

MKA
ECOLOGY

Construction Ecological Management Plan

Steyning Grammar School, West Sussex

Site	Steyning Grammar School, West Sussex
Project number	251882
Client name / Address	BAM Construction Ltd, CoachWorks, Dover Place, Ashford, Kent, TN23 1HU

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Declaration of compliance

This Preliminary Ecological Appraisal has been undertaken in accordance with British Standard 42020:2013 "Biodiversity, Code of practice for planning and development". The information which we have provided is true, and has been prepared and provided in accordance with the Chartered Institute of Ecology and Environmental Management's (CIEEM) Code of Professional Conduct. We confirm that the opinions expressed are our true and professional bona fide opinions.



MKA Ecology Ltd is a CIEEM Registered Practice. This means that MKA Ecology Ltd are formally recognised for high professional standards, working at the forefront of our profession.

Validity of data

Unless stated otherwise the information provided within this report is valid for a maximum period of 18 months from the date of survey. If works at the site have not progressed by this time an updated site visit may be required in order to determine any changes in site composition and ecological constraints.

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1. EXECUTIVE SUMMARY

In May 2026 MKA Ecology Ltd was commissioned to produce a Construction Ecological Management Plan (CEMP) for the proposed development at Steining Grammar School, West Sussex. The purpose of this document is to provide guidance on appropriate measures to protect biodiversity prior to, and during, the construction works.

The proposals involve a school redevelopment, which entails the demolition of existing buildings and erection of new buildings within the Site extent, and associated vegetation removal and new landscaping. The Site comprises buildings, hardstanding, areas of modified grassland and woodland, as well as a large number of trees and tree groups, a native hedgerow, and ornamental non-native hedgerows. Proposed habitats include buildings, hardstanding, introduced shrub, modified grassland, biodiverse green roofs, new trees, species-rich hedgerows, and a traditional orchard. Areas of other broadleaved woodland and modified grassland are also to be retained. The development will also involve the removal of 31 trees onsite, including three with potential roosting features (PRFs) for bats.

Previous ecological surveys at the Site identified ecological constraints relating to a number of different species groups. Furthermore, there are requirements for protective buffers, sensitive timing of works, and for an Ecological Clerk of Works (ECoW) to be present at certain times during clearance and construction works. The key actions to be undertaken to avoid adverse impacts upon these protected groups are as follows:

- **Habitats:** Protection of retained species-rich native hedgerow, trees, and woodland parcels with Heras fencing for the duration of the proposed works, and safe working methods to avoid pollution.
- **Invertebrates:** Retention and protection of deadwood features, such as log piles, wherever possible for Stag Beetles *Lucanus cervus*, or Ecological Clerk of Works (ECoW) if removal of these features is necessary.
- **Amphibians, reptiles, and Hedgehogs:** Protection of suitable habitats (hedgerow, woodland parcels and adjacent long sward grassland). If any of these habitats are to be impacted, mitigate residual risk of impacts on these species groups during works via staged vegetation clearance and sensitive working and avoidance measures under Method Statement.
- **Nesting birds:** Sensitive timing of works between the months of September and February inclusive (i.e. outside of the nesting bird season) or nesting bird checks.
- **Bats:** Sensitive lighting strategy, protection of trees, hedgerows, and woodland habitats, and the soft felling of PRF-I trees under Ecological Clerk of Works (ECoW).

2. INTRODUCTION

2.1. Aims and objectives

This Construction Ecological Management Plan (CEMP) was prepared to provide guidance on appropriate management and mitigation techniques to ensure the protection of biodiversity features and protected species, and compliance with wildlife legislation during the proposed works at Steyning Grammar School, West Sussex.

Following the Preliminary Ecological Appraisal, and other ecological surveys undertaken at the Site (as listed in Section 2.4), the potential for a number of protected species and priority habitats and species to be present onsite was identified. The purpose of this CEMP is to put in place measures to ensure that ecological features are protected for the duration of the construction period, or where impacts are anticipated, appropriate measures are proposed to minimise their impacts. This will be in accordance with BS 42020:2013 and adhere to the recommendations made in the Preliminary Ecological Appraisal and protected species survey reports.

The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details, unless otherwise agreed in writing by Horsham District Council. This is necessary to comply with the conservation and enhancement of protected and priority species and to allow the Council to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 (as amended) and Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 (as amended).

Good communication during the works process is key to good working practice in ecologically constrained sites.

Any new contractors starting at the Site will be made familiar with the contents of this document before starting any works at the Site. Ideally the key messages in this method statement should be included in the general induction for new contractors. A sign off sheet is provided in Appendix 3.

2.2. Management responsibility

Adherence to this CEMP at Steyning Grammar School, West Sussex, will be the responsibility of the Site manager, all allocated onsite contractors, and the Ecological Clerk of Works (ECoW), where relevant, during the proposed construction works.

2.3. Timescales for implementation

Exact timescales for site clearance and development activities are not known at this stage, but are anticipated to take place of the summer of 2026.

