



Environmental Risk Assessment

Radlett SFRI Area 2

January 2024

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Comments

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1. Introduction

1.1 The Brief

Waterman Infrastructure & Environment Limited (“Waterman”) has been appointed to prepare an application for an Environmental Permit (EP). The EP application is to authorise the permanent deposit of waste on land as a recovery activity. The waste recovery activity is for site-derived waste to be used in the construction of landscape bunds associated with the construction of the Radlett Strategic Rail Freight Interchange (SRFI), located at North Orbital Road, Upper Colne Valley, Hertfordshire, AL2 2ET – specifically the two landscape bunds on Area 2.

SEGRO Radlett Ltd is the master developer – the party responsible for bringing the scheme to fruition. It has appointed VolkerFitzpatrick Limited (VFL) to undertake the earthworks including bund construction and other enabling activities. VFL is therefore the EP applicant and will be the EP operator.

An Environmental Risk Assessment (ERA) is required to support the waste recovery EP application.

1.2 Context

Through the Radlett SRFI scheme SEGRO Radlett Ltd proposes to develop an intermodal terminal, with rail and road distribution units. The SRFI is located to the south of St. Albans, adjacent to the M25 and Midland Main line (MML) railway. The terminal will be serviced by a new dual track rail chord connected to the MML.

The SRFI comprises a 419-hectare (ha) development area that is sub-divided into eight plots referred to as Areas 1 to 8. The areas have the following proposed uses:

- Areas 1 (146 ha) and 2 (26 ha) – the SRFI Development Area. Area 1 will comprise an intermodal terminal and a rail and road served distribution facility consisting of several large warehouses. The rail chord connecting Area 1 to the MML will run through Area 2. Area 2 will also feature two landscape bunds (LS1 and LS2) that will help to screen the SRFI from public view and provide acoustic screening; and
- Area 3 to 8 (247 ha) – will be developed with additional works and landscaping to provide publicly accessible open land and a community forest.

The Areas are shown on plan “Different Development Phases (Areas 1 – 8) of the SRFI” (D-ESSD1A - drawings are to be found in the separate “ESSD drawings and information bundle”).

To enable construction of the SRFI, earthworks are required to prepare the SRFI Development Area as summarised below:

Area 1

Earthworks material will be excavated from the northern half of Area 1 where the levels need to be lowered to enable access from the public highway to the north, to install surface water flow attenuation features and to create suitable development platform levels. The cut will be used to raise levels across the southern half of Area 1, to construct landscape bunds around the perimeter of Area 1 and to construct the landscape bunds on Area 2.

Area 2

Excavation is required in Area 2 to construct the new rail chord linking the MML and the SRFI – the rail chord needs to pass under the MML. Some of the excavation will be into historic landfill, with the waste arising to be processed by mobile treatment EP to generate useable earthworks material (i.e. meeting the specification for the works) with the unusable waste despatched for recovery or disposal elsewhere. The waste recovered from processing the historic landfilled waste as well as restoration soils and capping

material from Area 2 and excavation arisings cut from Area 1 will be used to construct the landscape bunds on Area 2.

The cut and fill locations across Areas 1 and 2 are shown on plan “Earthworks Analysis Cut and Fill Volumes” (D-ESSD4A).

Regulatory Control of Earthworks

Pre-application liaison has been undertaken with both local (Hertfordshire and North London) and national (Permitting Support Centre) EA teams, seeking to establish the waste / non-waste status of various excavation arisings and the appropriate mechanisms to regulate the use of the arisings as earthworks materials. Aspects of this liaison are not concluded at the time of writing.

The southern part of Area 1 has been subject to mineral extraction and restoration. The land is recorded in Landmark data as “EA historic landfill polygon” and “LA recorded landfill site”. If the restoration material can be demonstrated to comprise overburden and interburden from the mineral extraction activity, excavation arising generated from that area will be excluded from the scope of waste. In that case, the reuse of such material will be managed under the Definition of Waste Development Industry Code of Practice (DoWCoP) in order to maintain an auditable record of the materials use within the earthworks. If the non-waste status of such material cannot be demonstrated / agreed, the arisings would be managed as waste. The local EA team has been provided with evidence to support non-landfill history of the southern part of Area 1 and the information has been passed forward to the EA team responsible for maintaining the historic landfill dataset with a request that the record is removed.

Natural soils and Made Ground will arise from excavation into the northern part of Area 1 – i.e. from land outside the historic mineral workings. Whilst natural soils excavated and able to be used in construction on the same site are excluded from the scope of waste, their use in earthworks on this scheme would be managed under the DoWCoP, as would the use of Made Ground.

The arisings from excavation into the historic landfill in Area 2 will be waste. The arisings will be treated under mobile treatment EP and the useful products of treatment will retain their waste label until their permanent deposit into earthworks, regulated by waste recovery EP. For the avoidance of doubt, the treatment will not be regulated by the site-based waste recovery EP.

Due to the unsettled status of the material to be cut from the mineral restoration area in Area 1, the waste recovery EP will include both bunds on Area 2. The permitted area boundary is limited to the areas occupied by landscape bunds LS1 and LS2 and is shown on plan “Area 2 Bunds Waste Recovery Area Boundary” (D-ESSD1C). The boundary for Area 2 is shown on plan “Site Location Plan” (D-ESSD1B).

1.3 Report Structure and Scope

The EP application requires an ERA. This ERA has been developed using relevant EA guidance¹, and Waterman’s standard approach to conducting an ERA for an EP application.

A Dust and Emissions Management Plan (DEMP – RAD-WAT-A2EX-XX-RP-I-0033) has also been submitted with the EP application. The dust and particulates risk assessment is presented in the DEMP rather than in this ERA, along with detailed dust prevention and mitigation measures.

Reference documents

Technical information pertaining to the Radlett SFRI Scheme has been utilised where appropriate. Including but not limited:

- data and analysis from ground investigation;

¹ Risk assessments for your environmental permit - GOV.UK (www.gov.uk) (accessed June 2023)

- documents required to fulfil planning conditions (in particular the Construction Method Statement² (CMS) submitted as details pursuant to Condition 14 of outline planning permission 5/09/0708);
- specification for material suitable for use in the earthworks;
- the planning applications for the scheme;
- waste classification analysis; and
- Conceptual Site Model, Environmental Setting and Site Design Report with associated drawings bundle (RAD-WAT-A2EX-XX-RP-I-0028 prepared by Waterman and submitted as part of the EP application).

