

**Project Conway**  
**Construction Environmental Management Plan**  
**(Biodiversity)**

<b>Project Conway</b>			
Client	<b>Strowdes Estates</b>	Contractor Reference	<b>Project Conway</b>
Contractor	<b>Beau Bespoke</b>	Contractor Rev	<b>P04</b>
Purpose of Issue	<b>For approval (discharge of planning conditions)</b>		
Site address	<b>Henley-on-Thames, RG9 3HR</b>	Planning Ref	<b>213587 'Main House' 213610 'Estate Management'</b>
Prepared by	<b>Chris Ash, Land &amp; Water Services Ltd</b>	Role	<b>Environmental Manager</b>

## Document Review

### Reviewed By:

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Title		Date:	

## Revision history

Revision	Purpose	Amendment	Prepared By	Date
P01	First draft	-	Chris Ash	25.03.25
P02	First Revision	Minor amendments	NC	31.03.25
P03	Planning approval	Updated to comments received from ecologist; review procedures added (revisions in italics)	NC	17.10.25
P04	Planning approval	Abbreviations and ref docs updated	NC	20.10.25

## Abbreviations and Definitions

Term / Abbreviation	Definition
CEMP	Construction Environment Management Plan
EMB	Estate Management Buildings
GCN	Great Crested Newts
ECoW	Ecological Clerk of Works
BMCL	Bat Mitigation Class Licence
TPF	Tree Protection Fencing
CMP / CMS	Construction Management plan / Construction Method Statement

## List of referenced documents and drawings

Ref	Title	Document author/owner or location	Document No. / Ref.
01	Ecological Addendum Report	ACD Environmental	PRI23977
02	Project Conway – Tree Protection Scope of Works 'Revised Tree Protection Scheme	Fulford-Dobson Associates Ltd (note: 2022 version specified in Main House 213587, Condition 9, and Gatehouse 213588 Condition 6)	FDA1242.2
03	Strowdes, Park Place, Henley-on-Thames – 2021 Ecological Update	Cotswold Wildlife Surveys	601-CWS-24

Ref	Title	Document author/owner or location	Document No. / Ref.
04	CMP / CMS	Beau Bespoke	P05 (21.07.25)

Information to inform this Construction Environmental Management Plan (CEMP:Biodiversity) has been extracted from ACD Environmental (2022) Ecological Addendum Report: Strowdes, Upper Culham Lane, Remenham, Berkshire. Abelo Estates Ltd. 07.11.2022<sup>(REF01)</sup>, with additional information drawn from Cotswold Wildlife Surveys (2021) 2021 Ecological Update for Strowdes, Park Place, Henley-on-Thames, Berkshire, RG9. October 2021<sup>(REF03)</sup> (stated as such).

Consultation on the development of the CEMP Biodiversity with respect to mitigations, controls and timings as documented in the various site investigations and pre-existing reports was provided by Sarah Board of Ecological Surveys Limited.

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# Details of Ecological Clerk of Works

## Ecological Clerk of Works

The ECoW is responsible for ensuring that the mitigations and controls listed within the CEMP Biodiversity are being implemented and enforced during the construction phase of the project. The EcoW is expected to be attend regular site progress meetings so that any non-compliances can be identified, reported and actions taken to close out any such occurrences. This includes ensuring that any protective measures to safeguard sensitive or protected species that remain on site are being enforced. The role will include, but not be limited to, the following:

- To provide support to the contractor's Environmental Manager or representative.
- Oversee monitoring for environmental/ecological compliance.
- Monitor the contractor's team for compliance and adherence to Environmental Management Plans with respect to the ecological aspects on site. In the event of an environmental incident, the Incident Reporting Procedure outlined in the Construction Management Plan (CMP, section 4.4) should be adopted, including operatives stopping work and notifying supervisors, so that appropriate preventive or corrective action and further reporting can be undertaken.
- Monitor the CMP, which is a complementary document to be read in conjunction with the CEMP, and ensure that it is kept updated as necessary to align with this document and the CEMP.
- Attend regular reviews of the CMP Action Plan (section 4.2) and identify any environmental or ecological issues or concerns that need to be reviewed, considered or require action. The LPA should be notified of any relevant revisions to the CEMP as a result of this process.
- Ensure that any compliance limits are being met with regards to noise, dust and vibration.
- Monitor and review vehicle tracking across the wider site in order to access the main house construction zone (as set out in the CMP). Reflect on any measures (e.g. vegetation management) that are required on the access route as a mitigation measure, noting this should be minor with haul routes already designed to avoid trees and vegetation.

