECoW will have the authority to issue a "stop work" order until the issue is resolved.
- Ecological toolbox talks: Prior to overnight works, the ECoW will deliver toolbox talks to the construction team to ensure all personnel are aware of the ecological sensitivities on-site and the specific measures in place to protect them.

3.3 Nature Conservation Sites

3.3.1 The Site is situated within the Impact Risk Zone (IRZs) of Ruislip Woods Site of Special Scientific Interest (SSSI) and Old Park Wood SSSI. The development proposals for the Site do not fall under activities that are identified as potential risks to the integrity of the SSSIs therefore coordination with Natural England is not considered necessary in this circumstance.

3.3.2 No statutory designated sites are considered likely to be directly affected by the proposed plans due to the nature of the works and intervening landscape between the Site and the designated sites.

3.3.3 Medipark Site SINC and Harefield Green Pond SINC lie within 200m of the Site. General habitat and environmental protection measures will be adhered to as set out in this CEMP to ensure no indirect impacts to nearby retained habitats/ nature conservation sites.

3.4 Habitats – Retained and Adjacent to Site

3.4.1 RISK AREAS: Retained habitat areas are present within the works area, including modified grassland

3.4.2 AIM: To ensure no direct or indirect impacts occur to the retained habitats or those adjacent to Site.

3.4.3 RATIONALE:

- To protect the integrity of retained and adjacent habitats.

- To ensure no long-term/delayed damage occurs to habitats.

3.4.4 APPROACH:

3.4.5 Temporary protective fencing (Heras or similar) will be erected at least 2 m from the canopy/dripline of retained trees. Root Protection Areas (RPAs) shall remain undisturbed, with no storage, compaction or discharge within the fenced zone

3.4.6 Air and waterborne pollution:

- Standard industry best practice in relation to construction sites and dust production/water pollution will minimise impacts to retained/adjacent habitats, as outlined in Section 3.2 above.

3.5 Badger

3.5.1 Whilst the Site offers limited potential to support significant badger territories, a precautionary approach is recommended to avoid the risk of harm to individual badger that may commute through/around the peripheries of the Site.

3.5.2 RISK: Works footprint.

3.5.3 AIM: To minimise disturbance to badgers that may commute through/around the Site and to implement measures to avoid direct harm to badger.

3.5.4 RATIONALE:

- To safeguard direct harm and indirect disturbance to badgers.
- To ensure wildlife legislation (notably Protection of Badgers Act 1992 and Wild Mammals (Protection) Act 1996 is not breached).

3.5.5 APPROACH:

3.5.6 Prior to works commencing the full Site area will be checked by the Ecological Clerk of Works for the presence of badgers to ensure no badger activity areas are present. Search area to extend 30 - 50 m beyond the works footprint.

3.5.7 Should an active badger sett be in close proximity to proposed works areas (e.g. drainage works) then the ECoW will advise on measures to minimise disturbances to allow works to proceed. If such measures are not possible then a badger disturbance licence may be required for small sections of the work, to be facilitated by the ECoW.

3.5.8 General protection measures during construction shall include:

- Any trenches and excavations must be covered at night and when construction staff are not present, or a means of escape must be provided for any animals that may fall in. Escape ramps should be no greater than an angle of 45°. Covering trenches and excavations is preferable as harm may come to some animals if they fall in; risk of harm is greater with

trenches/excavations over 1 m deep and if water collects. Trenches to be checked for trapped animals at the start of each day.

- All pipes must be capped or covered at night and when construction staff are not on Site to prevent badgers (and other fauna) entering and becoming trapped.
- Conditions should not be created that may be utilised by badger, e.g. piles of soft earth. If such features are unavoidable, they should be appropriately fenced to prevent badgers gaining access.
- If any active sett is found within 30 m of the works footprint, Natural England must be consulted and, if disturbance cannot be avoided, a Badger Development Licence will be obtained before works continue

3.6 Bats

3.6.1 The Site offers moderae potential for foraging and commuting bats due to the presence of deciduous woodland on Site. The Site supports a number of mature trees however no potential roosting features were recorded; however, a few trees were recorded with small amount of ivy cover. Pre-work checks are necessary to assess bat roosting potential prior to removal.