Risks to controlled waters from the use of waste are considered in the Hydrogeological Risk Assessment (HRA – RAD-WAT-A2EX-RP-I-0029) and risks to human health and the environment from ground gases are covered in the Gas Risk Assessment (GRA – RAD-WAT-A2EX-XX-RP-I-0030), both of which may be found elsewhere in the EP application bundle. This ERA report focuses on localised emissions with the potential to cause nuisance or amenity issues or health impacts to the various human receptors nearby (e.g. residents, school pupils, workers, visitors). Ecological and arboricultural receptors immediately surrounding Area 2 are also considered. Particular consideration is given to protected species within Area 2. This ERA also considers accidents with the potential to cause pollution of controlled waters.

VFL's general and environmental management policies and procedures are in place for the Radlett SFRI Scheme and will be applied as appropriate to Area 2 and the permitted activity. VFL's relevant documents are included elsewhere in the application bundle.

1.4 Limitations and Constraints

Waterman has endeavoured to assess all information provided to them during the preparation of this document. But makes no guarantees or warranties as to the accuracy or completeness of this information.

The conclusions resulting from this report are not necessarily indicative of future conditions or operating practices at or adjacent to the site.

² Construction Method Statement, April 2017 prepared on behalf of Helioslough Limited.

2. Site Location and Setting

2.1 Location and Surrounds

The permitted area is situated within Area 2 of the Radlett SFRI Scheme, at approximate address North Orbital Road, Upper Colne Valley, Hertfordshire, AL2 2ET, centred at approximate National Grid Reference TL 16114 03242. The waste recovery EP boundary is shown on D-ESSD1C. The Radlett SFRI development areas are shown on D-ESSD1A. The various land-uses around Area 2 including receptors potentially sensitive to emissions from the activities on Area 2, are shown on D-ESSD2A. The local wildlife sites (LWS) in the vicinity of Area 2 are shown separately on D-ESSD2F. The drawings are to be found in the “ESSD drawings and information bundle” submitted with the EP application.

The northeast of Area 2 is bordered by agricultural land and the Napsbury Park residential area. To the east lies more agricultural land and the River Colne. The southern boundary is adjacent to the M25 London Orbital Motorway, further south is a mix of woodland, small lakes, grassland and a commercial / industrial business park. The western side is flanked by the Midland Main Line (MML), beyond which is an expanse of grassland (Area 1 of the SRFI).

2.2 Site Layout and Infrastructure

Site and compound layout plans for Area 1 and Area 2 showing the location of the site compound and welfare offices, site entrance points and security features are provided in the drawings bundle submitted in support of the EP application (D-ESSD6E-H). The compounds are sized to enable mobile plant to be parked up out of hours and to accommodate fuel storage.

VFL has access to 2No. mains water hydrants. Located at the site compound in Area 1. VFL has appropriate keys and standpipes to use the hydrants. Access to the hydrants is available at all times.

Additional water for dust suppression may be available from lined pond(s) installed to collect stormwater runoff from land drains. This option is currently under consideration.

2.3 Other Potential Emitters in the Local Area

Other potential emitters of emissions such as dust and particulates or noise in the vicinity of Area 2 include:

- local road network in particular the M25 motorway to the south;
- Midland Mainline Railway running north to south between Areas 1 and 2;
- Area 1 (VFL will also be conducting the earthworks on Area 1 at the same time as the earthworks on Area 2); and
- Farmland to the east of Area 2.

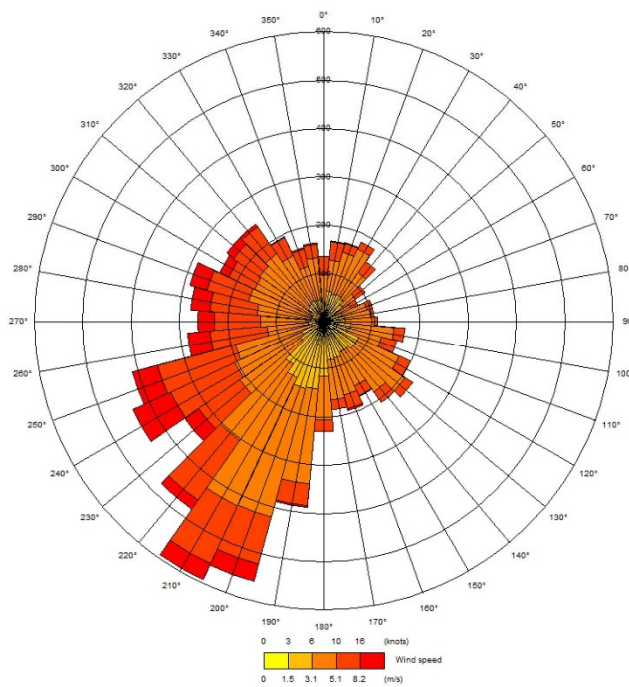
3. Sensitive Receptors

3.1 Receptors Map and Table

A map showing sensitive receptors within a 500m radius from the Area 2 boundary is presented in the drawings bundle submitted with the EP application (D-ESSD2A). Local wildlife sites (LWS) in the vicinity of the site are shown separately on plan D-ESSD2F.

The windrose for Luton Airport is included on the plan D-ESSD2A and reproduced below – it shows prevailing winds from south-south-westerly direction.

Figure 1: Luton Airport Windrose



Specific receptors within a 500m radius of Area 2 are detailed in Table 1.

