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Construction & Ecological Management Plan: Ecology (CEMP: Ecology)

Client

Bellway Homes Ltd (South West).

Project

Land off Melksham Road,

Holt

Date

May 2026

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FIGURES

Figure 1: Construction & Environmental Management Plan

Rev	Issue Status	Prepared/Date	Approved/Date
-	Draft	PJP / 01.05.26	
A	Final	PJP / 05.05.26	PJP / 13.05.26

1.0 INTRODUCTION

- 1.1 The following Construction & Environmental Management Plan for Ecology (CEMP: Ecology) has been prepared by FPCR Environment & Design Ltd on behalf of Bellway Homes Ltd., in relation to the Site known as Melksham Road, Holt.
- 1.2 The object of this report is to provide information pertaining to the methods required during construction, to be compliant with relevant legislation and policy, with regard to protected species and habitats identified during the Section 73 Amendment for the Reserved Matters Application, which transitions the design of the scheme to Bellway in lieu of Bewley Homes. This focuses primarily on protected species and should be read in conjunction with, and kept in the Site Managers Office with, the main Construction and Environmental Management Plan (CEMP).
- 1.3 This is in relation to discharge of Condition 8 (CEMP) of APP/Y3940/W/23/3315432 attached to Outline Application ref: PL/2022/03315.

Proposals

- 1.4 The application for the development of up to 88 residential dwellings and 1.27 ha of green infrastructure (approved Reserved Matters Application: PL/2025/04414).

Ecology Survey Background

- 1.5 The information within this document is based on that contained in the previous 2023 Ecological Appraisal, 2025 Technical Note (Rev F), and revised 2026 Technical Note (Rev A) completed by FPCR.
- 1.6 A timeline for the Outline and Reserved Matters application and survey work is as follows:
- Extended phase 1 survey: 24th November 2021
 - Ground level tree assessments: 24th November 2021
 - Bat activity surveys (static and transect): 13th April, 5th May, 20th June, 13th July, 18th August, 19th August, 20th September, and 3rd October 2022
 - Breeding bird surveys (BBS): 13th April and 26th May 2022
 - Presence/absence reptile surveys: 27th May, 21st June, 27th June, 5th July, 16th September, 26th September and 30th September 2022
 - Update Site walkovers 18th April 2024, 6th May 2025, and 5th May 2026

2.0 ECOLOGICAL CONSTRAINTS TO CONSTRUCTION

2.1 The following are the ecological constraints to construction identified on site to date. Precautionary means 'not an identified constraint to date', but 'continued consideration required' due to suitable habitat:

- Nesting birds: in all hedgerows/scrub/trees. March to September inclusive.
- Badgers: no setts have been recorded to date. However, a single mammal pathway was noted on site, and badger could not be ruled out. Precautionary pre-commencement badger check.
- Bats in trees: precautionary pre-commencement re-evaluation of roost potential and subsequent aerial assessment of trees with bat roosting potential and likely to be impacted by development.
- Bat activity (general assemblage): common pipistrelle *Pipistrellus pipistrellus*, soprano pipistrelle *P. pygmaeus*, *Myotis* sp., long-eared *Plecotus* sp., serotine *Eptesicus serotinus*, barbastelle *Barbastella barbastellus*, lesser horseshoe *Rhinolophus hipposideros* and greater horseshoe *R. ferrumequinum* were recorded commuting and foraging along the site's linear features. Annex II bat species (barbastelle, lesser horseshoe and greater horseshoe) were found to be using the site, particularly along the southern boundary hedgerow. Direct measures not required, will be dealt with through habitat protection along features. Lighting restrictions included.
- Reptiles: low populations of slow worm *Anguis fragilis* and grass snake *Natrix helvetica* were found during presence/absence surveys within taller vegetation around the field margins. Any suitable reptile habitat will be removed following a precautionary method statement.
- Great crested newt (GCN) *Triturus cristatus*: Ponds within 250m. Existing District Level Licence for the scheme to offset impacts to suitable terrestrial habitat on site within 250m. No suitable refuges for GCN (earth mounds, log piles etc.). Any suitable GCN habitat will be removed following a precautionary method statement
- Invasive non-native species: an area of fishpole bamboo and *Cotoneaster* sp. were identified within the neighbouring residential hedgerow along the southwest edge of the site. A precautionary buffer of 2-3m, enforced by Heras fencing, should be in place for the duration of the works.