2.4. Existing Site ecology

A suite of ecological surveys was undertaken at the Site prior to and in 2026. These surveys informed the following ecological reports:

- Updated Preliminary Ecological Appraisal Technical Note (MKA Ecology Ltd, 2026a).
- Biodiversity Net Gain Plan (MKA Ecology Ltd, 2026b).
- Ground Level Tree Assessment (MKA Ecology Ltd, 2026c).
- Ecological Impact Assessment (MKA Ecology Ltd, 2026d).
- Bat Presence and Absence Surveys (Brindle & Green, 2025).

The Site (central grid reference: TQ 17539 11845) is a school located within the village of Steyning, which falls under the authority of Horsham District Council. Within this report, this area is referred to as the Site or Steyning Grammar School.

The Site comprises buildings, hardstanding, areas of modified grassland and woodland, as well as a large number of trees and tree groups, a native hedgerow, and ornamental non-native hedgerows. A baseline habitat map is provided in Figure 1, Appendix 1. The surrounding environment comprises residential development, areas of woodland, and arable land. Priority habitats in the wider landscape include deciduous woodland immediately north of the Site, lowland calcareous grassland 0.7km south-west and coastal and floodplain grazing marsh 0.7km east of the Site. The habitats onsite are generally of lower ecological value with built form and modified grassland occupying most of the area within the boundary. Native trees, hedgerows, and the woodland are of elevated value in the context of the Site. There are also a number of trees which have potential to provide opportunities for roosting bats (Figure 2, Appendix 1).

The Preliminary Ecological noted that a number of habitats onsite, mainly the grassland, hedgerow, trees, and woodland, were suitable for amphibians, reptiles, Hedgehog *Erinaceus europaeus*, and common nesting birds (MKA Ecology Ltd, 2026a). Of the habitats themselves, the native hedgerow and a woodland parcel directly north of the Site were identified as Habitats of Principal Importance.

The Ground Level Tree Assessment identified a total of 11 trees with potential roosting features (PRFs) onsite. Potential roosting features that could only support individual bats or very small numbers of bats are classified as PRF-I, and potential roosting features which could support multiple bats and may therefore be used by a maternity colony are classified as PRF-M (Collins, 2023). Trees which could not

be properly inspected from the ground were either classified as Further Assessment Required (FAR) or as PRF (a tree with at least one PRF present) (Collins, 2023). Three of these 11 trees were found to have PRF-I features, one tree was found to support PRF-M features, two trees were classified as PRF, and five trees and the boundary trees in woodland 2 were classified as FAR.

The three PRF-I trees are scheduled for removal, while the other eight trees with PRFs are to be retained (MKA Ecology, 2026c). No bat roosts were identified in the buildings onsite (MKA Ecology, 2026d).

From this survey effort, the ecological features identified as requiring protection measures are:

- **Habitats:** Protection of retained species-rich native hedgerow, trees, and woodland parcels with Heras fencing for the duration of the proposed works, and safe working methods to avoid pollution.
- **Invertebrates:** Retention and protection of deadwood features, such as log piles, wherever possible for Stag Beetles *Lucanus cervus*, or Ecological Clerk of Works (ECoW) if removal of these features is necessary.
- **Amphibians, reptiles, and Hedgehogs:** Mitigate residual risk of impacts on these species groups during works via staged vegetation clearance and sensitive working and avoidance measures under Method Statement.
- **Nesting birds:** Sensitive timing of works between the months of September and February inclusive (i.e. outside of the nesting bird season) or nesting bird checks.
- **Bats:** Sensitive lighting strategy, protection of trees, hedgerows, and woodland habitats, and the soft felling of PRF-I trees under Ecological Clerk of Works (ECoW).

2.5. Proposed development

The proposals involve a school redevelopment, which entails the demolition of existing buildings and erection of new buildings within the Site extent, associated vegetation removal, and new landscaping. Proposed habitats include buildings, hardstanding, introduced shrub, modified grassland, biodiverse green roofs, new trees, species-rich hedgerows, and a traditional orchard. Areas of other broadleaved woodland and modified grassland are also to be retained. The development will also involve the removal of 31 trees onsite.

3. PROTECTION OF ECOLOGICAL FEATURES DURING CONSTRUCTION

3.1. Risk assessment of potentially harmful construction activities

The proposed development will require the removal of parcels of the existing modified grassland, introduced shrub, and the removal of 31 trees (MKA Ecology Ltd, 2026d). Vegetation clearance, tree removal, and building works are the main activities that may cause harm to wildlife in the absence of appropriate controls. Any inappropriate use of lighting during construction may also impact bats, [REDACTED] and other nocturnal wildlife present. A number of sensitive control and mitigation measures have been outlined in detail in the following sections. These measures will minimise the risk of any harmful construction activities accordingly.

