Woodfords, Shipley Road, Southwater

Bellway Homes Limited (South London)

Construction Ecological Management Plan

Pursuant to Condition **4 of DC/21/2180**

Version	Created By	Approved By	Date
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1. Introduction

1.1. Background

1.1.1. Ecology Solutions was commissioned in June 2025 by Bellway Homes Limited (South London) to complete a Construction Ecological Management Plan (CEMP) for Woodfords, Shipley Road, Southwater, hereafter referred to as the 'Site'.

1.1.2. The Development Proposals for the Site are for creation of up to 73 new dwellings, associated public open space, landscaping, drainage and highway infrastructure works, including vehicular access from Shipley Road.

1.1.3. This document aims to provide the information required to discharge condition 4 of the outline planning permission for the Site (Planning ref = DC/21/2180). Condition 4 reads as follows:

No development shall take place until a Biodiversity Construction Environmental Management Plan (CEMP: Biodiversity) has been submitted to and approved in writing by the local planning authority. The CEMP (Biodiversity) shall include the following:

a) Risk assessment of potentially damaging construction activities.
b) Identification of "biodiversity protection zones".
c) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts before construction (may be provided as a set of method statements).
d) The location and timing of sensitive works to avoid harm to biodiversity features.
e) The times during construction when specialist ecologists need to be present on site to oversee works.
f) Responsible person and lines of communication.
g) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.
h) Use of protective fences, exclusion barriers and warning signs.
i) Details of any lighting required.

The approved Biodiversity CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details, unless otherwise agreed in writing by the local planning authority.

Reason: To conserve protected and Priority species and allow the LPA to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 (as amended) and s40 of the NERC Act 2006 (Priority habitats & species).

1.1.4. Surveys were previously completed by The Ecology Partnership (TEP) in 2019 and 2020 in support of the outline planning application. These surveys and their findings constitute the ecological baseline for the Site and are referred to within this document as appropriate. Update surveys have been completed by Ecology Solutions in support of the reserved matters application where deemed necessary and these are discussed within this document.

1.2. Site Characteristics

1.2.1. The Site comprises of two large horse grazed fields, separated by a collection of buildings, hardstanding, vegetated garden and scattered trees in the centre of Site. Hedgerows with trees present are found to all boundaries of the Site, with a single road access point along the western site boundary (see Plan ECO1).

1.2.2. Both fields were both comprised of species-poor grassland, managed to a short sward through long term and frequent grazing by horses and were of limited botanical interest.

1.2.3. Habitats of greatest interest (in the context of the Site) are the boundary hedgerows with trees and an overgrown hedgerow that runs east to west to the south of several of the buildings.

1.3. Purpose of this Report

1.3.1. This report is prepared to address the requirement for a CEMP as part of the planning permission for the Site. This report provides details of the proposed mitigation and avoidance measures that shall be employed during the remediation and construction phases of the proposed development in respect of ecology and nature conservation. By following these measures, the development will be in line with all relevant legislative and planning policy requirements.

2. Baseline Information

2.1. Designated Sites

2.1.1. **Statutory Sites.** There are no statutory designations of nature conservation value within the Site or immediately adjacent to it. The closest statutory site is St Leonards Forest Site of Special Scientific Interest (SSSI) located approximately 6.6km to the north-east of the Site.

2.1.2. The closest 'habitats site' is Arun Valley SAC/SPA, located approximately 11.7km south-west of the Site and designated on account of it's wetland marshes supporting a wide variety of waterfowl and waders as well as supporting a population of little whirlpool ramshorn snail *Anisus vorticulus*. Arun Valley is also designated as a Ramsar site on account of supporting seven threatened wetland invertebrate species as listed in the British Red Data Book and several nationally rare and scarce plant species. Other reason for designation are the rich and diverse flora present generally and the assemblage of waterfowl present.

2.1.3. It is not considered that development of the Site would have a significant adverse effect on any of the above designated sites due to the nature of the proposal, the reasons for designation and the distances involved.

2.1.4. **Non-statutory Sites.** There are no non-statutory designations within the Site or immediately adjacent. Several non-statutory sites are present within the local area. The closest of these are Southwater Country Park Complex (0.43km), The Downs Link, Nutham Wood & Greatseeds Farms Meadow (0.56km) and Horsham Common, Alder Copse, Coate's Furzefield & Constable's Furze (0.63km). All of which are designated as Local Wildlife Sites (LWS).

2.1.5. Given the spatial separation between these LWS and the Site, and the reasons for designation of the LWS, it is considered that the proposed development will not have an impact on these LWS.

2.2. Habitats

2.2.1. The following main habitat / vegetation types were identified within the Site during updated surveys undertaken by Ecology Solutions in July 2025:

- Bramble Scrub;
- Developed Land; Sealed Surface;
- Introduced Shrub;
- Modified Grassland;
- Ruderal / ephemeral;
- Vegetated Garden; and
- Hedgerows (with trees).

2.2.2. For detail on habitats identified by The Ecology Partnership (TEP) please refer to the Ecological Impact Assessment produced by TEP dated 7th September

2021. Habitats were largely as described by TEP during the updated survey completed by Ecology Solutions, however as the update surveys were completed following UKHab methodology and not Phase 1, some changes to terminology and habitats recorded is to be expected. The only significant discrepancy found was that where TEP had identified areas of scrub along every boundary of the Site, Ecology Solutions recorded grassland that had not been subject to grazing and as such was rougher with some scattered scrub present.

2.2.3. The locations of the habitats identified by Ecology Solutions are shown on Plan ECO1 with full descriptions of the habitats detailed below

2.2.4. The habitats within the Site are generally not considered to be of any particular ecological importance with the majority of the Site being comprised of horse grazed grassland, buildings and hardstanding.

Bramble scrub

2.2.5. Two small areas of bramble scrub are present, one in the north-eastern corner of the Site, and one within the area of ruderal / ephemeral vegetation.

Developed Land; Sealed Surface

2.2.6. Areas of hardstanding and buildings present near to the centre of the Site. A swimming pool is also present which has been assigned as developed land.

Introduced Shrub

2.2.7. Introduced shrub is present in the form of areas of amenity / garden planting associated with the dwelling.

Modified grassland

2.2.8. Modified grassland makes up the majority of the Site, the grassland is grazed by horses. Species present across all the modified grassland include: false oat grass *Arrhenatherum elatius*, timothy *Phleum pratense*, barren brome *Bromus sterilis*, white clover *Trifolium repens*, wild garlic *Allium ursinum*, ribwort plantain *Plantago lanceolata*, creeping buttercup *Ranunculus repens*, rough meadow grass *Poa trivialis*, perennial ryegrass *Lolium perenne*, cock's foot *Dactylis glomerata*, germander speedwell *Veronica chamaedrys*, common couch *Elymus repens*, meadow foxtail *Alopecurus pratensis* oak sapling *Quercus sp*, sweet vernal grass *Anthoxanthum odoratum,* meadow buttercup *Ranunculus acris*, crested dog's tail *Cynosurus cristatus* and common ragwort *Jacobaea vulgaris.*

Ruderal / ephemeral

2.2.9. Two seperate patches of ruderal vegetation were located within the Site, species present include: curled dock *Rumex crispus*, common nettle *Urtica dioica*, field bindweed *Convolvulus arvensis*, cock's foot, timothy, false oat, field thistle *Cirsium arvense*, ragwort, pendulous sedge *Carex pendula*,

Fleabane *Erigeron sp*, broad leaved dock *Rumex obtusifolius*, crested dogs tail, willowherb *Epilobium sp*, and ash saplings.