2.2 The above constraints are shown in *Figure 1: Construction and Environmental Management Plan*.

2.3 The following are **not** considered material constraints to the development proposals:

- Roosting Bats: absence of buildings within the site boundaries, or adjacent, which might otherwise have offered potential roost features.

3.0 PROTECTED SPECIES METHOD STATEMENTS

General Measures

Roles and Responsibilities

- 3.1 FPCR Environment & Design Ltd. are appointed Ecological Clerk of Works (ECoW) and Bellway Homes Ltd. (South West) will be supplied with relevant contact details of competent ecology team staff members selected to attend site as ECoW.
- 3.2 The ECoW (a competent FPCR Ecologist) will keep a record of any site visits and supervision works undertaken.
- 3.3 All FPCR staff working on site will have valid CSCS cards and experience working as appointed ECoW.
- 3.4 All licensable protected species work will be conducted by the appropriate class-licenced or low-impact class-licenced, or accredited members of staff.
- 3.5 This document shall be kept in the Site Managers office and shall be available on request.
- 3.6 The ECoW (FPCR Ecology team) contact details shall be kept in the Site Managers office and the ECoW shall be contacted where it is indicated below that site supervision works, or pre-commencement checks/inspections, are required.
- 3.7 The ECoW shall be contacted for advice on any currently unplanned changes that may have an impact on the important ecological features shown in *Figure 1*, or any other ecology related queries, or issues, that may arise.

Habitat Protection – Biodiversity Protection Zones

- 3.8 The potential for impacts on retained habitats outside of the immediate working areas during construction activities will be minimised through the erection of protective fencing around Biodiversity Protection Zones, as required. These are shown in *Figure 1*.
- 3.9 Retained hedgerows will be protected in accordance with BS 5837. Protective fencing shall be installed 2 to 3 meters from retained hedgerows for the duration of construction in adjacent areas to prevent encroachment or damage.
- 3.10 Throughout construction, retained trees will be protected in accordance with BS5837 2012 by high visibility fencing, erected according to their calculated root protection zone (RPZ), as required, in accordance with the *Arboricultural Assessment*. Indicative zones are shown in *Figure 1*. The tree protection fences shall form sacrosanct construction exclusion zones and shall be kept clear of construction activity, material storage and fires, and no excavations shall take place within these zones. The fencing will remain in place until completion of construction and shall only be removed as part of the final landscape works.
- 3.11 Warning signs will be placed on the protective fencing around the Biodiversity Protection Zones stipulating that access is not permitted.
- 3.12 Weekly checks of the fencing demarcating the Biodiversity Protection Zones will be made by the Principal Contractor and this will ensure:
 - The integrity and correct positioning of protective fencing; and,

- Repairs are made to the fencing, as necessary.
- 3.13 No temporary storage of materials, construction of haul routes, or site machinery shall be sited within retained habitats, their Biodiversity Protection Zones, or outside of the site boundaries, and any unnecessary, or informal, access to these areas by construction site personnel will be prevented by exclusion fencing and appropriate signage.
- 3.14 Any environmentally hazardous material will be kept in dedicated stores, and storage tanks must have appropriate bunding to prevent run-off to the retained habitats and into the wider surrounding landscape.
- 3.15 There shall be no lighting outside of site operating hours (07:30-18:00) throughout the year.
- 3.16 Dead wood produced from clearance works, or on-going arboricultural work, where applicable, will be retained as an ecological feature, offering new habitat for saproxylic invertebrates as well as potential hibernacula for reptiles or amphibians, should they colonise.

Pollution Prevention

- 3.17 Pollution Prevention Guidelines (PPG) are currently archived on the National Archives website, and remain downloadable, representing the most up-to-date outline of good practice measures for pollution prevention. Measures to be employed to prevent pollution will therefore follow the recommendations set out in the Environment Agency's PPGs.
- 3.18 It will be responsibility of the Site Manager to ensure site contractors and staff are aware of and adhere to these measures, and deal with pollution incidents.
- 3.19 Storage of any construction materials (such as fuel and oil for vegetation management tools) and/or waste will be situated away from areas fenced for their ecological sensitivity, including retained hedgerows and trees in adjacent off-site areas.

