

Protected Species Precautionary Working Methods Statement

July 2025

**Stonehouse Farm,
Handcross**

Prepared by
CSA Environmental

On behalf of
Lake Investments Ltd.

Report No: CSA/6746/12

This report may contain sensitive ecological information. It is the responsibility of the Local Authority to determine if this should be made publicly available.

Report Reference	Revision	Date	Prepared by	Approved by	Comments
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1.0 INTRODUCTION

- 1.1 This Protected Species Precautionary Working Methods Statement (PWMS) has been prepared by CSA Environmental on behalf of Lake Investments Ltd in relation to Stonehouse Farm, Handcross (hereafter 'the Site') where mixed-used development is proposed. A full planning application has been submitted (Horsham District Council Ref: DC/25/0403), consisting of three application areas within the Stonehouse Farm landholding. These are referred to as 'Stonehouse Business Park', 'Anaerobic Digester (AD) Plant and Main Livestock Building' and 'Jackson's Ridge'. Baseline Habitats Plans for these application areas are provided in Appendix A.
- 1.2 This PWMS sets out the proposed approach to the removal of habitat features with low potential to support notable / protected species (e.g. hazel dormouse *Muscardinus avellanarius*, badger *Meles meles*, hedgehog *Erinaceus europaeus*, barn owl *Tyto alba*, great crested newt *Triturus cristatus* and widespread reptile species such as slow worm *Anguis fragilis*, common lizard *Zootoca vivipara* and grass snake *Natrix helvetica*).
- 1.3 Whilst targeted survey work undertaken across the Site during 2023-2025 has not confirmed the presence of these species, records of these species have been provided from within the local area (Sussex Biological Records Centre, 2024) and given their legal protection and/or conservation status a precautionary approach to clearance of habitat features which could provide opportunities for these species is proposed.
- 1.4 Full details of ecological survey work undertaken to inform this PWMS and an impact assessment for the proposed development is provided within the Ecological Impact Assessment (EcIA) (CSA/6746/08/D), which should be read in conjunction with this report.
- 1.5 The application areas comprise the following habitat features which will be impacted by the proposals, and to which the precautionary measures set out herein will apply:
- **Stonehouse Business Park:** loss of small areas of sparsely vegetated land. Modified grassland and demolition of derelict barns (B3 and B4).
 - **Anaerobic Digester (AD) Plant and Main Livestock Building:** loss of modest areas of grassland, sparsely vegetated land and c.110m of native hedgerow and change of use of existing barns (B1 and B2).
 - **Jackson's Ridge:** loss of small areas of sparsely vegetated ground, grassland, rubble piles, scrub and change of use / demolition of existing barns (B1 to B6).

2.0 LEGISLATION

2.1 Legislation relating to species identified within this PWMS includes:

- The Conservation of Habitats and Species Regulations 2017 (as amended)
- The Wildlife and Countryside Act 1981 (as amended)
- The Natural Environment and Rural Communities (NERC) Act 2006
- Protection of Badgers Act 1992

2.2 This above legislation has been addressed, as appropriate, in the production of this PWMS.

European Protected Species

2.3 The Conservation of Habitats and Species Regulations 2017 (as amended) enacts the Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora, and Council Directive 79/409/EEC on the Conservation of Wild Birds, into UK law. European Protected Species (EPS) comprise those listed under Section 43 of the Regulations.

2.4 These regulations make it an offence to deliberately capture, injure, kill or disturb (impairing their ability to survive, breed reproduce or rear/nurture their young) an EPS or to damage or destroy a breeding site or resting place of an EPS. Where development is proposed that would result in an offence under the Habitats and Species Regulations an EPS licence needs to be granted by Natural England to permit an act that would otherwise be unlawful. This provides for a specific derogation from the legislation, to prevent a legal infringement occurring.

2.5 EPS species of relevance to the Site comprise the following;

- **Dormice** (sections of hedgerow and scrub habitat to be removed to allow construction of new roads and provide room for development)
- **Great crested newt** (loss of terrestrial habitat which could be used by GCN if present within on-site/ nearby ponds)

2.6 Measures set out within this PWMS seek to avoid and / or minimise potential impacts to EPS, in order to be compliant with the Habitats Regulations. Where impacts to EPS species cannot be avoided, works will need to be covered by a Mitigation EPS licence from Natural England, to allow derogation from the Habitats Regulations legislation.

UK Protected Species

2.7 The Wildlife and Countryside Act 1981 (as amended) forms the primary piece of UK legislation relating to the protection of habitats and species.

- **Nesting Birds** (potential for direct impacts to birds during vegetation clearance; W&CA it makes it an offence to kill, injure or take any wild bird, or to take, damage or the nest of a wild bird, or to take or destroy eggs).