Vegetated garden

2.2.10. Areas of frequently managed vegetated garden were present around the buildings within the Site. The garden was largely dominated by perennial ryegrass and creeping bent, with annual meadow grass, white clover and daisy *Bellis perennis* also present at lower frequencies.

2.2.11. Habitats of greatest interest (in the context of the Site) are the boundary hedgerows with trees and an overgrown hedgerow that runs east to west to the south of several of the buildings.

Hedgerows (with trees)

2.2.12. Ten hedgerows are located within the Site, the majority making up the boundaries of the Site, the remaining bordering some of the on-site buildings. Species found in the hedgerows include; English oak *Quercus robur*, ash *Fraxinus excelsior*, hazel *Corylus avellana*, field maple *Acer campestre*, cypress *Cupressus sp*, horse chestnut *Aesculus hippocastanum*, holly *Ilex aquifolium*, hawthorn *Crataegus monoggyna*, blackthorn *Prunus spinosa*, wild cherry *Prunus avium*, sessile oak *Quercus petraea*, dogrose *Rosa canina*, beech *Fagus sylvatica*, sweet chestnut *Castanea sativa*, pine *Pinus sp*, Eucalyptus *Eucalyptus sp*, and crab apple *Malus sylvestris*.

2.3. Species

Badgers

2.3.1. **Legislation.** Badgers are protected under the Protection of Badgers Act 1992 and are specifically listed under Schedule 6 in the Wildlife and Countryside Act 1981, as amended. This makes it illegal to:

- Intentionally capture, kill or injure a badger
- Damage, destroy or block access to their setts
- Disturb badgers in setts
- Treat a badger cruelly
- Deliberately send or intentionally allow a dog into a sett
- Bait or dig for badgers
- Have or sell a badger, or offer a live badger for sale
- Have or possess a dead badger or parts of a badger (if you got it illegally)

- Mark or attach a marking device to a badger

2.3.2. **Site use.** No signs of badger were present during the baseline faunal survey of the Site either during the badger survey completed by Ecology Solutions in June 2025 or by TEP in 2019 and 2023. However, due to the mobile nature of the species. it is considered possible that badgers may use the Site for foraging and commuting purposes and there is a possibility that badgers could construct a sett within the Site during the construction stage of development. As such, precautionary avoidance / mitigation measures are outlined in section 4 below.

Bats

2.3.3. **Legislation.** All bats are protected under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) and included on Schedule 2 of the Conservation of Habitats and Species Regulations 2017 ("the Habitats Regulations"). These include provisions making it an offence to:

- Deliberately kill, injure or take (capture) bats;
- Deliberately disturb bats in such a way as to be likely to significantly affect:-

  (i) the ability of any significant group of bats to survive, breed or rear or nurture their young; or to hibernate; or

  (ii) to affect significantly the local distribution or abundance of the species concerned;
- Damage or destroy any breeding or resting place used by bats;
- Intentionally or recklessly obstruct access to any place used by bats for shelter or protection (even if bats are not in residence).

2.3.4. **Site use.** A suite of bat activity and roost surveys was completed by TEP in 2019 and 2020, in support of the outline planning application (DC/21/2180). The results of these surveys are summarised below.

2.3.5. Update roost surveys were completed by Ecology Solutions in 2025, the results of these are summarised below, for methodology, see Appendix 2.

Roosting - buildings

2.3.6. Previous surveys of the Site completed by TEP identified several roosts within Building **B1**, species roosting were common pipistrelle *Pipistrellus pipistrellus*, daubenton's *Myotis daubentonii* and brown long-eared bat. Building **B3** was also found to contain a soprano pipistrelle day roost during these surveys.

2.3.7. Ecology Solutions completed an updated walkover on the 23rd June 2025 to determine whether the potential of buildings for roosting bats had changed since previous surveys (See Plan ECO2 for building locations).

2.3.8. Ecology Solutions found that all buildings were as described by TEP in their reporting. During the visit completed by Ecology Solutions on 23rd June 2025, access was gained both internally and externally to all buildings, with the exception of **B1**, which is now to be retained in full. Two additional buildings were recorded during the 2025 update survey that were not described during previous surveys by TEP. A description of these buildings **(B8 and B9)** is provided below.

2.3.9. **B8** is a wooden shed present to the north west of Building **B5**, adjacent to the swimming pool and is used for storage. **B8** is of wooden board construction with a pitched roof that is clay tiled with felt beneath and supported by wooden beams. Access points to the interior of **B8** were present at the eaves, however no evidence of bats (droppings, staining etc) was found within the building. **B8** was considered to hold low potential for roosting bats due to the lifted tiles and one emergence survey was completed of this building.

2.3.10. **B9** is a wooden shed present to the north of Building **B5.** It is of wooden board construction with a pitched roof covered with roofing felt. The buildings is in good repair and used for storage. No evidence of bats (droppings, staining etc) was found during the visit on 23rd June 2025 and it is considered that the buildings hold no potential for roosting bats. No further survey work was considered necessary.

2.3.11. Updated emergence surveys were completed to inform the mitigation measures required to allow the Development Proposals to come forward. Building **B6** and **B8** were subject to a single emergence survey completed on the 8th of July 2025. **B3** has been subject to three emergence surveys, on the 9th of July, 30th of July and 2nd of September 2025.

2.3.12. No bats were found to have emerged from building **B6** or **B8** during the survey completed on the 9th July 2025. The surveys of building **B3** did not record any soprano pipistrelle roosting activity (as previously recorded by TEP). However brown long-eared bat and a single common pipistrelle were noted to use the building as a feeding roost and day roost respectively during the emergence surveys. For survey methodology and more detailed findings please refer to Appendix 2.

Roosting - trees

2.3.13. Ecology Solutions recorded a total of five trees with PRF-I potential for roosting bats during the update PRA / GLTA completed in June 2025. Precautionary mitigation measures are outlined in section 4 below.

Commuting and foraging

2.3.14. The Site provides suitable foraging and dispersal opportunities for bats in the form of hedgerows with trees at the boundaries of the Site. To a lesser extent the grassland provides some limited foraging opportunities for bats.

Dormouse

2.3.15. **Legislation**. In the UK, hazel dormice are protected by The Conservation of Habitats and Species Regulations 2017, as amended and The Wildlife and Conservation Act 1981, as amended. This includes:

- Deliberately capturing, injuring and killing hazel dormice
- Damage or destroy a dormouse resting place or breeding site
- Deliberately or recklessly disturb a hazel dormouse while it's in a structure or place of shelter or protection
- Block access to structures or places of shelter or protection
- Possess, sell, control or transport live or dead hazel dormice, or parts of hazel dormice

2.3.16. **Site use.** A suite of hazel dormice surveys was conducted by TEP between July and October 2020. In summary, a maximum count of two adult dormice were recorded on site, including one with young, along with seven dormouse nests. For full details regarding the results please refer to the dormouse survey report by TEP dated 7th September.

2.3.17. Ecology Solutions completed an updated walkover on the 23rd June 2025 to determine whether the suitability of habitats for dormouse within the Site had changed since the previous surveys.

2.3.18. Ecology Solutions determined that the habitats within the Site, specifically the hedgerows at the boundaries of the Site had not changed significantly since the previous surveys and it is assumed that dormouse still utilise the boundaries of the Site for breeding, foraging and commuting purposes. In line with current guidance[1], no further surveys were considered necessary.

Hedgehogs

2.3.19. **Legislation.** Hedgehog *Erinaceus europaeus* is listed as a Species of Principal Importance under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006. The NERC Act 2006, as amended places responsibility upon public bodies to have regard for the conservation of biodiversity in England. This makes it illegal to:

- Deliberately capture and kill hedgehog

[1] Wells, D., Chanin P.R.F,. and Gubert, L. (2025) *Hazel Dormouse Mitigation Handbook*. 4th edn. Mammal Society.