Dust & Particulate Matter Control

- 3.20 Preventative measures for control of emission of dust and particulate matter from site construction activity must be implemented to protect adjacent retained habitat from contamination. Such measures will include:
- Use of clean water for dust suppression, to avoid re-circulating fine material;
 - High standards of housekeeping aimed at minimising tracked out and wind-blown dust;
 - A preventative maintenance programme, including readily available spares, to ensure efficient operation of plant and equipment; and,
 - Effect staff training in respect of the causes and prevention of dust.
- 3.21 As an overriding consideration, during dry and/or windy weather; if any operations are identified as causing, or likely to cause, visible emission across the site boundaries, or if abnormal emissions are observed within the site, then the Site Manager will immediately modify, reduce, or suspend those operations, until effective remedial actions can be taken, or the weather conditions giving rise to emissions have moderated.

Tree, Hedge & Scrub Nesting Birds

- 3.22 No removal of woody vegetation will take place during the bird nesting season (March to September inclusive) unless a thorough survey, by an appropriately experienced ecologist, first confirms *no active nests are present*. Should any active nests be observed, a suitable buffer of at least 15m must be placed around the nest to protect it, and the habitat left *in situ* and undisturbed until the young have fledged; and this is *confirmed by an ecologist*.
- 3.23 In the event a species listed under Schedule 1 of the Wildlife & Countryside Act is recorded nesting, the nest must again be marked with hazard tape and appropriately buffered, according to the species. Special measures may be required, such as licencing and/or additional compensation measures, and therefore further ecological must be sought.

Ground Nesting Birds

Pre-commencement nesting bird check

- 3.24 No removal of habitat suitable for ground nesting species, including dense, tussock-forming grassland, during the bird nesting season (March to September inclusive). If this is not possible, a thorough survey for ground nesting birds must first be conducted, by an appropriately experienced ecologist, to confirm *no active nests are present*. Should any nests be observed, they will be marked, a suitable buffer will be placed around the nest, and the habitat left *in situ* until the young have fledged; and *this is confirmed by an ecologist*. The check will be conducted by the appointed ECoW as follows:
- ECoW will be contacted prior to works to arrange site presence.
 - Check will be conducted ideally on the day of removal, so that the ECoW can judge whether or not the vegetation requires constant supervision; for example, where dense vegetation requires removal in small increments (e.g. 1m to 2m sections) to enable observation; or where removal is to be completed within a maximum of 24 hours following a nesting bird check, unless otherwise advised by the ECoW.
 - Toolbox talk (TBT) will be given by the ECoW prior to works.
 - Any nest's observed will be appropriately buffered, as advised by the ECoW, and marked with hazard tape.
 - If birds are found with eggs or young, these will be protected until after the young have fledged, as advised by the ECoW. A 15m buffer will be erected around each nest, with the buffer marked using red tape. The active nest site will be monitored, and communication made with the contractors about the buffer zone being off-limits.
 - Timings will be provided in writing to the contractor as to when suitable to re-check to see if young have fledged and the above shall be repeated.

Badgers

- 3.25 No signs of badger were recorded on Site, and badgers are not considered a current constraint to development, but precautionary measures will be adopted, as detailed below, given badgers are a mobile and transient species.

- 3.26 A pre-commencement badger check prior to works will need to be conducted to search for any new evidence of activity / occupation.
- 3.27 If the pre-commencement update survey results, or a change to the proposals (at any stage) is assessed by the Ecological Clerk of Works to result in potentially illegal disturbance to a badger sett that cannot be avoided, sett monitoring and potentially a DEFRA mitigation licence will be required to legitimise the works. If the latter involves sett closure (s), there may be seasonal constraints and delays while the sett is closed under licence.