Name	Position	Organisation	Contact Details
Tom Woo-Glover	Ecological Clerk of Works	Ecological Surveys Ltd.	tom@ecological-surveys-ltd.co.uk

## ECoW Site presence programme

Activity	Task	Time required
Routine site inspection	Site walkover and conduct inspection to ensure that activities are compliant with the CEMP and that timings and methodologies have been adhered to.	Weekly

Removal of spoil mounds	Provide a watching brief during removal of mounds	To be present during works
Badger survey	Carry out a pre-construction badger survey	Prior to construction within the red line boundaries
Bat survey at meter house	Perform a bat survey as precursor to obtaining a bat license	Summer 2025
Cutting of vegetation/grass	Provide a watching brief to check for birds, nests, reptiles, small mammals	When cutting grass/shrubbery

## Important Ecological Features

### Important Ecological Feature: Amphibians and Reptiles

The red line boundary of planning application 213610 (EMB) contains two large mounds, covered with ruderal vegetation. The mounds are made up of earth and building rubble. The mounds have potential to support amphibians, including Great Crested Newts (GCNs) and reptiles. However, the application site is located 500 meters from Pond 1 and 480m from Pond 2. Furthermore, Pond 1 is located adjacent to high quality terrestrial habitat including woodland, and Pond 2 is located adjacent to woodland and several large vegetated mounds, which provide similar hibernation opportunities. On that basis, the risk of encountering GCNs during construction is considered to be low.

With regards to reptiles, given the height and steepness of mounds, it would not be practical to carry out a reptile survey. If reptiles were present, it would not be practical to carry out trapping.

Given the logistical constraints, the distance from the ponds, and the fact that the proposed development would not generate any significant impacts to any populations (if present), the following proportionate measures should be taken during construction to avoid harm:

- Cut and remove vegetation during winter to reduce suitability of habitat before animals become active in Spring.
- Keep vegetation low during early Spring
- Excavate/remove the mounds outside of the hibernation period (in March/April) once frosts have dissapeared and temperatures are consistently above 10°C.
- Only remove mounds if there are no conflicts with any other species that may have been identified before or during the works.
- Mounds should be removed carefully under a watching brief overseen by the Ecological Clerk of Works.

The red line boundary for planning application 213587 (Main House) comprises closely mown grassland, therefore risk to amphibians and reptiles is considered to be negligible.

- Prior to construction, the grassland should be kept short to discourage any amphibians/reptiles from colonising the site.

## Important Ecological Feature: European Badger 'Meles meles'

A badger field signs survey was conducted in 2022 by ACD Environmental recorded the following badger evidence:

[REDACTED]

Two small outlier holes within [REDACTED] [REDACTED] no fresh spoil, badger hairs, or badger prints were found at the entrances.

No badger setts were recorded on the mounds within the red line boundary of the Estate Management Buildings planning, or the red line boundary of the Main House planning application.

Given the presence of significant areas of grassland and woodland, the wider estate [REDACTED] although the foraging value of the grassland is sub-optimal, because it is only cut once per year.

Given the presence of multiple latrines, it is considered [REDACTED]

There are currently no badger constraints associated with planning applications 213610 (Estate Management Buildings) and 213587 (Main House). However, given the significant size of the estate, it is recommended that:

- A repeat badger field signs survey is carried out in March/April, to survey the outer margins of the estate, including the southern reaches of the estate adjacent to the River Thames.
- A pre-commencement badger survey of the construction areas should be carried out, to check for new badger setts.
- The CEMP may need to be reviewed in the light of new survey evidence, and the LPA kept apprised as necessary.