Table 1: Receptors within 500m of Area 2

Receptor type	North and north-east	East and south-east	South and south-west	West and north-west
Human				
Residential properties	Rosmary Drive, Tamarix Crescent, Beningfield Drive, Goldring Way, Pegrum Drive and other properties extending beyond 500m	Beningfield Drive other properties extending beyond 500m	-	-
Commercial premises (hotels, offices, retail)	Orange Blossom (Wedding Planner),	-	Ventura Park (business park), Express Logistics, Pangaea	-

Receptor type	North and north-east	East and south-east	South and south-west	West and north-west
			Laboratories, The Flooring Hub, JMT Indisplay, DHL	
Industrial premises	-	-	-	-
Public places (squares, parks, places of interest, sports and recreation)	Napsbury Park, Napsbury Pavilion (registered park and garden)	Public footpaths	Public footpaths	-
Community and health centres	-	-	-	-
Places of worship	-	-	-	-
Vulnerable populations				
Hospitals	-	-	-	-
Schools	-	-	-	-
Care homes	-	-	-	-
Other (childcare, convalescent, other medical facilities)	-	-	-	-
Infrastructure and utility				
Transport infrastructure:				
Roads;				
Main and arterial	Various local roads	London Orbital Motorway (M25),	London Orbital Motorway (M25), Midland Mainline, various local roads	Midland Mainline
Local / residential routes				
Railways				
Electricity;				
Cabling	-	-	-	-
Pylons				
Substations				
Gas;				
Above ground networks	-	-	-	-
Gas holders				
Generators, turbines	-	-	Parkbury Power	-
Sensitive built environment (solar panels, air conditioning systems, car parking areas)	-	-	Ventura Park (business park), Pangaea Laboratories, parking off Old Parkbury Lane	-

Receptor type	North and north-east	East and south-east	South and south-west	West and north-west
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Water supply for human consumption	-	-	-	-
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Ecology and arboriculture				
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Bodies of water	Unnamed streams to north east	Unnamed stream on boundary; River Colne	Ponds / lakes to south of M25	Ponds in Area 1 (to be lost to the development)
Habitats (including trees to be retained)	Deciduous woodland	Deciduous woodland	Deciduous woodland	-
Local Wildlife Sites (LWS)	-	Including Arable Field SW of London Colney and Old Parkbury Fishing Lakes	Old Parkbury Fishing Lakes	Quarry at Former Radlett Aerodrome (to be lost to the development)

In view of the prevailing wind direction and location approximately 250m away from the Area 2 boundary, the residential properties at Napsbury Park to the north east are particularly noted.

3.1.1 Protected Species

Ecological surveys conducted in Area 2 in 2023 identified Great Crested Newts (GCN) as present in Area 2. Earlier survey works also identified foraging and commuting bats around Area 2 and birds.

The ponds and hibernacula to be located in the centre of Area 2, as shown on plan D-ESSD5I, will provide habitat for GCN. The ponds will be used to translocate GCN found in Area 1. The ponds will be secured using herpetofauna fencing to prevent the GCN from escaping into the wider Area 2.

Management plans will take into consideration control measures to prevent pollution risks towards this sensitive receptor located within Area 2. The GCN works summarised here are and will be subject to Natural England licensing controls.

Regarding badgers, no setts or other evidence was identified in Area 2 or within 30m of the permitted area. Considering this, general mitigation measures will be adopted during works throughout Area 2. These measures will include regard to potential new sett creation and measures to prevent badgers being trapped in excavations. If badgers or badger setts are discovered any works will take place at appropriate distances away and be supervised by an appropriately licensed individual.

For further information regarding ecological management and mitigation measures refer to the Ecology Method Statement, at Appendix A.

3.1.2 LWS

The following LWS have been identified near the permitted area:

- Arable Field SW of London Colney, immediately east of Area 2;
- Quarry at Former Radlett Aerodrome, located within Area 1; and
- Old Parkbury Fishing Lakes, 100m southeast of Area 2.

These LWS are shown on plan D-ESSD2F.

The sites immediately east of Area 2 and within Area 1 are addressed within the Ecology Method Statement included in Appendix A. The LWS located within Area 1 is entirely within the Radlett SRFI Development Area and will be lost to facilitate the overarching development. The works that will eradicate the LWS will occur simultaneously with the works the subject of the permit. Therefore the Quarry at Former Radlett Aerodrome LWS is not considered further within this report, nor the DEMP. The risks posed to the remaining two LWS are addressed below in Tables 3 - 6.

4. The Operation

4.1 Description of Activity and the Waste

An overview of the activity is provided in section 1.2 above.

The permitted activity is the use of non-hazardous waste in construction of landscape bunds on Area 2. All waste will be site derived. The waste will not need to travel on the public highway to move from source locations to landscape bund locations in Area 2.

Waste will arise from excavation in Area 1 to reduce levels and create surface water flow attenuation features. It will be transported for use as fill in the landscape bunds on Area 2. Only waste meeting the specification for the works without treatment will be used.

Waste will arise from excavation in Area 2 to prepare the route of the rail chord and the footprints of the landscape bunds. Topsoil from across Area 2 and Made Ground outside of the historic landfill footprints will be used in landscape bund construction subject to it meeting the specification for the works without treatment.

Waste will arise from excavation into the historic Napsbury Tip to create the rail chord corridor. This waste will be subject to treatment by separate mobile treatment EP in order to generate a treated waste that meets the specification for the works.

The Waste Acceptance Procedures submitted with the EP application contains further detail on the nature of the various wastes to be used and should be referred to.

Depending on factors such as the earthworks programme and the weather, it may be necessary to stockpile waste pending its use in bund construction. Standard earthmoving and handling mobile plant will be used to load, transport, place and compact the waste as an earthworks material in bund construction.

Following completion of the earthworks, the landscape bunds will be planted.

4.2 Operational Hours

Normal working hours for the Radlett SRFI Scheme are:

- Monday to Friday 06:30 – 20:30;
- Saturday 07:30 – 13:00.

Waste handling activities will not take place outside of the designated hours.

4.2.1 Out of hours

Area 2 will be secured at all times by a combination of staffed and / or locked security gates with compounds secured out of hours with guards and dogs present, including on weekends and bank holidays. Access control will be governed by M-Site system, which will use biometric locks to prevent unauthorised entry.

A day guard will be positioned outside the entrance to Area 2 from Beningfield Drive, with the access locked out of hours. Access from Area 1 will be staffed at all times. See plan D-ESSD6E.

4.3 Plant and Equipment

4.3.1 Mobile plant used in earthworks

The following table lists the type, make and model and emission ratings for typical mobile plant and equipment used on Area 2. A non-road mobile machinery (NRMM) register will be maintained for the duration of the permitted activity.

