Culham Storage Environmental Statement: Volume 1

Chapter 7: Environmental Management Mitigation and



Mitigation and Monitoring

Culham Storage Chapter 7: Environmental Management, Mitigation and Monitoring

INTRODUCTION

- 7.1 Mitigation refers to 'measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment' as set out in the EIA Regulations (amended 2018, 2020)¹. Throughout the design process, environmental mitigation measures have been incorporated into the design of the Proposed Development to prevent, reduce and off-set potentially adverse effects. These mitigation measures have been incorporated into the design of the Proposed Development and so comprise part of the scheme for which planning consent is sought. These embedded (primary) environmental mitigation measures are described within ES Volume 1, Chapter 2: Design Evolution, Alternatives and the Proposed Development and the ES technical chapters (ES Volume 1, Chapters 3 to 5) and they are not repeated within this chapter of the ES. In addition, environmental enhancement measures have been incorporated into the design of the Proposed Development and the test potential chapter of the ES.
- 7.2 improve the existing environmental conditions of the site and surrounding area. Again, these are described in this ES in **ES Volume 1, Chapter 2: Design Evolution, Alternatives and the Proposed Development**; they are not repeated within this chapter of the ES. Securing these primary mitigation and enhancement measures will be via the planning permission granted for the Proposed Development itself.
- **7.3** A number of Management Plans or Management Documents have also either been prepared to accompany the planning application, whereby it is expected that compliance with such Management Plans will be secured via an appropriately worded planning condition. Alternatively, a number of Management Plans are committed to being prepared and implemented at various stages of the project, which relate to mitigating adverse environmental effects. It is suggested that these Management Plans / Documents be secured through planning conditions attached to the permission if granted by the South Oxfordshire District Council (SODC). Table 7.1 lists the Management Plans / Management Documents that have been prepared or would need to be prepared following consent and at the appropriate stage of the project.
- **7.4** Table 7.2 presents the environmental mitigation and monitoring measures required for the Proposed Development as identified as a result of the EIA process and described within this ES. The environmental mitigation and monitoring measures presented include those which are standard measures / commitments that would be adopted as a matter of course to meet best practice guidance, in relation to the enabling and construction works; and any additional project bespoke mitigation and monitoring measures that have been identified as being required by the EIA.
- **7.5** The environmental mitigation and monitoring measures presented in Table 7.2 are measures that the SODC will need to secure for the project, either using planning conditions on the Decision Notice, or through planning obligations secured by appropriate legal agreement(s). It is however, noted that the way in which any required mitigation is secured is for the SODC to determine. This is stipulated in Section 70(1)(a) of the Town and Country Planning Act 1990 which enables the SODC in granting planning permission to impose such conditions as they think fit. Paragraph 55 of the National Planning Policy Framework² also states that planning conditions should be kept to a minimum and only used where they satisfy certain tests (i.e., are necessary, relevant to planning, relevant to the development to be permitted, enforceable, precise with the Applicant) before they are imposed.
- **7.6** The mitigation and monitoring measures have been developed through coordination with the Applicant, Design Team and EIA technical specialists to ensure the environmental mitigation and monitoring measures described are delivered and are considered appropriate in terms of their ability to mitigate likely significant adverse environmental effects associated with the Proposed Development.

Table 7.1 Management Plans / Documents

MANAGEMENT PLANS / DOCUMENTS

PR	E-COMN
Archaeological Investigations	ES Volur ES Volur Investiga
Fire Liaison Framework	Non-EIA
Landscape and Ecological Management Plan (LEMMP)	ES Volui Impact A
Biodiversity Net Gain Management and Monitoring Plan (BMMP)	ES Volui Impact A
ENABLI	NG AND
Construction Environmental Management Plan (CEMP)	ES Volur ES Volur Developr ES Volur Impact A
Site Management Plan	ES Volur Developr Non-EIA Strategy
Construction Traffic Management Plan (CTMP)	Non-EIA
Tree Protection Scheme	Non-EIA
OPERATION	COMPL
Access Note	Non-EIA