- **Barn owl** (potential for direct / disturbance impacts to birds during barn demolition / change of use; W&CA it makes it an offence to kill, injure or take any wild bird, or to take, damage or the nest of a wild bird, or to take or destroy eggs. Barn owl are additionally listed on Schedule 1 of the Act which affords them special protection against disturbance whilst nesting).
- 2.8 Under Section 5, Schedule 9(4) of the Act it is an offence to intentionally or recklessly disturb a species whilst occupying a structure or place which it uses for shelter or protection, or to obstruct access to such a place. This schedule will be of relevance to the following:
- **Dormice** (Section 5, Schedule 9(4); potential for disturbance and obstruction of resting sites within hedgerow and scrub habitat; and
 - **Great crested newt** (Section 5, Schedule 9(4); potential for disturbance and obstruction of resting sites i.e. via loss of rough grassland, scrub and hedgerow habitat.
- 2.9 Section 5, Schedule 9(1) of the Act is an offence to intentionally or recklessly kill or injure a species listed under this schedule. This schedule will be of relevance to the following:
- **Reptiles** (widespread species Section 5, Schedule 9(1); potential for killing and injury of reptiles during clearance of vegetation e.g. hedgerows and rough grassland margins).
- 2.10 The Protection of Badgers Act 1992, aims to protect badgers and their setts from cruelty.
- 2.11 Mitigation set out within this report seeks to avoid an offence under the Wildlife and Countryside Act in respect to these species.

Priority Species for Conservation

- 2.12 Section 40(1) of the Natural Environment and Rural Communities (NERC) Act 2006 states that each public authority “must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity”. This legislation makes it clear that planning authorities should consider impacts to biodiversity when determining planning applications, with particular regard to the Section 41 list of 56 habitats and 943 species of principal importance, irrespective of whether they are covered by other legislation. The S41 list species of relevance to the Site include:
- **Hedgehog** *Erinaceus europaeus*

3.0 BASELINE SURVEY SUMMARY

Desk Study

- 3.1 As part of the Ecological Impact Assessment (EclA; CSA/6746/08/D), CSA Environmental carried out an ecological desk study, which included a review of any records of protected species held by Sussex Biological Records Centre (SXBRC) from within 2km of the Application Site as well as a review of the Multi-Agency Geographic Information for the Countryside (MAGIC) online database was reviewed to identify the following ecological features (based on the Site's likely 'zone of influence' in respect of such features).

Field Surveys

Habitats

- 3.2 UK Habitat Classification ('UKHab') surveys were carried out on 18 and 20 December 2023 and 04 January 2024, and updated along with a Habitat Condition Assessment on 18 and 23 July 2024. Habitats Plans are provided in Appendix A.

Dormice

- 3.3 A total of three records of dormouse *Muscardinus avellanarius* were identified within the search area, dating from 2018 to 2021. Whilst some opportunities for this species exist within the local landscape, habitat suitability / connectivity within the proposed development areas is considered to be sub-optimal for dormice. Records and habitat suitability for each part of the Application Site are summarised below:

- **Stonehouse Business Park:** The closest record of a dormouse is c. 1.1km to the west and is from 2021. Boundary hedgerows may offer some limited resources for dormice, but proposals will not result in any impacts to such features.
- **Jackson's Ridge:** The closest record of dormice is c. 1.2km to the south-west from 2021. Boundary hedgerows / tree lines are considered to be sub-optimal for dormice; and proposals will not result in any impacts to these features. Minor loss of poor quality scrub habitat, unlikely to be able to support dormice.
- **Anaerobic Digester (AD) Plant and Main Livestock Building:** The closest record of a dormouse is c. 0.6km to the south-west and dates from 2021. Hedge H28 contains some fruit-bearing species which could be of value to dormice, but is recently planted with poor structure and has limited connectivity to other off-site habitats within the wider landscape. It is considered highly unlikely that dormice will be present within H28; however given the loss of c. 110m of this hedgerow to facilitate upgrades to the existing site access, precautionary working measures are detailed herein to ensure that any adverse impacts to this species are avoided in the unlikely event that they are found to be present.

- 3.4 Overall it is considered unlikely that dormouse populations will be impacted by the proposals, however given their presence in the local landscape then precautionary working measures would be appropriate where suitable habitat features are to be removed.

Badgers

- 3.5 The SxBRC have not returned records for badger *Meles meles* due to the sensitive nature of these records. No evidence of badgers (e.g. setts, latrines, other field signs) was recorded during the visits to the Application Site. The Application Site does not consist of habitat likely to attract badger foraging or sett building. However, the surrounding land ownership and wider rural area contains habitat in which badger setts and roaming of badgers is likely, and as such it may be possible for badgers to pass through, likely skirting the edges using boundary habitats such as hedgerows.