Table 2: Mobile plant used for recovery activity

Mobile Plant	Make	Model	Emissions standard
45T Excavator	Volvo	EC400e	V
30T Excavator	Hyundai	HX300L	V
22T Excavator	CAT	320-07	V
Dumptruck	Hydrema	912f	V
Dumptruck	Volvo	A25G	V
Dumptruck	Bell	B40E	V
Dumper	Wacker Neuson	DW90	V
Dozer	CAT	D6T	IV
Roller	CAT	CS66B	IV
Loading Shovel	Volvo	L90H	V
Water Tanker	Bell	B30E	IV
Towable Bowser	TBC	TBC	IIIB

Mobile plant on-site will be a combination of leased and owned.

Servicing and maintenance of mobile plant will be undertaken as per the manufacturer's recommendations.

4.3.2 Dust suppression equipment

Dust suppression equipment is addressed in the DEMP.

5. Environmental Emissions

This section outlines the emissions to the environment that could be released by the permitted activity. This information will also include the likelihood of emissions being generated and their respective impacts on receptors. Mitigating and preventative measures for the categories of emissions listed below will also be discussed.

The permitted activity will potentially generate the following fugitive emissions:

- noise;
- dust;
- mud (as a source of dust in Area 2);
- litter;
- pests;
- odour; and
- other fugitive emissions, for example spillage of fuel or fire due to an accident.

In line with EA guidance on conducting a risk assessment, certain environmental risks will be deemed not applicable and excluded. These emission risks include:

- mud and debris on the public highway (waste will all be site derived and will not need to be transported on the public highway);
- litter – the historically landfilled waste will be treated under separate mobile treatment EP – littering items will have therefore been removed from the waste before it is accepted into the waste recovery activity;
- any discharge, for example sewage or trade effluent to surface or groundwater;
- release of bioaerosols, for example from shredding, screening and turning organic waste, or from stack or open point source release such as biofilter; and
- any global warming potential from the activity (due to the duration of the project being less five years).

Some environmental management measures are included in the CMS. These measures have been incorporated into the risk assessments that follow.

5.1 Noise and Vibration

The risk assessment for noise and vibration is presented in Table 3.

It is noted the local noise climate will be dominated by the M25 and MML.

Residential properties are located 600m east and west from Area 2 therefore noise and vibration monitoring will not be undertaken.

5.2 Dust

The dust risk assessment with control measures can be found in Table 3 of the DEMP.

5.3 Pests, vermin and insects

The pests, vermin and insects risk assessment with control measures can be found in Table 4.

Food will not be consumed within or around the permit boundary, which removes a potential food source to attract pests and vermin.

Insects can also find harbourage in standing water. Procedures are in place to prevent infestations from taking hold within Area 2.

5.4 Odour

The odour risk assessment with control measures can be found in Table 5.

Whilst the landfill waste will have been treated, it is considered plausible it could still emit odour.

5.5 Accidents

The accidents risk assessment with control measures can be found in Table 6.

This section covers the unintentional emissions that arise from accidents.

Accidental fugitive emissions sources could include:

- fires; and
- spillages of fuel.

No burning of waste or other fires are allowed in Area 2. Accidental fires are possible but highly unlikely. Potential ignition sources and fuel will be limited to the mobile plant used and litter recovered by the mobile treatment activity (which will be subject to separate EP control). In the event of a fire occurring, the vicinity will be evacuated, and vehicles will be moved away if safe to do so. The emergency services will be called to attend to the fire.

Mobile plant will be active in Area 2, as such the possibility of fuel leakage or spillage exists. The potential risk will be mitigated by preventing mobile plant from parking in Area 2. Activities such as fuel storage and refuelling will only be allowed to occur in other areas.

Routine testing of environmental emergency response is in effect in the Radlett SFRI Scheme. Supporting toolbox talks and event scenarios will be employed to reinforce the need for emergency preparedness. In the event of a serious spillage that is beyond the capacity of VFL site team to manage, a specialist response unit will be deployed within 4 hours to contain and control the spillage.

Site security measures will prevent unauthorised access out of hour to reduce the likelihood of vandalism or arson.

6. Environmental Management Procedures

6.1 General Management Principles

VFL operates a management system certified as compliant with ISO14001:2015. The management system will be applied to the VFL works to be completed to deliver the Radlett SRFI scheme.

6.2 Environmental Incidents

VFL will use record all incidents and the outcomes of investigations. Staff working in Area 2 will be inducted and given toolbox talks on the environmental implications of incidents and the correct manner with which to respond.

Every subcontractor will ensure that all environmental incidents are reported to VFL. Incidents will be investigated by a responsible manager who will receive the full co-operation of all subcontractors involved. In the event of a major incident, a report will be written from compiled witness statements and photographic evidence will be used to assist in the investigation. Incidents will be reported to relevant regulatory authorities as required.

Example environmental incidents include:

- chemical, fuel or oil spills or leakages; and
- breach of noise, air quality or dust limits.

Spillages of fuel from plant and vehicles will be dealt with in accordance with the appropriate cleaning up / emergency procedure, as directed by the Works Manager and/or Technically Competent Manager. The VFL procedure³ and guidance⁴ is included in the VFL bundle.

6.3 Staff Training

The site induction will address the environmental risks present and site specific training will also be adapted to best mitigate these risks. The need for site specific training is currently anticipated to be limited to asbestos awareness training.

Supplementary toolbox talks will be delivered to staff to compliment the site induction. These talks or briefings will address a range of topics and will be given throughout the project duration, as necessary. Topics that will be included in the toolbox talks are:

- contaminated land;
- general project environmental requirements;
- implementing BPM (noise and dust);
- waste management and storage;
- protected species protection; and
- water conservation and management.

A training record will be maintained for all staff and subcontractors.

6.4 Site Environmental Inspection

The Works Manager/Foreman will be responsible for daily surveillance of the Area 2. The Technically Competent Manager and Environmental Advisor will be responsible for surveillance of Area 2 on a weekly and monthly basis respectively. This will take the form of regular site inspections to monitor compliance.

³ EG03 – Environmental Protection and Incident Response

⁴ EG03–G01 – Environmental Incident Response Guidance

The Environmental Inspection procedure⁵ is provided in the application bundle submitted in support of the EP application.

Daily, weekly, and monthly inspections will be conducted to ensure compliance with legal requirements including EP conditions, the CMS and ancillary management plans such as the DEMP. The checks will include but are not limited to:

- visible, audible or olfactory emissions and pollution;
- Area 2 boundaries (including the boundary of the perimeter hoardings and haul roads, checking security and whether any noise or dust are present);
- checking the integrity of the barrier fencing around the GCN habitat (plan D-ESSD5I);
- stockpiles are orderly and as they should be; and
- stormwater and run-off management.