ES REFERENCE

MENCEMENT

me 1, Chapter 3: Cultural Heritage

Ime 3, Appendix: Cultural Heritage – Annex 3 Written Scheme of ation

A Deliverable: Fire Liaison Framework

Ime 3, Appendix: Ecology and Biodiversity – Annex 1 Ecological Assessment

Ime 3, Appendix: Ecology and Biodiversity – Annex 2 Biodiversity Assessment

CONSTRUCTION

ume 1, Chapter 1: Introduction and EIA Methodology **ume 1**, Chapter 2: Design Evolution, Alternatives and the Proposed oment

ume 1, Chapter 4: Land Take and Soils **ume 3**, Appendix: Ecology and Biodiversity – Annex 1 Ecological Assessment

Ime 1, Chapter 2: Design Evolution, Alternatives and the Proposed ment

A Deliverable: Flood Risk Assessment and Conceptual Drainage

A Deliverable: Construction Traffic Management Plan

A Deliverable: Tree Protection Scheme

LETED DEVELOPMENT

A Deliverable: Access Note

¹ https://www.legislation.gov.uk/uksi/2017/571/schedule/4/made?view=plain

Mitigation and Monitoring Schedule Table 7.2

able 1.2 Willig	ation and monitoring Schedule
TIMING	MANAGEMENT PLAN, MITIGATION OR MONITORING MEASURE
	ARCHAEOLOGICAL INVESTIGATIONS
	Undertake evaluation trial trenching (TT), as outlined within the Written Scheme of Investigation (WSI), to establish the nature, extent and significance of any archaeological remains within the site enable an appropriate programme of mitigation if required.
	Subject to the findings of the evaluation TT, if required, undertake a programme of archaeological evaluation and mitigation to manage impacts on below ground archaeological remains and deport through preservation in record.
	Mitigation of the archaeological remains through excavation or similar strategy would ensure that any archaeological remains within the site are appropriately preserved by record prior to any advect construction effects. An archaeological watching brief may be required to ensure no remains are lost without record or no further work may be necessary. If areas of significant remains are identificant targeted excavation may be required.
	All archaeological work will be undertaken under the terms of a standard archaeological planning condition in consultation with South Oxford District Council, Oxford County Council, and their archaeological advisor in advance of development, in accordance with an approved archaeological WSI.
	ECOLOGY - BADGER LICENCE
	Badger is protected under the Protection of Badgers Act 1992. It is not permitted to wilfully kill, injure, take, possess or cruelly ill-treat a badger, or to attempt to do so; or to intentionally or reckle interfere with a sett. Sett interference includes disturbing badgers whilst they are occupying a sett, as well as damaging or destroying a sett or obstructing access to it. A badger sett is defined in legislation as "a structure or place, which displays signs indicating current use by a badger".
	Further monitoring of sett S5 (at the eastern extent of the site, at the proposed substation extension location) will be conducted once planning permission is secured to inform a badger licence to enaits lawful destruction should it be confirmed as being active. Some bramble scrub clearance will be required around S5 to enable all sett entrances to be identified. The licence can be implemented betw 1st July and 30th November. Implementation, if required, will include installation of a one-way gate to enable badger to leave but not re-enter, followed by 21 days of monitoring, closure of the sett ar destructive search of the burrow.