3.2. Habitats

The species-rich native hedgerow present along the western Site boundary and the woodland directly north of the Site are key ecological features, and are listed as Habitats of Principal Importance (HPI) under Section 41 of the NERC Act 2006. These habitats, therefore, must be protected for the duration of the proposed works. Protective fences (such as Heras fencing) should be established around retained hedgerows, woodland areas, and trees onsite prior to, and during, the construction phase to minimise the risk of any accidental damage from equipment or vehicles. Maps of the baseline habitats and trees onsite are shown in Appendix 1, in Figure 1 and Figure 2 respectively. Figure 1: Habitat Classification Map for Steyping Grammar School, West Sussex (MKA Ecology Ltd, 2026a).

The following safe working methods should also be adhered to at all times to avoid pollution of the retained habitats:

- Any activities involving potential pollutants, such as concrete or fuel, should be carried out in dedicated areas which are designed so that spills, leaks, drips, and contaminated run-off can be captured and properly disposed of.
- Measures to minimise dust arising, when necessary, should be implemented, including the use of dust control machinery and wet machinery.
- Stockpiles (for example soil, sand or hardcore) should be protected so that materials are not blown or washed away.
- Water should be prevented from entering any excavations via the use of covers.

3.3. Invertebrates

The Site holds some potential for invertebrates, in particular Stag Beetle, with log piles and some deadwood present (see Target Notes 1 and 3 in Figure 1, Appendix 1). Every effort should be made to retain and protect these features during construction to reduce impacts if these species are present. If the removal of the deadwood features onsite be required, this should be supervised by an Ecological Clerk of Works (ECoW). Information regarding the identification of Stag Beetle is shown in Figure 3, Appendix 2.

Protocol to follow if Stag Beetles are found

A licence is not required to capture or disturb Stag Beetle or their larvae. It is recommended that any Stag Beetle larvae or adults discovered onsite are left to disperse of their own accord, or captured and released in a safe location in a suitable habitat, such as the woodland areas to the north and west of the Site.

3.4. Amphibians, reptiles, and Hedgehogs

The data search undertaken in the Preliminary Ecological Appraisal returned two recent records of Great Crested Newt *Triturus cristatus*, the closest and most recent located 0.9km south-east of the Site. Although there is no aquatic habitat onsite, the woodlands and native hedgerow onsite could be used by Great Crested Newts for refuge, whilst the grassland may provide minimal foraging opportunity for common amphibians, such as Common Toads *Bufo bufo*, a Species of Principal Importance under the NERC Act 2006. Apart from some parcels of modified grassland and introduced shrub, these habitats are not scheduled for removal, but protection measures such as Heras fencing, as discussed in the Habitats section of this report, should be employed to mitigate impacts of the construction works on both the habitats themselves, and on any amphibians present within them (MKA Ecology Ltd, 2026a).

The data search returned recent records for common reptiles including Slow-worm, Grass Snake, and Common Lizard, with the closest located 0.4km south-east of the Site in 2024. Nine records of Adder were also recorded within 2km of the Site, the closest located 0.8km south-west in 2015. The Site is likely to be of limited value for reptiles given it is comprised largely of modified grassland, buildings, and hardstanding, however, the woodlands and native hedgerow within the Site, as well as the woodland immediately north outside the Site boundary provides terrestrial cover for reptiles. The woodland immediately north of the Site is surrounded by some long sward grasses and has some log piles within it, therefore, there is a chance that a small number of reptiles may be present, visiting the Site sporadically. The hedgerow and woodland are not scheduled for removal, but protection measures such as Heras fencing, as discussed in the Habitats section of this report, should be employed to mitigate impacts of the construction works on both the habitats themselves, and on any reptiles present within them (MKA Ecology Ltd, 2026a).

The grassland, woodland and hedgerows onsite provide some suitable habitat for Hedgehog. While the short sward grassland within the Site is less suitable for Hedgehogs due to lack of cover, it does provide foraging value, as earthworm biomass is typically higher in modified grasslands, of which make up a significant proportion of Hedgehogs' diets. The woodland and hedgerows also hold potential in providing hibernation opportunities. Therefore, there is a risk of Hedgehogs being present onsite. In addition to this, over 30 records of Hedgehog were returned by the data search; the closest record located 0.03km east of the Site in 2018. The woodland and hedgerow habitats are not scheduled for removal, but protection measures such as Heras fencing, as discussed in the Habitats section of this report, should be employed to mitigate impacts of the construction works on both the habitats themselves, and on any mammals present within them (MKA Ecology Ltd, 2026a).

In order to mitigate against any risk of causing injury to amphibians, reptiles, and Hedgehogs during the works, a Method Statement is set out below to outline sensitive working measures that should be followed, should areas of habitat suitable for these species (long sward grassland adjacent to woodlands, woodlands, or native hedgerow) need to be cleared to facilitate works. This is informed by mitigation guidelines set out by Grundy (2025) and English Nature (2001) for amphibians in particular. Works to clear modified grassland and introduced shrub do not need to follow the Method Statement as there is negligible risk of amphibians, reptiles, and Hedgehogs being present in these habitats.

