

Construction Environmental Management Plan

WILT18 – Chippenham Habitat Bank

Report Reference: WILT18-EB-CEMP

Report Version: v01.00

Issued on: April 2026

1. Introduction

Scope

This Construction Environmental Management Plan (CEMP) (Biodiversity) has been prepared by Environment Bank Ltd (EBL) in support of planning application; PL/2025/05596 for construction of a wetland including ponds, ditches and scrapes at Stockham Marsh near Foxham, Wiltshire.

This plan sets out environmental protection procedures for undertaking works associated with the proposed development; specifically dealing with the protection of habitats and species during the construction phase. Information relating to other issues, such as traffic movements, compound location, Site welfare and working hours will be detailed in contractors method statements and risk assessments.

This plan has been informed by ecological surveys and the following corresponding reports:

- WILT18-EB-BAR-v07.00 - Biodiversity Appraisal
- WILT18-EB-HMP-v10.00 - Habitat Management Plan
- Wiltshire and Swindon Biological Records Centre (WSBRC) – Protected/notable species and designated Sites information

This CEMP outlines measures to prevent impacts on retained habitats and protected species; thus avoiding offences being committed under relevant legislation. The purpose of this plan is to:

- Plainly identify the known risks to preserving habitats and/or function of the Site for protected and/or notable species and implement the mitigation outlined in the ecological report;
- Clearly set out when and where ecological supervision will be required;
- Identify ecologically sensitive areas (biodiversity protection zones) and indicate where protective buffers/fencing is required; and
- Identify roles and responsibilities for undertaking the work in relation to protecting biodiversity on SSite during the construction phase.

2. Responsible Personnel & Line of Communication

Client

EBL are responsible for the implementation of this CEMP and shall liaise with the Ecological Clerk of Works (ECow) and arrange an ecologist's input or SSite attendance, where required.

Should management on the Site change, new personnel will be made aware of and action this CEMP.

Site Manager

EBL Habitat Delivery Project Manager and Principal Contractor, Martin Green, are responsible for the implementation of actions required to ensure compliance with this CEMP.

Ecological Clerk of Works ECoW

An ECoW is required to support the development and ensure that EBL and Martin Green adhere to the requirements of this CEMP to be legally compliant.

Ecological queries should be directed to Hannah Tracey, contactable on 07498 387 916. Any ecologist undertaking the ECoW role will be suitably qualified and experienced.

The ECoW will be responsible for delivering the prescriptions requiring ecological expertise during construction. They shall assist and advise EBL in their adherence to the requirements of this CEMP.

Contact Details

Client/Site Manager	Environment Bank Ltd – Alex Edwards	[REDACTED]
Contractor	Martin Green	[REDACTED]
Principal Designer/ECoW	Environment Bank Ltd – Hannah Tracey	[REDACTED]

3. Biodiversity Protection Zones

Biodiversity Protection Zones (BPZs)

The following ecological features (as informed through the aforementioned baseline surveys) will be safeguarded through implementation of BPZs or sensitive working methods (see section 5) to avoid and minimise adverse impacts during the construction phase. The location of ecological features is illustrated in Figure 1. A detailed risk assessment of the construction-phase impacts of the proposals upon identified ecological features is provided in Section 4.

Habitats

Lowland Mixed Deciduous Woodland

Two small copses of woodland are present along Cade Burna stream in the east of the Site. Another small copse lies on the Site's southern boundary, in the southeastern corner of field 5. Species here comprised of Pedunculate Oak *Quercus robur*, Field Maple *Acer campestre*,

Crack-willow *Salix fragilis* with an understorey of Hawthorn *Crataegus monogyna* and Hazel *Corylus avellana*. The ground flora largely comprised Bramble *Rubus fruticosus* agg. and Common Nettle *Urtica dioica*.

Ponds (Non-priority Habitat)

There is a small pond present within the woodland in Field 11. The pond is artificially connected to the adjacent watercourse and is shaded by trees and surrounding scrub.