Based on current known situation

- 3.28 No badger setts are present within the development boundaries; therefore, no licence will be required to legitimise works.
- 3.29 To prevent accidental harm to any badgers casually using the site, all excavations must be covered at night, or a ramp provided, to prevent badgers, and other mammals, from becoming trapped. This will also protect other, less notable large mammals, such as fox *Vulpes vulpes*, which may also utilise the site.
- 3.30 The following precautionary methods will be implemented to ensure that badgers are not harmed during development works:
- Should any deep trenches need to be left open overnight, a means of escape will be provided, such as a suitably placed plank of wood to avoid badgers (and other mammals) becoming trapped on the Site,
 - Potentially poisonous/hazardous substances required on Site during the construction phase will be stored securely in fenced-off, inaccessible areas; and
 - Any temporarily exposed open pipe systems will be capped, or blocked, in such a way as to prevent badgers gaining access.
- 3.31 The ECoW will not be responsible for ensuring such measures are implemented.

Bat activity

- 3.32 Several common and widespread bat species, and Annex II species (lesser & greater horseshoe and barbastelle), were found to be using the wider locality for commuting and foraging.
- 3.33 Lighting outside the construction timeframes will be reduced to solely core areas (if at all) to limit the duration of lighting magnitude across the site.
- 3.34 All retained boundary habitat has been marked in *Figure 1*, and shall be protected with Heras fencing during construction, and as per the measures 3.8 to 3.11 above.
- 3.35 Works will be undertaken during daylight hours to avoid disturbance to foraging and commuting bats, so there shall be no lighting outside of site working hours (07:30-18:00) throughout the year.
- 3.36 If this is not possible, an ecological lighting strategy must be employed, using directional lighting and 'lighting hoods' to ensure no light spill outside the works area. Care must be taken in the placement of lighting.

Bats in Trees

- 3.37 The mature trees on site have been assessed for their ability to support roosting bats. Trees T7 and T13 were classified as moderate, and trees T5, T6, and T9 were classed as low. T1 was reassessed as negligible, following endoscope inspection of the feature. All other trees on site were classified as negligible. The final method for felling of trees is determined on a tree-by-tree basis, dictated by the level of roost suitability.
- 3.38 Currently no mature trees are proposed for removal; however, in the event that any trees with bat potential are required to be removed at a later date, the ECoW will prescribe the appropriate method based on the suitability of the tree to support roosting bats (methods adapted from Natural England, 2013¹), as outlined below.

Negligible/Low Suitability

- Work to be conducted in a sensitive manner with soft felling/dismantling preferential.
- Felling trees from ground level will be conducted only as a last resort if the tree is unsafe to climb and/or cannot be accessed from a MEWP.
- Should a bat or a suspected bat roost be identified, then works should cease and the ECoW be contacted.

Moderate Suitability

- 3.39 To follow all recommendations for trees with Negligible/Low suitability; additionally:
- a) 24 hours prior to the removal of a tree with moderate suitability for roosting bats, the tree will be climbed or accessed with a MEWP and aerially assessed for roosting bats.
 - b) Timber with bat potential must not be directly sawn through.
 - c) Timber with bat potential to be lowered to ground. Where lowering is impractical, piles of brash or logs can be used to soften the impact of them hitting the ground.
 - d) Timber with bat potential must be left at the base of the tree for at least 48 hours following removal.

High Suitability

- 3.40 To follow all recommendations for trees with Negligible/Low and Moderate suitability, and additionally:
- e) Works to be postponed in the first instance until Natural England have been consulted by the ECoW.
 - f) **Works may only proceed** without consulting Natural England if required immediately in interest of Public Safety. In this scenario:
 - g) ECoW or Wiltshire Council to inform the police ahead of the work commencing so they are aware (in case it is reported by the public).
 - h) Once removed, ECoW to check timber with bat potential for the presence of bats.

¹ Natural England (2013). Bat habitat assessment prior to arboricultural operations. Guidance for Natural England's National Nature Reserves. Available at: <https://www.trees.org.uk/Trees.org.uk/files/e4/e4bdca92-c9a0-44bd-9af2-f4a300424bbf.pdf> (Accessed 06.10.2021).

- i) Attempts will be made to return any timber containing confirmed roosts back to a similar position and height by strapping to a nearby tree of a similar stature.
- j) Natural England to be notified of works once complete.