Relevant legislation

Great Crested Newts (GCN) are protected under Schedule 2 of the Conservation of Habitats and Species Regulations 2017 (as amended) and Schedule 5 of the Wildlife and Countryside Act 1981 (as amended). In summary, it is against the law to:

- Intentionally or recklessly capture or kill, or intentionally injure Great Crested Newt.
- Deliberately disturb Great Crested Newt or intentionally or recklessly disturb them in a place used for shelter or protection.
- Damage or destroy a breeding site or resting place.
- Intentionally or recklessly damage, destroy, or obstruct access to a place used for shelter or protection.

Common reptile species are protected from being injured or killed under the Wildlife and Countryside Act 1981 (as amended). They are also listed as Species of Principal Importance under the Natural Environment and Rural Communities Act (2006).

Hedgehogs are also listed as Species of Principal Importance under the NERC Act (2006).

Sensitive timing of works

Great Crested Newt become less active during the winter (November to February) and will use brash/rubble and log piles, woodland, and hedgerows as locations to shelter during this period. Great

Crested Newt are particularly vulnerable to disturbance during this period. Habitat that may provide refuge onsite include grassland and hedgerows. Removal of these, as well as any deadwood features, should be carried out outside of newt hibernation period, ideally between September and October. Removals may be undertaken in November and February; however, these are sub-optimal months. Removal in suboptimal months should be weather dependent to avoid periods of freezing temperatures.

Reptiles are typically active between March and October inclusive (peak April to September) and will hibernate during the winter period. During the hibernation period these species are particularly vulnerable to disturbance. Therefore, disturbance of the ground layer should avoid the period November to February inclusive.

Habitat manipulation and clearance works

Any tall grass sward and areas of scrub vegetation should be strimmed gradually to encourage animals to move into more suitable habitat, such as adjacent hedgerows that are to be retained and protected. This is achieved by cutting the vegetation in stages down to ground level with vigilance, working towards the adjoining suitable habitat beyond the Site boundary.

The first cut should be no lower than 150mm. The second cut and soil stripping can take place after 48 hours. The surface of the soil should then be slowly stripped by mechanical means. All arisings should be removed after each stage and ideally taken off-site or used in the creation of habitat features elsewhere.

Once cut, the sward should be maintained at ground level prior to the commencement of groundworks so that it remains unsuitable for amphibians, reptiles, and Hedgehogs.

Avoidance measures during works

- Machinery and materials should be stored on areas of hardstanding or raised from the ground on pallets where possible to avoid animals taking refuge overnight.
- Stacks of pallets and other building materials may offer resting places and should be inspected daily prior to works commencing.
- Waste materials should be removed off site immediately or stored in skips raised off the ground on baulks of timber.
- Excavations should be backfilled, covered overnight, or ramps placed in order to allow any animals to escape. All excavations should be inspected prior to backfilling.
- Excavations and working areas should be managed so as not to create temporary waterbodies which may attract newts onto the Site.
- Unsecured food, litter, or chemicals will not be left within the working area overnight.

Destructive search

Ground clearance work within the development area will begin with a destructive search under a

watching brief. This will involve hand searches of vegetation by an appointed contractor before it is removed to ensure that no animals are present. Any rubble piles or log piles should be deconstructed by hand to ensure no individuals are sheltering beneath these structures. This approach will ensure that no animals are accidentally killed or injured during Site clearance works.

Protocol to follow if a Great Crested Newt is found

In the highly unlikely event that a Great Crested Newt is discovered onsite during the course of development works, all ground works must cease immediately, and MKA Ecology Ltd head office should be called on 01763 262211.

A licence from Natural England will need to be obtained and proposed methodologies must also be reviewed. All onsite contractors must be aware of the protocol to follow if a Great Crested Newt is found during construction works. A guide to identifying Great Crested Newt is provided in Figure 4, Appendix 2. All contractors must be familiar with this identification guide prior to works.

If a newt is found and there is any uncertainty regarding identification, MKA Ecology Ltd head office should be called on 01763 262211. A photograph, if available, can be emailed to the office will help enable prompt identification of the amphibian species encountered.

Protocol to follow if other amphibian species are found

A licence is not required to capture or disturb amphibian species such as Common Toad, Common Frog *Rana temporaria*, Smooth Newt *Lissotriton vulgaris*, or Palmate Newt *Lissotriton helveticus*. These amphibians should, as practicable, be captured in a gloved hand wet with water, handled minimally and transported in a well-ventilated container, lined with damp moss or leaf litter to a safe habitat, such as the woodland or grassland areas to the north and west of the Site.

Protocol to follow if reptiles are found

A guide to identifying common reptiles is provided in Appendix 2. It is recommended that any reptiles discovered onsite are left to disperse of their own accord, or captured and released in a safe location in a suitable habitat, such as the woodland or grassland areas to the north and west of the Site. Given that very low numbers of animals, if any, are likely to be found, this is considered to be the most appropriate approach.

Protocol to follow if Hedgehogs are found

A licence is not required to capture or disturb a Hedgehog. It is recommended that any Hedgehogs discovered onsite are left to disperse of their own accord, or captured and released in a safe location of suitable habitat type. Hedgehogs should be removed from Site by wearing gloves of a thick material and either transporting the Hedgehog by hand if it has defensively rolled itself into a ball, or placing the Hedgehog into a container, to then be transported to a well-vegetated area outside the construction footprint.