Hedgerows and Lines of Trees

The fields are bordered by hedgerows - many of which are species-rich comprising Ash *Fraxinus excelsior*, Hawthorn, Blackthorn *Prunus spinosa*, Field Maple, Crack-willow, Elder *Sambucus nigra* and Field-rose *Rosa arvensis*. Many of the hedgerows have an associated ditch which did not fit the criteria for a standalone ditch. An ecologically valuable line of trees runs along the Cade Burna.

Other Rivers and Streams

A small stream called the Cade Burna flows through the centre of the Site. The stream is approximately 1.5 m wide and varies between 30 cm to 1 m deep. The stream is bordered by mature trees with areas of dense scrub. The Cade Burna runs to the north of the proposed ponds. This will remain disconnected from the ponds and unimpacted by the proposed designs.

Ditch

A small ditch, approximately 1 m deep, is present between Fields 1 and 2. The ditch is partially shaded by an existing hedgerow which runs halfway down the water features.

Species

Invasive Plant Species

No invasive plant species have been identified on Site.

Protected Plant Species

No protected plant species have been identified on Site

Invertebrates

Several invertebrate records were provided by WSBRC within 1 km of the Site. The Site offers limited opportunities for invertebrates currently, being dominated by cultivated arable fields. The pond, small areas of Lowland mixed deciduous woodland, scrub and hedgerows offer some suitable habitat for aquatic and terrestrial invertebrates. However, these areas are generally small in comparison to the remainder of the Site. There are also very few microclimates present on Site. Due to the lack of habitat variation, the invertebrates present within the Site would be limited to a common assemblage.

Amphibians

One record of Great Crested Newt *Triturus cristatus* from 2010 was returned within 1 km of the Site.

The pond within the Site provides suitable breeding habitat for amphibians. However, eDNA analysis of samples collected on the 11th May 2023 returned negative results for Great Crested Newt. A review of aerial photography identifies a further three small waterbodies within 500 m of the Site; all situated within arable fields to the west of the Site.

The Site is dominated by unsuitable cultivated arable fields which offer limited potential for amphibians. However, the semi-natural broad-leaved woodland and hedgerows on and bordering the Site provide suitable hibernation habitat as well as foraging and ranging.

Reptiles

No records of reptiles were returned within 1 km of the Site. The small areas of woodland provide suitable hibernation habitat with foraging opportunities for Grass Snake *Natrix helvetica* within the on-Site pond and adjacent stream (Cade Burna). However, the majority of the Site is sub-optimal, lacking the structural variation and key basking opportunities with high levels of disturbance and lack of cover.

Birds

Several bird records were returned by the data search within 1 km of the Site including Skylark *Alauda arvensis* and Linnet *Linaria cannabina* which are recorded from the Site itself. It is likely therefore that both species are present as breeding species on Site.

As regards the remaining records, only Kingfisher *Alcedo atthis* and Barn Owl *Tyto alba* are likely to use the Site regularly for foraging and will require consideration.

Overall, the Site offers some nesting and foraging opportunities for a range of bird species but is not considered to be of elevated value for birds in the local area.

Bats

Multiple records of bats were highlighted within 1 km of the Site. The trees within the small strips of woodland are mostly young and semi-mature but some may offer suitable roosting features for bats. The Site offers some foraging potential with commuting and foraging opportunities via the hedgerows.

Otter and Water vole

One record for Otter *Lutra lutra* from 2015 was returned within 1 km of the Site. This record is located 924 m south-east of the Site along Cowick Brook. No records of Water Vole *Arvicola amphibius* were returned within 1 km of the Site.

No signs of Otter or Water vole were identified during the River Condition Assessment.

The Cade Burna stream, which flows through the centre of the Site, has the potential to periodically support Otter, particularly for commuting during periods of high flow.