Reptiles

- 3.41 Small populations of slow worm and grass snake were previously found on the Site, primarily within marginal vegetation along the field boundaries, and precautionary clearance methods should therefore be used for any such suitable habitat.
- 3.42 Given the presence of suitable reptile habitat on site in the form of grassland margins and hedgerow bases, removal of this habitat, where necessary, shall take place under the following precautionary method statement:
- Removal of potential reptile habitat will be completed during the active reptile season (April-October) when temperatures are consistently above 10°C, under the supervision of a suitably qualified ecologist to avoid disturbance to potentially hibernating reptiles.
 - ECoW will be contacted prior to works to arrange site presence for supervision.
 - Toolbox talk will be given prior to works.
 - The area will first be walked over and searched by the ECoW for reptiles and potential hibernacula (if present) and moved to the site boundary. Any hibernacula will be dismantled by hand and searched for reptiles.
 - If after the inspection there is uncertainty whether or not reptiles are present, then the grassland will be strimmed from the centre of the area to be cleared towards retained habitat in two cuts, allowing reptiles to move from these areas into retained habitats. The first cut will be to 200mm and the second to 50mm 2 hours later.

4.0 KEY WORKS AND TIMINGS SUMMARY

Constraint and Activity	Suitable habitat	Suitable Timing of mitigation	Mitigation
(Ground) Nesting Birds	Site wide	October to February March to September	None. If removal of arable vegetation is undertaken March to September , ECoW must be notified and nesting bird checks must take place in advance of works to confirm no active nests are present.
Nesting Birds	Boundary hedgerows & trees	October to February March to September	None. If removal or disturbance (via proximity) to any vegetation, including hedgerow or mature trees, is undertaken March to September , ECoW must be notified and nesting bird checks must take place in advance of works to confirm no active nests are present.
Bat Activity	Hedgerows, woodland, mature trees, and boundary scrub	All year	All habitat marked on <i>Figure 1</i> as retained, to be Heras fenced for the duration of the works. Lighting to be restricted around retained hedgerows and the proposed dark corridor, enforced around the southern boundary hedgerow. ECoW to be contacted if removal of any of this habitat is subsequently required.
Badgers	Site wide	To be undertaken three months prior to commencement of works	Pre-construction survey and precautionary working measures must be adopted for duration of construction (escape routes or capping of open excavations, securing hazardous materials)
Reptile	Grassland margins, scrub, and hedgerow bases	April to October (when the ambient temperature is consistently above 10 degrees Celsius).	Summer: two stage removal under ECoW supervision.

5.0 MONITORING AND REVIEW

- 5.1 Ongoing monitoring will be employed to ensure adherence and compliance with the precautionary working practices detailed in the preceding sections of the Construction Environmental Management Plan: Ecology (CEMP: Ecology).
- 5.2 Compliance checks to be conducted regularly by a competent person(s), such as the assigned ECOW, both throughout the construction period, and immediately post-construction, to verify the protected species mitigation methods have been followed, as detailed, and a record of kept of relevant activities undertaken following these measures.
- 5.3 Review with the appointed ECOW, Council Biodiversity Officer and Landscape Officer, comprising a site walkover, to be undertaken on a regular basis (suggested once every three months) to verify compliance with the measures detailed the Construction Environmental Management Plan: Ecology (CEMP: Ecology).

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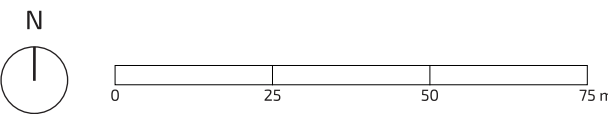
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- Site Boundary
- Bats-in-Trees
 - Low
 - Moderate
 - Negligible
- Habitat to be removed under supervision of an ECoW following the method statement for reptiles
- Root protection Zone
- Protective fencing
- Habitat to be removed under supervision of an ECoW following the method statement for breeding birds and reptiles

date
13/05/26

drwn/chkd
PJP / PJP

client
Bewley Homes Limited (South West)

project
Land at Melksham Road, Holt

title
CONSTRUCTION & ENVIRONMENTAL MANAGEMENT PLAN

scale
1:1,200 @ A3

number
FIGURE 1

rev
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