Toolbox talk

All onsite contractors must be made aware of the potential for amphibians, reptiles, and Hedgehogs to be present during the development prior to commencing any works, and a copy of this CEMP will be available if requested.

3.5. Nesting birds

All wild birds, their active nests, and eggs are protected under the Wildlife and Countryside Act (1981), as amended. This makes it an offence to deliberately, or recklessly, kill or injure any wild bird or damage or destroy any active nest or eggs of a wild bird. Some bird species are listed under Schedule 1 of the Wildlife and Countryside Act (1981) as amended and it is an offence to wilfully or recklessly disturb an active nest site of these species or disturb adults when they are with dependant young.

The hedgerows, introduced shrub, woodland, trees, and buildings onsite have the potential to support common nesting bird species (MKA Ecology Ltd, 2026a). The majority of these habitats are to be retained post-development, however, 31 trees and some areas of introduced shrub are to be removed prior to construction works.

Scheduling any destructive works to the roofs of the buildings, and to any trees, introduced shrub or woodland onsite, should be undertaken between the months of September and February inclusive (i.e. outside of the nesting bird season) in order to avoid impacts on nesting and breeding birds. Should these timings not be possible, a nesting bird check by a suitably qualified ecologist should take place prior to any clearance. Any active birds' nest identified during this check must be protected from harm until the nesting attempt is complete. This will require a buffer to be left around the nest, the size of which will depend upon the species involved (as a general rule, this will be 10m of vegetation in all directions around the nest). Any vegetation buffers established as a result of the initial nesting bird check must be subjected to a second check after the original nesting attempt is completed before such areas can be removed during the breeding bird season.

Toolbox talk

All onsite contractors must be made aware of the potential for birds to be present during the development prior to commencing any works, and a copy of this CEMP will be available if requested.

3.6. Bats: foraging and commuting habitat

All bat species are protected under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) and Schedule 2 of Conservation of Habitats and Species Regulations 2017 (as amended). Bats are also Species of Principal Importance listed on Section 41 of the NERC Act (2006). It is an offence to deliberately disturb a bat, damage or destroy a bat roost, intentionally or recklessly disturb a bat at a roost, or obstruct access to a roost.

Lighting is known to adversely affect bat foraging behaviour, along with negatively affecting other wildlife, including birds and Hedgehogs which have the potential to use the Site.

Given the construction works will be undertaken during day light hours it is unlikely that construction lighting will be implemented. However, if lighting design during construction is required, then it must avoid suitable habitat for roosting, foraging, and commuting bats, including the hedgerows, trees, and woodland areas, and be developed in line with guidance provided by the Institute of Lighting Professionals (ILP) (2023):

- Minimise the lighting levels across the Site.
- All luminaires should lack UV elements when manufactured. Metal halide, compact fluorescent sources should not be used.
- LED luminaires should be used where possible due to their sharp cut-off, lower intensity, good colour rendition, and dimming capability.
- A warm white light source (2700Kelvin or lower) should be adopted to reduce blue light component.
- Light sources should feature peak wavelengths higher than 550nm to avoid the component of light most disturbing to bats.
- Only luminaires with a negligible or zero Upward Light Ratio, and with good optical control, should be considered.
- Luminaires should always be mounted horizontally, with no light output above 90° and/or no upward tilt.
- Where appropriate, external security lighting should be set on motion sensors and set to as short a possible a timer as the risk assessment will allow. For most general residential purposes, a 1- or 2-minute timer is likely to be appropriate.
- Minimise upward spill of light with the use of directional luminaires, shields, baffles, and louvers to direct light where it is needed and prevent light being directed over and around the feature concerned.

3.7. Bats: roosting habitat

All bat species are protected under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) and Schedule 2 of Conservation of Habitats and Species Regulations 2017 (as amended). Bats are also Species of Principal Importance listed on Section 41 of the NERC Act (2006). It is an offence to deliberately disturb a bat, damage or destroy a bat roost, intentionally or recklessly disturb a bat at a roost, or obstruct access to a roost.

Three of the 31 trees scheduled for removal as part of the proposed development have been assessed as being PRF-I, shown in Figure 2, Appendix 1, with the labels T30, T35, and T67. Further detail regarding each individual tree and their PRFs can be found in the Ground Level Tree Assessment report (MKA Ecology Ltd, 2026c). Given their potential to support roosting bats, these trees are to be felled in

a sensitive manner following a soft-felling protocol outlined in Precautionary Working Method Statement below, in order to mitigate against any adverse impacts in the event that any bats are present at the time of the removal.

Soft felling

Soft felling involves the lowering and cushioning of sections of the tree with bat potential features to reduce any potential effects caused by hard impact with the ground. Following this, the felled sections should be left on the ground for a period of at least 24 hours in order to allow any bats, in the unlikely event that they had been present, to escape. An Ecological Clerk of Works (ECoW) should be present to supervise the felling.