Breeding Birds / Barn Owl

- 3.6 A total of 1110 records of 51 bird species were identified within the search area, dating from 1980 to 2022. Hedgerow and scrub habitats across the Application site provide nesting opportunities for a range of farmland bird species. As such, where any removal of potential nesting habitat will occur potential impacts to nesting birds will need to be considered.

- 3.7 Ten records of a barn owl were returned within the data results, although these records have not been given to an accurate grid reference and as such cannot be placed accurately in reference to the Application Sites. Targeted surveys to establish the presence / likely absence of breeding barn owl within buildings to be impacted by the proposals were undertaken in December 2023 and May 2024 (Stonehouse Business Park and Jackson's Ridge) and April and July 2025 (Ad Plant and Main Livestock Building). Findings are summarised as follows:

- **Stonehouse Business Park:** No field signs (e.g. pellets, feathers, droppings etc) were observed during the surveys undertaken in December 2023 or May 2024. A barn owl was briefly observed perching on top of building B4 during an evening bat survey undertaken on 03 June 2024, however no evidence to suggest that barn owl were using this building for nesting was observed.
- **Jackson's Ridge:** No field signs (e.g. pellets, feathers, droppings etc) were observed during the surveys. As such, no evidence to suggest that barn owl were using this building for nesting was observed.
- **Anaerobic Digester (AD) Plant and Main Livestock Building:** No conclusive field signs (e.g. pellets, feathers, droppings etc) were observed during the surveys undertaken in April or July 2025. A single pellet considered to potentially be attributed to barn owl was found on a scissor lift stored within building B2. Given that the scissor lift is a portable piece of machinery, it cannot be

guaranteed that the pellet originated from inside B2. No evidence to suggest that barn owl were using B1 or B2 for nesting was observed.

- 3.8 As such, no barn owl nesting sites have been confirmed. However, barn owl are known to be present within the wider landscape and may be using surrounding areas for hunting / commuting to nesting sites. It is therefore possible that barn owl may make use of available nesting resources within on-site buildings in the future and as such precautionary working measures would be appropriate where suitable habitat features are to be removed.

Reptiles and Amphibians

- 3.9 A total of 43 records of four reptile species were identified within the search area including slow worm *Anguis fragilis*, common lizard *Zootoca vivipara*, adder *Vipera berus* and grass snake *Natrix helvetica*. A total of 24 records of five amphibian species were identified within the search area, including between 1987 and 2021 and included common toad *Bufo bufo*, common frog *Rana temporaria*, palmate newt *Lissotriton helveticus*, smooth newt *Lissotriton vulgaris* and great crested newt *Triturus cristatus*.
- 3.10 Habitat Suitability Index (HSI) Assessment and eDNA sampling to determine the presence / likely absence of great crested newt was undertaken on all ponds within 500m of the application areas (where access could be obtained), in spring 2024.
- 3.11 Records of protected reptile and amphibian species and habitat suitability for each part of the Application Site are summarised below:
- **Stonehouse Business Park:** The closest record of a reptile is of grass snake c. 670m north from 2002. The closest record of a great crested newt was recorded at Warley Barn Farm, c. 640m north-east of the Application site in 2019. No reptiles or evidence of reptiles / amphibians was found during the Site visit. The Site offers very limited suitable habitat for reptiles / amphibians, confined to the small areas of grass which are isolated from connective habitat by hardstanding. Some additional suitable habitat may be found at hedgerow bases but these were not considered to be high quality features for reptiles / amphibians and will not be impacted by the proposals. The wider rural landscape offers suitable habitat for reptiles / amphibians including four ponds (P1-P4) and adjacent reedbed areas occur within 250m of the Application Site. eDNA sampling of these ponds returned a positive result for great crested newt within P4 (c.150m north-east).
 - **Jackson's Ridge:** Dominated by hardstanding, offering negligible opportunities for reptiles / amphibians. However, adjacent treeline bases and areas of grassland could provide some foraging, sheltering and dispersal routes for reptiles / amphibians.

One pond is present within 250m (P12), which returned a negative result for great crested newt.

- **Anaerobic Digester (AD) Plant and Main Livestock Building:** Hedgerow and treeline bases, areas of grassland, particularly those with tall forbs, and areas of made-up ground could provide foraging, sheltering and dispersal routes for reptiles. A small ephemeral pond is present within an excavated area next to Building B2. The pond has a small area of fringing 'other neutral grassland' but is isolated from other semi-natural grassland by hard standing / sparsely vegetated land (c. 30m to nearby grassland). eDNA sampling returned a negative result for great crested newt, with no other ponds being present within 250m.

