

## Blackbridge EPS Licence compliance audit – (Draft schedule)

This is a draft audit document to accompany the shadow licence application for planning. Once the planning is obtained, the shell licence can be modified to include exact audit completion dates.

No	Performance Indicator	Evidence Required - this list should be adapted to reflect the agreed method statement.	Proposed compliance date	Audit Completion Date
	<b>General</b>			
1	Appointment of appropriate Tier 3 – Ecological compliance auditor	Written confirmation of appointment, along with documentation to establish suitability for the role – submitted to NRW	Within 3 weeks of receiving of request from NRW	TBC
2	The licensee will advise NRW Species Officer of the start date for the works prior to works commencing.	Written or electronic documentation with notification of start of works.	Prior to start of works. Construction of mitigation and enhancement roosts due to commence in Autumn/winter 2018 (subject to licence approval)	TBC
3	A suitably experienced licensed ecologist will be appointed and retained during the life time of this licence to provide on-site advice.	Letter, contract or other document outlining the appointment of an ecologist for the lifetime of the project.	Prior to start of works.	TBC
4	Prior to the start of any works on site, all site workers will be inducted by the project ecologist. This induction will cover the legal status of the species, the method of working and, action to be taken if	Copy of documents from ecological induction, showing induction content and detailing contact numbers and contingency procedures should bats be found during the course of works.	Prior to start of works.  Additional inductions will be required as works progresses and additional construction contractors are appointed.	TBC

	protected species are encountered.	List of induction attendees. Logs of these inductions will be collected and be ready for the auditor to assess against the site worker/visitor log for the site.		
5	<p>In addition to the specific project ecologist induction for contractors likely to come across bats during the works (Above). A basic bat induction will be added to the standard site induction pack to show:</p> <p>The correct procedure should bats be encountered.</p> <p>The restricted areas of the site</p> <p>Site rules regarding light and noise disturbance.</p>	<p>Copy of documents from ecological induction, showing induction content and detailing contact numbers and contingency procedures should bats be found during the course of works.</p> <p>List of induction attendees. Logs of these inductions will be collected and be ready for the auditor to assess against the site worker/visitor log for the site.</p> <p>A monthly internal compliance check will be implemented by the licensed ecologist.</p>	<p>Prior to start of works.</p> <p>Additional inductions will be required as works progresses and additional construction and operational workers/contractors are appointed.</p>	TBC
6	Preparation and implementation of a biosecurity risk assessment as detailed in E.5 of the method statement	<p>Biosecurity risk assessment is available for inspection.</p> <p>Log of biosecurity measures is available for inspection and shows that they have been implemented.</p> <p>Field observation shows that biosecurity measures are in place e.g. anti-fungal spray</p>	Prior to start of works.	TBC
	<b>Licence available for inspection by any police constable, employee of the</b>	<b>Licence is available for inspection on site</b>	Prior to start of works.	TBC

	<p><b>Welsh Assembly Government or employee of the Countryside Council for Wales or authorised persons on demand.</b></p>			
	<p><b>No agent of the licensee shall act under licence unless they are in possession of a letter signed by the licensee appointing them by name as the duly accredited agent of the licensee for the purposes of this licence, and shall carry with them the said letter and a copy of this licence and shall produce them to any police constable or employee of the Natural Resources Wales or other authorised person on demand</b></p>	<p><b>All relevant accredited agents have copies of licence holder's letter of authorization. Licence holder's letter is available for inspection.</b></p> <p>Copies of the accredited agent letters will be retained along with the licence documentation on site. These documents will be kept regularly updated throughout the licensed period.</p> <p>A monthly internal compliance check will be implemented by the licensed ecologist.</p> <p>The auditor will be asked to check compliance with this protocol on each site visit.</p>	<p>Prior to start of works.</p> <p>Updated regularly throughout the licensed works</p>	TBC
	<p><b>E.1 Bat disturbance, capture and exclusion</b></p>			
7	<p>The construction of the new maternity roost, modification of the former incinerator building (S01), construction</p>	<p>Internal compliance check and written confirmation of completion by licensed ecologist</p>	<p>Current schedule requires the features to be complete by March 2019.</p>	TBC

