

Construction Environment Management Plan

Lower Dunge Farm, Westbury

April 2026

Ecology | Green Space | Community | GIS

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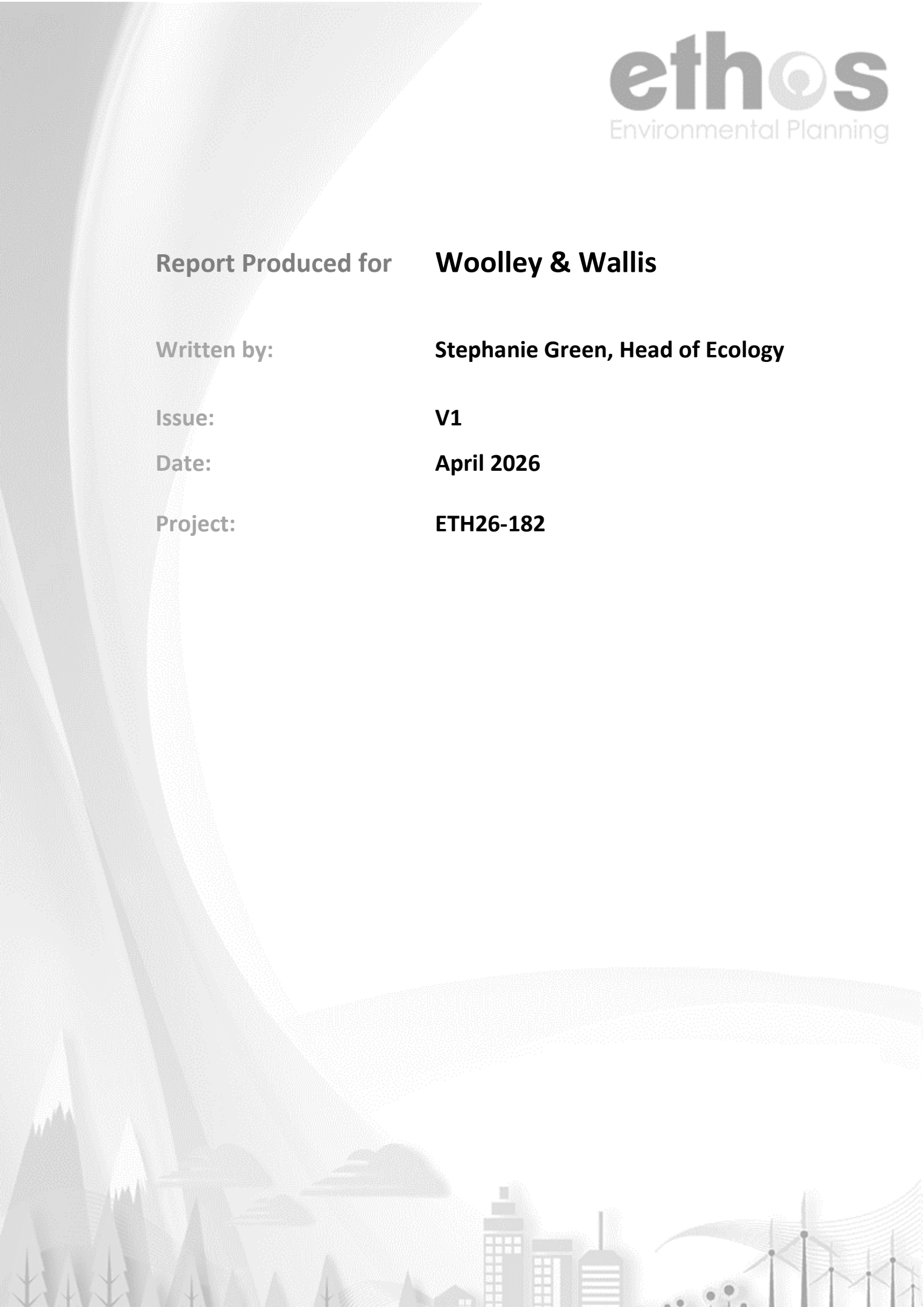
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1 SUMMARY

1.1 Table 1 contains a summary of the construction mitigation measures, habitat/ species at risk, responsibilities and timing of year the works are to be undertaken.