- Deliberately treat a hedgehog cruelly

2.3.20. **Site use.** A hedgehog was noted foraging during the June 2020 bat activity transect conducted by TEP, Ecology Solutions have found no evidence to suggest evidence of hedgehogs. However, hedgehogs are known to be in the locality, and the Site contains suitable habitats for foraging, dispersal, and hibernation, including grassland, scrub and hedgerows.

Birds

2.3.21. **Legislation.** Section 1 of the Wildlife & Countryside Act 1981 (as amended) is concerned with the protection of wild birds. With certain exceptions, all wild birds and their eggs are protected from intentional killing, injuring and taking; and their nests, whilst being built or in use, cannot be taken, damaged or destroyed.

2.3.22. **Site use.** The trees, scrub and hedgerows offer suitable habitat for nesting birds, whilst the Site as a whole provides some foraging opportunities. Avoidance / mitigation measures are recommended below in section 4.

2.3.23. Buildings present also provide nesting opportunities for birds. Indeed, Ecology Solutions recorded the presence of an active barn swallow *Hirundo rustica* nest within building **B7** during the preliminary bat roost assessment in June 2025.

Reptiles

2.3.24. **Legislation.** Owing to their abundance in Britain, Common Lizard *Zootoca vivipara*, Slow Worm Anguis *fragilis*, Grass Snake *Natrix helvetica* and Adder *Vipera berus* are only 'partially protected' under the Wildlife and Countryside Act 1981 (as amended) and as such only receive protection from:

- Deliberate killing and injuring;
- Being sold or other forms of trading.

2.3.25. The habitat of common reptiles is therefore not directly protected. However, because of their partial protection, disturbing or destroying their habitat while they are present may lead to an offence.

2.3.26. All reptile species are listed as Species of Principal Importance under Section 41 of the NERC act 2006. The NERC Act 2006 places responsibility upon public bodies to have regard for the conservation of biodiversity in England.

2.3.27. **Site use.** Suitable reptile habitats are limited to the hedgerows with trees present at the boundaries of the Site. The vast majority of the Site is grassland grazed short by horses and as such, is sub-optimal for reptiles. It is considered likely that reptiles utilise the boundaries of the Site and avoidance / mitigation measures are recommended in section 3 below.

Amphibians (Great Crested Newts)

2.3.28. **Legislation.** Great Crested Newts *Triturus cristatus* are subject to the same level of legislative protection as bats (see above). Common Toads *Bufo bufo* are Species of Principal Importance under Section 41 of the NERC Act 2006.

2.3.29. **Site use.** Assessments completed by TEP determined that the Site would not be likely to be utilised by Great Crested Newt due to the lack of suitable breeding ponds within or in close proximity to the Site.

2.3.30. Waterbodies within the Site during the survey completed by Ecology Solutions in June 2025 were limited to a chlorinated swimming pool, all other depressions that might hold water were dry and contained no aquatic vegetation indicating that they are dry for the majority of the year. The majority of terrestrial habitats are sub-optimal for Great Crested Newt due to regular grazing, only the boundaries of the Site would present some opportunities for foraging, commuting and hibernating Great Crested Newt. However given the lack of nearby suitable waterbodies, it is considered highly unlikely that Great Crested Newt utilise the site and no further consideration is given to this species within this report.

Invertebrates

2.3.31. **Site use.** Given the habitats present it is likely an assemblage of common invertebrate species would be present within the Site. Due to the size of the Site and retention of key habitats, significant potential impacts are considered unlikely during the construction phase.

3. Construction Ecological Management Plan

3.1. This section details the methodologies, timings and prevention measures to be used to minimise disturbance and harm to protected species and other wildlife within and adjacent to the Site.

3.2. Risk Assessment of Potentially Damaging Construction Activities

3.2.1. Potentially damaging construction activities include vegetation clearance, soil compaction, building demolition, plant machinery and vehicle operation, general construction works, lighting, dust and surface run-off pollution.

3.2.2. The likelihood of these impacts arising, and their potential severity, is set out in Table 3.1 below, which also includes the measures to be taken to reduce or avoid the risks identified.

3.2.3. Following the implementation of appropriate actions, as set out in Table 3.1 and discussed further below, it is considered that the likelihood and impact severity of identified risks has been reduced to acceptable levels, and, hence, that significant adverse effects on local wildlife within the Site would be avoided.

Table 3.1 Risk Assessment of construction activities

Activity	Risk	Risk Likelihood (1 highly unlikely to 5 highly likely)	Risk Impact Severity (1 minor to 5 very severe)	Action Taken	Risk Likelihood after action	Risk Impact Severity after action
Vegetation clearance	Disturbance / harm to nesting birds, bats, hedgehogs, dormice and badgers on-site	4	4	**Hazel dormouse** Given the confirmed presence of hazel dormouse within the Site, a Natural England licence will be required for the removal of any suitable habitat (scrub, hedgerows, treelines etc). the mitigation measures will be approved by Natural England. However details are provided below as to the methodology to be implemented during clearance works to avoid impacts on dormouse. The clearance of suitable dormouse habitat will be undertaken either by a two stage or single stage process. Furthermore, a combination of these approaches may be employed across the development site, as necessary, following consultation with Natural England at the licencing stage. A two-stage process would involve works being undertaken over winter and spring, with initial clearance of habitat conducted during the dormouse hibernation period (December to March). Emerging Dormouse will move into retained habitat nearby in late Spring. Subsequent removal	1	1

Activity	Risk	Risk Likelihood (1 highly unlikely to 5 highly likely)	Risk Impact Severity (1 minor to 5 very severe)	Action Taken	Risk Likelihood after action	Risk Impact Severity after action
				of root balls will be undertaken after dormouse have fully emerged from hibernation and moved to retained habitats. The single stage process involves removal of all habitat at once when dormouse have emerged from hibernation but no dependant young are present (typically May or between mid-September and October). Areas of retained habitat will be protected throughout construction by the implementation of temporary protective fencing (2m Heras fencing) in areas adjacent to construction activities. Where active dormouse are discovered during work they will be encouraged to disperse into retained suitable habitats. Where this is not possible, any dormouse found during the active season that are active or torpid will be relocated in their existing nest to suitable habitat, or a specially erected dormouse nest box (4 of which will be erected prior to commencement of any clearance works). See Plan ECO4 for locations. Any dormouse found during hibernation will remain in situ unless actively at risk will be moved by a suitably qualified ecologist to a suitable area within 100m of their original location and concealed with appropriate materials.		

Activity	Risk	Risk Likelihood (1 highly unlikely to 5 highly likely)	Risk Impact Severity (1 minor to 5 very severe)	Action Taken	Risk Likelihood after action	Risk Impact Severity after action
				In the extremely unlikely event that an active breeding nest is found, works will stop and an appropriate buffer (at least 5m) will be implemented following consultation with the ecologist. No works will recommence within the buffer until the young have fledged and the nest is no longer active.		

Activity	Risk	Risk Likelihood (1 highly unlikely to 5 highly likely)	Risk Impact Severity (1 minor to 5 very severe)	Action Taken	Risk Likelihood after action	Risk Impact Severity after action
				Bats Ecology Solutions recorded five trees to possess PRF-I potential for roosting bats, on a precautionary basis, these will be felled under a soft fell methodology, whereby features are carefully removed from the tree and safely lowered to the ground. These will then be left overnight with the feature facing upward to allow any bats present to disperse. In the event that felling / maintenance works of any trees is required to take place more than 12 months following the previous visit (23rd June 2025), an update check for roosting features will be completed by a suitably qualified ecologist. Where features have developed, there may be a need for further surveys to be completed and if bats are found to be present a licence will be sought from Natural England. Works will only commence once the licence is granted.		