Hazel Dormouse

No records of Hazel Dormouse *Muscardinus avellanarius* were returned within 1 km of the Site. The hedgerows within and around the Site offer some value to Hazel Dormouse for foraging and commuting, however, they lack good connectivity to well established woodland. The southern woodland within the Site is prone to flooding and so would not be suitable for hibernation. All woodlands present on Site were considered too small to support Hazel Dormouse populations.

Badger

Several records of Badger *Meles meles* were returned by the data search within 1 km of the Site. No evidence of Badger setts or activity signs (paths, prints, foraging signs, hairs, latrines) were recorded during the Site surveys.

The small patches of woodland on Site and larger tracts nearby (Catcomb Wood) offer suitability for sett creation, while the field margins and small areas of scrub offer limited foraging opportunities.

4. Ecological Risk Assessment

Risk Assessment

A risk assessment of the construction-phase impacts of the proposals upon habitats and species identified in Section 3, along with suggested remedial measures to be implemented through Method Statements, is provided below. This excludes impacts which have been avoided through timings of works, e.g. Breeding birds.

Ecological Feature	Ecological Feature Description/Comments	Potential adverse impacts	Risk avoidance method statements (MS)	Timings to implement risk avoidance MS	Person Responsible to implement risk avoidance methods
Habitats					
Retained Hedgerow	Species rich hedgerow with trees	Accidental physical (mechanical) damage to trees, including disturbance (direct or indirect) of any species using features. Also soil compaction and associated effects.	MS3 - BPZ	Throughout construction	Contractor
		Accidental damage from airborne pollution resulting in smothering of leaves/ deposition of spoil from runoff resulting in change to soil character. Could lead to degradation of habitat and indirect adverse effects on species it supports	MS1 – Airborne pollution and silt control	During Construction	Contractor

Ecological Feature	Ecological Feature Description/Comments	Potential adverse impacts	Risk avoidance method statements (MS)	Timings to implement risk avoidance MS	Person Responsible to implement risk avoidance methods
Species					
Invertebrates	Local assemblage of terrestrial invertebrates	Accidental injury/ mortality due to smothering by airborne pollution/ deposition of spoil from runoff. Indirect effects of pollution damage to habitats	MS1 – Airborne pollution and silt control	During Construction	Contractor
Great Crested Newt	Record of one GCN found within 1 km of the SSite, 50 m to the west of the SSite within woodland. Local populations likely to be present	Accidental injury/mortality from construction activities	MS4 – GCN Risk avoidance	During Construction	Contractor ECoW
Reptiles & Other Amphibians	Reptiles and Common Toad <i>Bufo bufo</i> likely to be present in surrounding marginal habitat	Accidental injury/mortality from construction activities	MS6 - Reptiles and Amphibian risk avoidance	During Construction	Contractor
Breeding Birds	Populations of birds nesting within SSite or adjacent woodlands	Accidental injury/mortality from vehicular damage.	MS5 – Nesting Bird Mitigation	During Construction	Contractor ECoW

Ecological Feature	Ecological Feature Description/Comments	Potential adverse impacts	Risk avoidance method statements (MS)	Timings to implement risk avoidance MS	Person Responsible to implement risk avoidance methods
		Accidental degradation of nests and injury or mortality of young due to dust deposition	MS1 – Airborne pollution and silt control	During Construction	Contractor ECoW
Bats	Habitats within Site are likely to be used by local populations of bats for foraging and commuting.	Potential dissuasion of bats from foraging/ commuting areas, possibly resulting in reduced prey availability/ reduced fitness of individuals and population decline	MS2- Noise and light pollution control	During Construction	Contractor

5. Biodiversity Method Statements

The method statements detailed below relate to the ecological features identified in Section 4. Adherence to these Method Statements will ensure that construction activities remain legally compliant and follow best practice measures relating to biodiversity. Periodic review of the Method Statements will be undertaken, informed by construction-phase monitoring by the ECoW, to ensure that the recommendations remain relevant and any required remedial action is taken.