- 3.12 Overall it is considered unlikely that reptiles / amphibian populations will be impacted by the proposals, however given their presence in the local landscape then precautionary working measures would be appropriate where suitable habitat features are to be removed.

Hedgehog

- 3.13 Two records of hedgehog were identified within the search area, dating from 2005 and 2006. An accurate grid reference was not given with the records, although are reported to have been recorded in Lower Beeding, which is c. 1.2km south-west from the Site.
- 3.14 Hedgehogs are considered to be widespread in Sussex and will make use of a range of common habitats, such as hedgerows, grassy areas, woodland, scrub, etc. as well as garden habitat. The habitats recorded on all three Application sites and the wider landholding, particularly around the boundaries, may offer some suitable foraging habitat for hedgehog. Given the surrounding rural landscape and connected habitats, it is considered likely that hedgehogs would make use of the site to forage or commute. As such, it is considered that precautionary working measures would be appropriate where suitable habitat features are to be removed.

4.0 PRECAUTIONARY WORKING METHOD

Update Surveys

Site Clearance / Construction - Badgers

- 4.1 Prior to site clearance / construction occurring an update badger survey to look for the presence of any active setts will be undertaken.
- Should any badger setts be identified that will not be directly affected by proposals, a 30m buffer will be installed around the outermost entrances to the sett in which no development works will occur, prior to any development taking place
 - The buffer should be constructed with Heras fencing with suitable entrances for badgers to pass through/underneath and to ensure materials do not pass through into this buffer zone
 - During construction any open excavations should be covered with wooden boards, or fitted with appropriate escape ramps, in order to prevent badgers falling into them and injuring themselves or becoming trapped
 - Monitoring of the Site for any new sett excavation during prolonged remediation, construction or landscaping works should be undertaken
 - No artificial lighting will be positioned where it would fall on the main badger sett or paths leading directly from it.

Building Demolition / Change of Use – Nesting Birds

- 4.2 Prior to building demolition / change of use occurring an updated inspection survey to look for the presence of nesting birds, including barn owl, will be undertaken.
- 4.3 If there is any evidence of birds actively nesting then works will need to be postponed until young have fledged. In the event that the presence of nesting barn is confirmed, the suitable mitigation for the loss of any nesting sites shall be required. Suitable mitigation may include provision of a new nest site (to be provided within 200m of the building to be lost, 60 – 90 days prior to any works starting).

Timing of Works

Hedgerow / Scrub / Grassland / Rubble Pile Removal

- 4.4 It is proposed that the removal of habitat suitable for nesting birds is undertaken outside the of core testing period of March to August inclusive. Where such features could also offer potential refuge for dormice, hedgehog, reptile or amphibian species then removal will be avoided during the winter period when these species are inactive / hibernating and risks of impact from disturbance is greater. As such, habitat removal will either be timed for early spring (e.g. March) or (preferably) autumn (September / October).

- 4.5 These timings are broadly in line with the Hazel Dormouse Mitigation Handbook (Wells, *et al.* 2025¹), which suggested a single-stage clearance during the spring or autumn where habitat can be subject to a finger-tip search for dormice immediately preceding the works (see below), and where no more than 150m of hedgerow / scrub habitat will be removed in one day.
- 4.6 Grassland and scrub to be gradually cut back with hand tools only (e.g. strimmer) to c. 200mm above ground level under ecological supervision. The cutting would be in a systematic manner, working from a central point of the construction working area to encourage dispersal of any reptiles present to the boundaries. All refugia found, will be removed by hand and any animals present moved to the boundaries. A second cut to ground level will be undertaken 24 hours after the first cut, again under ecological supervision.
- 4.7 Semi-permanent reptile/ amphibian fencing will then be installed along the perimeter of the construction area (where necessary) to prevent reptiles recolonising these areas. This requirement will be determined by the project ecologist follow vegetation clearance.
- 4.8 The vegetated habitats on the Site will need to be maintained at ~200mm until construction begins. The exclusion fencing will remain in place for the duration of the construction phase, and only removed under ecological supervision.

Working Methods

- 4.9 A 'Suitably Qualified Ecologist' (SQE), i.e. experienced ecologist, licenced or accredited by a licenced ecologist to handle hazel dormice, will be appointed by the developer to oversee the implementation of the PWMS.

Toolbox Talk

- 4.10 Works may only progress following the delivery of a toolbox talk by the SQE to the operatives on Site. The toolbox talk will cover what Important Ecological Features (IEF) may be present (dormice, badger, GCN, reptiles and nesting birds), the methods to be used, the legislative protections offered to each of these potential constraints to the works and the protocol to be followed, i.e. works must stop in the event that a dormouse or dormouse nest / great crested newt is found and an EPS Licence must be secured.
- 4.11 Works would also cease in the event a nesting bird is found in the location of the works until such a time as the chicks have fledged and the nest is no longer in active use. Reptiles may be translocated /

¹ Wells, D. Chanin, P. & Gubert, L. (2025) *Hazel Dormouse Mitigation Handbook*. The Mammal Society. ISBN: 978-1-0687982-2-1

dispersed into 'safe' areas of the Site which shall be retained as part of the proposals.

