Herdwick Ecology

Luccombe Mill, Bratton, Wiltshire

Construction Environmental Management Plan (CEMP: Biodiversity)

A report for and on behalf of Pelly Developments

October 2023

Report Reference: 137/R3/2023/V1

Rev No.	Status	Author	Date
1	Draft for Review	CG	30/10/2023
1	Final	CG	18/11/2023

1.0 INTRODUCTION

1.1 Full planning consent (PL/2021/04036) was granted by Wiltshire Council on 24th April 2023 for the change of use from 'Industrial processes' to holiday let and associated conversion works at disused pump houses at Luccombe Mill, Bratton. Condition 3 of this consent states:

No development shall commence on site, including demolition, groundworks/excavation, site clearance, vegetation clearance and boundary treatment works, a Construction Environmental Management Plan (CEMP) shall be submitted to, and approved in writing by the local planning authority. The Plan shall provide details of the avoidance, mitigation and protective measures to be implemented before and during the construction phase, including but not necessarily limited to, the following:

a) Identification of ecological protection areas/buffer zones and tree root protection areas and details of physical means of protection, e.g. exclusion fencing.

b) Working method statements for protected/priority species, such as nesting birds and reptiles.

c) The location all areas of construction impact such as any temporary construction compound.

d) Work schedules for activities with specific timing requirements in order to avoid/reduce potential harm to ecological receptors; including details of when a licensed ecologist and/or ecological clerk of works (ECoW) shall be present on site.

e) Key personnel, responsibilities and contact details (including Site Manager and ecologist/ECoW).

f) Timeframe for provision of compliance report to the local planning authority; to be completed by the ecologist/ECoW and to include photographic evidence.

Development shall be carried out in strict accordance with the approved CEMP.

REASON: To ensure adequate protection and mitigation for ecological receptors prior to and during construction, and that works are undertaken in line with current best practice and industry standards and are supervised by a suitably licensed and competent professional ecological consultant where applicable.

Purpose of this Report

1.2 As stated in above, this management plan has been produced to discharge Condition 3 of the planning consent and to:

- to ensure adequate protection and outline appropriate mitigation for ecological receptors prior to and during construction and so avoid committing offences under the relevant legislation.

1.3 This CEMP: Biodiversity focusses on the protection of biodiversity and ecological features on site, as required to discharge the planning condition. Therefore, Information relating to the management of

other environmental issues such as traffic movements, compound location, site welfare, working hours, services and noise are not included within this CEMP.

Aims of the report

1.4 The aim of the report as incorporated is to:

- Highlight risks that could occur to habitats and/or the function of the site for protected or notable species and implement the mitigation outlined in the Ecological Impact Assessment;
- Identify ecologically sensitive areas (biodiversity protection zones) and indicate where protective buffers/fencing are required;
- Set out when and where ecological supervision will be required; and
- Identify roles and responsibilities for undertaking the work in relation to protecting biodiversity on site during the construction phase.

1.5 This CEMP: Biodiversity follows the guidelines set out within the Biodiversity – Code of Practice for Planning and Development, British Standard 42020:2013.

2.0 KEY RESPONSIBILITIES AND PERSONNEL

Client

2.1 The Client (Henry Pelly, Pelly Developments) will be responsible for the implementation of this CEMP: Biodiversity and will liaise with the site manager/contractor (Leszek Cislak) to commission and arrange an Ecological Clerk of Works (ECoWs) input or site attendance, as required.

Site Manager/Contractor

2.2 The client should ensure that the site manager/contractor reviews this CEMP. The site manager will need to ensure that the CEMP is implemented correctly, under supervision of the Ecological Clerk of Works (ECoW).

Ecological Clerk of Works (ECoW)

2.3 An ECoW is required to support the Proposed Development and ensure that client and contractors adheres to the requirements set out within this CEMP: Biodiversity in order to be legally compliant. The appointed ecologist must be suitably qualified and have a thorough understanding of the responsibilities of the ECoW. The ECoW will be responsible for advising and delivering the prescriptions requiring ecological support during construction. They shall advise and ensure the client and contractors have a clear understanding as to the requirements of this CEMP: Biodiversity.

3.0 BASELINE CONDITIONS – BIODIVERSITY PROTECTION ZONES

3.1 The baseline conditions were identified during the Preliminary Roost Assessment and Ecological Impact Assessment. The site lies within an rural, wooded location on the edge of the village of Bratton at the foot of Salisbury Plain (grid reference ST9229 5204). The site comprises two disused Wessex Water Pumping Station buildings, surrounded by a high chain lined security fence. Broadleaved woodland immediately surrounds the site, with grazed calcareous grassland, meadows and scrub forming the slopes of the Plain. A chalk stream runs through the woodland that feeds the mill pond.