	of the coastal roost, and installation of bat protection areas fences, must be completed before any capture and exclusion works on the buildings or tunnels commence.	<p>The licensed ecologist will contact the auditor upon the commencement of construction of these features with an outline timetable for completion. This will be updated as necessary.</p> <p>The auditor will be expected to make a visit upon completion of the builds to confirm the sign off, prior to the commencement of capture exclusion works</p>		
8	Auditor to be provided start and estimated timetable of capture and exclusion activities.	Written or electronic documentation with notification of start of works and timetable. To be updated as necessary throughout the capture and exclusion process	<p>Spring - Summer 2019 - Blast wall arch S05, Tunnels 1, 2, 3 and 9. Building D</p> <p>Spring - Summer 2020 Tunnels 4, 5, 6, 7 and 8</p>	TBC
9	Auditor to conduct at least one unannounced (short notice) site visit during the capture and exclusion works to assess whether agreed protocol being met	<p>Auditor to use timetable above to pick date/dates of inspection.</p> <p>The audit inspection will be written up and submitted to NRW as proof of compliance.</p>	<p>Spring - Summer 2019 - Blast wall arch S05, Tunnels 1, 2, 3 and 9. Building D</p> <p>Spring - Summer 2020 Tunnels 4, 5, 6, 7 and 8</p>	TBC
10	Pre – works dawn return survey of structures deemed to be high risk	<p>All tunnels, Blast wall arch and building D to be subjected to pre works dawn surveys prior to scheduled high risk works.</p> <p>Results – Survey dates, emergence counts, species and activity to be logged along with survey conditions and any constraints to be logged and should be provided to the auditor on request.</p>	<p>Spring - Summer 2019 - Blast wall arch S05, Tunnels 1, 2, 3 and 9. Building D</p> <p>Spring - Summer 2020 Tunnels 4, 5, 6, 7 and 8</p>	TBC
11	Works affecting bat roosts will not commence until the Project Ecologist has inspected the area and confirmed that work can go ahead – as detailed in E.1 of	<p>Log and field observation show disturbance, capture and exclusion (as relevant) have been undertaken as detailed in the method statement. Dates of action taken should be noted.</p> <p>Examples of actions to be included -</p>	Spring - Summer 2019 - Blast wall arch S05, Tunnels 1, 2, 3 and 9. Buildings A, B, C, D and E	TBC

	the method statement.	<ul style="list-style-type: none"> <li>- timing of observations and methods used to confirm if bats still present</li> <li>- details of exclusions or deterrent methods used</li> </ul>	Spring - Summer 2020 Tunnels 4, 5, 6, 7 and 8	
12	Action taken if bats found during the course of work	<p>Log detailing</p> <ul style="list-style-type: none"> <li>- number and species of bats found and location</li> <li>- actions undertaken if animals found</li> </ul>	<p>Spring - Summer 2019 - Blast wall arch S05, Tunnels 1, 2, 3 and 9. Buildings A, B, C, D and E</p> <p>Spring - Summer 2020 Tunnels 4, 5, 6, 7 and 8</p>	TBC
	<b>E.2 Bat roost and habitat retention, modification and / or creation</b>			
13	<u>Retention of existing roost/s</u> and features (minor changes and maintenance works) as detailed in E.2.1 of the method statement.	<p>Log and field observation demonstrate retention is in accordance with method statement including:</p> <ul style="list-style-type: none"> <li>- Dates of all works to the tunnels (and foundation works in close proximity to the blast wall arch (S05) to be recorded.</li> <li>- Photographic log of the excavation of the foundations of building 10)</li> <li>- Photographic log of refurbishment/replacement of tunnel doors</li> <li>- Photographic log of refurbishment of tunnel entrance masonry</li> <li>- Photographic log of where light baffle enhancements are used within the tunnels</li> </ul>	<p>Spring - Summer 2019 - Blast wall arch S05, Tunnels 1, 2, 3 and 9. Buildings A, B, C, D and E</p> <p>Spring - Summer 2020 Tunnels 4, 5, 6, 7 and 8</p>	TBC
14	<u>Creation of new roosts</u> (including bat houses and bat boxes) as detailed in E.2.3 of the method statement	<p>Log and field observation demonstrate construction and installation was in accordance with Method Statement including:</p> <ul style="list-style-type: none"> <li>- number, location and dimension of roost areas</li> <li>- construction materials (e.g. roofing membranes, roofing material)</li> <li>- number, design &amp; location of entrances</li> </ul>	All roost creation to be completed by August 2021	TBC