- 4.12 The delivery of this toolbox talk will be evidenced by the completion of a signing sheet and a hard copy of the toolbox talk, along with this PWMS and the other associated mitigation strategies, will be kept in the Site office at all times.

Fingertip Search

- 4.13 Prior to works commencing a thorough fingertip search of the working area will be undertaken by the SQE. Where any dense vegetation and leaf litter is present at ground level then this should carefully be removed by hand, or with the aid of hand-held tools. Fingertip searches will be undertaken on the same day as habitat clearance occurs.

Single-Stage Vegetation Removal

- 4.14 Hedgerow removal will be undertaken in segmented stages, through the use of hand tools only. The SQE will provide a watching brief as works take place to monitor the vegetation for any evidence of protected species thereafter and repeat this process as each segment is cut back.
- 4.15 Once the hedgerow has been reduced to ground-level, machinery may be used to pull out stumps and level-off the soil in the immediate location of the works. The SQE will remain to provide a watching brief over this part of the works in order to safeguard any protected species that may be present.

Unexpected Presence of Dormice / Great Crested Newt

- 4.16 In the unlikely event that any evidence of dormice / great crested newt is found during any stage of the above works, then all habitat removal works will need to cease, and Natural England will need to be contacted on how best to proceed. Works will need to be put on hold until a full EPS Mitigation License is in place.

5.0 SUMMARY

- 5.1 Proposed development at Stonehouse Farm will result in the loss of small areas of habitat which could potentially be used by a range of local wildlife. Whilst the presence of protected / notable species (e.g. dormice, badger, hedgehog, nesting birds including barn owl, reptiles and amphibians including great crested newts) has not been confirmed within the proposed development areas, these species are known to occur within the wider landscape and as such precautionary working measures will be implemented as appropriate during the removal of suitable habitat features.
- 5.2 In addition to precautionary working measures to be implemented during the construction phase, a range of habitat replacement and enhancement measures will also be implemented (e.g. hedgerow replacement, new hedgerow / tree planting and grassland creation) as part of the proposals, as well as across the wider landholding as apart of an emerging Habitat bank. Full details are provided within the EcIA (CSA/6746/08/D) and the BNG Report (CSa/6746/06/E).
- 5.3 Subject to the measures set out within this PWMS, the potential for adverse effects and contravention of the Wildlife and Countryside Act 1981 (as amended) or the Conservation of Habitats and Species Regulations 2017 (as amended) is considered unlikely and as such do not need to be covered by EPS licencing. However, should any signs / presence of EPS (e.g. dormice / great crested newt) be found during the removal of suitable habitat features, all works will need to cease and further advice will be sought from Natural England.

Appendix A

Habitats Plan







- Site boundary
- Modified grassland (g4)
- Developed land, sealed surface (u1b)
- Buildings (u1b5)
- Artificial unvegetated unsealed surface (u1c)
- Building reference
- Hedgerows (Priority Habitat) (h2a)
- Other Hedgerows (h2b)
- Line of trees (33)