3.6.2 RISK AREAS: Woodland and mature trees within the Site.

3.6.3 AIM: To minimise disturbance to bats that may be using key habitat areas for commuting, foraging and roosting.

3.6.4 RATIONALE:

- To safeguard direct harm and indirect disturbance to bats.
- To maintain the favourable conservation status of bats on Site.
- To ensure wildlife legislation (notably Wildlife and Countryside Act 1981 as amended and European Legislation) is not breached.

3.6.5 APPROACH:

3.6.6 Mature tree features:

- The Ecological Clerk of Works (ECoW) will maintain precautionary checks on any mature tree features scheduled for clearance to ensure that no potential bat roosting features are present before works proceed. This approach ensures compliance with wildlife legislation and minimises any potential impact on bats, even in the absence of confirmed roosts.

3.6.7 Lighting:

- No temporary lighting will be directed toward retained treelines, woodland or watercourse corridors.
- Luminaires will be fitted with hoods, cowls or louvres to maintain lux levels < 1 at habitat edges.
- Warm-white LEDs (< 2700 K) will be used where lighting is unavoidable; and

- No additional flood lighting to be used between sunset and sunrise without agreement with the Ecological Clerk of Works.

3.7 Nesting Birds (general)

3.7.1 RISK AREAS: Existing vegetation within and immediately adjacent to the works footprint.

3.7.2 AIM: To ensure birds are not utilising the vegetation within/immediately adjacent to works for nesting.

3.7.3 RATIONALE:

- To safeguard direct harm and indirect disturbance to nesting birds.
- To ensure wildlife legislation (notably Wildlife and Countryside Act 1981 as amended) is not breached.

3.7.4 APPROACH:

3.7.5 Large scale vegetation clearance works should aim to avoid the core nesting season (March to August inclusive).

3.7.6 Works affecting or in proximity to woodland during the core nesting season will require the following:

- Immediately prior to works commencing (within 48 hours) an inspection by the ECoW to check for any evidence of nesting or nest building birds including ground nesting bird checks. If evidence is found, works may be delayed. No works will recommence until the ECoW confirms fledging completion and issues written clearance

3.7.7 If nesting birds are found at any stage during construction works:

- All works that are likely to cause disturbance and/or are within the zone of influence of the birds MUST stop immediately and not re-commence until advice has been received from the Ecological Clerk of Works (ECoW).
- A buffer zone should be established around the active nest to avoid disturbance. The size of the buffer zone will depend on the species, location, and sensitivity of the nest. Typically, a minimum exclusion zone of 5-10 meters is recommended for small, common species, but larger zones may be required for more sensitive or protected species, such as raptors or ground-nesting birds. For example, ground-nesting birds or Schedule 1 birds under the Wildlife and Countryside Act 1981 may require buffer zones of up to 50 meters or more.
- The ECoW will assess the situation based on the species, stage of nesting, and proximity to the works. Depending on this assessment, an exclusion zone will be established and works within this zone will either be stopped or restricted until the nesting is complete and the young have fledged. Signage and fencing may be erected around the exclusion zone to ensure compliance with the ecological protocols.

3.8 Reptiles

3.8.1 RISK AREAS: High risk areas – woodland

3.8.2 AIM: To protect reptiles from harm during Site clearance and construction works and to ensure that sufficient quality, quantity and connectivity of habitat is provided to accommodate reptiles on the Site with no net loss of the local reptile conservation status.

3.8.3 RATIONALE:

- To safeguard direct harm to reptiles.
- To ensure wildlife legislation (notably the Wildlife and Countryside Act 1981 as amended) is not breached.