		<ul style="list-style-type: none"> <li>- number, design &amp; location of roost crevices</li> <li>- number, location and design of bat boxes as specified (e.g. make &amp; model number)</li> <li>- lighting scheme avoids illumination of roosts / entrances</li> </ul>		
15	Retention &/or modification of existing and creation of new habitat as detailed in E.2.4 of the method statement	<p>Log and field observation demonstrate retention, modification or creation was in accordance with Method Statement including:</p> <ul style="list-style-type: none"> <li>- measures to ensure that existing bat habitat (e.g. vegetation features close to roosts and/or used as flightlines, foraging habitat) have been retained and not damaged during construction.</li> </ul> <p>for new or modified habitat:</p> <ul style="list-style-type: none"> <li>- design, habitat type, planting schemes &amp; locations;</li> <li>- provenance of imported plants &amp; biosecurity considerations</li> </ul>	All habitat restoration measures and finalised habitat management program to be in place by August 2021	TBC
	<b>F and H Post-development site safeguard</b>			
16	Implementation of roost site / bat habitat management / maintenance and monitoring as detailed in F.1 and F.2 of the method statement	<p>If audit undertaken during <u>development phase</u>:</p> <ul style="list-style-type: none"> <li>- Habitat/site management plan demonstrates measures are in place to ensure ongoing maintenance of roost site/s and management of habitat (retained, modified and newly created) post-development and rectifying errors &amp;/or ineffective mitigation including:</li> <li>- responsibility for and funding for roost site maintenance and management</li> <li>- maintenance and retention of existing bat habitat features</li> <li>- monitoring the condition of new planting schemes including irrigation when appropriate, replacement of material that has failed within 2 months with new planting of the same species and size</li> </ul>	All habitat restoration measures and finalised habitat management program to be in place by August 2021	TBC

		<p>If audit undertaken <u>post development</u>:</p> <ul style="list-style-type: none"> <li>- log or report demonstrate roost site management plan has been implemented</li> <li>- site management works are maintaining the ecological functionality of the mitigation/compensation site</li> </ul>		
17	<p>Implementation of <u>population monitoring</u> as detailed in F.2 of the method statement</p>	<p>If audit undertaken <u>during the development phase</u>:</p> <ul style="list-style-type: none"> <li>- monitoring plan demonstrates measures are in place to undertake bat population monitoring post-development.</li> </ul> <p>If audit undertaken <u>post-development</u>:</p> <ul style="list-style-type: none"> <li>- log or report demonstrate monitoring plan has been implemented</li> <li>- log or report demonstrate results passed to local record centre</li> </ul> <p>The external auditor will be appointed to oversee the first monitoring year. After this point an internal audit will be undertaken by the project ecologist.</p>	<p>Monitoring due to commence in Winter 2021</p> <p>Monitoring due for completion in Autumn 2030</p>	TBC
18	<p>Implementation of <u>long term site safeguard proposals</u> as detailed in F.4, H.1 and H.2 of the method statement</p> <p><i>NB Not all schemes will require all of the activities</i></p>	<p>Log of works demonstrates implementation financial plan in place to resource mitigation, compensation, monitoring, site management or wardening</p>	<p>Compliance check in August 2021 once construction phase is complete</p>	TBC