3.2 The site lies within the Bratton Downs Site of Special Scientific Interest (SSSI). This site is notified for both its geomorphological and biological features, comprising species-rich calcareous grassland and ancient broadleaved. It supports a diverse range of invertebrate and bird species. The site sits within Unit 13, listed as 'Earth Heritage' and is in a favourable condition with no identified threats to this unit. Unit 7 encompasses the nearby lowland calcareous grassland and is currently in an unfavourable condition with a low threat level identified.

3.3 No protected or notable species were noted within the application area- that encompasses the chain lined fence line. However, old nests were noted on the pumphouses and the surrounding habitat does offer excellent habitat for numerous species. An active badger sett is present offsite but close to the boundary fence line.

3.3 The following ecological features will be protected through the implementation of Biodiversity Protection Zones (BPZs) and/or through adoption of sensitive working methods to avoid and minimise impacts during the construction phase. The BPZ should be considered all the habitats that sits outside of the chain line fence, as illustrated in Figure 1 below.

3.4 A risk assessment of the construction-phase of the proposals on the identified ecological features listed below, is provided in Table 1.

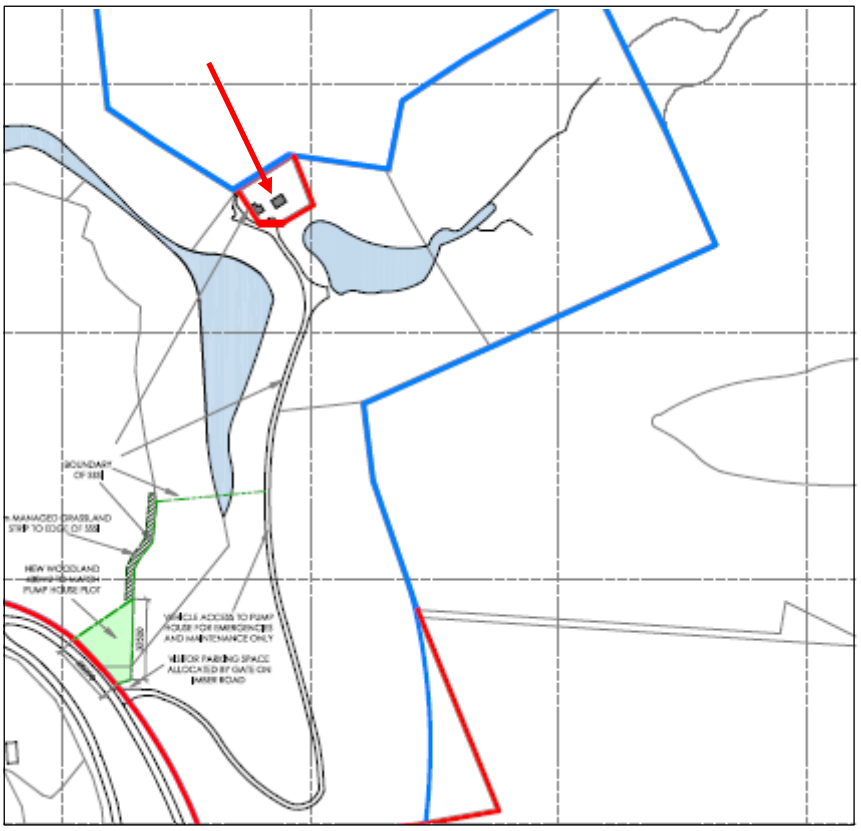

Plate 1: Illustrating the red line boundary, that follows chain link fence around the pump houses. All the habitats outside of this boundary are considered to be BPZs.