	ARBORICULTURE – DESIGN CONSIDERATIONS
	Technical Design Considerations – Routing and Installation of Utility Apparatus
F	• Wherever possible, utility apparatus should be routed outside of any Root Protection Areas (RPAs). Failing this, services should be routed together in common ducts, with any inspection chamb being located outside of the RPA.
ËN.	• Where it is necessary for underground services to intersect an RPA, specialist excavation methods should be used.
E	• In such situations, the design team should consult with Ligna Consultancy in order to establish a suitable services route, and specify the specialist excavation method most suitable.
NC	Potential for Subsidence and Heave
IME	Where shrinkable sub-soils may be present, the potential for tree related subsidence and/or ground heave (resultant from proposed tree removals) must be considered by a structural engineer prior to final specification of foundation depth/type.
PRE-COMMENCEMENT	FIRE LIAISON FRAMEWORK
PRE	The Applicant wishes to strengthen the strategic support in relation to liaising with third party organisations, particularly Local Fire and Rescue Services, to assist in achieving a safer, more standardis effective, efficient approach to the planning, building, commissioning, and operational delivery associated with their BESS schemes. The Fire Liaison Framework (FLF) submitted in support of the plann application sets out the principles which underpin the FLF, as well as the long-term approach with regards to fire and rescue liaison throughout the planning, commissioning and operational delivery associated with these phases as appropriate, as set out within the FLF.
	LANDSCAPE AND ECOLOGICAL MANAGEMENT AND MONITORING PLAN
	A Landscape and Ecological Management and Monitoring Plan (LEMMP) will be required to specify the long-term management of the habitats to meet their target conditions and deliver long-term bend for wildlife. A LEMMP will be produced with reference to the Biodiversity Code of Practice for Planning and Development British Standard: BS 42020:2013 (BSI Standards Limited, 2013) and in partice Section 11.1 which provides details on the content of management plans. This LEMMP will be produced by an ecologist alongside consultation with the developer and landscape architects to ensure appropriate design and long-term management of mitigation measures to protect and enhance the landscape character and biodiversity. The LEMMP will include: Review of site potential and constraints;
	 Purpose and conservation objectives for the proposed works;
	 Detail design(s) and/or working method(s) to achieve the stated objectives;
	 Extent and location/area of proposed works on appropriate scale maps and plans (e.g. woodland planting / creation of log piles),
	Type and source of materials to be used where appropriate (e.g. native species of local provenance, specification, etc.);
	 Timetable for implementation;
	• Details of initial aftercare and long-term maintenance of ecological habitats (e.g. woodland, hedgerows and grassland areas);
	• Details for monitoring and remedial measures;
	Persons responsible for implementing the works;
	Preparation of a work schedule to cover 20 years; and
	• Details of the body or organisation responsible for implementation of the plan.