3.8.4 APPROACH:

3.8.5 Mitigation measures in relation to loss of habitat areas known to support reptiles will include:

3.8.6 Displacement:

- Where only small areas of low value habitat areas are being affected, mitigation works will include the displacement of reptiles from work areas into adjacent retained habitats. This will be achieved through a gradual reduction of vegetation in a phased and directional manner, pushing reptiles toward safer areas.
- This approach is particularly relevant in low-risk areas, where the presence of reptiles is possible but not confirmed. By adopting this method, the risk to reptile populations is minimised, ensuring they are safely displaced rather than harmed.
- Such works would be conducted during the reptile active period (March to October inclusive). Where temperatures fall below 10 °C or prolonged wet/cold conditions persist, clearance will be postponed to avoid hibernation risk ensuring that reptiles can move freely and are not hibernating when displacement occurs.
- The works will include the following stages:
    - Site walkover and fingertip search: Prior to vegetation clearance, the Ecological Clerk of Works (ECoW) will conduct a detailed walkover and fingertip search of the area to locate any refuges or signs of reptiles. This will involve checking under stones, logs, and other features where reptiles may be hiding.
    - Removal of refugia: Any artificial or natural refuges, such as log piles or stones, will be carefully removed to prevent harm to reptiles and allow them to move to safer areas.
    - Vegetation cutting: Where tall vegetation (any vegetation over 200 mm) requires removal as part of preparation for construction, this will be removed under an ecology watching brief. The initial cut will involve reducing vegetation height in a phased manner to encourage reptiles to move away from the work area after an initial search. This first cut will be done at a height of approximately 150mm, ensuring that reptiles are not harmed during the process.

- Re-searching the area: After the first cut, the area will be re-checked for any remaining reptiles using fingertip searches. Any reptiles found will be carefully relocated to suitable habitats.
- Final cut to ground level: Once the area has been cleared of reptiles, a final cut to ground level will be performed to prepare the area for construction. This will be done with careful supervision by the ECoW to ensure no reptiles are present.

- All vegetation clearance and displacement works will be planned and overseen by the Ecological Clerk of Works (ECoW)

3.8.7 Ecological Clerk of Works:

- The Ecological Clerk of Works will review the works area with the Site Manager with regard to risk to reptile species and will apply the most appropriate approach with regard to the level of mitigation required. This would need to consider the Site clearance programme and seasonal timing constraints.

3.9 Stag Beetle

3.9.1 RISK AREAS: High risk areas – woodland

3.9.2 AIM: To protect stag beetles from harm during Site clearance and construction works and to ensure that sufficient quality, quantity and connectivity of habitat is provided to accommodate stag beetles within the Site with no net loss of the local conservation status.

3.9.3 RATIONALE:

- To safeguard direct harm to stag beetles
- To ensure wildlife legislation (notably the Wildlife and Countryside Act 1981 as amended) is not breached.

3.9.4 APPROACH:

3.9.5 Mitigation measures in relation to loss of habitat areas known to support stag beetles will include a hand search and precautionary approach.

- The works will include the following stages:
  - Site walkover and fingertip search: Prior to vegetation clearance, the Ecological Clerk of Works (ECoW) will conduct a detailed walkover and fingertip search of the area to locate any refuges or signs of stag beetles This will involve checking under stones, logs, deadwood and other features where stag beetles may be hiding.
  - Removal of refugia: Any artificial or natural refuges, such as log piles or stones, will be carefully removed to prevent harm to stag beetles and allow them to move to safer areas.
- All vegetation clearance and displacement works will be planned and overseen by the Ecological Clerk of Works (ECoW)

- Where practicable, suitable deadwood (free from disease and safe to handle) will be retained or repositioned within retained woodland margins to provide ongoing stag beetle breeding habitat

3.10 Other Fauna

3.10.1 RISK AREAS: Works footprint.

3.10.2 AIM: To ensure no common and widespread and highly mobile fauna (e.g. common amphibians, foxes, rabbits, small rodents, invertebrates and hedgehogs) are inadvertently harmed during Site clearance.

3.10.3 RATIONALE:

- To safeguard direct harm to common/ widespread/ highly mobile fauna.
- To encourage natural vacation of animals out of the area and also enable any hidden refugia to be identified and subsequently dismantled if deemed necessary.
- To ensure wildlife legislation (notably Wild Mammals (Protection) Act 1996) is not breached.