Method Statement No. 1 – Airbourne pollution and silt control	
Personnel Required	Principal Contractor
Description of works	Dust and silt control measures to be implemented throughout construction phase for relevant activities.
Purpose	To protect retained habitats and protected species therein. Wildlife and Countryside Act (1981)
Sequence/method	All aspects of works will be conducted in such a manner to minimise the generation and spread of dust and silt into the surrounding area, including the following: • Stockpiles of materials will be kept away from the Site entrance and field boundaries; • Stockpiles of materials subject to wind erosion will be dampened down or seeded to ensure satisfactory dust control and covered with tarpaulins as appropriate; • Airborne dust will be kept to a minimum by the regular use of water spray systems and bowsers wetting down haul roads and pre-excavated areas if required; • All loads entering and leaving Site, as well as skips stored on Site, will be securely covered; • Delivery of materials to Site will be programmed to minimise the time stockpiles are kept on Site; • Plant and wheel washing will only be carried out in a designated area at least 15 metres from any watercourse, surface drain or potential pollution pathway. This will be constructed on an impermeable base with a collecting sump to prevent spreading of dust and spoil onto the surrounding roads; • The wheels of all vehicles will be checked on leaving the Site, and if necessary, will be cleaned by jet wash within the designated washing area; • Construction activities within 25 metres of woodland, hedgerows, ditches or ponds will be avoided during heavy rain to minimise risk of sediment effects;

Method Statement No. 1 – Airbourne pollution and silt control

	Silt fencing or temporary drainage channels will be used to block or divert runoff from stockpiles of materials.
Completion	Implementation of correct procedure as verified by Site Manager.
Monitoring /aftercare	Monitoring of habitat condition during construction.

Method Statement No. 2 – Noise and light pollution control

Personnel Required	Principal Contractor
Description of works	Lighting and noise reduction control measures to be implemented throughout the construction phase.
Purpose	To avoid adverse impacts to relevant wildlife
Sequence/method	- No artificial lighting will be employed during construction of the development unless agreed with the ECoW before use.; - It is anticipated that no artificial lighting will be used during the summer months (April - September inclusive); - Artificial lighting, if required, is likely to be restricted to use within the Site compound and will only be used during typical working hours approx. (7 am – 7 pm); - Should any artificial lighting need to be employed, this will be directed away from retained boundary habitats to ensure light spill is avoided in these areas; - Lighting will only be used during working hours and no lighting will be switched on overnight outside of these hours, unless under prior agreement with the ECoW, with lighting being on a motion sensor with a maximum agreed time limit; - Plant machinery and vehicles will only be operated during working hours (7 am – 7 pm); - All plant and machinery in intermittent use shall be shut down in the intervening period; - All plant and machinery is to be maintained in good and efficient working order, according to the manufacturer's specification; Where possible, battery equipment shall be used instead of diesel or petrol-powered generators.
Completion	Implementation of correct procedure as verified by Site Manager.
Monitoring /aftercare	Lighting strategy to be agreed with ECoW before artificial lighting is used.

Method Statement No. 3 – Biodiversity Protection Zones

Personnel Required	ECoW, Site Manager, Principal Contractor
Description of works	BPZs to be maintained through provision of fencing and agreed with marked transportation routes.
Purpose	To protect retained habitats and protected species therein. Wildlife and Countryside Act (1981)
Sequence/method	• The BPZs will prevent construction activities from resulting in physical damage to areas of sensitive habitat and species outside of the construction area; • BPZs will be delineated by appropriate fencing or markers for each habitat type / feature to be protected, as detailed in the table below; • The ECoW will decide on an appropriate system to delineate BPZs; • Any fencing will be in accordance with British Standard 5837:2012 Trees in relation to design, demolition and construction and will be marked with weather-proof signage (minimum A4 size) stating "Biodiversity Protection Zone – Keep Out"; • Temporary fencing or markers will remain in place until the development is completed and all Site machinery and materials removed from Site; • No Site personnel or machinery shall enter the BPZs and no equipment will be stored therein for the duration of construction. The maintenance of the BPZs and condition of fencing will be inspected by an ECoW on installation to ensure it complies with the correct specification and is installed in the correct locations; • Thereafter the fencing will be subject to regular checks by the ECoW; however, it will be the responsibility of the Site manager to ensure the fence is appropriately maintained throughout the construction phase.
Completion	Completion of BPZ marking/fencing installation and inspection by ECoW
Monitoring /aftercare	Monitoring of BPZ by ECoW and Principal Contractor