	ES REFERENCE
site and	
deposits	ES Volume 1, Chapter 3: Cultural Heritage
adverse lentified,	ES Volume 3, Appendix: Cultural Heritage – Annex 3 Written Scheme of Investigation
eological	
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o enable between ett and a	ES Volume 3, Appendix: Ecology and Biodiversity – Annex 1 Ecological Impact Assessment
nambers	Non-EIA Deliverables: Arboricultural Impact Assessment
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ardised, planning	ES Volume 1, Chapter 1: Introduction and EIA Methodology
delivery	Non-EIA Deliverable: Fire Liaison Framework
benefits articular sure the	ES Volume 3, Appendix: Ecology and Biodiversity – Annex 1 Ecological Impact Assessment

TIMING	MANAGEMENT PLAN, MITIGATION OR MONITORING MEASURE
	BIODIVERSITY NET GAIN MANAGEMENT AND MONITORING PLAN
	In order for the anticipated net gain in biodiversity to be realised, a Biodiversity Net Gain Management and Monitoring Plan (BMMP) must be created and adopted prior to works commencing. A BM could be secured as a suitably worded pre-commencement condition and would need to be referenced by a legal agreement (S106, conservation covenant or similar) to secure the hat creation/enhancement needed to achieve the net gain in biodiversity.
	The BMMP must include the details outlined below:
	• Habitat Creation and Management; The BMMP must include details of individually referenceable parcels/habitats that are to be created and managed to contribute towards the net gain in biodivers. The BMMP may make reference to a LEMMP (or similar) or include detailed habitat creation and management prescriptions within its contents.
	• Timeframe: The BMMP must cover a period of at least 30 years. The 'times to target condition' must accord with the details outlined in Appendix 5 of ES Volume 3, Appendix: Ecology and Biodiver – Annex 2: Biodiversity Impact Assessment.
	• Scope: The BMMP will cover creation and management of any habitats contributing towards the biodiversity net gain result described above with the exception of buildings and hardstanding what are better addressed within a separate LEMMP or similar. Where habitat parcels are described within both a LEMMP and a BMMP, the creation/management prescriptions must align precisely
	• Responsible Bodies: The BMMP must outline necessary qualifications/experience for ecologists undertaking monitoring surveys, and must also name responsible bodies for:
	 Creation and management of the habitats; and Review of monitoring reports.
	• Monitoring: The BMMP must include provision for independent ecological monitoring and progress reporting over the lifetime of the management period, with provision for rectification work required. Ecological monitoring must take place yearly as a minimum for five years, with monitoring reports produced to document:
	 Commissioned client, site name and purpose of report; Background and timeline for project; Project description, as built; Aims/objectives/scope of monitoring survey; Reference to original aims described within this report; Survey methods; Evidence of technical competence and experience; Limitations; Clear statements on whether biodiversity unit targets are being met; and
	 Details of any rectification works and implications necessary. The frequency of monitoring will likely be decreased (e.g. to years 5, 10, 15, 25, 30) after five years at the monitoring ecologists' discretion if targets are being consistently met and risk of deviar is considered low.
	 Condition: The BMMP must make clear which condition criteria (e.g. DEFRA statutory metric) are targeted for each individual habitat so that ecological monitoring reports have a benchmark aga which to measure. It may be appropriate to update condition criteria assessment as new versions of the metric are made available; any deviation from the version used within this report should highlighted and justified.
	 Broad Management Prescriptions: The BMMP should be based on the below broad management prescriptions which have been agreed with the Applicant during the design stage. Parcel referen within the below refer to those on drawing EBD_2513_DR003 (proposed habitats) at Appendix 2 of ES Volume 3, Appendix: Ecology and Biodiversity – Annex 2: Biodiversity Impact Assessme
	 Newly created other neutral grassland (moderate condition): The other neutral grassland within the application site must be managed around a traditional 'hay-cut' regime with the exception informal footpaths which are to be mown regularly to a short height: mowing as required to <10mm height between March and mid-April inclusive; leaving grassland unmanaged during mid-April to late-July; taking a single summer hay cut in early August and remove arisings; and mowing monthly to <10mm August-October, removing arisings each mow. Newly created mixed scrub: The newly planted mixed scrub within the application site will require no specific management beyond periodic brush-cutting and replacement of dead/damage areas to maintain their current extent.
	 Newly planted scattered trees and tree line: The proposed trees must be watered as required during the first year, and then will require minimal ongoing management with the exception inspections, restorative pruning, and replacement of damaged/failed individuals. Newly created other broadleaved woodland: The newly planted woodland should initially be subject to weed control through the application of mulch or mulch mats around tree bases in exsummer or the strimming of vegetation 1m around the base of each tree. Bio-degradable tree guards should be used to protect new trees from potential damage through grazing. New planting an annually thereafter for five years, with watering, weed control, tree guard replacement and the replanting failed specimens undertaken annually. Once established, tree guards and stakes (if used) will be removed. A site visit will be carried out every five years (commencing year 5 post-construction) of the woodland to monitor growth/condition and inform if/when any of the following are required:
	 Thinning of close-set trees and non-native trees within the canopy; Replanting of varied native canopy and understorey species; Rotational coppicing of understoreys; Continued control of deer populations and piling of brash screening around newly planted/coppiced areas to manage over-grazing; and
	 Creation of standing and fallen deadwood features. Substantial works (other than minor trimming) will take place outside 1st March to 31st August inclusive to avoid impacting nesting birds. Newly created SuDS and wildlife pond: The newly created SuDS and wildlife pond will be subject to ongoing management carried out in response to the conditions at the time. This will gener include the removal of litter and larger items of debris, containment and investigation of any pollutions, selective pruning of surrounding vegetation and marginal vegetation, monitoring was conditions (i.e. algal blooms) and monitoring levels of human disturbance and taking remedial action if required.