3.10.4 APPROACH: Dependant of timing of works but likely to involve the following (this method is consistent with other vegetation clearance approaches for other fauna groups, e.g. reptiles and birds and will run in tandem where necessary):

3.10.5 Phase 1:

- Site walkover and fingertip search: Before any vegetation clearance begins, the Ecological Clerk of Works (ECoW) will conduct a detailed Site walkover. This involves a thorough visual inspection of the area to identify any potential wildlife or signs of activity, such as reptile basking spots, mammal burrows, or bird nests. The walkover will also identify potential refuges like log piles, rocks, or dense vegetation where animals might be hiding. A fingertip search will be conducted alongside the walkover, where the ECoW carefully inspects under stones, logs, and other debris to ensure no animals are sheltering. Any animals encountered, such as small mammals, reptiles, or amphibians, will be carefully relocated to suitable habitats away from the construction area.
- Removal of refugia: Any natural or artificial refugia, such as log piles, rocks, or other debris, will be carefully dismantled by hand. The use of hand tools is crucial to avoid accidentally harming any animals hiding in these features. Each item will be moved cautiously, and the ground beneath will be thoroughly checked for any fauna. Any animals discovered will be safely relocated to an adjacent retained habitat. This step ensures that no animals are left behind in areas where construction work will take place.
- Vegetation cutting – first cut: Once the Site has been inspected and cleared of fauna, the first cut of the vegetation will begin. The vegetation will be cut down to a height of approximately 150mm to encourage any remaining animals to move toward safer, retained habitat areas. This initial cut is done gradually and in a phased and directional manner, meaning that the vegetation is cleared in one continuous direction. This allows any fauna

to escape ahead of the clearance work. The phased approach is important because it gives animals time to move away without being trapped or harmed. All cut vegetation will be immediately removed from the Site to prevent animals from seeking shelter in the debris.

- Re-search the area: After the first cut, the area will be re-checked for any remaining animals. This will involve another fingertip search, similar to the initial inspection, to ensure that no fauna remains within the vegetation. The ECoW will carefully inspect the ground and any remaining cover to ensure that the Site is fully cleared before proceeding to the next phase.
- Vegetation cutting – final cut to ground level: Once the area has been confirmed to be clear of fauna, the vegetation will be cut down to ground level. This ensures that no habitat remains that could attract animals back into the area before construction begins. The final cut prepares the Site for construction while ensuring that no animals are displaced at this stage. The ECoW will supervise this process to ensure compliance with ecological protocols and wildlife legislation.
- Hedgehog:
    - If active hedgehogs are encountered, works that are likely to cause disturbance and/or within the zone of influence of the hedgehog must stop, and the ECoW must be consulted. The ECoW will assess the situation and, if required, carefully move the hedgehog by hand to nearby retained habitat away from the construction area.
    - If a hibernating hedgehog is encountered (typically November to February), works must stop immediately. The ECoW will assess whether the hedgehog can remain in situ. If the hedgehog can be left in place, its nest will be carefully re-covered, and food/water will be provided as a precaution should the hedgehog awaken. The ECoW will monitor the situation until it is evident that the hedgehog has moved on. If necessary for urgent clearance works, the ECoW will carefully relocate the hedgehog along with its nesting material to an appropriate location, ensuring habitat connectivity is maintained. Food and water will be left at the relocation site as a precaution.
    - Any relocated hedgehogs will be logged with date/time and location coordinates; the ECoW will undertake a follow-up inspection within 48 hours to confirm safe dispersal

3.10.6 Phase 2:

- Second check for presence of common/widespread/highly mobile fauna. Any animals present to be removed to a place of safety following best practice at the time (see above for hedgehog requirements).
- Vegetation to be cut to ground level.

3.10.7 Phase 3:

- Vegetation to be maintained short at ground level until works commence within the area to ensure that it remains unfavourable for common/widespread/highly mobile fauna that may re-disperse into the area. Use of appropriate/approved herbicide may be acceptable; to be determined by the Ecological Manager/Landscape Architect at the time. If vegetation starts

to grow the area will need to be re-checked for the presence of fauna before works commence.