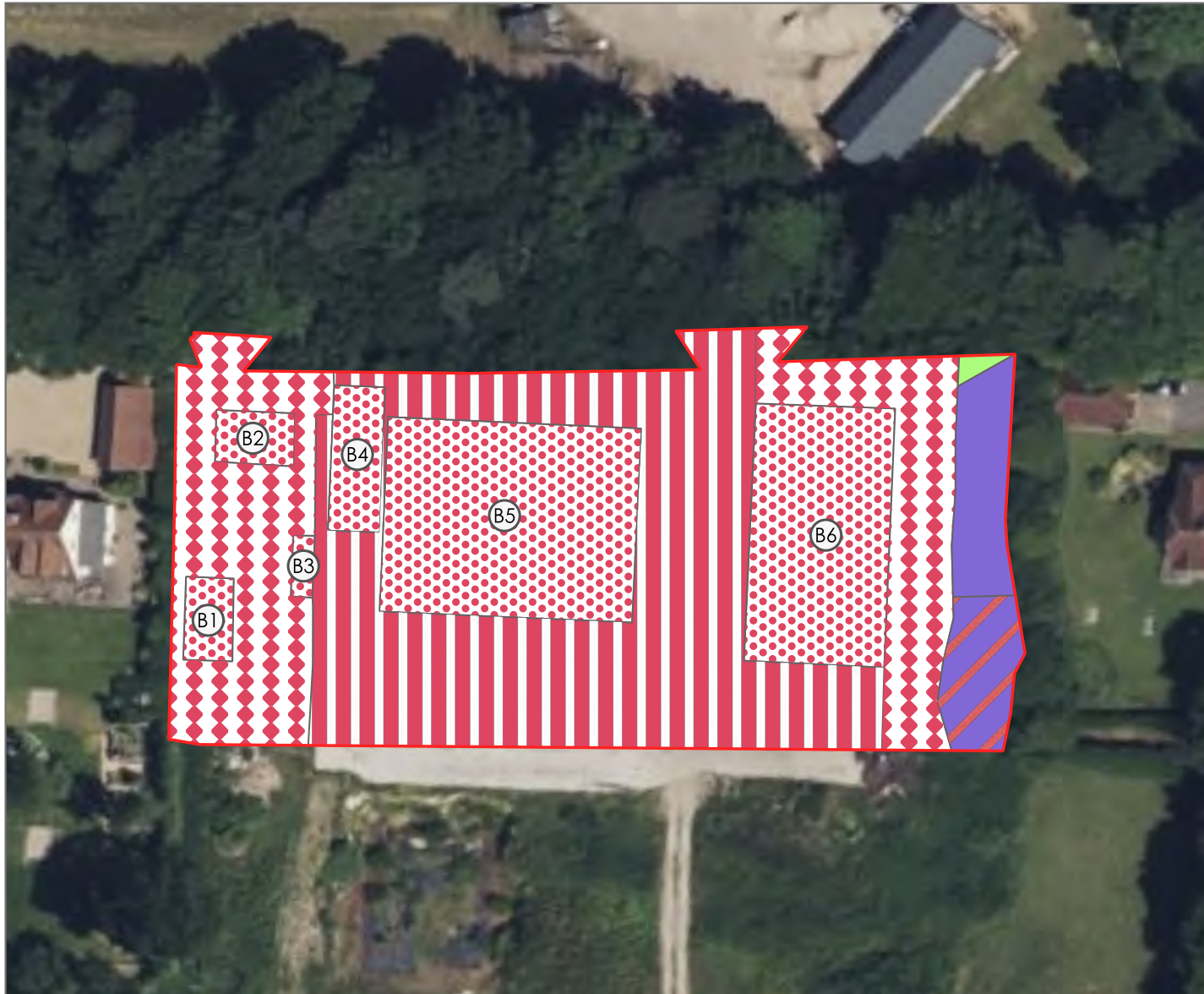
Project	Stonehouse Farm, Handcross	Date	Feb 2025	Drawing No.	CSA/6746/102
Drawing Title	Stonehouse Business Park, Habitats Plan	Scale	Refer to scale	Rev	C
Client	Lake Investment Ltd.	Drawn	LG	Checked	CC



-  Site boundary
-  Other neutral grassland (g3c)
-  Modified grassland (g4)
-  Developed land, sealed surface (u1b)
-  Buildings (u1b5)
-  Sparsely vegetated land (u1f)
-  Ponds (r, 41)
-  Field/ Building reference
-  Hedgerows (Priority Habitat) (h2a)



Project	Stonehouse Farm, Handcross	Date	July 2025	Drawing No.	CSA/6746/118
Drawing Title	Anaerobic Digester (AD) Plant and Main Livestock Building Habitats Plan	Scale	Refer to scale	Rev	D
Client	Lake Investment Ltd.	Drawn	LG	Checked	CC