	ES REFERENCE
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	MANAGEMENT PLAN, MITIGATION OR MONITORING MEASURE	ES REFERENCE
	SITE MANAGEMENT PLAN	
ĺ	The Principal Contractor will be responsible for management and disposal of rainwater runoff generated from the site in its temporary condition during construction. The contractor shall develop a formal Site Management Plan, which will address pollution management and control in relation to site plant and vehicles, raw materials storage and waste generation, to ensure that all surface water runoff generated in the temporary condition will be free of contamination.	ES Volume 1, Chapter 2: Design Evolut Alternatives and the Proposed Development
	The site will be subject to topsoil strip and bulk earthworks to prepare the site to the correct level for development. The contractor shall provide temporary drainage measures to contain runoff within the development site boundary, ensuring that this is sized appropriately, and that means to remove excess surface water are available for use at all times.	Non-EIA Deliverable: Flood Risk Assessment Conceptual Drainage Strategy
Ī	HABITAT ENHANCEMENT AND CREATION	
	Other neutral grassland will be created and managed to achieve moderate condition by passing the following criteria: (i) the vegetation closely matching characteristics of other neutral grassland with indicator species throughout the sward, (ii) no bracken and cover of scrub less than 5% (restricted to the margin of the southern scrub), and (iii) absence of invasive species. It may fail the following criteria (i) cover of bare ground being 1-5% and (ii) sward height being varied and (iii) there being greater than 9 species per meter square. Roughly 50% of the grassland will be power harrowed in strips, seeded with a species-rich seed mix and then managed as a traditional hay meadow with an annual cut in the summer, removing risings. The remaining 50% of the grassland would be bare ground following harrowing to allow natural seeding to occur. A suitable seed mix would comprise the Emorsgate basic general purpose meadow mixture. The grassland will be mown annually within late-July or August and all arisings will be removed. This will serve to remove nutrients and minimise scrub encroachment. Any invasive species will be identified and removed. Areas of modified grassland will be regularly mown to a short height, likely with arisings left in-situ. The wildlife pond will have good water quality, have semi-natural habitat for at least 10m from the pond edge, will not be connected to other waterbodies and will have water levels which fluctuate naturally. The attenuation basin will be sown with a grassland seed mix tolerant of seasonal inundation such as Emorsgate Seeds EM8 meadow mixture for wetlands or similar. Other broadleaved woodland will be created, targeting moderate condition. The woodland will be comprised of at least five native species and managed to prevent the establishment of invasive species and allow a varied structure with a mixture of different aged trees to develop. Areas of mixed scrub will be created. The scrub will include at least three woody native species with no single species comprising mor	ES Volume 3, Appendix: Ecology and Biodiver – Annex 2 Biodiversity Impact Assessment
	non-native plants do not become established. The scrub will also be allowed to develop edge habitat with scattered scrub and tall forbs/grassland between it and the adjacent other neutral grassland.	
ľ	Native hedgerow native hedgerow with trees and a native tree line will be planted.	
	CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN	
	and quality procedures, in this way those involved with the construction of the Proposed Development, including trade contractors and site management, will be committed to adopt the agreed best practice and environmentally sound methods. Trade contractors will be required to demonstrate how they will meet the targets of the CEMP and how the potential impacts will be offset, reduced or minimised. The CEMP will include the following minimum items: The CEMP will include the following minimum items: calcul handling of material and wasts, such as lowering rather than dropping items, storing waste materials in appropriate contains to be collected by a waste carrier to a registered waste transfer station and re-using materials where possible; core working hours for construction; Bacard pollution control measures; Codo gractice measures for runoff management and materials storage to avoid spillages; Measures to reduce the quantity of waste and materials during construction and to sustainably manage any waste generated; Measures to reduce the quantity of waste and materials during construction and to sustainably manage any waste generated; Bergy conservation measures; Energy conservation measures; Personal hygiene, washing and changing procedures; Personal hygiene, washing and changing procedures; A pan of the works, highlighting the various stages and their context within the project, including a full schedule of materials and mappower resources, as well as plant and equipment schedules; Bearla and safety, procedures for	ES Volume 1, Chapter 1: Introduction and Methodology ES Volume 1, Chapter 2: Design Evolu Alternatives and the Proposed Development ES Volume 1, Chapter 4: Land Take and Soils ES Volume 1, Chapter 5: Climate Change ES Volume 3, Appendix: Ecology and Biodive – Annex 1 Ecological Impact Assessment
Ī	CEMP - ECOLOGY	
	The CEMP will identify measures to be adopted to ensure protection of valued features during construction, including:	
		ES Volume 3, Appendix: Ecology and Biodiver – Annex 1 Ecological Impact Assessment