Table 1 CEMP Summary

Sensitive receptor	Mitigation Measure	Responsibility	Timing of Works
Boundary hedgerows	No material storage within 10 metres of hedgerows.	Lead Contractor Site Manager	Any time of year
Great crested newt	Pre-works check by Suitably Qualified Ecologist (SQE). Supervision of vegetation removal under ECoW if suitable for GCN.	Lead Contractor Site Manager to engage SQE	Prior to construction start, any time of year.
Breeding birds	Pre-works check of any vegetation requiring removal during the nesting season (March – August)	Site Manager to instruct an ECoW Site Manager to make all contractors aware of the need to contact an Ecologist if an active bird nest is found in areas to be cleared	March to August inclusive
Nocturnal mammals	Restrict working hours to daylight hours. No security lighting is required.	Lead Contractor Site Manager	During all site clearance and construction works

2 INTRODUCTION

- 2.1 This Construction Environment Management Plan (CEMP) has been produced by Ethos Environmental Planning (Ethos) for the development of Lower Dunge Farm, Westbury, BA14 6AX (Central Grid Reference ST 90105 54105) and hereafter referred to as the 'site'. This CEMP has been produced to address consultee comments by Wiltshire Council ecologist on 16/03/26 (Application Number PL/2025/08773) which have proposed the following condition relating to ecology:

2. Construction Method Statement

No development shall commence on site (including any vegetation removal or works to existing structures), until a Construction Method Statement has been submitted to, and approved in writing by the Local Planning Authority. The Construction Method Statement shall include all precautionary measures to be implemented during the construction period, for the protection of sensitive habitats and species known to be present within or adjacent the site, with particular reference to great crested newts, bats, badgers and nesting birds. The development shall be carried out in strict accordance with the approved Construction Method Statement.

REASON: To ensure adequate protection, mitigation and compensation for protected species and priority habitats throughout the construction period.