Weekly inspections will be conducted to ensure that all fuels, oils and chemicals have appropriate secondary containment and well-functioning mitigation measures in place such as deployable booms and other relevant spill kit. This inspection will also cover site drainage systems, to ensure their integrity, and that there are no chemicals stored or in use in their vicinity. The spill kit checklist⁶ is also provided in the application bundle submitted in support of the EP application. Any refuelling activities will take place away from drainage and be restricted to specifically designated locations. The designated locations will feature impermeable surfacing and readily available access to spill kits.

6.5 Complaints Procedure

SEGRO Radlett Ltd will manage stakeholder engagement including the receipt of complaints. Full details of the procedures to be applied will be provided to the EA prior to permitted works commencing. It is anticipated that the project website and signage at the entrances to the Radlett SRFI Development Area will provide telephone and email contact details for use during and outside working hours. SEGRO Radlett Ltd and VFL will develop the necessary procedures to ensure that complaints are investigated and responded to in a timely manner.

⁵ Environmental Inspection, ref: EMS-07, Issue no. 6, October 2020

⁶ Spill Kit Checklist, ref: E03-01, Issue no.1, May 2023

7. Risk Assessment Tables

Table 3: Noise and vibration risk assessment

Noise						
Hazard	Receptor	Pathway	Risk management techniques	Probability of exposure	Consequence	Overall risk
<p>Sources of noise and vibrations include:</p> <ul style="list-style-type: none"> • dump truck and mobile plant; • road roller; • engines; • reverse alarms; and • mechanical handling e.g. tipping of waste. 	<p>Local human population (in particular residents of Napsbury Park)</p> <p>Local ecology (protected species on Area 2)</p> <p>Local wildlife sites - Arable Field SW of London Colney and Old Parkbury Fishing Lakes</p>	<p>Airborne (noise)</p> <p>Through the ground (vibration)</p>	<p>Reduction at source:</p> <p>White noise reverse alarms are used (rather than tonal).</p> <p>Operational hours are limited as below – no engine noise, waste handling or equipment running overnight.</p> <ul style="list-style-type: none"> • Monday to Friday: 06:30 – 20:30 • Saturday: 07:30 – 13:00. <p>Screening:</p> <p>Area 2 will be screened to receptors by established trees on the boundary to the north and east. The western boundary is formed by embankment to MML. Localised palisade fencing is proposed to stop up existing public access points on the east and south boundaries. Existing fencing will also be maintained, and temporary security mesh fencing will be installed as required for security purposed.</p> <p>Acoustic enclosures shall be employed where noisy activities take place.</p> <p>Methods of working:</p> <p>The material handled is not noisy when</p>	<p>Low</p> <p>The activity may be audible but is unlikely to cause discomfort or annoyance due to distance to human receptors and the prevailing noise climate.</p> <p>Potential impact to ecology on Area 2 and Arable Field SW of London Colney LWS.</p> <p>The M25 motorway separates Area 2 from the Old Parkbury Fishing Lakes LWS therefore the noise arising from the M25 will dominate the noise environment at the LWS.</p>	<p>Noise and vibration at receptors are unlikely to cause offence.</p>	<p>Low</p>

Noise						
Hazard	Receptor	Pathway	Risk management techniques	Probability of exposure	Consequence	Overall risk
			<p>dropped. There is no dropping from height.</p> <p>There is no scraping of metal on concrete (e.g. plant buckets on concrete surface).</p> <p>One-way systems will be implemented as far as is practicable to reduce the requirement for reversing.</p> <p>Management:</p> <p>All site vehicles and mobile plant are subject to Planned Preventative Maintenance (PPM) so they are well maintained, lubricated moving parts.</p> <p>There is no unnecessary revving of engines.</p> <p>There is a “no idling” policy to limit engine run times.</p> <p>A complaints handling procedure is in place.</p> <p>Baseline and real time monitoring will inform remedial actions, as necessary.</p>			

Table 4: Pests, vermin and insects risk assessment

Pests, vermin and insects						
Hazard	Receptor	Pathway	Risk management techniques	Probability of exposure	Consequence	Overall risk
Pests: Rats, foxes, Scavenging birds	Local human population (in particular residents of Napsbury Park) Local ecology and arboriculture (protected species on Area 2) Local wildlife sites - Arable Field SW of London Colney and Old Parkbury Fishing Lakes	Attracted by food or harbourage and then direct transmissions	Reduction at source: Food sources will not be present in the permitted area but sites for harbourage may be found. Screening: The M25 motorway separates Area 2 from the Old Parkbury Fishing Lakes LWS therefore acting as a barrier and deterrent to pests. Methods of working: Activities taking place in the surrounding Site will be an effective deterrent against pests seeking harbourage. Management: Compliance inspections will be carried out daily. Pest management procedures will be in place and enforced by Works Manager.	Minimal with control measures in place.	Nuisance, disease transmission, loss of amenity. Predation of protected species.	Low
Flies and insects Mosquitos	Local human population (in particular residents of Napsbury Park) Local wildlife sites - Arable Field SW of London Colney and Old Parkbury Fishing Lakes	Breeding in still pooled water on site and then direct transmission. Breeding in the ponds within Area 2 and then direct transmission.	Reduction at source: Receptacles for standing water will not be present in Area 2 e.g., empty skips / buckets. The waste can absorb rainwater minimising run-off. Management: Rainwater that collects on impermeable surfaces will be removed by road sweeper. Rainwater that collects on unsealed areas will be treated with crushed concrete or the area	Minimal with control measures in place	Nuisance, disease transmission, loss of amenity.	Low

Pests, vermin and insects						
Hazard	Receptor	Pathway	Risk management techniques	Probability of exposure	Consequence	Overall risk
			<p>recontoured to prevent pooling.</p> <p>Water quality in the ponds will be maintained such that a natural balance of predators and prey develop.</p>			