Activity	Risk	Risk Likelihood (1 highly unlikely to 5 highly likely)	Risk Impact Severity (1 minor to 5 very severe)	Action Taken	Risk Likelihood after action	Risk Impact Severity after action
				Hedgehog Any vegetation clearance of suitable hedgehog habitat should be carried out in a systematic and controlled manner to allow hedgehogs to disperse. Suitable nesting habitat for hedgehogs will be checked by an ecologist prior to clearance / removal to ensure no harm to hedgehogs occurs.		

Activity	Risk	Risk Likelihood (1 highly unlikely to 5 highly likely)	Risk Impact Severity (1 minor to 5 very severe)	Action Taken	Risk Likelihood after action	Risk Impact Severity after action
				Badger Surveys completed by TEP in 2019 and 2020, and Ecology Solutions in 2025 found no evidence of badger within or adjacent to the Site. However, given the mobile nature of badgers precautionary mitigation is recommended. Should works not commence within 12 months of the most recent survey, an update walkover will be completed by a suitably experienced ecologist to determine whether any evidence of badgers is present. Site personnel will report any potential signs of badgers (digging, latrines, hair) that they may find to the site manager who will discuss with a suitably experienced ecologist. Stockpiles of materials offer potential sett building opportunities for badgers. As such, they will not be left in close proximity to site boundaries and will be monitored regularly to ensure that no sett is built. In the event that a badger sett is found it will be fenced off with an appropriate biodiversity protection zone. Any work within the area would be prohibited until a Natural England licence is in place or approval is granted from a suitably experienced ecologist.		

Activity	Risk	Risk Likelihood (1 highly unlikely to 5 highly likely)	Risk Impact Severity (1 minor to 5 very severe)	Action Taken	Risk Likelihood after action	Risk Impact Severity after action
				Any trenches will be covered overnight, if this is not possible an escape ramp (e.g., scaffold board) will be placed within the trench at an angle no greater than 35˚ to allow any badgers or other wildlife to vacate the depression in the event of a fall. Any open trenches will be checked at the beginning of each day, to ensure that badgers are not present, and at the end of each day, to ensure that the means of escape remain in place. All open pipework greater than 120mm are required to be capped overnight to prevent entrance by badger or other wildlife and subsequent harm. Tools and loose materials will be stored in an appropriate container in order to reduce the risk of Badgers coming onto site and injuring themselves; No fires or chemicals will be left unsupervised anywhere on the site;		

Activity	Risk	Risk Likelihood (1 highly unlikely to 5 highly likely)	Risk Impact Severity (1 minor to 5 very severe)	Action Taken	Risk Likelihood after action	Risk Impact Severity after action
				Nesting Birds Any clearance of suitable nesting habitat will be completed outside of the main nesting bird season (typically March – August). However, should clearance be required during the nesting season a pre-commencement checks will be completed by a suitably experienced ecologist. If any evidence of nesting birds is discovered during the pre-commencement nesting bird check, a minimum 5m buffer zone shall be erected around the nest in question and no works shall take place within this buffer zone until nesting activities have ceased, confirmed by a suitably experienced ecologist.		

Activity	Risk	Risk Likelihood (1 highly unlikely to 5 highly likely)	Risk Impact Severity (1 minor to 5 very severe)	Action Taken	Risk Likelihood after action	Risk Impact Severity after action
Vegetation / soil compaction	Compaction of retained habitat of identified value (on and off-site)	3	3	Retained habitats near to those scheduled for remediation and / or removal will be safeguarded throughout the construction phase with Heras fencing delineating the biodiversity protection zones. Appropriate signage will inform personnel of protected habitat and that no vehicle and heavy plant machinery is to be permitted in the zones. Access on foot and the use of hand tools will be permissible, subject to discussion with a suitably experienced ecologist.	1	1
Building demolition	Disturbance / destruction of bat roost and active bird nests	5	5	Surveys completed by Ecology Solutions in 2025 found building **B3** to support a feeding roost for brown long-eared and a day roost for a pipistrelle species (to be identified). Previous surveys completed by TEP found building **B3** to also support a soprano pipistrelle day roost. The demolition of **B3** will be completed under a Natural England mitigation licence (CL21 or A13). Works with potential to disturb / harm bats or disturb / destroy a roost will not commence until this licence has been granted.	1	1

Activity	Risk	Risk Likelihood (1 highly unlikely to 5 highly likely)	Risk Impact Severity (1 minor to 5 very severe)	Action Taken	Risk Likelihood after action	Risk Impact Severity after action
				To minimise disturbance, it is recommended that the proposed works be undertaken outside of the active season i.e. demolition occurring between October to May inclusive when bats are unlikely to be present. Prior to works, contractors will be briefed as to the potential presence of bats. Contractors will be informed of their legal responsibilities and be instructed to seek advice from a suitably qualified ecologist in the event that a bat is uncovered during the work. A soft-strip demolition will be required, with works to proceed under the supervision of a suitably qualified ecologist. The soft-strip exercise will involve any features of potential for roosting bats being carefully dismantled under supervision by the suitably qualified ecologist to ensure that no bats are harmed. Particular care will be taken in the handling of old timbers, such as fascia or soffits, with attention paid to the potential presence of bats in crevices. Any bats encountered during works will be moved to bat boxes installed on retained trees within the Site prior to commencement of any such works (1x Schwegler 1FF and 1 x Schwegler 1FS). See Plan ECO4 for box locations.		

Activity	Risk	Risk Likelihood (1 highly unlikely to 5 highly likely)	Risk Impact Severity (1 minor to 5 very severe)	Action Taken	Risk Likelihood after action	Risk Impact Severity after action
				All building demolition is to be sensitive of nesting birds and ideally completed outside of nesting bird season, if this is not possible, a nesting bird check will be undertaken immediately prior to demolition by a suitably experienced ecologist. Any active nests identified will be left in-situ until the young have fledged and the nest no longer active.		
Plant, machinery and vehicle operation	Noise disturbance to wildlife within and adjacent to the Site.	4	3	Plant noise emissions shall not exceed that set out in legislation; if any item is suspected of breach, it shall be tested and replaced as necessary. The plant will be maintained so that extraneous noise from mechanical vibration, creaking and squeaking is kept to a minimum. Ancillary pneumatic percussive tools are to be fitted with mufflers or silencers of the type recommended by the manufacturers. Any machinery / plant will be shut down when not in use. Plant engine covers will be kept in place at all times. All compressors and generators are to be of a super silenced type. Compressors will be fitted with properly lined and sealed acoustic covers and kept closed whenever in use.	1	1

Activity	Risk	Risk Likelihood (1 highly unlikely to 5 highly likely)	Risk Impact Severity (1 minor to 5 very severe)	Action Taken	Risk Likelihood after action	Risk Impact Severity after action
General construction works activities	Noise and visual disturbance to wildlife within or adjacent to the Site.	2	1	All reasonable practical means shall be employed to keep noise to a minimum. Care shall be taken when loading or unloading vehicles, constructing / dismantling scaffolding or moving materials to keep noise to a minimum. No part of the works or maintenance of the plant will be carried out in such a way as to cause unnecessary noise or vibration.	1	1
Construction lighting installation	Disturbance to bats, badgers, hazel dormouse and other wildlife adjacent to the site.	3	2	In the event that lighting during the construction period is required, this will be situated as to not illuminate key commuting and foraging routes at the boundaries of the Site. Lighting will also avoid illuminating building **B1,** which is to be retained and supports a high number of bat roosts.	1	1
Dust	Pollution deposits on vegetation within and adjacent to the Site	3	3	Best standard practice guidelines in respect to pollution will be followed, including dampening the ground before and during works on dry days or during dust producing activities. Vehicles will keep to the Site speed limit to prevent dust becoming airborne. Wheel washing will be used by all construction vehicles entering and leaving the Site.	1	1