3.3 Sites/Habitats:

- Bratton Downs SSSI and associated habitats (woodland, wet woodland, chalk stream)

3.4 Species:

- Active badger sett within adjacent woodland
- Potential for nesting birds within buildings and adjacent habitats; foraging opportunities within and around site
- Potential for bats foraging and commuting within adjacent woodland; offsite trees will offer roosting opportunities
- Possible presence of amphibians and reptiles within surrounding vegetation

Table 1: Sensitive Ecological Receptors and Risk Avoidance Measures

Ecological Feature	Description	Potential impact	Risk Avoidance Measures	Responsibility for Implementation
SSSI and associated habitats	Bratton Downs SSSI	Degradation of habitats during construction, such as pollution through water run off. Trampling of habitats through vehicle movements	Implementation of best practice construction pollution prevention controls, minimisations of vehicle movements	Site manager/contractors
Badgers	Badgers are active within the locality. No active setts onsite but one active sett within adjacent woodland	Accidental injury/death of badgers due to becoming trapped in excavations/ site materials; electrocution or collision with vehicles	Precautionary Site Construction methods	Site manager/contractors following briefing by ECoW
Bats	No roosting opportunities are present onsite but bats are likely to use the surrounding vegetation for moving across the landscape and foraging	Accidental disturbance to bat commuting routes and foraging habitat through construction lighting	Precautionary Site Construction methods	Site manager/contractors following briefing by ECoW. Supervision of installed of new timber fence by the ECoWs due to proximity of sett.
Breeding Birds	Nesting birds likely to be using habitats around periphery of site	Accidental destruction of nests and death of young through site clearance or disturbance	Timings of site clearance and construction works; precautionary site construction methods	Site manager/contractors following briefing by ECoW
Great Crested Newts	Possible presence within wider habitats	Accidental injury/death of individual reptiles due to insensitive site clearance and timings.	Precautionary site clearance methods	Site manager/contractors following briefing by ECoW
Reptiles	Common reptiles likely to be present within adjacent habitats	Accidental injury/death of individual reptiles due to insensitive site clearance and timings.	Precautionary site clearance methods	Site manager/contractors following briefing by ECoW
Other species i.e. hedgehog	Hedgehog likely to be present within the locality	Accidental injury/death of hedgehog due to becoming trapped in excavations/ site materials;	Precautionary Site Construction methods	Site manager/contractors following briefing by ECoW

		electrocution or collision with vehicles		

4.0 METHOD STATEMENTS & TOOL BOX TALK

Description of Works

4.1 The works are small scale and involve the conversion of the existing pump houses with a new timber pergola linking the two buildings. As such, there is no requirement for a site compound, with materials brought in via the existing tracks. The chain link fence will be replaced with a timber fence, although it is anticipated that the concrete posts will remain. As such, the only excavations will be to installed a new septic tank, which will require emptying once/twice per year. There will be no parking onsite, with access via an existing track. The existing trees onsite will be retained and the grassland will be overseeded with a woodland flora seed mix.

4.2 Although there is to be minimal site clearance, a precautionary method statement has been provided below. An additional method statement has been prepared with regard to the nearby badger sett. The measures set out are applicable to all the sensitive ecological features listed in Table 1. Adherence to the method statement and pre commencement tool box talks will ensure that construction activities remain legally compliant and follow best practice measures relating to biodiversity.

4.3 A tool box talk will be given to the site manager/contractors prior to works commencing onsite that will discuss the following method statement and sensitive working methods, to ensure the measures set out this CEMP: Biodiversity are adhered to.

4.4 In summary the following site clearance/construction measures will be implemented:

- Construction works must ensure no impacts to the surrounding woodland and water courses. There will be no vehicle movements, associated with the construction works, outside of the chain link fence, with the exception of the access track.
- The surrounding woodland (outside of the fence line) must be left unaltered i.e. not landscaped with no created of adjacent footpaths/bridges etc through the woodland or over the stream. The existing footpaths will be maintained in its existing condition.
- An update badger check will be undertaken prior to the removal of the chain link fence and installation of the new timber fence. Should any new posts be required, they fence posts will be positioned to ensure there are no impacts to the adjacent sett and there will be gaps along the new fence line to allow for movement of species, including badgers. The installation of the new timber fence will be supervised by the ECoWs.
- Any vegetation removal and building works must avoid the breeding bird season, which generally runs from March to August. If works are to be undertaken during this time then a check for

breeding birds must be undertaken by an experienced ecologist immediately (no more then 24/48 hours) prior to works starting. If an active nest is found then works will need to wait until the chicks have fledged. A buffer will be put in place by the ecologist, this is usually 5m either side of the nest or determined by the ecologist. No works within the buffer is to take place, this to avoid disturbance to the nest. An Ecological Clerk of Works should be present during any vegetation clearance.

- There must be no night time construction to avoid the need for lighting
- Foundation trenches and all excavations (which will be limited to installation of septic tank) must either be covered overnight or must have scaffolding boards, or similar, placed within them to ensure that any animals that fall in are able to escape.
- Raise stored materials (that might act as temporary resting places for species such as amphibians and reptiles) off the ground, e.g. on pallets.