Table 5: Odour risk assessment

Odour						
Hazard	Receptor	Pathway	Risk management techniques	Probability of exposure	Consequence	Overall risk
Exhaust fumes from dump truck or mobile plant	Local human population (in particular residents of Napsbury Park)	Atmospheric dispersion	<p>Reduction at source:</p> <p>Dump trucks and mobile plant meet relevant regulatory standards for emissions.</p> <p>Low sulphur diesel will be used.</p> <p>Management:</p> <p>Vehicles are well-maintained (PPM)</p> <p>There is no unnecessary revving of engines.</p> <p>No idling policy in place to limit engine run time.</p> <p>All site vehicles and mobile plant are subject to PPM so they are well maintained.</p> <p>All on site mobile plant engines will be Stage IIIB emission standard as a minimum.</p>	Minimal with control measures in place	Nuisance, loss of amenity	Low
Odour from general operations (house keeping) Bins and drains	Local human population (in particular residents of Napsbury Park)	Atmospheric dispersion	<p>Reduction at source:</p> <p>There will be no litter receptacles, kitchens or welfare facilities in the permitted area.</p> <p>There will not be any open drains on Area 2.</p> <p>Receptacles for standing water will not be present in Area 2 e.g. empty skips / buckets. The waste can absorb rainwater minimising run-off.</p> <p>Management:</p> <p>Site security will limit the potential for fly-tipping</p>	Minimal with control measures in place	Nuisance, loss of amenity	Low

Odour						
Hazard	Receptor	Pathway	Risk management techniques	Probability of exposure	Consequence	Overall risk
			<p>occurring within Area 2.</p> <p>Rainwater that collects on impermeable surfaces will be removed by road sweeper.</p> <p>Rainwater that collects on unsealed areas will be treated with crushed concrete or the area recontoured to prevent pooling.</p>			
Odour from historic landfill waste following treatment	Local human population (in particular residents of Napsbury Park)	Atmospheric dispersion	<p>Treatment of historic landfilled waste will be undertaken in accordance with measures agreed under separate mobile treatment EP. This includes for odour monitoring and management.</p> <p>If the treated landfill waste remains odorous, VFL will implement an odour management plan.</p> <p>Stockpiles in place for more than three months will be constructed to a maximum height of 5m, facilitating the use of odour neutralising sprays if found to be necessary.</p> <p>Management:</p> <p>Daily inspection for odour at Area 2 boundary by trained individuals.</p> <p>A complaints handling procedure is in place.</p>	Minimal with control measures in place	Nuisance, loss of amenity	Low

Table 6: Accidents risk assessment

Accidents						
Hazard	Receptor	Pathway	Risk management techniques	Probability of exposure	Consequence	Overall risk
Fire leading to air pollution (Vehicle fire possible)	Local human population (in particular residents of Napsbury Park) MML M25 road users Protected species using the ponds within Area 2 Local wildlife sites - Arable Field SW of London Colney and Old Parkbury Fishing Lakes	Smoke / airborne ash and soot	Vehicles are well maintained. They are not used for excessive periods without engine breaks. An emergency response procedure is in place. The duration and spread of a fire would be limited.	Minimal with control measures in place	Damage to health and nuisance (soiling of cars / windows)	Low
Fire leading to water pollution (Vehicle fire possible)	Land Stream to eastern boundary of Area 2	Direct run-off across ground surface	Vehicles are well maintained. They are not used for excessive periods without engine breaks. An emergency response	Minimal with control measures in place	Harm to protected species from poor water quality and pollution of controlled waters	Low

Accidents						
Hazard	Receptor	Pathway	Risk management techniques	Probability of exposure	Consequence	Overall risk
	Groundwater used for public water supply (in Chalk – SPZ1 and 2)	Downward transmission through underlying geology	procedure is in place. The duration and spread of a fire would be limited.		(surface water) Pollution of land and controlled waters (groundwater) (fire unlikely to generate sufficient contaminated water to impact public water supply)	
	Old Parkbury Fishing Lakes	Transmission via stream to eastern boundary of Area 2				
Spillage (of fuel from vehicle or fuel storage tank - either during refuelling or due to unauthorised access / vandalism)	Protected species using the ponds within Area 2 Stream to eastern boundary of Area 2 Land Groundwater used for public water supply (in Chalk – SPZ1 and 2)	Direct run-off across ground surface Downward transmission through underlying geology	Refuelling will take place in Area 2 in the compound. The activity will be undertaken on sealed surfacing and drainage. The compound including fuel storage tank is secured out of hours. Only trained staff are allowed to refuel. Mobile plant will ordinarily be parked in the secure compound out of hours. If mobile plant needs to be left at the work place, it will be secured out of hours by use of mobile intruder detection units ⁷ monitored by security personnel out of hours.	Minimal with control measures in place	Pollution of land and controlled waters (groundwater) (quantity of fuel on a vehicle unlikely to be sufficient to impact public water supply, however loss of full contents of fuel tank conceivably could)	Low

⁷ For example, https://safer-group.com/products-services/safer-pod-s1/?gad=1&gclid=EAlaIqobChMI_tSgg8TcgAMVKYtQBh2f5ALiEAAAYAAAEgL-sfD_BwE

Accidents						
Hazard	Receptor	Pathway	Risk management techniques	Probability of exposure	Consequence	Overall risk
			A Spillage Response Procedure is in place.			
Physical damage to GCN habitat or barrier fencing	Protected species using the habitat	Direct contact (by machinery or unauthorised access / vandalism)	Security measures prevent unauthorised access Induction training and ongoing reinforcement by tool box talks in ensure staff understand the importance of not damaging the barrier fencing Daily inspection of the fencing	Minimal with control measures in place	Bodily harm to protected species	Low
Physical harm – from contact with mobile plant or waste	People (intruders)	Direct contact	Security measures prevent unauthorised access Waste is non-hazardous.	Minimal with control measures in place	Bodily harm to intruders	Low

APPENDICES

A. Ecology Method Statement

Ecology Method Statement, Ecology Solutions August 2023

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4743: RADLETT SRFI

TECHNICAL NOTE: ECOLOGY METHOD STATEMENT (EA PERMIT APPLICATIONS)