Activity	Risk	Risk Likelihood (1 highly unlikely to 5 highly likely)	Risk Impact Severity (1 minor to 5 very severe)	Action Taken	Risk Likelihood after action	Risk Impact Severity after action
				Textile dust barriers will be fitted to all site fencing that protects a biodiversity protection zone. This will absorb the majority of dust from adjacent construction work as well as providing visual screening of retained habitats. These barriers will remain in place throughout the construction period except by agreement of an ecologist.		
Surface run-off	Pollution of sensitive habitats within and in close proximity to the Site.	2	4	Appropriate refuelling and fuel storage areas will be established away from sensitive habitats at the boundaries of the Site. Standard spill prevention measures will be used throughout the pre-construction and construction phases, including safe storage of all chemicals in a designated area well away from retained habitats. Spill kits on-site are to be used as required with substrate (sand). Once used, they are to be disposed of in accordance with best practice guidelines. Any contaminated waste, including hazardous waste, will be dealt with in accordance with the current regulations, and a specialist contractor with the required waste licences will be used for removal.	1	1

3.3. Identification of Biodiversity Protection Zones

3.3.1. Biodiversity protection zones will be established throughout the Site (see Plan ECO3). These are designed to safeguard retained ecological interest within and adjacent to the Site. The Ancient Woodland present adjacent to the north-eastern corner of the Site to shall be protected by Heras fencing placed 15m from the boundary to prevent access into the woodland during construction. Works within this area will be required in order to implement the drainage strategy for the Site, however following works completed by Keen Consultants, it was determined that the proposals would not result in any impact on the Ancient Woodland due to the topography of the ground and presence of a deep ditch that runs along the boundary of the Ancient Woodland meaning that any roots present would be below the lowest area of the drainage basin and swale.

3.3.2. No vehicle movements or storage of materials will be permitted in these areas without further discussion and agreement with a suitably experienced ecologist. The biodiversity protection zones will remain in place for the duration of the construction works.

3.4. Responsible Persons and Lines of Communication

3.4.1. The site manager appointed by Bellway Homes Limited (South London) will be responsible for the implementation of this CEMP throughout the construction stage. Ecology Solutions, or another appointed professional ecologist, will be contacted wherever supervision is required as laid out within this CEMP. Bellway Homes Limited (South London) will be able to contact Ecology Solutions for advice at any time. If instructed Ecology Solutions' staff will attend meetings (in person or virtually) to discuss matters as and when required to do so. A copy of this document will be kept on-site and form part of the site induction.

3.5. Requirements for Ecologists During Construction

3.5.1. As referenced above in Table 3.1, a suitably qualified ecologist will be present on-site during any habitat clearance exercise where protected species may be present. A suitably qualified ecologist would also be required during any building demolition where bat roosts have been confirmed, and removal of bird nesting habitat during the nesting season will also be subject to a pre commencement check. Supervision of hedgehog and reptile habitat to be removed would also require ecologist supervision.

3.5.2. There is no requirement for daily presence of an ecologist on Site however, Ecology Solutions will be available to the site manager and other Bellway Homes Limited (South London) personnel for advice as and when necessary.

4. Summary and Conclusions

4.1. Ecology Solutions was commissioned in June 2025 by Bellway Homes Limited (South London) to complete a Construction Ecological Management Plan (CEMP) for the site at Woodfords, Southwater (Planning ref = DC/21/2180) in order to discharge condition 4 of the permission.

4.2. The measures detailed in this report specify the means by which significant disturbance on the ecological interest of the Site and its environs would be avoided or reduced to acceptable levels.

4.3. As such, it is considered that Condition 4 can be discharged.

Plans

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PLAN ECO1

Ecological Features

KEY:

- SITE BOUNDARY
- INDIVDUAL TREES
- DEVELOPED LAND; SEALED SURFACE (BUILDING)
- DEVELOPED LAND; SEALED SURFACE (HARDSTANDING)
- INTRODUCED SHRUB
- MODIFIED GRASSLAND
- UNVEGETATED UNSEALED
- VEGETATED GARDEN
- RUDERAL OR EPHEMERAL
- BRAMBLE SCRUB
- NATIVE HEDGEROWS WITH TREES
- NON-NATIVE AND ORNAMENTAL HEDGEROW
- LINE OF TREES

N

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12691: WOODFORDS, SOUTHWATER

PLAN ECO1: ECOLOGICAL FEATURES

Rev: A
Sep 2025

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PLAN ECO2

Survey Results (Bats)

KEY:

- Site Boundary
- Buildings With Bat Roosts Present
- Trees Marked As PRF-I (Potential Roost Feature - Individual)
- Buildings Subject To Emergence Surveys In 2025
- Emergence Survey Positions

N

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PLAN ECO2: SURVEYS RESULTS (BATS)

Rev: A
Sept 2025

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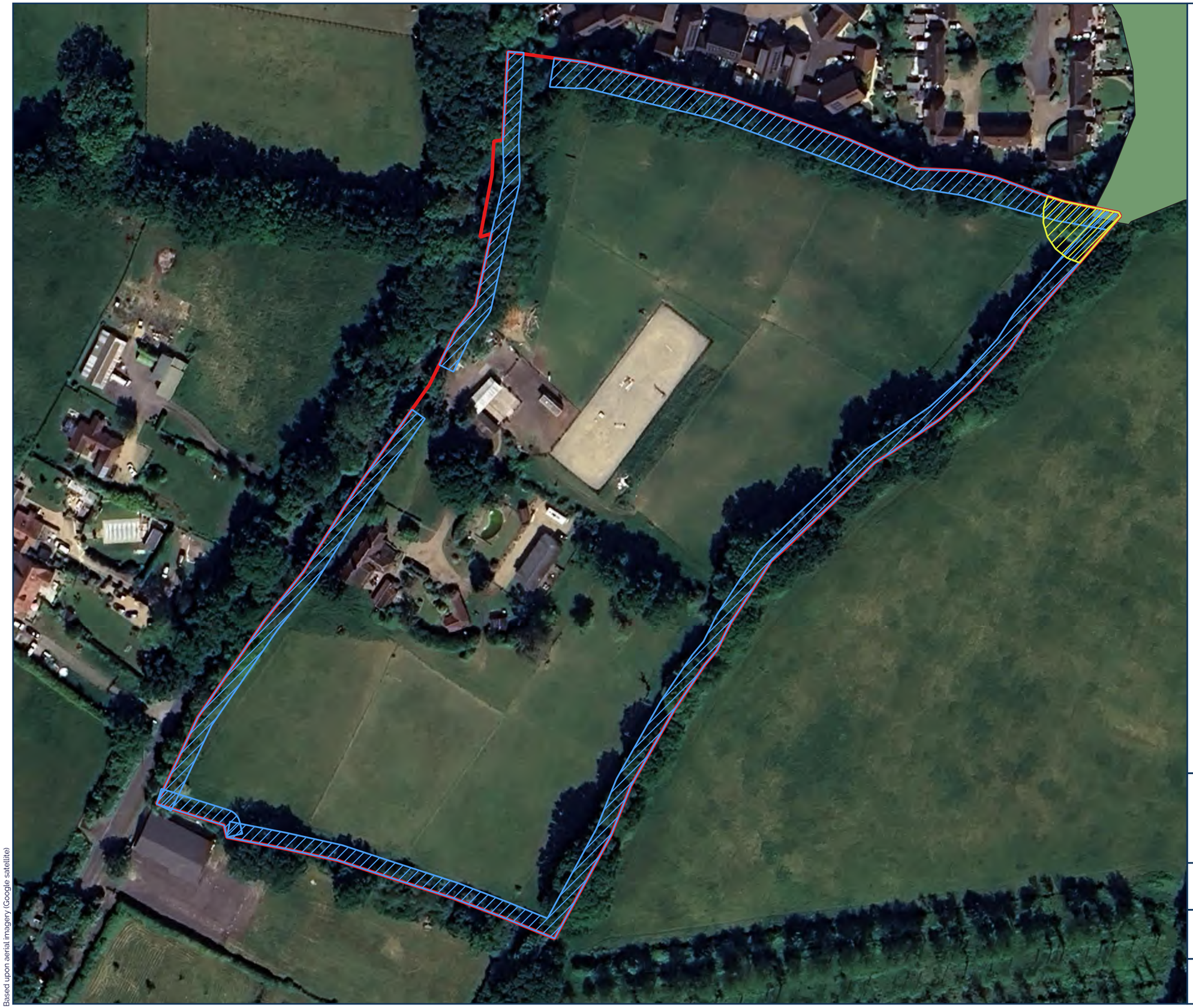
PLAN ECO3