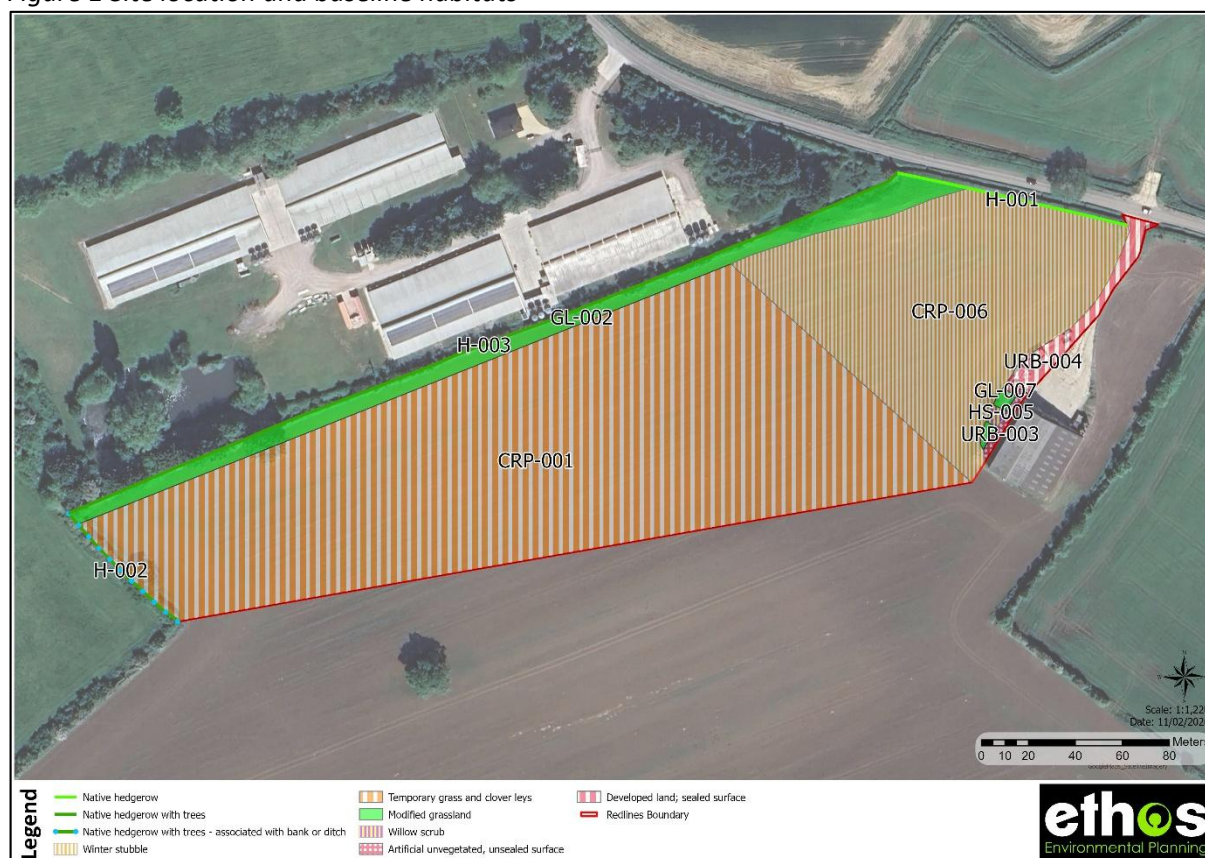
2.2 Aims and Objectives

- 2.2.1 The key aim of the CEMP is to ensure that the ecological interest and sensitive habitats on site are protected during the construction works. The objectives of the CEMP are as follows:
- Set out details of construction activities which have the potential to impact the biodiversity interest of the site;
 - Set out measures to avoid and mitigate impacts on protected species from construction works;
 - Provide details of the locations and timing of works to avoid impacts on protected and notable species; and
 - Provide details of other on-site personnel who are responsible for the implementation of the CEMP.

2.3 Site Location and Description

- 2.3.1 The site is located at Lower Dunge Farm (Central Grid Reference ST 90105 54105) and contains an arable field with small areas of grassland, scrub and boundary hedgerows. The site location and baseline habitats are shown in Figure 1.

Figure 1 Site location and baseline habitats



2.4 Ecological Constraints

2.4.1 A UK habitat classification survey was undertaken by Ethos in 2025, with an updated survey undertaken in January 2026. Full survey results are detailed within 'Page Westbury Ecology Technical Note V2, (Ethos, 2026). Results are summarised below in Table 2:

Table 2 Summary of important ecological features and mitigation

Ecological Feature	Significance of effects	Mitigation / Compensation	Notes
Great crested newt	N/a – Legal only	Pre-works check of habitat to be removed by suitably qualified ecologist. Sensitive construction measures.	GCN breeding pond within the local area, over 250m from the proposed development site.
Badger	N/a – Legal only	Precautionary mitigation during construction.	No evidence of badger on site but habitat within proximity to the site which is suitable for badger.
Hedgehog	Local scale	Precautionary construction measures.	
Hedgerows	Local scale	Provision of ecological buffers.	Existing hedgerows to be retained and protected