Sensitive timing of works

In line with guidance provided by The Bat Conservation Trust (2018), felling should be undertaken in September or October to avoid the maternity and hibernation seasons during which roosting bats are most vulnerable to disturbance.

Toolbox talk

All onsite contractors must be made aware of the potential for bats to be present during the development prior to commencing any works, and a copy of this CEMP will be available if requested.

3.8. Ecological Clerk of Works (ECoW)

ECoW role and responsibility

An ECoW is required to be present onsite to monitor the development project to reduce the likelihood of disturbance to Stag Beetle, nesting birds, and roosting bats.

An ECoW is required to monitor a development project where there is a likelihood of disturbance to sensitive species and/or habitats, and as such, must be aware of all relevant legislation regarding species that may be found onsite. The role will involve:

- Providing an onsite induction.
- Ensuring that sensitive working measures are adopted during construction.
- Supervising the implementation of planning conditions, licences (where appropriate), and best practice guidance through the construction and operational phases of developments.
- Ensuring that works onsite comply with legislation regarding protected species. Non-compliance with environmental and ecological legislation, licenses, or consents can result in delays to a project, heavy fines, and even custodial sentences in some circumstances. The role of the ECoW can add significant value to a project, not just by avoiding fines and delays, but through enhancing the reputation of clients and their projects through good publicity.

- Providing guidance and advice on how to avoid or minimise on-site ecological impacts through, for example, the design and supervision of ecological mitigation and compensation measures.

Before any work can proceed onsite, the ECoW must ensure that any ecological issues have been identified and that adequate protection measures are put into place. These have been outlined within this document.

Depending on the habitats that will be impacted by the works, and the time of year these removals take place, the roles for the ECoW at Steyning Grammar School, West Sussex may include nesting bird checks of vegetation clearance, supervising deadwood and/or vegetation removal for invertebrates, and the soft felling of PRF-I trees for bats.

Onsite induction

The ECoW will provide a brief induction for contractors onsite prior to commencement of works, detailing the contents of this document. A copy of this CEMP should be available onsite at all times. Any new contractors starting at the Site will be made familiar with the contents of this document before starting any works at the Site. Ideally the key messages in this CEMP should be included in the general Site induction for new contractors.

Although MKA Ecology Ltd will be present for some elements of vegetation clearance, should there be any ecological issue or concern that arise, or if any of the species described in this document are found during unsupervised works, MKA Ecology Ltd should be contacted immediately.

See Appendix 2 for information and photographs of key species to assist with identification of Stag Beetles, Great Crested Newts, and common reptiles.

Communication

Good communication and close liaison with other contractors, project managers, and designers is an essential part of this type of work. The ECoW should not 'police' the Site or give instruction but must ensure that sensitive ecological issues are identified early and managed according to Best Practice. During Site operations that may impact upon the ecology of the Site, the ECoW will work closely with operatives and operators of machinery to provide advice and be at hand in case any issues arise during works.

The ECoW and Site Manager should agree a procedure of work before any works commence with regard to avoiding harm, damage, or destruction to any species and habitats protected by law and/or relevant planning guidance. Where details of works change, these should be discussed with the ECoW prior to delivery.

Agreements should be put into document form and all operatives should be briefed and sign the document to confirm that they agree to adhere to the procedures and methodologies outlined.

Close-down report

Where an ECoW is required, a brief Letter Report summarising the outcome of the clerk of work actions will be issued to detail the actions that were taken, for submission to the local planning authority at the end of the restoration works period.

3.9. Construction phase management timings

An indication of the timings for the construction phase management actions to be undertaken is shown in the table below. These should be used to inform the scheduling of development works at the Site.

Table 1: Construction phase management timings

Activity	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Removal of terrestrial habitats suitable for amphibians (including Great Crested Newt)												
Removal of habitats suitable for reptiles												
Removal of trees and habitats suitable for nesting birds												
Soft felling of trees identified as PRF-I												

Key

Optimal timing of works	
Sub-optimal timing of works	

3.10. Construction phase protection measures

Table 2: Construction phase protection measures

Species	Construction phase mitigation	Timing	Responsibility
Habitats	Heras fencing to protect retained hedgerows, trees, and woodland parcels, and safe working methods to avoid pollution.	To be established pre-construction and maintained during construction.	Site manager and all contractors.
Invertebrates	Retain and protect deadwood features wherever possible OR removal under ECoW.	To be established pre-construction and maintained during construction.	Site manager and all contractors, or ECoW.
Amphibians, reptiles, and Hedgehogs	Protection of suitable habitat. Staged vegetation clearance and sensitive working and avoidance measures under Method Statement should areas of suitable habitat be removed.	Pre-construction phase and during construction phase.	Site manager, all contractors, and ECoW.
Nesting birds	Sensitive timing of works OR nesting bird checks.	Vegetation works from September to February (i.e. outside of the nesting bird season).	Site manager and all contractors, or ECoW.
Foraging and Commuting Bats	Implementation of sensitive lighting strategy.	To be established pre-construction and maintained during construction.	Site manager.
Roosting Bats	Soft felling of PRF-I trees scheduled for removal under Precautionary Working Method Statement.	Pre-construction phase.	Site manager and all contractors, and ECoW.