Features	BPZ Minimum Specification	Marker Type
Woodland / trees	Root Protection Zone or Shading zone, whichever is greater	Marker Flags or temporary Heras depending on adjacent construction works/passing plant

Features	BPZ Minimum Specification	Marker Type
Hedgerow	4 m from hedgerow edge	Marker Flags or temporary Heras depending on adjacent construction works/passing plant
Ditches and watercourses	6 m from top of bank	Marker Flags or temporary Heras depending on adjacent construction works/passing plant
Badger sett	5 m from sett entrance	Temporary Heras
Ground-nesting bird	50 m from nest	Marker Flags or temporary Heras depending on adjacent construction works/passing plant
Other nesting bird	4 m around nest	Marker Flags or temporary Heras depending on adjacent construction works/passing plant

Method Statement No. 4 Great Crested Newt Risk Avoidance

Personnel Required	Site Manager ECoW Principal Contractor
Description of works	Precautionary working methods to avoid adverse impacts upon Great Crested Newts within defined Great Crested Newt Working Area (GCNWA).
Purpose	To avoid adverse impacts upon Great Crested Newts and thereby avoid committing an offence.
Sequence/method	• Works will be restricted to within the existing arable fields. Under no circumstances will any hedgerows or field margin habitat be removed or disturbed during construction. • Works will delivered between 1st July – 31st August. • Site operatives will be provided with a 'toolbox' talk prior to commencing work on Site. This will inform all operatives of the importance to restrict all working activities to within the security fencing and not to disturb any retained field margin habitat. • Contractors will be provided with visual guides on the identification of Great Crested Newts in the unlikely event that any are encountered during the works. In the event that any Great Crested Newts are encountered, they will be left in-situ. The Site manager will ensure that ECoW are contacted immediately, and any works within 50 m from the area within which the newt is found must stop.

Method Statement No. 4 Great Crested Newt Risk Avoidance

Completion	Completion of all construction works
Monitoring /aftercare	Regular monitoring by the ECoW during contraction phase.

Method Statement No. 5 Nesting Bird Mitigation

Personnel Required	Site Manager ECoW Principal Contractor
Description of works	Open habitats within the construction zone will be maintained as unsuitable for nesting birds prior to construction commencing. Thereafter, any open or hedgerow / woodland habitat which remains suitable for nesting birds will first be inspected by an ecologist, if these habitats are to be impacted during the nesting season.
Purpose	To avoid harm to nesting birds, their eggs and young. Wildlife and Countryside Act (1981)
Sequence/method	• Nesting Bird Inspections during the construction phase. Any removal of suitable vegetation for nesting, including hedgerow, woodland and open areas which have not been maintained as unsuitable through the measures detailed above, should ideally be conducted outside the bird nesting season (which is usually March to August but variable dependent on climate). However, in the event works are required during this period, an inspection to confirm the absence of nesting birds must first be carried out by a suitably experienced ecologist (or the ECoW) to ensure that offences relating to nesting birds are not committed. • Open Field: If suitable habitats remain during the nesting season (vegetation >100 mm), an experienced ecologist will conduct a walkover survey within 48 hours prior to construction commencing to check for nests within the open field. If no nests are found, the habitats should be cut short to maintain them as unsuitable for nesting within 48 hours of the survey. • Woody Vegetation: A check of any hedgerow, woodland or scrub for nesting birds must be carried out no more than 48 hours prior to their removal. If an active nest is found, a suitable exclusion zone (to be determined by the ecologist but minimum 50 m for nests in open habitats and 4 m for other nests) will be instigated around the nest to protect it until completion of nesting. The exclusion zone will be demarcated by barrier tape or appropriate temporary fencing (e.g. High Visibility Netlon or Heras) along with notices informing Site staff that the excluded area must not be disturbed. • A brief proforma report will be issued to the SSite Manager immediately following the inspection which will detail the