Culham Storage Chapter 7: Environmental Management, Mitigation and Monitoring

/ING	MANAGEMENT PLAN, MITIGATION OR MONITORING MEASURE
	 Any birds' nests are protected whilst in use. Ideally, works to suitable nesting habitat/features should be scheduled to avoid the bird nesting season (March to August inclusive). Should such
	take place during March-August inclusive, they must be immediately preceded by a check for any active nests by a suitably qualified ecologist. Any active nests identified during works (regard of time of year) would need to be protected and left with a suitable buffer (to be defined by the ecologist) until the nest is no longer active;
	• Any update surveys/ecological checks required prior to site clearance (e.g., a pre-commencement nesting bird and/or badger check);
	Risk assessment of potentially damaging construction activities;
	Identification of biodiversity protection zones;
	• Practical measures (both physical measures and sensitive working practices) to avoid, reduce or mitigate the impacts on important habitats and protected species during construction;
	The location and timing of sensitive works to avoid harm to biodiversity features;
	The times during construction when specialist ecologists need to be present on site to oversee works;
	Responsible persons and lines of communication; and
	Use of protective fences, exclusion barriers and warning signs.
	CEMP – LAND TAKE AND SOILS (AGRICULTURE)
	The CEMP will take into account the measures set out in the Defra Construction Code of Practice for the Sustainable use of Soils ³ , which includes the most appropriate re-use for the different to soils within the site, as relevant, and the proposed methods for handling and storing soils on-site. The adoption of these measures will ensure that the soil resources on-site will be able to continue their various ecosystem services and functions.
	CONSTRUCTION TRAFFIC MANAGEMENT PLAN
	The Construction Traffic Management Plan (CTMP sets out a number of measures to be adhered to, including:
	 Development traffic during construction will involve numerous large articulated vehicle movements together with Abnormal Indivisible Loads and large mobile cranes. The Proposed Develor will be accessed via a Site Security Checkpoint located at the entrance to the construction site. Unrestricted access is not allowed without undertaking a Site-Specific Induction, Assessme Approval. In the absence of this training and approval, visitors to the site will always be escorted by a site member in possession of this training and authorization;
	• The BESS site will be a Safe 6 site and all personnel working or carrying out deliveries to site will require as a minimum Safety Helmet (Hard Hat), Hi-Vis Tabard, Coveralls, Gloves, Lig Protection, Safety Boots. For temporary visitors spare sets of Light Eye Protection and Hard Hats will be provided but it is the expectation that all deliverers/collection persons will have equipment with them. It is a requirement that all site personnel and visitors sign in and out of the site on all occasions;
	 A temporary compound area will be established next to the site access with enough capacity to accommodate welfare facilities for the workforce, parking for workforce vehicles, secure store materials and the unloading requirements of the delivery vehicles. Its size will allow the largest delivery vehicles to turn such that they can both enter and depart the site in a forward gear. way there will be no queuing, parking, unloading or materials storage on the public highway;
	 The Site Manager or his designated deputy will be responsible for supervising, controlling and monitoring vehicle movements within the site and ensuring that there are suitable arrangements the safe delivery and collection of vehicle loads. All plant, delivery/collection vehicles and cranes will be supervised by a Banksman when re-versing. If a temporary compound area car established within the main site area the Applicant will seek to agree a suitable area outside the red line for use on a temporary basis;
	 5.5m wide tracks will be provided within the site to enable vehicle access to the various areas of BESS installation. Topsoil will be removed before 200mm of 75mm crushed stone is la compacted on an appropriate geotextile membrane;
	 Topsoil will be removed before 200mm of 75mm crushed stone is laid and compacted on an appropriate geotextile membrane;
	 Delivery and workforce vehicles that enter and depart the site will not be required to travel on unmade ground as all such movements will be contained within the com-pound area or will foll site access tracks, both of which will be of a 'stoned' construction. Notwithstanding, all HGVs leaving the site will be inspected by the Banksman prior to departure to ensure that their whe sufficiently clean to access the public highway. Wheel washing facilities in the form of a jet washer and water supply will be provided adjacent to the site access and used should the need a
	buildently doubt to doodo the public highway. Wheel washing tabilities in the form of a jet washer and water supply will be provided adjusted to be a be a board the need a
	• The Site Manager will monitor the cleanliness of the local highway network on a regular basis and hire a mobile road sweeper should this be found to be necessary:
	 A Banksman stationed at the site access will be tasked with ensuring that the surfacing of the access is kept clear of loose stones and similar. Appropriate equipment will be provided to ass The areas the BESS facility will be fenced off and clear of the Public Rights of Way (PRoWs) themselves and will not have any impact on their usage either during construction or once opera During the construction period, warning signage for pedestrians will be provided on the PRoW informing them about the construction works in progress. 'No Entry to Construction Traffic's
	 A Banksman stationed at the site access will be tasked with ensuring that the surfacing of the access is kept clear of loose stones and similar. Appropriate equipment will be provided to ass The areas the BESS facility will be fenced off and clear of the Public Rights of Way (PRoWs) themselves and will not have any impact on their usage either during construction or once operation.