Biodiversity Protection Areas



KEY:

- Site Boundary
- Ancient Woodland
- Biodiversity Protection Area
- Biodiversity Protection Area (From Ancient Woodland)

N

Based upon aerial imagery (Google satellite)

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PLAN ECO3: BIODIVERSITY PROTECTION AREAS

Rev: A
Aug 2025

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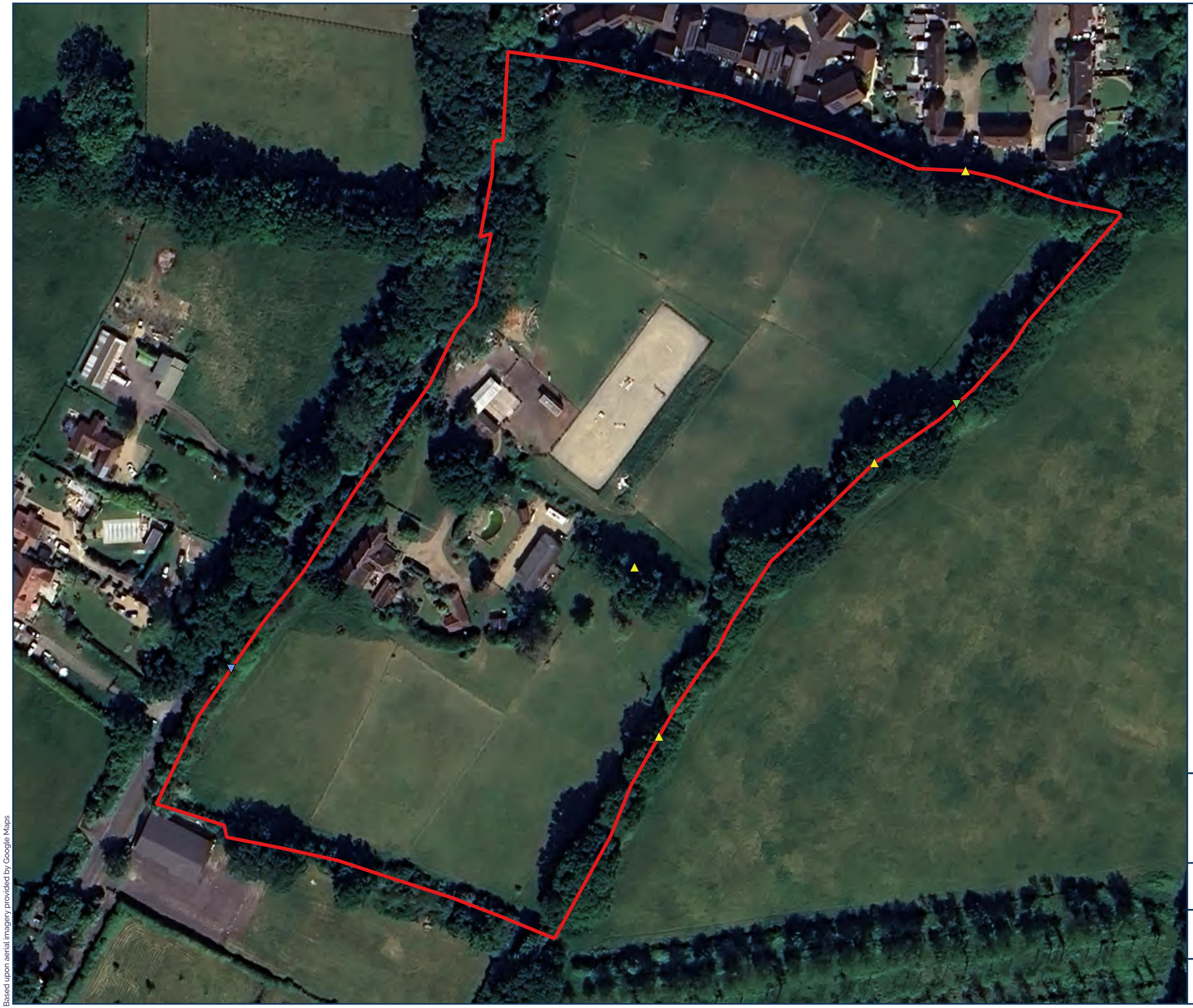
PLAN ECO4

Mitigation Measures



KEY:

- Site Boundary
- Bat Box Schwegler 1FF
- Bat Box Schwegler 1FS
- Dormouse Nest Boxes

N

Based upon aerial imagery provided by Google Maps

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PLAN ECO4: Mitigation Measures

Rev: A
Aug 2025

Appendices

APPENDIX 1

Site Photographs

Photograph 1 – Northern aspect of B3

Photograph 2 – Eastern aspect of B3

Photograph 3 – Western aspect of B3

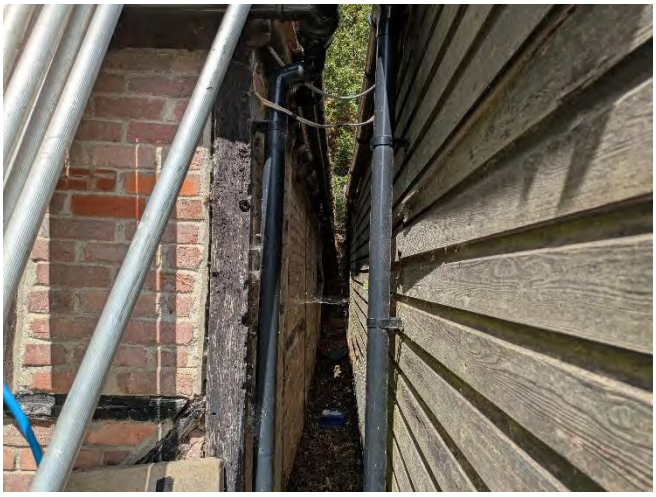
Photograph 4 – Western aspect of B3

Photograph 5 – Inside B3 Eastern half

Photograph 6 – Inside B3 Western half

Photograph 7 - Western aspect of B6

Photograph 8 – Inside B6



Photograph 9 – Eastern aspect of B6

Photograph 10 – Northern aspect of B6

Photograph 11 – Inside of B6

Photograph 12 – Southern aspect of B6

Photograph 13 – Northern aspect of B8

Photograph 14 – Western aspect of B8

Photograph 15 – Inside of B8

Photograph 16 – Grassland edge on northwest edge facing south

Photograph 17 – Grassland edge, hedgerow boundary and treeline on eastern boundary of site

Photograph 18 – Hedgerow behind B1 and vegetated garden

Photograph 19 – Central hedgerow

Photograph 20 – Large on-site tree next to B6

APPENDIX 2

Bat Emergence Survey Report 2025

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Technical Note: Bat Survey Report 2025

1. Introduction

1.1. Ecology Solutions was commissioned by Bellway Homes Limited (South London) in June 2025 to undertake update Preliminary Roost Assessment (PRA) and a suite of bat emergence surveys at Land at Woodfords, Shipley Road, Southwater, hereafter referred to as the 'Site'.