3.10.8 Throughout construction period:

- Creation of habitat that fauna (including small animals, reptiles/amphibians) may use for refuge, e.g. piles of construction material or loose-packed spoil on edges of construction zones, to be avoided.
- If evidence of specifically protected species comes to light during the development then works that are likely to cause disturbance and/or within the zone of influence of the animals should stop until advice has been sought from the Ecological Clerk of Works.

4. SUMMARY OF PROTECTION MEASURES

4.1 Summary of works

4.1.1 Table 4.1 provides an over-view summary of protection measures required to safeguard wildlife and habitats within and in the immediate environs of the proposed works. This Table must not be read/used in isolation; it is a brief summary of the specific details and protection measures detailed in Section 3.

Table 4.1 Summary of Protection Measures And The Stages of Works That They Are Implemented

Measure	Before any work on Site	Before any works to grassland or ruderal	Before any works in proximity to trees/shrub	Throughout works period
Toolbox talks				3.1 (ECoW required)
Pollution prevention				3.2, 3.4
Works to be avoided between sunset and sunrise				3.2, 3.6, 3.8, 3.10 (ECoW required if necessary)
Erect protection fencing around retained habitats/trees/water courses	3.4, 3.8, 3.9 (ECoW required to monitor)			
No access/plant storage/material storage in fenced-off areas				3.4 (ECoW to monitor compliance)
Controlled habitat reduction	3.8, 3.9, 3.10 (ECoW required)	3.8, 3.9, 3.10 (ECoW required)	3.8, 3.9, 3.10 (ECoW required)	
No creation of temporary features that may be used by fauna for refuge				3.5, 3.8, 3.9 and 3.10 (ECoW to monitor)
Check for nesting birds	3.7 (ECoW required)	3.7 (ECoW required)	3.7 (ECoW required)	
Use of flood lights to be avoided				3.6 (ECoW to assess impact)
Escape ramps/covering trenches/excavation /capping/pipes etc.				3.5 (ECoW to ensure compliance)
Daily check for fauna, notable trenches, pipes etc.				3.5 (ECoW required for ongoing monitoring)

Notes
Numbers refer to sections in Chapter 3 of the current document
* To be provided to all staff working on Site (incorporated into general induction process where possible)

4.2 Responsible Organisations

4.2.1 NHS, Royal Brompton and Harfield Hospitals, Part of the Guy and St. Thomas NHS Foundation Trust and their appointed contractors shall be responsible for managing the landscape and ecology matters around the Site and their land. This shall be carried out under the expert guidance of BMD Ecology.

4.2.2 This CEMP forms a live document. It shall be reviewed by the Ecological Clerk of Works during active construction and updated where design changes, phasing alterations, or unforeseen ecological issues arise. Revisions will be logged and circulated to the Principal Contractor and Local Planning Authority as part of the project's environmental compliance process.

5. GLOSSARY

5.1 Scientific Terms and Acronyms

CIEEM *Chartered Institute of Ecology and Environmental Management, the professional organisation and provider of professional codes of conduct for ecological consultancy.*

LBAP *Local Biodiversity Action Plan.*

Level of protection – "EU" *Protected under the Conservation of Habitats and Species Regulations (2017). "UK": Protected under the Wildlife and Countryside Act 1981 (as amended).*

LWS *Local Wildlife Site. Non-statutory designation.*

Notable species *A species which is listed as a UK Priority Species, carries an unfavourable conservation status (e.g. scarce, rare, threatened, Red-listed), is invasive or is otherwise worthy of note from an ecological perspective.*

Protected species *A species which is protected under specific UK or European legislation, including Habitats Directive, Wildlife and Countryside Act.*

S41 Habitat / Species *See UK Priority Habitat / species.*

UK Priority Habitat / species *A habitat or species identified as a priority for conservation in accordance with Section 41 of the Natural Environment and Rural Communities Act (2006). Section 40 of the Act places a duty on public authorities to have regard for the conservation objectives of these habitats / species.*