AUGUST 2023

Introduction

1. Ecology Solutions Limited has been retained to provide ongoing ecological support in relation to the Radlett Strategic Rail Freight Interchange (SRFI) site in Hertfordshire.
2. Planning permission for the development was granted by the Secretary of State on 14 July 2014 (application reference 5/09/0708). A number of the planning conditions attached to the consent related to ecology; specifically Condition 19 (Area 2 ponds), Condition 20 (Acid Grassland Mitigation Strategy) and Condition 21 (Protected Species).
3. Subsequently, Ecology Solutions has produced reports to discharge Condition 19 (Area 2 Ponds, dated June 2018), Condition 20 (Mitigation Strategy for Acid Grassland, also dated June 2018) and Condition 21 (Protected Species Report, dated August 2016).
4. Updated ecological survey work across the SRFI site has been undertaken in 2023 to identify an up to date baseline position, in order to inform the implementation of the proposed development.
5. The purpose of this Technical Note is to identify the key ecological receptors (including designated sites, habitats and protected / notable species) situated within and in close proximity to the works to be authorised by Environmental Permits issued by the Environment Agency, specifically waste treatment activities to be conducted on Area 2 from Autumn 2023 under a mobile treatment plant deployment, and waste deposit for recovery activities (the construction of landscape bunds) to commence in Summer 2024 under bespoke site permit, and to set out an ecological method statement which will be adopted to ensure that adverse impacts are fully avoided and mitigated.

Ecological Baseline

6. The following paragraphs summarise the ecological baseline associated with Area 2. Full detail regarding the findings of survey work undertaken historically within the Radlett SRFI Development Area was submitted as part of the planning application.
7. There are no statutory or non-statutory designated sites of nature conservation interest located within Area 2. Moreover, there are no statutory designated sites of nature conservation interest located in close proximity.
8. There are two non-statutory designated sites of nature conservation interest which are located adjacent; specifically, Arable Field S.W. of London Colney Local Wildlife Site (LWS), located to the east of Area 2, and Quarry at Former Radlett Aerodrome LWS, located to the west of Area 2 across the Midland Main Line.
9. Arable Field S.W. of London Colney LWS was designated in 1997 on account of the arable habitat that the site supports, including the vascular plant species Cornflower *Centaurea cyanus*, Spreading Hedge Parsley *Torilis arvensis* and Prickly Poppy *Papaver argemone*. This non-statutory designated site is located beyond the Radlett SRFI Development Area
10. Quarry at Former Radlett Aerodrome LWS was designated in 2009 on account of the former gravel quarry habitats that it supported, with reference made to re-seeded grassland, lagoons, pools, ponds and plantation woodland habitats, and to waterfowl and wetland birds.
11. This non-statutory designated site is located entirely within the Radlett SRFI Development Area and will be lost to facilitate the overarching development, with a comprehensive suite of mitigation and enhancement measures which will be delivered.
12. The permit areas primarily comprises areas of rough, tussocky grassland with ruderal vegetation and scattered scrub. Other habitats present in close proximity within Area 2 include waterbodies (in the form of drainage ditches) and broadleaved woodland. None of the habitats present within the permit areas are considered to be of high intrinsic ecological value, nor are they likely to support protected or notable botanical species.
13. As outlined in the Protected Species Report (submitted in relation to Condition 21), Survey work undertaken previously confirmed the presence of the following faunal groups within Area 2:
 - Great Crested Newts;
 - Birds; and
 - Foraging and commuting bats.
14. Whilst historical surveys did not record the presence of reptiles within Area 2, given their known presence in Area 1 to the west it was considered likely that they would be present within the permit areas.
15. Updated survey work is currently underway in 2023 to confirm an up to date baseline position. Survey work has been undertaken in respect of the following species / groups:

- Bats, comprising an initial updated ground-level appraisal of all trees present within and adjacent to the permit areas to assess for roosting bats, and evening emergence / dawn re-entry surveys to ascertain the presence of any roosts;
 - Badgers, to search for any evidence indicative of Badger activity within Area 2 (and within a 30 metre radius) including any setts or other evidence including foraging pits, latrines, well used pathways, footprints or hairs;
 - Great Crested Newts, comprising updated aquatic surveys of waterbodies within Area 2 (in close proximity to the permit areas) in addition to other waterbodies within the Radlett SRFI Development Area to the west; and
 - Reptiles, comprising refugia surveys throughout Area 2.
16. Surveys have confirmed the continued presence of Great Crested Newts within two waterbodies in the north of Area 2 (in close proximity to the permit areas), with a peak count of one and three adult newts respectively).
 17. No evidence of Badger setts was recorded within or in close proximity (i.e. within 30 metres) of the permit areas.
 18. There are no trees or other features with potential to support roosting bats within the permit areas, although there is a tree adjacent to the permit area with high bat roosting potential.
 19. Survey work in relation to reptile species is currently underway (August 2023), although it is considered likely that reptiles are present within Area 2 including the permit areas.
 20. The updated walkover did not identify the presence of the non-native invasive species Japanese Knotweed *Fallopia japonica* or Himalayan Balsam *Impatiens glandulifera* within the permit areas. However, these species have previously been recorded within Area 2.

Ecological Avoidance and Mitigation Measures

A. Prior to works

21. The permit areas are physically separated from non-statutory designated sites in the local area by existing mature woodland along the eastern boundary of Area 2, and by the Midland Main Line to the west. Notwithstanding the fact that the LWS to the west will intrinsically be lost to facilitate the SRFI in due course, adverse effects will therefore not arise to these designations during the site preparatory works (clearance of vegetation), either directly or indirectly.
22. A Great Crested Newt mitigation licence has been issued by Natural England to permit the completion of ground investigation works in Area 2. In accordance with the agreed methodology in the licence, trapping will be undertaken followed by temporary habitat removal to enable the required works to be undertaken, with newts moved to a temporary receptor area situated on the western boundary of Area 2 (outside of the permit areas). All works associated with the licence will be

undertaken under the direct supervision of an ecologist, in accordance with the requirements set out in the licence.