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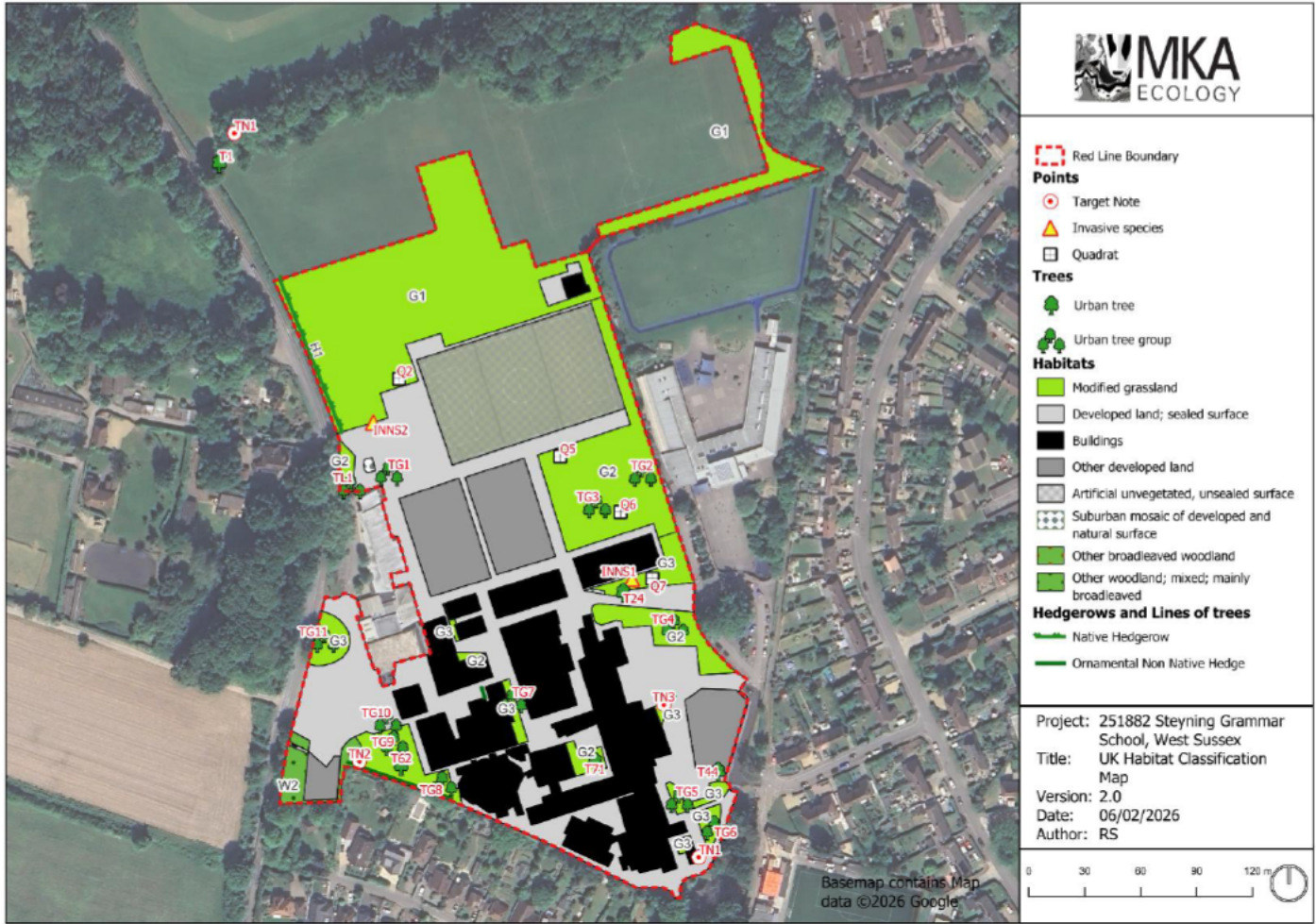
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5. APPENDICES