³ Department for Environment, Food and Rural Affairs (Defra) (2009). Construction Code of Practice for the Sustainable Use of Soils on Construction Sites. Code of practice for the sustainable use of soils on construction sites - GOV.UK (www.gov.uk)



	ES REFERENCE
h works gardless	
types of e to fulfil	ES Volume 1, Chapter 4: Land Take and Soils ES Volume 1, Chapter 5: Climate Change
lopment and aght Eye e all the orage of r. In this hents for innot be laid and ollow the eels are arise; sist; rational. signage	ES Volume 1: Chapter 2: Design Evolution, Alternatives and the Proposed Development Non-EIA Deliverables: Construction Traffic Management Plan

TIMING	MANAGEMENT PLAN, MITIGATION OR MONITORING MEASURE
	TREE PROTECTION SCHEME
	Prohibited Activities The following must not be carried out under any circumstances: Cutting down, uprooting, damaging or otherwise destroying any retained tree. Lighting a fire within 10 metres of the canopy of any retained tree. Equipment, signage, fencing, tree protection barriers, materials, components, vehicles or structures shall not be attached to or supported by a retained tree. Mixing cement, chemical toilets and other use or storage of anything that would be harmful to trees shall not take place within, or close to a Root Protection Area (RPA). The distance away the RPA must be sufficient, and the slope of the site must be such that contamination of soil in the RPA would not occur if there were spillage, seepage or displacement. No plant or equipment or vehicle with a hydraulic arm such as a mini digger shall be operated within striking distance of stem and branches or the RPA of any retained tree unless otherwise specing in this report. Tree Work Requirements Tree removal should be undertaken following acceptance of planning permission, by suitably qualified and insured arborists, observing location of trees on the Arboricultural Site Plan and Tree Protection Plan. Protective Measures – Tree Protection Barriers Tree protection barriers must be installed before the commencement of any site works, and a construction exclusion zone established, to protect all retained trees during the construction of the properticement.
	ACCESS NOTE
OPERATION / COMPLETED DEVELOPMENT	The Proposed Development, when operational, will be operated automatically, with limited need for personnel on site. Development traffic will likely comprise occasional maintenance vehicle accessecurity checks and routine maintenance, primarily by car and van as and when required, from the public road Thame Lane via the retained construction access.
	HABITAT MAINTENANCE
	The neutral grassland grassland will be mown annually within late-July or August and all arisings will be removed. This will serve to remove nutrients and minimise scrub encroachment. Any investigate species will be identified and removed. Areas of modified grassland will be regularly mown to a short height, likely with arisings left in-situ. The scrub will be allowed to develop edge habitat with scattered scrub and tall forbs/grassland between it and the adjacent other neutral grassland.

	ES REFERENCE
way from specified rotection proposed	Non-EIA Deliverables: Tree Protection Scheme
ccess for	Non-EIA Deliverables: Access Note
invasive	ES Volume 3, Appendix: Ecology and Biodiversity – Annex 2 Biodiversity Impact Assessment