23. A further licence application has been submitted to Natural England to facilitate the translocation of Great Crested Newts from Area 2 (including the permit areas) into a dedicated receptor area towards the south. The receptor area will be fenced throughout the duration of construction works in the locality, including the completion of the works under permits, to avoid newts from recolonising areas which have been trapped out.
24. The methodology and detail of the Great Crested Newt licence application will be agreed with Natural England as part of the licence application. However this exercise will entail the provision of temporary fencing to subdivide Area 2 including the permit areas; trapping of Great Crested Newts using pitfall traps and carpet tiles; translocation of all newts to dedicated receptor ponds which have been created to the south within Area 2 (outside of the permit areas); and subsequently the clearance of habitats under supervision of a suitably qualified and licenced ecologist.
25. The completion of this exercise, which would be required prior to any further works being undertaken within Area 2 (including within the permit area), will ensure that all newts will have been moved out of the permit area.
26. Upon issue of the licence (anticipated late August 2023), the adoption of the translocation exercise will ensure that all Great Crested Newts have been moved out of the permit areas into the dedicated receptor area, with fencing in place to prevent recolonisation. This will therefore ensure that the measures will enable mobile plant permitted works to commence thereafter.
27. Any reptiles present within the permit area will also be translocated into the dedicated receptor area during the Great Crested Newt translocation, such that this group would also be removed from within the permit area boundary.
28. The translocation exercise will ultimately entail the removal of all habitats within the permit areas, including rough grassland and areas of scrub. The methodology to be adopted will avoid harm to nesting birds, either through the removal of suitable nesting habitat outside of the bird nesting season (March to July inclusive) or alternatively following the completion of a check by a suitably qualified ecologist immediately prior to the removal of vegetation which confirms the absence of any active nests.
29. Notwithstanding the fact that it is located beyond the permit area, further survey work is underway to ascertain whether one tree with high bat roosting potential adjacent to the permit area supports roosting bats. In the event that no evidence of roosting bats is found, there would be no constraints associated with this tree and a licence will not be required for felling. The tree shall subsequently be felled in line with a 'soft felling' methodology by a suitably qualified contractor, with limbs and branches removed slowly and carefully in a stepwise manner. In the unlikely event that a bat is encountered, works will cease and a suitably qualified ecologist will be contacted.
30. In the event that the survey work identifies the presence of a bat roost, a licence will be required from Natural England prior to felling of the tree. The avoidance and mitigation measures required will be agreed with Natural England as part of the licence application; however, subject to the adoption of identified and

appropriate measures such as the provision of new bat roosting boxes on suitable retained trees within Area 2 and felling of the tree in line with a sensitive methodology at an appropriate time of year (for instance late October) under supervision of a suitably qualified ecologist.

31. Whilst surveys have not identified the presence of Japanese Knotweed or Himalayan Balsam within or in close proximity to Area 2 the permit areas, further checks will be undertaken by the supervising ecologist during the vegetation clearance works on a precautionary basis. Should these species be identified, advice will be sought from a specialist contractor prior to removal in line with an appropriate methodology, although the risk of this occurring is considered to be very limited.

B. During the works

32. As above, the permit areas are physically separated from non-statutory designated sites in the local area. As noted above, the LWS to the west will intrinsically be lost to facilitate the SRFI in due course, and therefore the permitted works would not lead to adverse effects.
33. Subject to the adoption of the following measures, adverse effects to the LWS situated to the east of Area 2 will be avoided:
 - Machinery and personnel will only be permitted to operate within Area 2, with access into off-site land prohibited;
 - Works will be undertaken in line with standard engineering protocols and will incorporate measures to prevent harm arising via pathways such as dust deposition and contaminated run-off.
34. It is also noted that the permits will have conditions which will ensure that the release of fugitive emissions to air or water is avoided and mitigated. Moreover, for the waste deposit permit, a Dust and Emissions Management Plan, which sets out prevention, management and mitigation measures to be employed, will be produced.
35. The following measures will be adopted throughout the construction works in order to avoid potential issues arising in respect of protected and notable species.
36. All personnel attending site will be subject to a toolbox talk as part of the standard site induction process. This will include reference to Great Crested Newts, reptiles, nesting birds and Badgers, and will include the following elements:
 - Information to assist with the identification of the relevant species;
 - Brief summary of legislative requirements as they pertain to contractors;
 - Details regarding measures which have been adopted to avoid harm; and
 - Information regarding next steps if animals or evidence is encountered.
37. In the event that any protected species, or evidence to indicate the presence of protected species, is encountered by site personnel, works in the immediate vicinity will cease and advice will be sought from a suitably qualified ecologist before proceeding.

38. Whilst further detail in relation to frequency will be confirmed as part of the Great Crested Newt mitigation licence, regular checks will be required of the fencing associated with the receptor area (to the south of the permit area) to confirm that it remains intact and in optimal condition, thereby preventing recolonisation of the site by newts. Should any damage be identified, it will be fixed immediately by relevant contractors under the direct supervision of a suitably qualified ecologist.
39. Provisions will be taken to ensure that there is no risk of potential contamination entering the receptor area or indeed other habitats within or in close proximity to the permit areas via surface water runoff or stored materials such as fuels, oils and loose material. Potential contaminants will be stored within appropriately bunded compounds, with the use of interceptor fencing where any potential risk is identified.
40. Given evidence to indicate the presence of Badgers within the wider area, the following measures will be adopted throughout the works.
41. Any trenches, excavations or deep pits associated with the works that are to be left open overnight will be provided with a means of escape to avoid Badgers from becoming trapped in any such features. This could simply be in the form of a roughened plank of wood placed in the trench as a ramp to the surface, or excavations dug with gentle gradients to allow for Badgers to climb out of the pit.
42. Excavations left open overnight will be inspected the following morning to ensure no Badgers have become trapped overnight. Should a Badger become trapped in a trench it will likely attempt to dig itself into the side of the trench, forming a temporary sett. Should a trapped Badger or excavation be encountered, the suitably qualified ecologist will be contacted immediately for further advice, with no works undertaken until an appropriate way forward has been identified and confirmed.
43. The storage of topsoil or other 'soft' building materials on site will be given careful consideration, using fencing were considered necessary following consultation with the suitably qualified ecologist. Badgers can readily adopt such features to construct new setts, which would then be afforded the same protection as established setts. Areas of spoil will be subject to regular inspections, with consideration afforded to the use of fencing to discourage excavation where appropriate.
44. The storage of any fuels or chemicals will be contained in such a way that they cannot be accessed or knocked over by roaming Badgers (e.g., chemical storage cabinets, storage units or containers).
45. All site personnel will remain aware of the potential for new excavations as construction proceeds. If any excavations or potential setts are identified, works in the vicinity will cease until such time as advice has been provided by the project ecologist. This may require a specific survey to be undertaken.



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