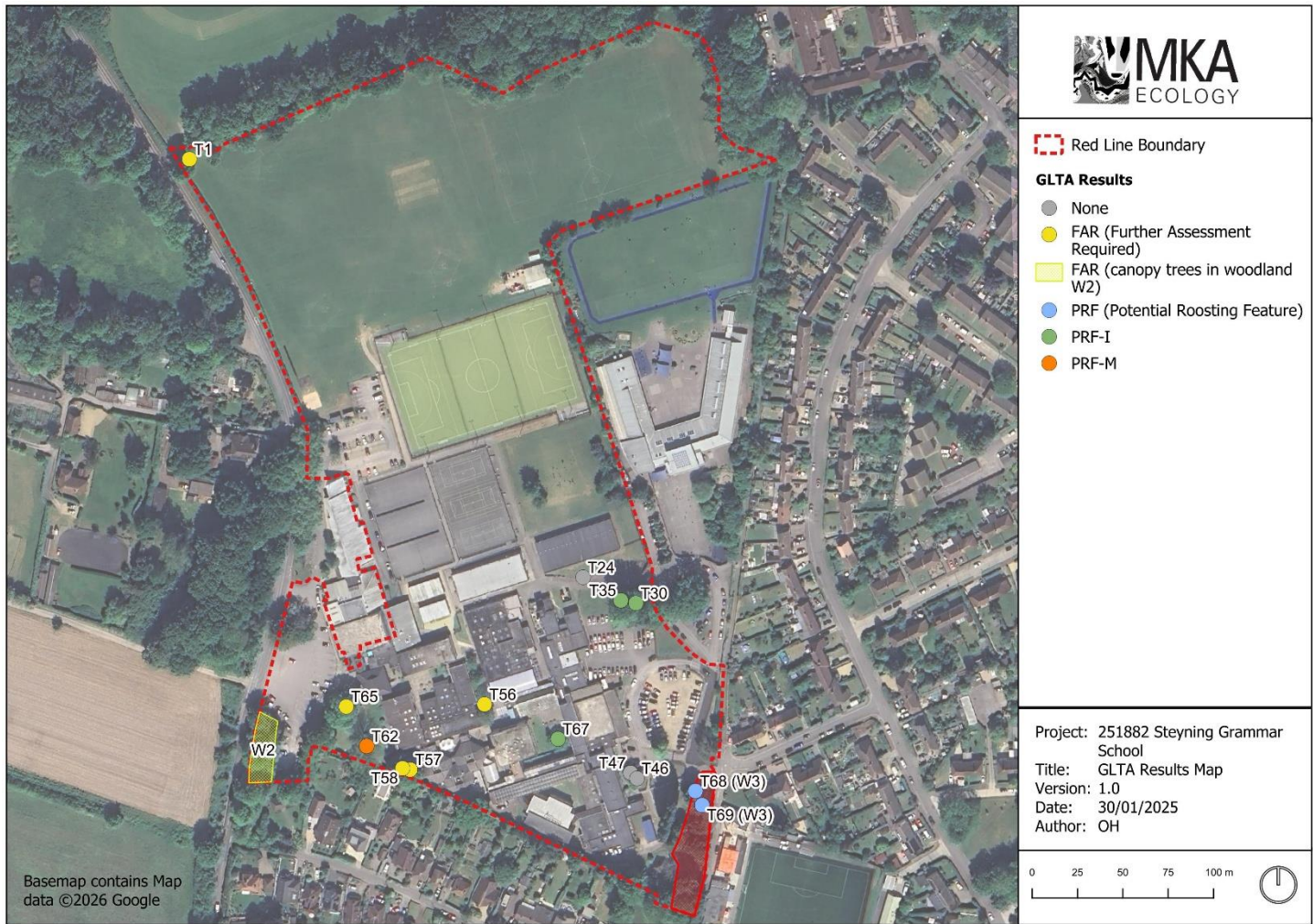
5.1. Appendix 1: Figures

Figure 1: Habitat Classification Map for Steining Grammar School, West Sussex (MKA Ecology Ltd, 2026a).



Target note	Description
1	Log piles
2	Leaf piles
3	Tree stumps

Figure 2: Ground Level Tree Assessment Map for Steining Grammar School, West Sussex (MKA Ecology Ltd, 2026c).



5.2. Appendix 2: Species identification and ecology

Figure 3: Adult Stag Beetle (left) and Larval Stag Beetle (right)



Figure 4: GCN in terrestrial phase, showing dark, warty, damp skin (left). GCN in breeding phase, with a white tail flash indicating a male (right).



Reptiles

Common Lizard

Common Lizards are long-bodied and short legged with a pointed snout and can measure up to 140mm in length. They are variable in colouration, with predominately green or brown shades but occasionally can be black, grey, blue or yellowish. Dark markings, often bordered with white, line and spot their backs creating an array of patterns. The belly is lighter with shades from white to red and dark spots in males in particular. They predominately occupy habitats consisting of grassland and heathland.

Slow-worm

Slow-worms are a widespread legless lizard that can grow up to 50cm in length. They are typically much smaller than UK snake species and have much smoother skin. They are golden-grey in colour.

Males are typically paler whereas females may have darker flanks and a dark stripe down their backs. They can be found in heathland, tussocky grassland and woodland edges, but are also found in gardens and allotments, particularly around compost heaps.

Grass Snake

This species can grow up to 1m in length and are the longest snake in Britain. They are also variable in colour and pattern with varying shades of green, brown or grey, but with a distinct 'collar' behind their heads of a light-yellow colouration. Black markings also run along the sides of the snake in regular patterns.

Figure 5: Common Lizard (top). Slow-worm (middle). Grass Snake (bottom).



5.3. Appendix 3: Sign off sheet

We, the undersigned, acknowledge that the proposed works to be undertaken must accord with the information set out in this method statement and that we are responsible for taking all reasonable precautions to avoid harm or disturbance to animals and habitats discussed in this report.

Please sign and print the names of all attending parties.

Company	Name	Signature	Date



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