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6.1 Scientific Names

6.1.1 Scientific names of species mentioned in this report are outlined in Table 6.1.

Table 6.1 Scientific names of species mentioned within this report

English Name	Scientific Name
Amphibians	
Common toad	*Bufo bufo*
Great crested newt	*Triturus cristatus*
Invertebrates	
Stag Beetle	*Lucanidae*
Mammals	
Badger	*Meles meles*
Bat	*Chiroptera sp.*
Fox	*Vulpes vulpes*
Hedgehog	*Erinaceus europaeus*
Rabbit	*Oryctolagus cuniculus*

APPENDICES

A. RELEVANT WILDLIFE POLICY AND LEGISLATION

A.1.1 Table A1.1 provides a summary of wildlife legislation and policy of relevance to development at the Site. Detailed descriptions of the legislation and national policy of relevance to ecology during the planning process are provided in a separated document produced by BMD which is available on request.

Table A1.1 Overview of species/groups relevant to the current proposals and associated legislation/policy

Species / group	European	UK[1]	Priority Species / habitat[2]
Amphibians	Species-dependent	Species-dependent	Incl. common toad
Bats (all species)	✓	Full	Species dependent
Birds		Full	Species dependent, incl. red kite
Invasive species	✓	✓	Various
Invertebrates	Species-dependent	Species-dependent	Various
Mammals (general)		Species-dependent	Incl. hedgehog & brown hare
Reptiles (excluding sand lizard and smooth snake)		Partial – including killing and injury	✓
Plants	Species-dependent	Species-dependent	Various

Notes
[1] Principally the Wildlife and Countryside Act (Full = full protection; partial = partially protected). ✓= covered by other specific legislation.
[2] Includes over 900 species listed in accordance with Section 41 of the NERC Act (2006). Species known or most likely to utilise the Site are listed here.

A.1.2 Key planning policies/documents are:

- The Environment Act (2021);
- Schedule 7a of the Town and Country Planning Act (1990)
- The National Planning Policy Framework (2025); and
- The Natural Environment and Rural Communities (NERC) Act (2006).

A.1.3 Table A1.2 lists the specific legislation of relevance to species that may be impacted by the current works. The Countryside and Rights of Way Act 2000 strengthened the Wildlife and Countryside Act so has not been listed separately where a species is covered by the latter.

Table A1.2 Relevant species legislation for the current works

Species / group	Legislation [see notes]													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Amphibians									✓	✓				
Bats (all species)					✓		✓		✓	✓				✓
Birds (nesting)		✓	✓							✓				
Invasive species								✓			✓	✓	✓	
Hedgehog							✓			✓				✓
Plants										✓				
Reptiles						✓				✓				
Mammals - general														✓

Notes

1. Protection of Badgers Act 1992
2. Wildlife and Countryside Act, 1981 (as amended) – Part 1
3. Wildlife and Countryside Act, 1981 (as amended) – Schedule 1 (some species, none recorded within the Site)
4. Wildlife and Countryside Act, 1981 (as amended) – Schedule 5, Section 9
5. Wildlife and Countryside Act, 1981 (as amended) – Schedule 5, Section 9(4b, 4c) and (5)
6. Wildlife and Countryside Act, 1981 (as amended) – Schedule 5, Section 9(1, in respect of killing and injuring) and (5)
7. Wildlife and Countryside Act, 1981 (as amended) – Schedule 6, Section 11
8. Wildlife and Countryside Act, 1981 (as amended) – Schedule 9, Section 14
9. Conservation of Habitats and Species Regulations 2017 (as amended) – Schedule 2 (European protected species)
10. Natural England and Rural Communities Act (2006) – Section 40, various species listed in accordance with Section 41
11. Invasive Species regulations: EU Regulation (1143/2014) on invasive alien (non-native) species
12. Anti-social Behaviour, Crime and Policing Act 2014
13. Environmental Protection Act 1990
14. Wild Mammals (Protection) Act 1996

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