1.2. The Site comprises of two large horse grazed fields, separated by a collection of buildings, hardstanding, vegetated garden and scattered trees in the centre of Site. Hedgerows with trees present are found to all boundaries of the Site, with a single road access point along the western site boundary.

1.3. The Development Proposals for the Site are for creation of up to 73 new dwellings, associated public open space, landscaping, drainage and highway infrastructure works, including vehicular access from Shipley Road.

1.4. Previous surveys of the Site and the building / trees present were completed by The Ecology Partnership in 2019 and 2020. The results of these are referenced below where appropriate. For further information please refer to the Preliminary Ecological Appraisal and Bat roost survey report produced by TEP, both dated 7th September 2021.

2. Survey Methodology

Preliminary Roost Assessment (PRA) / Ground Level Tree Assessment (GLTA)

2.1. Buildings to be impacted by the Development Proposals were the subject of detailed internal and external inspections in June 2025. The buildings were assessed for their potential to support roosting bats, with searches made for any features which could be used by bats for roosting purposes and any obvious roost access points. Searches were also made for any evidence of roosting bats, such as droppings, staining and individuals (either alive or dead). Where necessary endoscope, ladder and binoculars were used to aid with the inspections.

2.2. Any trees within or in close proximity to the Site were also subject to a detailed inspection to assess their potential to support roosting bats.

2.3. Surveys were undertaken with regard to best practice guidelines issued by Natural England (2023[1]), the Joint Nature Conservation Committee (2004[2]) and the Bat Conservation Trust (2023[3]).

Emergence surveys

2.4. Following the initial building PRA / GLTA assessments, three buildings were subject to a suite of dusk emergence and dawn re-entry surveys to ascertain their use (or lack thereof) by roosting bats.

2.5. The emergence surveys were conducted from 15 minutes before sunset to approximately 2 hours after sunset. Surveys utilised Infrared Cameras (Nightfox Whisker) and Echometer Touch 2 Pro (EMT2) bat detectors to record the data, which was subsequently analysed using Kaleidoscope bat sound analysis software and manually checked by a suitably experienced ecologist to correct any misidentified registrations. This survey method aimed to identify if any bats were roosting within the buildings and the position of any access points used by bats as well as the species and number of bats using any identified roosts.

3. Survey Results

PRA / GLTA

3.1. Building **B1** is a large dwelling, roof features include five interconnected voids with open access in between each and missing/broken tiles. The Ecology Partnership (TEP) recorded approximately 70-80 brown long eared bat droppings below the apex near the southwest chimney, confirming **B1** as an active bat roost during their initial PEA, subsequent roost surveys confirmed additional roosts for daubenton's bat and common pipistrelle. **B1** is to be retained as part of the development proposals, as such Ecology Solutions conducted no additional surveys of this building in 2025.

3.2. **Building B2** is a small building adjacent to **B1** and was used as a kennel for several dogs during the survey completed by Ecology Solutions in June 2025. The roof features include missing/broken tiles presenting suitable roosting features for bats. At the time of TEP was conducting the PRA survey the building was inaccessible. Due to **B2** being retained as part of the development proposals Ecology Solutions conducted no additional surveys of this building in 2025.

3.3. Building **B3** is a large single-story building constructed of a timber frame with pitched clay tiled roof and used for storage, roost features include gaps present in eaves and walls as well as multiple tiles missing/broken and warped weather boarding at the southwest gable end. TEP found no evidence of bats using the building during their initial PRA but determined the building held moderate potential for roosting bats. In the subsequent emergence surveys TEP confirmed a soprano pipistrelle day roost to be present (maximum count of 2 individuals). During the PRA

[1] Reason P.F. and Wray, S. (2023). UK *Bat Mitigation Guidelines: a guide to impact assessment, mitigation and compensation for developments affecting bats. Chartered Institute of Ecology and Environmental Management, Ampfield.*
[2] Mitchell-Jones, A.J. & McLeish, A.P. (Eds.) (2004). *Bat Workers' Manual*. 3rd edition. Joint Nature Conservation Committee, Peterborough.
[3] Collins, J. (ed.) (2023) Bat Survey for Professional Ecologists: Good Practice Guidelines (4th edition). Bat Conservation Trust, London.

completed by Ecology Solutions evidence of a feeding roost was found in the form of a small collection of wing casings and droppings present beneath a wooden beam towards the centre of **B3**. The droppings were collected and sent for DNA analysis, results show that the droppings were from a brown long eared bat (appendix 1).

3.4. Building **B4** is a small single-storey summer house constructed with a wooden timber frame, wooden panelling and a pitched roof clad in roofing felt. The building featured no voids, no obvious access points or potential roost features. TEP labelled **B4** as holding negligible potential for roosting bats. Ecology Solutions also determined **B4** to hold negligible potential for roosting bats and no further survey work was deemed necessary.

3.5. **B5** is a single-storey prefabricated dwelling in good condition, **B5** has no roof voids and no other potential roost features were found. Both TEP and Ecology Solutions deemed **B5** to have negligible potential for roosting bats and no further survey work was deemed necessary.

3.6. **B6** is a single-storey storage building constructed of brick and with a pitched clay tiled roof, roosting features were present in the form of gaps at the eaves and walls providing access for bats to the interior of the building. Whilst the tiles were clearly old and were covered in moss, they were in relatively good condition with minimal lifted and loose tiles present. TEP found no evidence of bats and labelled **B6** as holding low potential to support roosting bats. No bat roosts were recorded during the subsequent roost survey. Ecology Solutions deemed the building to hold low potential for roosting bats in June 2025 and a single emergence survey was completed.

3.7. **B7** is a single storey wooden building, with thin corrugated plastic and asbestos panel roof used as stables for horses. No loft void is present and no other potential roost features were found during the visits by TEP or Ecology Solutions. No evidence of bats (droppings, staining, scratch marks etc) were found by Ecology Solutions during the PRA in June 2025. Both TEP and Ecology Solutions deemed **B7** to have negligible potential to support roosting bats. No further survey work was considered necessary.

3.8. **B8** is a wooden shed present to the north west of Building **B5**, adjacent to the swimming pool and is used for storage. **B8** is of wooden board construction with a pitched roof that is clay tiled with felt beneath and supported by wooden beams. Access points to the interior of **B8** were present at the eaves, however no evidence of bats (droppings, staining etc) was found within the building. **B8** was considered to hold low potential for roosting bats due to the lifted tiles and one emergence survey was completed of this building.

3.9. **B9** is a wooden shed present to the north of Building **B5.** It is of wooden board construction with a pitched roof covered with roofing felt. The buildings is in good repair and used for storage. No evidence of bats (droppings, staining etc) was found during the visit on 23rd June 2025 and it is considered that the buildings hold no potential for roosting bats. No further survey work was considered necessary.