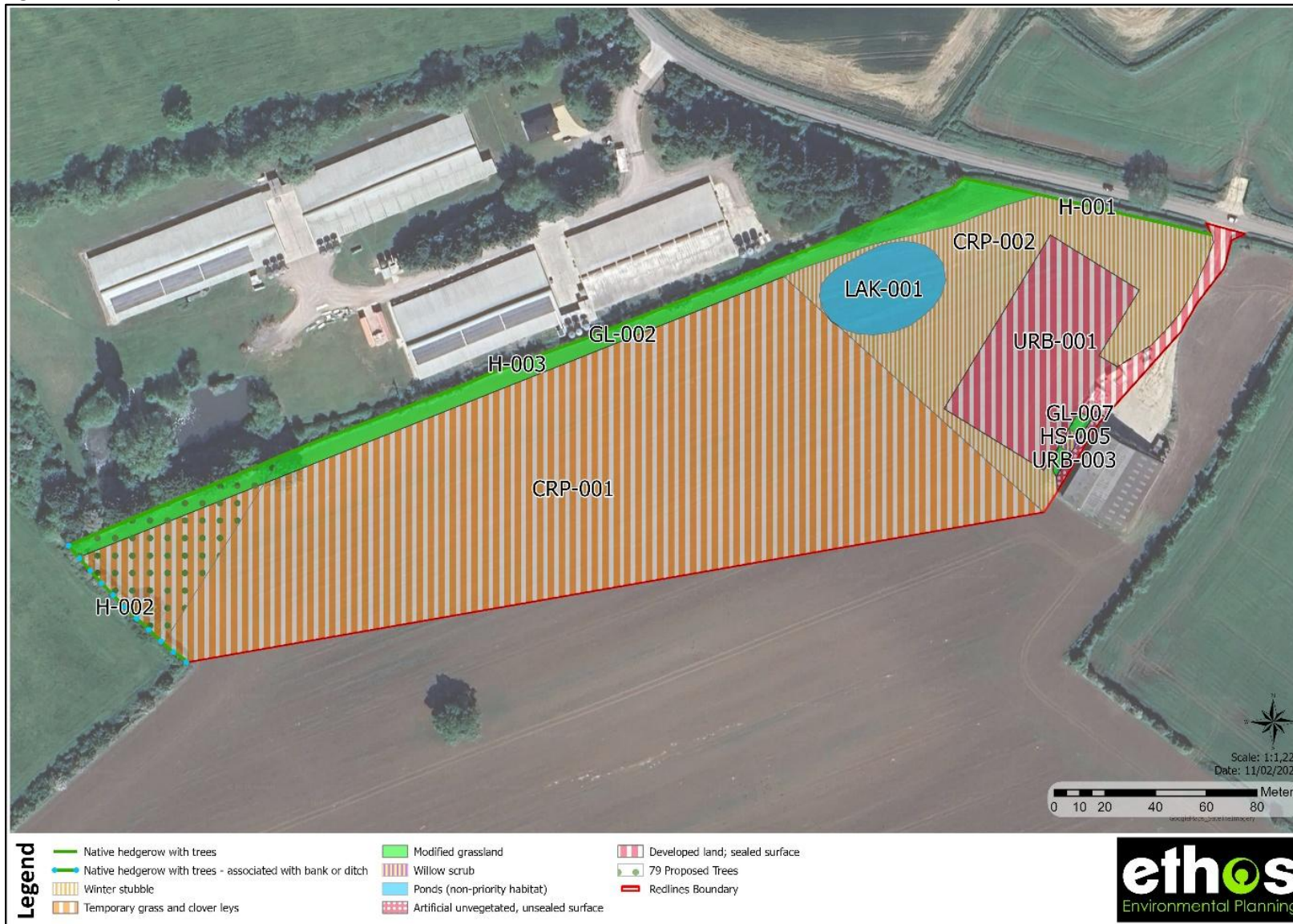
Ecological Feature	Significance of effects	Mitigation / Compensation	Notes
		Precautionary mitigation measures during construction.	are located on the west and northern boundaries of the site.
Bats	Local scale	No construction lighting.	No lighting proposed to protect bats potentially utilising boundary habitats for commuting and foraging.
Birds	N/a – Precautionary only	If any bird nesting habitat requires removal, works will be timed to avoid nesting bird season, or supervision of hedgerow removal under ECoW.	No hedgerow is proposed to be removed.

2.5 Development Proposals

2.5.1 The proposals for the site include the construction of two new agricultural barns and an associated yard to be built on existing arable land. Proposed habitats are shown in Figure 2. The layout of the development has been developed to minimise impacts on biodiversity as follows:

- The development footprint is to be situated entirely on the existing arable field, which was assessed to contain very low value for biodiversity.
- The modified grassland margin along the northern edge of the site will be retained, alongside the area of willow scrub, modified grassland and artificial unsealed surface around the existing farmyard.

Figure 2 Proposed habitats



2.6 Structure of the Report

2.6.1 The following sections are included within this report:

- Construction plan;
- Risk assessment and mitigation measures;
- Identification of Biodiversity Protection Zones;
- Method statements for protected species and habitats;
- General good practice mitigation measures; and
- Responsible persons and lines of communication.

3 CONSTRUCTION PLAN AND MITIGATION MEASURES

3.1 Construction Plan

- 3.1.1 The construction programme is anticipated to start in late spring 2026 and last approximately 6 months. Should timings change, the mitigation measures detailed within the CEMP will be reviewed by the ECoW and the Developer will be informed of any necessary amendments.
- 3.1.2 Materials will be stored either in the existing yard east of the proposed building footprint or within the arable field. All materials will be stored at least 10 metres from boundary habitats.

3.2 Risk Assessment and Mitigation Measures

- 3.2.1 A summary of the key construction mitigation measures has been provided in Table 3.