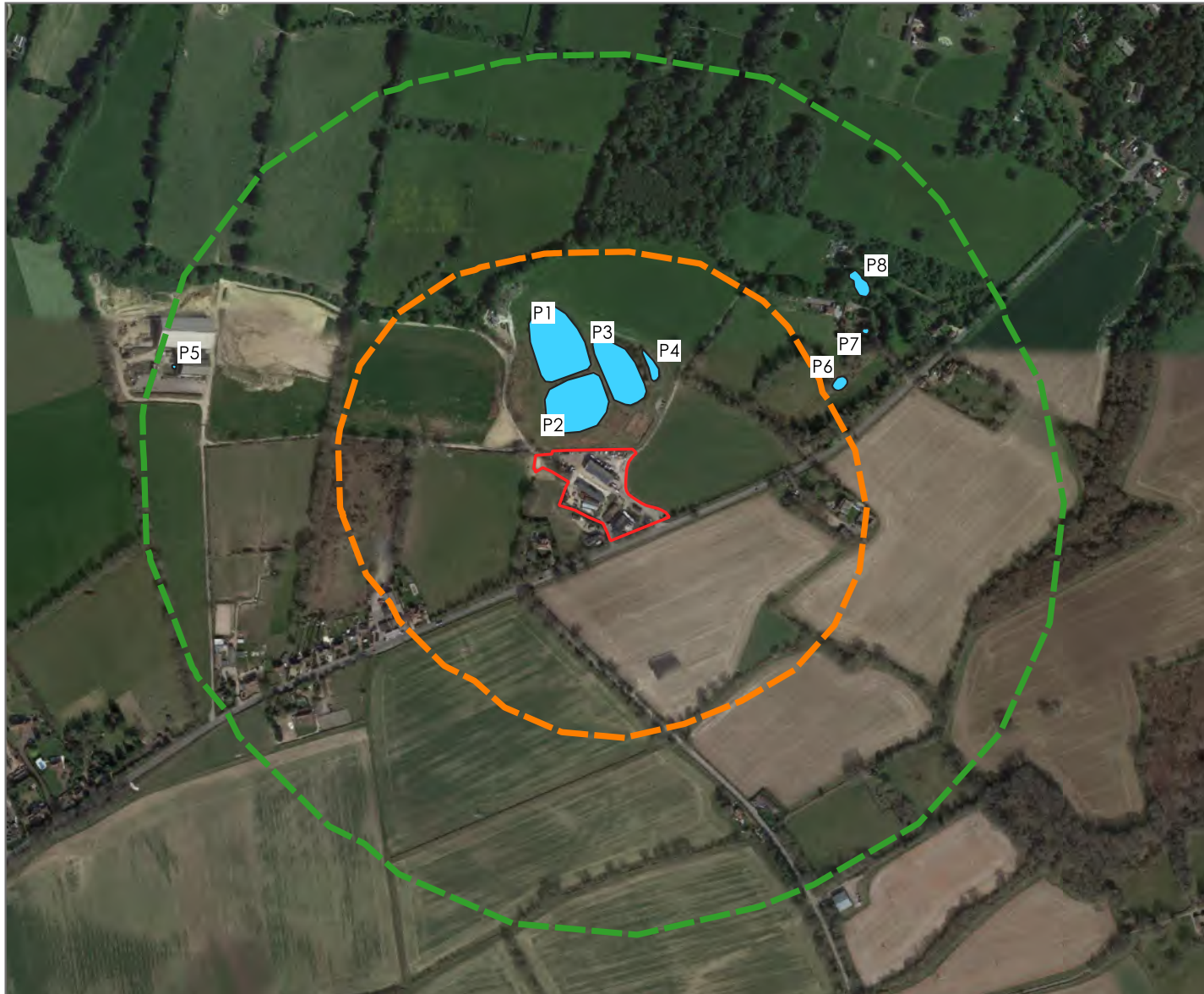
- Site boundary
- Modified grassland (g4)
- Bramble scrub (h3d)
- Mixed scrub (h3h)
- Developed land, sealed surface (u1b)
- Buildings (u1b5)
- Sparsely vegetated land (u1f)
- Building reference



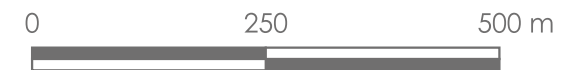
Project	Stonehouse Farm, Handcross	Date	Feb 2025	Drawing No.	CSA/6746/120
Drawing Title	Jackson's Ridge Habitats Plan	Scale	Refer to scale	Rev	C
Client	Lake Investment Ltd.	Drawn	LG	Checked	CC