Method Statement No. 5 Nesting Bird Mitigation

	findings, any constraints, and confirmation of actions required. The ecologist will monitor the nest periodically and determine when the chicks have fledged so the exclusion zone can be removed. In the unlikely instance that an active bird nest is subsequently identified during Site clearance in the absence of an ecologist, activity must cease immediately and advice sought from the ECoW
Completion	Approval by ECoW that all checks have been conducted.
Monitoring /aftercare	Monitor any nests found and protect until completion of nesting.

Method Statement No. 6 Reptiles and Amphibians Risk avoidance

Personnel Required	Site Manager ECoW Principal Contractor
Description of works	Precautionary strategy for clearance of habitats liable to support reptiles or amphibians
Purpose	To avoid reckless injury or mortality of widespread reptiles and other wildlife such as toads. Wildlife and Countryside Act (1981)
Sequence/method	- Field margins, scrub, the bases of hedgerows and tree roots may support widespread reptile species and amphibians such as Common Toad. Generally, these areas are being protected and therefore minimal work in these habitats is necessary. If works to these habitats is required, this will be restricted to the months of April - October inclusive and be conducted under an ecological watching brief by an ecologist. - In the event that any reptiles and / or amphibians are discovered during Site clearance, they shall be captured and relocated to suitable retained habitat around the Site.
Completion	Approval of correct procedure by ECoW.
Monitoring /aftercare	None

Method Statement No. 7 Management and storage of chemicals

Personnel Required	Site Manager, Principal Contractor
Description of works	Management and Storage of chemicals, including spillage and environmental contamination
Purpose	Protection of environment through safe chemical management

Method Statement No. 7 Management and storage of chemicals

Sequence/method

- Any potential contaminants (fuel, oils and chemicals) used during construction will be stored in designated compounds on an impermeable surface, at least 15 m from any watercourse or pond. These will be securely locked away when not in use. Appropriate measures to prevent the spillage of chemicals into the ponds and ditches will be implemented, including the storage of several spill kits and, potentially, the usage of earth bunds surrounding the designated refuelling/chemical handling Site. A detailed pollution/spill response plan will be kept within the Site office. The Environment Agency will be contacted in the event of an incident.
- Machinery operation within 25 m of ponds and ditches will be minimised in general and avoided entirely during periods of heavy rain.
- Appropriate pollution control measures will be employed in accordance with those outlined in the NetRegs document Guidance for Pollution Prevention (GPP) 5: Works and maintenance in or near water (February 2018). Although not endorsed by the Environment Agency in England (as the EA do not currently provide good practice guidelines following the withdrawal of Pollution Prevention Guidelines (PPG) 5), measures in this document (accessed at: <http://www.netregs.org.uk/media/1418/gpp-5-works-and-maintenance-in-or-near-water.pdf>) should nevertheless be followed in order to prevent pollution of the nearby watercourses and ensure any pollution events are dealt with swiftly.
- A spill kit must be kept on Site with sand, earth or commercial products for the containment of fuel and other material spillages. All staff will receive appropriate training in the use of these kits and are to be made aware of where the kit is stored.
- In the event of a spillage of oils or chemicals resulting in contamination of water courses or damage to habitats, the following procedure will be adopted:
- The appropriate spill kit is to be deployed immediately and the SSite Manager is to be informed; • The incident is to be recorded within the Site log book; and • In the event of contaminants being discharged directly to water courses, or in the event of significant spillage (in excess of 10 litres), the Environment Agency is to be contacted on the incident hotline: 0800 80 70 60.

Completion

Implementation of correct procedure as verified by Site Manager.

Monitoring /aftercare

Monitoring of habitat condition during construction