Further mitigations and controls to include:

- All excavations and trenches should be covered at night or fitted with a ramp to allow animals to escape.
- All open drainage pipes should be capped at night.
- All chemicals should be locked away and stored securely where animals cannot reach them.
- All contractors and estate workers should be briefed on the potential presence of badger setts. Under the Protection of Badgers Act 1992, it is an offence to:
  - Damage a badger sett or any part of it
  - Destroy a badger sett
  - Obstruct access to, or any entrance of, a badger sett
  - Disturb a badger when it is occupying a badger sett
    - Heavy machinery should keep 30 metres or more from any badger setts.

- Work using power tools within 20 metres of any badger setts should be minimised.
- If badger setts are discovered within close proximity to areas where landscaping/excavation/digging will occur, advice should be sought from the ECoW, prior to commencement of works.

## Important Ecological Feature: Bats

During the internal inspection of the Meter House on 31st August and 22<sup>nd</sup> September 2022, several discarded fly and butterfly wing cases were recorded on the floor, along with scatterings of small numbers of fresh droppings, characteristic of brown long-eared bat. No bats were observed within the Meter House.

Given the presence of small numbers of fresh droppings, found during the internal inspection carried out in 2022, it is considered likely that the Meter House is an occasionally-used day roost for brown long-eared bat.

Given that the Meter House supports a bat roost, and the legal protection afforded to bats and their roosts, it is recommended that:

- Prior to demolition, the Meter House is registered under the Bat Mitigation Class Licence (BMCL).
- Once the site registration is in place, the roof tiles and fascias should be removed by hand under the supervision of the named ecologist (ECoW).

A Bat Mitigation Class Licence is required from Natural England before any works can start on the Meter House. As the information is based on 2022 surveys, Bat Emergence Surveys will be required in 2025 prior to applying for the Licence. The licence application will be written by a bat ecologist and will include mitigation measures, such as those mentioned in section 12.9 of ACD Environmental (2022) set out above.

- Recent surveys have taken place to support the Bat Mitigation Class Licence (BMCL). The CEMP may need to be reviewed in the light of new survey evidence, and the LPA kept appraised as necessary.

## Important Ecological Feature: Birds and small mammals

Given the protection afforded to all nesting birds under The Wildlife and Countryside Act 1981 (as amended):

- Areas of vegetation to be cleared should be removed outside the nesting bird season where possible (widely accepted to be March to August inclusive). Where this is not possible, the vegetation must be checked by a suitably qualified ecologist, prior to clearance.
- If a nest is found, the ecologist will establish a suitably sized buffer around the nest using high visibility tape.
- No work may be carried out in the buffer zone, and no traffic, machinery or building materials may enter or be stored within the buffer at any time.
- The buffer must stay in place until the ecologist confirms that the nest is no longer in use.

Ground-nesting birds, dormice and harvest mice nest in scrub and long grassland. Even if vegetation clearance is being carried out outside the bird nesting season;

- Check all areas beforehand for woven nests using brush cutters, chainsaws and strimmers, to ensure woven nests and/or animals are not present.

Vegetation to be cleared outside the bird nesting season (as mentioned in the text from section 13.3 above<sup>(REF15)</sup>) includes the trees and any woody shrubs growing on the mounds within the area proposed for the Estates Management Building. Scrub and long grass may have developed on the mounds and therefore the text mentioned in section 13.4 applies within this area.

An old wren's nest was found within the Meter House in 2021<sup>(REF03)</sup>. This building therefore has potential for nesting birds and should either be removed outside of the bird breeding season (i.e. removed between October and February inclusive) or be checked by the ECoW immediately prior to removal. If a nest is found within or on the building, then no work can take place within a 5m radius of the building, and an exclusion zone should be put in place. Work can only commence once all birds have fledged – confirmed by the ECoW.