Table 3 Key construction mitigation measures

Ecological Feature	Risk Assessment of Potential Impacts	Mitigation
Great crested newt	There is a low risk of GCN to be present within the site, due to the distance between the site and the breeding pond. In addition, the existing site comprises an arable field of very low value to amphibians such as GCN. A residual risk remains that GCN could be injured or killed during construction activities.	Full details and method statement in Section 3.3.
Nocturnal Mammals: Badger and hedgehog	Injury or mortality of badgers or hedgehog using the site to commute and forage.	Full details and method statement in Section 3.4.
Retained boundary hedgerows	Damage to roots from construction activities such as vehicles driving over roots or machinery/ equipment being stored on roots	Full details and method statement in Section 3.5.
Bats	Potential disturbance to bats utilising boundary hedgerows for commuting and foraging.	No construction lighting is proposed. No impacts.
Breeding birds	Accidental damage / disturbance / destruction of nests on site during site clearance. This risk is considered very low, as no hedgerow or other breeding bird habitat is proposed for removal.	Full details and method statement in Section 3.6.

3.3 Great Crested Newt

- 3.3.1 The following measures will be implemented to protect GCN and other amphibians during construction:
- A pre-works check by a Suitably Qualified Ecologist (SQE) will be undertaken. This will include an inspection of the proposed construction footprint for any potential

GCN habitat. As the construction zone comprises an arable field it is considered unlikely that the site contains suitable habitat for the species.

- If suitable habitat for GCN requires removal it will be removed under supervision of the SQE.
- In the unlikely event that a GCN is identified during vegetation clearance or during construction, works will cease and the SQE will assess the requirement for additional mitigation and a GCN licence from Natural England.

3.4 Nocturnal Mammal Method Statement

3.4.1 The measures detailed within this section will allow the protection of species including bats and badger during the construction period.

- Excavations and trenches will either be covered at night or include an escape ramp to prevent nocturnal mammals (including hedgehog and badger) from becoming trapped. The escape ramp could be a gently sloping side of the trench, or could be a roughened plank of wood.
- Materials will be stored sensitively to avoid creating refugia for hedgehog; see General Good Practice Measures below.

3.5 Tree and Hedgerow Protection

3.5.1 No construction works are proposed within the vicinity of hedgerows, with no hedgerow requiring removal as part of the development. Material storage within the field during construction will not be undertaking within 10 metres of hedgerows to safeguard root protection zones.

3.6 Bird Method Statement

3.6.1 No hedgerow or other bird nesting habitat requires removal as part of the development. However, if any potential bird nesting habitat does require removal, the following precautions will be undertaken:

- Any hedgerow removal during construction should be undertaken outside the breeding bird season (March to August inclusive) or following a precautionary nesting bird survey by a SQE to ensure compliance with legal obligations.
- If active bird nests are identified during the survey, a buffer zone will be set up by the SQE around the nest until all young birds have fledged and left the area.

3.7 General Good Practice Mitigation Measures

3.7.1 The following section details general good practise measures which will be adopted during the construction process. It will be the responsibility of the Site Manager/ Lead Contractor to ensure that all staff are inducted and made aware of these recommendations.

Dust generation

- 3.7.2 Generation of dust will be mitigated by wetting down if appropriate. This will avoid dust deposition on sensitive habitats such as the retained hedgerows on the northern and western boundaries.

Excavations and trenches

- 3.7.3 All excavations and trenches will either be covered at night or include an escape ramp to prevent nocturnal species such as badger and hedgehog from becoming trapped. This could be in the form of a roughened plank of wood. The trenches/pits will be inspected each morning to ensure no badgers or other species have been trapped.

Contractor materials and hazardous waste

- 3.7.4 All chemicals and hazardous materials and waste will be stored in-line with best practice guidelines, ensuring they are secure and cannot be accessed by roaming animals.

Sympathetic working practices

- 3.7.5 Avoid creating potential refuges. Keep the site tidy and store materials off the ground, for example on pallets where possible, to avoid protected species utilising crevices.
- 3.7.6 Store materials away from areas of retained vegetation which are considered suitable for species such as GCN (e.g. hedgerows).
- 3.7.7 Should it be necessary to store materials such as topsoil on site then the stockpile should be smoothed to prevent access by faunal species into potential cavities.
- 3.7.8 Staff should simply demonstrate awareness when working and moving materials. Should an animal be found, it should be gently moved, for example in a clean bucket, to a suitable location within habitat well away from the working area.