Appendix B

Pond Plans



- Survey Area
- Pond
- 250m buffer
- 500m buffer



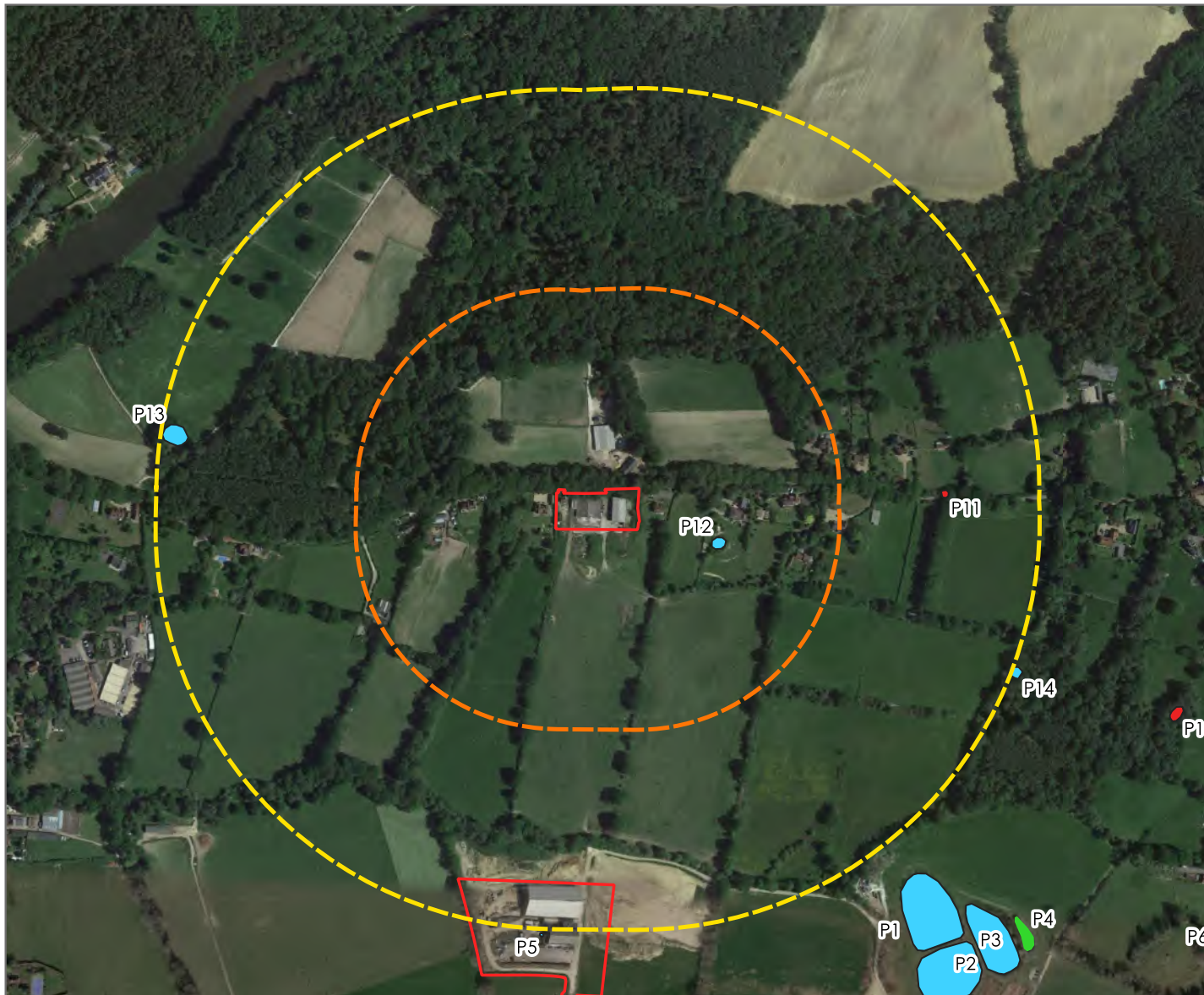
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Office 20, Citibase, 95 Ditchling Road,
Brighton BN1 4ST

t 01273 573871
e brighton@csaenvironmental.co.uk
w csaenvironmental.co.uk

Project	Commercial Yard, Stonehouse Farm, Plummers Plain, Horsham	Date	Feb 2024	Drawing No.	CSA/6746/105
Drawing Title	Pond Plan	Scale	Refer to scale	Rev	-
Client	Hunter Development Holdings Ltd	Drawn	LG	Checked	CC



- Application Site boundary
- Pond no longer present
- Pond and reference number
- Pond with positive eDNA result

Pond ref	HSI Score	eDNA result
P5	Poor	Negative
P11	N/A	Negative
P12	Excellent	Negative
P13	Excellent	Negative
P14	Below average	Negative



Project	Stonehouse Farm, Handcross	Date	Feb 2025	Drawing No.	CSA/6746/134
Drawing Title	Jackson's Ridge Great Crested Newt Survey Results	Scale	Refer to scale	Rev	-
Client	Lake Investment Ltd.	Drawn	LG	Checked	CC



Dixies Barns, High Street,
Ashwell, Hertfordshire
SG7 5NT

t 01462 743647
e ashwell@csaenvironmental.co.uk
w csaenvironmental.co.uk

Office 20, Citibase,
95 Ditchling Road,
Brighton BN1 4ST

t 01273 573871
e brighton@csaenvironmental.co.uk
w csaenvironmental.co.uk

3 Ripple Court,
Brockridge Park, Twynning,
Tewkesbury GL20 6FG

t 01386 751100
e tewkesbury@csaenvironmental.co.uk
w csaenvironmental.co.uk

Wizu Workspace, 32 Eyre
St, Sheffield City Centre,
Sheffield S1 4QZ

t 07838 290741
e sheffield@csaenvironmental.co.uk
w csaenvironmental.co.uk

Worting House,
Church Lane, Basingstoke,
RG23 8PY

t 01256 632340
e basingstoke@csaenvironmental.co.uk
w csaenvironmental.co.uk