3.10. A small fruit tree (labelled as **T1** by TEP) present to the east of **B1** was assessed by TEP to have moderate potential for roosting bats. Emergence surveys were completed by TEP in 2020 and no bat roosts were noted during these. **T1** is to be retained under the development proposals and no further survey work was deemed necessary.

3.11. Ecology Solutions recorded a total of five trees with PRF-I potential for roosting bats during the update PRA / GLTA completed in June 2025. In line with guidance, no further surveys were deemed necessary, however a precautionary 'soft fell' methodology should be followed when removing these.

Emergence surveys

3.12. Given the presence of potential roosting features / evidence of roosting, a suite of emergence surveys were undertaken in July and September on the relevant features. Weather conditions for the surveys are detailed in Table 1 below.

Survey Number	Date	Sunset time	Start temperature (°C)	End temperature (°C)	Wind force	Cloud cover (%)	Additional notes
1	09/07/2025	21:14	20	18	1	5	
2	30/07/2025	20:50	21	19	1	30	
3	02/09/2025	19:44	17	15	3	90	Light showers

***Table 1** : Weather conditions during Ecology Solutions emergence surveys*

3.13. **B3** – Three emergence surveys were conducted by Ecology Solutions covering B3 in July and September 2025. During the survey completed on 30/07/2025, a single brown long eared bat *Plecotus auritus* was noted to enter B3 at 21:43, emerging later at 21:56, confirming use of **B3** as a feeding roost for brown long eared bat.

3.14. During the survey completed on 02/09/2025, a single common pipistrelle *Pipistrellus pipistrellus* was recorded to exit building **B3** via the garage door at 20:20 having not entered previously**. It is therefore considered that the bat was likely roosting within the main room of the building.**

3.15. **B6** – A single emergence survey was conducted covering **B6** on 09/07/2025, no emergences were recorded during this survey and it is considered that no roosts are present.

3.16. **B8** – A single emergence survey was conducted covering **B8** on 09/07/2025 no emergences were recorded during this survey and it is considered that no roosts are present.

4. Summary

4.1. Ecology Solutions was commissioned by Bellway Homes Limited (South London) in June 2025 to undertake update Preliminary Roost Assessment (PRA) and a suite of bat emergence surveys at Land at Woodfords, Shipley Road, Southwater

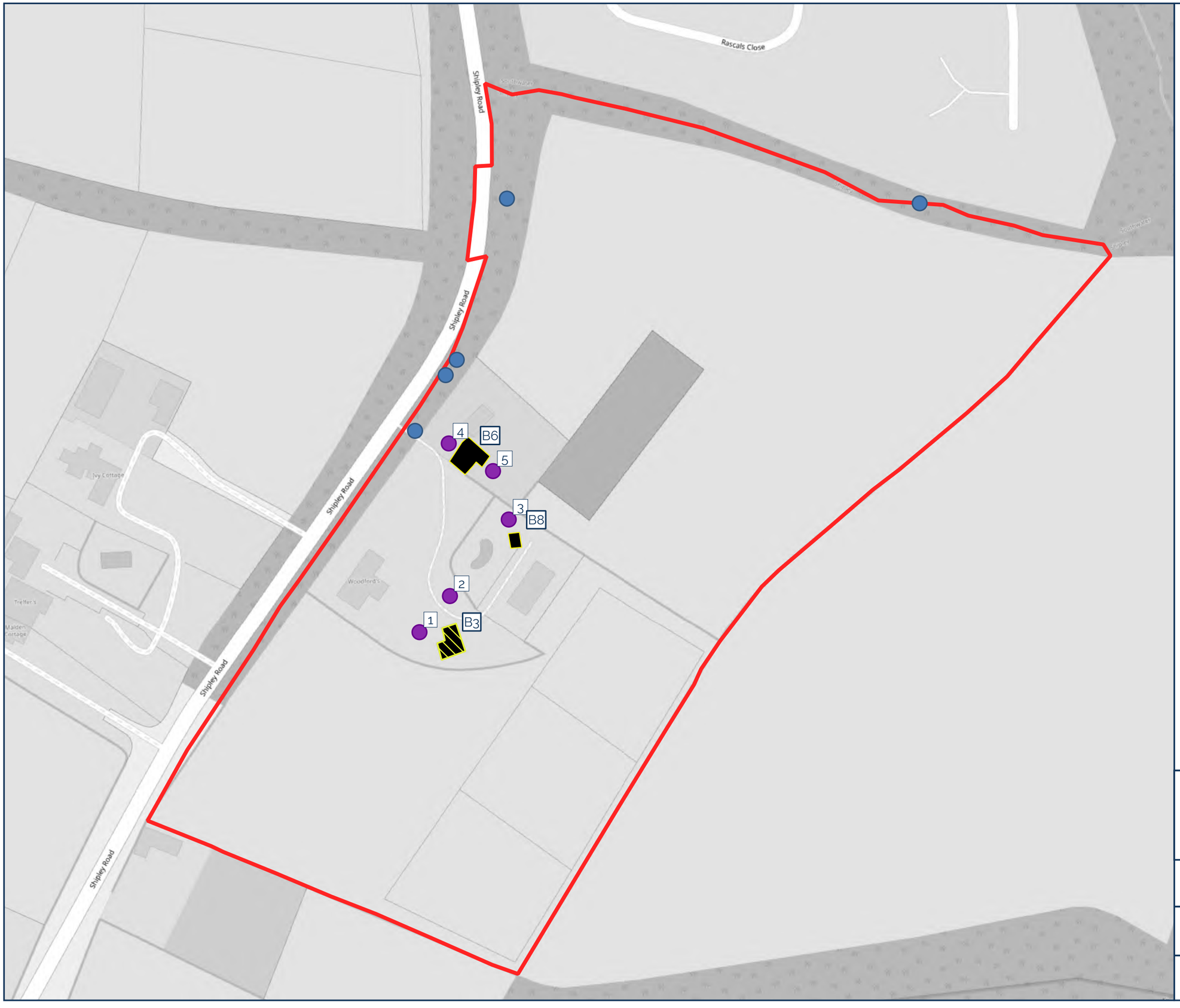
4.2. The Site comprises of two large horse grazed fields, separated by a collection of buildings, hardstanding, vegetated garden and scattered trees in the centre of Site. Hedgerows with trees present are found to all boundaries of the Site, with a single road access point along the western site boundary.

4.3. Surveys completed by Ecology Solutions during 2025 found one building (building **B3**) to contain two separate bat roosts, a feeding roost for brown long-eared bat and a day roost for common pipistrelle.

4.4. Given the presence of roosting bats, within building **B3**, prior to demolition or any other impactful activity on the bat roosts present a bat licence will be granted by Natural England.

Plan ECO1 – Bat Survey Plan

Appendix 1 – Bat dropping analysis results (SEL-380-1)



KEY:

- Site Boundary
- Buildings With Bat Roosts Present
- Trees Marked As PRF-I (Potential Roost Feature - Individual)
- Buildings Surveyed
- Emergence Survey Positions

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PLAN ECO1: BAT SURVEY PLAN

Rev: A
Sept 2025

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Samples submitted

Sample Code	Multi-species?	Sample Type	Date Sample Found	Species Group	Site postcode/ post town /grid ref	Site description / comments (Optional)	Suspected identity of species
SEL-3810-1	No	Faecal	23/06/2025	C. Bats	TQ 15595 24959		Brown long ear

Analysis Results

Sample Code	DNA Extraction Code	Species Identified	ID Method	Ct value	% match
SEL-3810-1	EG-2025-2261	Plecotus auritus (Brown long-eared bat)	qPCR	23	

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