4 RESPONSIBLE PERSONS AND LINES OF COMMUNICATION

4.1 Toolbox Talk

4.1.1 The Lead Contractor, and other supervisors as deemed appropriate, will be given a toolbox talk by the appointed ECoW as part of the pre-works check.

4.1.2 This will comprise:

- The legal protection afforded to protected species;
- The precautionary methods of working (outlined in this document);
- Contractors will be made aware of the sensitive habitats on site; and
- The procedures to follow in the event that any protected species are discovered during the works.

4.1.3 It will be the responsibility of the Lead Contractor to ensure that all site operatives, including sub-contractors are informed of the CEMP. Site inductions will contain details on the ecologically sensitive areas present on site. The purpose of protective fencing, wildlife exclusion barriers and warning signs, and the potential consequences of removing or damaging them, will be explained to all site personnel during the toolbox talk.

4.2 Review of the CEMP

4.2.1 The CEMP will be regularly reviewed throughout the construction/ implementation process to monitor the effectiveness of mitigation measures and to comply with legal and planning requirements where appropriate. This will be undertaken by the Lead Contractor who will engage the SQE where required.

4.2.2 Records will be maintained, and environmental procedures will be reviewed regularly, to identify and report issues to site managers and the project team, identifying remedial action where necessary.

4.2.3 Records will include the results of monitoring the implementation success of mitigation methods where required.

REFERENCES

BSI Standards Institution (2013) BS 42020:2013 BSI Standards Publication. Biodiversity — Code of practice for planning and development.

CIEEM (2017^a) *Guidelines on Ecological Report Writing*. Chartered Institute of Ecology and Environmental Management (CIEEM), Winchester.

Ethos Environmental Planning (2026) Page Westbury, Ecology Technical Note V2.

Wildlife and Countryside Act 1981. Available at: <http://www.legislation.gov.uk/ukpga/1981/69> [Accessed 13th November 2023]

APPENDIX 1 PROTECTED SPECIES LEGISLATION

A.1 Bats

All British bats are fully protected under Section 9 Schedule 5 of the Wildlife and Countryside Act 1981 and amendments. Bat species are fully protected under The Conservation of Habitats and Species Regulations 2017. In addition, they are protected under the Berne Convention; they are given migratory species protection within the Bonn Convention.

Regulation 43 (1) of The Conservation of Habitats and Species Regulation 2017 makes it an offence to:

- deliberately capture, injure or kill any species of bat;
- deliberately disturb any species of bat;
- damage or destroy a breeding site or resting place of any species of bat.

It is an offence to disturb any bat roosting site, whether the bats are there or not. Under Regulations 43 (2) disturbance includes in particular any disturbance which is likely:

- To impair their ability
 - to survive, to breed or reproduce, or to rear or nurture their young; or
 - in the case of a hibernating or migratory species, to hibernate or migrate; or
- To affect significantly the local distribution or abundance of the species to which they belong.

Presence of bats does not necessarily mean that development cannot go ahead, but that with suitable, approved mitigation, exemptions can be granted from the protection afforded to bats under regulation 43 by means of a licence. Natural England (NE) is the appropriate authority for determining licence applications for works associated with developments affecting bats, including demolition of their roost sites. In cases where licences are required, certain conditions have to be met to satisfy Natural England. Before the Statutory Nature Conservation Organisation (SNCO), in this case NE, can issue a licence to permit otherwise prohibited acts three tests have to be satisfied under the requirement of Regulation 55. These are:

1. Imperative Reasons of Overriding Public Interest [Reg 55(2)(e)];
2. No Satisfactory Alternative [Reg 55(9)(a)];
3. Maintenance of Favourable Conservation Status [Reg 55(9)(b)].

In order to meet the tests, SNCO usually expects the planning position to be fully resolved as this is necessary to satisfy tests 1 and 2. Full planning permission, if applicable, will need to have been granted and any conditions relating to bats fully discharged. ahead of any licence application to the SNCO. The LPA have a legal duty under The Conservation of Habitats and Species Regulations 2017, to assess whether the application is likely to meet the Three Tests

and therefore the requirements for Natural England licensing, prior to determination of an application. The Licence application process may take two months before a licence is issued. Planning Permission and granting of a bat licence are separate legal functions. Therefore receiving planning permission from the Local Authority is no guarantee that the SNCO will issue a derogation licence.

A.2 Badger

The Protection of Badgers Act 1992 is based primarily on the need to protect badgers from baiting and deliberate harm or injury. It also contains restrictions that apply more widely and it is important for developers to know how this may affect their work. All the following are criminal offences:

- to wilfully kill, injure, take, possess or cruelly ill-treat a badger;
- to attempt to do so; or
- to intentionally or recklessly interfere with a sett.

Sett interference includes damaging or destroying a sett, obstructing access to a sett, and disturbing a badger whilst it is occupying a sett. It is not illegal, and therefore a licence is not required, to carry out disturbing activities in the vicinity of a sett if no badger is disturbed and the sett is not damaged or obstructed.

Development should not be permitted unless it is possible to take steps to ensure the survival of the badgers in their existing range and at the same population status, with provision of adequate alternative habitats if setts and foraging areas are destroyed. Natural England will normally only issue a licence after detailed planning permission has been granted, where applicable, so that there is no conflict with the planning process.

Before the planning application is determined, the local planning authority should request a detailed ecological survey/report and developers should be prepared to provide the following information:

- The numbers and status of badger setts and foraging areas that are affected by the proposal;
- the impact that the proposal is likely to have on badgers and what can be done by way of mitigation;
- judgment on whether the impact is necessary or acceptable; and
- a recommendation on whether a licence will be required.

A badger survey usually requires assessment of the site and a 30-50m buffer area as tunnels can extend up to 20m from sett entrances. As badgers are not a European Protected species the Three Test do not need to be applied, however Planning Permission and badger licensing are separate legal functions. Thus receiving planning permission from the Local Authority is no guarantee that development operations will not breach the Protection of Badgers Act 1992. Similarly planning permission does not guarantee that a badger licence will be granted.

A.3 Birds

All wild birds are protected under the Wildlife and Countryside Act 1981 (as amended) and cannot be killed or taken, their nests and eggs taken, damaged or destroyed while their nest is in use or being built. It also prohibits or controls certain methods of killing or taking except under licence. Other activities that are prohibited include possession and sale. Activities such as killing or taking birds (including relocating) which would otherwise be illegal can be carried out under licence where there is suitable justification and the issue cannot be resolved by alternative means.

Specially protected or Schedule 1 birds receive full protection under the Wildlife and Countryside Act 1981 (as amended). Part I birds are protected at all times, Part II during the close season only. In addition to the protection from killing or taking that all birds, their nests and eggs have under the Act, Schedule 1 birds and their young must not be disturbed at the nest.

A.5 Great Crested Newt

Great crested newts are fully protected under UK and European legislation:

- Bern Convention 1979: Appendix III
- Wildlife & Countryside Act (as Amended) 1981: Schedule 5
- EC Habitats Directive 1992: Annex II and IV
- The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019
- Countryside Rights of Way Act 2000 (CRoW 2000).

These pieces of legislation prohibit the following:

- Deliberately or intentionally killing and capturing (taking) or intentional injuring.
- Deliberately disturbing
- Deliberately taking or destroying eggs
- Damaging or destroying a breeding site or resting place or intentionally damaging a place used for shelter or protection.
- Intentionally obstructing access to a place used for shelter; and keeping, transporting, selling or exchanging; offering for sale or advertising.

Under Regulations 43 (2) (The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019) disturbance includes in particular any disturbance which is likely:

- To impair their ability
 - to survive, to breed or reproduce, or to rear or nurture their young; or
 - in the case of a hibernating or migratory species, to hibernate or migrate; or

To affect significantly the local distribution or abundance of the species to which they belong. Paragraphs 43(1) and 43(2) ensure that protection applies to all stages of their life cycle.

GCN mitigation and licensing can be complex. Natural England have a rapid risk assessment tool which can be used for guidance to assist with determining whether a licence needs to be applied for, or if the development can proceed with Reasonable non-licensed Avoidance Measures (RAM). If a licence is required, the Favourable Conservation Test needs to be met.