## Additional Mitigation Measures

- A Construction Exclusion Zone is required to keep all works, including the storage of materials, chemicals, machinery etc. away from the semi-natural broadleaved woodland to the east of the area proposed for the Estate Management Building. This is the same as the tree protection area as shown in Appendix IV Tree Protection Plan 04 (Supplementary addendum to the Estate Management Building Block Plan) contained within the *Revised Tree Protection Scheme for Development Work at Conway Estate* produced by Fulford-Dobson Associates Ltd in 2022 and reproduced below (Figure 3). Details concerning the tree protection fencing are also given in Fulford-Dobson Associates Ltd (2022)<sup>(REF02)</sup>.



Fig 1. Revised protection measures around retained trees

Areas proposed for planting both within the application boundary for the Main House, as well as the application boundary for the Estate Management Building should also be fenced off during the groundworks and construction phase to limited damage to the ground and soil compaction.

- Large earth piles/bunds should not be created onsite; these provide future habitat for badgers etc.
- Building materials such as stone, bricks, wood etc. should be stored on raised pallets so as not to provide refugia for reptiles, amphibians etc.
- Trenches or large excavations will be covered overnight during the groundworks and construction phases to prevent wildlife such as badgers or hedgehogs falling in and failing to escape. If this is not possible then a strategically placed plank will be installed to provide a means of escape. Any large bore pipes should be capped at the end of the day to reduce the potential for badgers and other wildlife entering and becoming trapped.
- No lighting should be introduced to the site during the groundworks and construction phases of the proposed development.

## Tree Protection

For detailed tree protection measures refer to the report document 'Project Conway, Tree Protection Scope of Works<sup>REF02</sup>'. The report details (i) Phase 1 measures – Precommencement of any site work including ground levelling or demolition, (ii) During site

wok commencement (Refer to mitigations in Aspect Ecology & Biodiversity in Table 4). (iii) Soft landscaping and post-construction tree inspection for final sign off.

The tree mitigations and controls are summarised as follows:

- Tree protection zones, demarcated by fencing as identified in the revised tree protection plan<sup>(REF02)</sup>.
- Temporary fencing and ground protection will stay in place until completion of the construction or hard landscaping phase.
- No materials, chemicals, machinery or vehicles or site huts will be stored within the fenced off areas.
- Any damaged caused to the retained trees or to protective fencing to be reported immediately.
- No materials that are likely to have adverse effects on tree health such as oil, bitumen or cement will be stored within 10m of the trunk of retained trees.
- In the event of a spillage in or adjacent to protected trees, work to stop and remedial action taken immediately, to include placement of sandbags on the line of the tree protection area.
- No fires will be lit within fenced off areas
- No notice boards or other signage to be attached to retained trees.
- Consult the on-site arboriculturist regarding any works or actions concerning the retained trees.

Summary of mitigations, controls and timings with respect to ecology and biodiversity

Receptor	Activity	Mitigation or Control Measure
<b>Protected Species</b>		
<b>Amphibians &amp; reptiles</b>	Protection of protected species	<ul style="list-style-type: none"> <li>• Cut and remove vegetation during winter to reduce suitability of habitat before animals become active in Spring.</li> <li>• Keep vegetation low during early Spring</li> <li>• Excavate/remove the mounds outside of the hibernation period (in March/April) once frosts have disappeared and temperatures are consistently above 10°C.</li> <li>• Only remove mounds if there are no conflicts with any other species that may have been identified before or during the works.</li> <li>• Mounds should be removed carefully under a watching brief overseen by the Ecological Clerk of Works.</li> <li>• Prior to construction, the grassland should be kept short to discourage any amphibians/reptiles from colonising the site.</li> </ul>
<b>European badger</b>	Protection of protected species	<ul style="list-style-type: none"> <li>• A repeat badger field signs survey is carried out in March/April, to survey the outer margins of the estate, including the southern reaches of the estate adjacent to the River Thames.</li> <li>• A pre-commencement badger survey of the construction areas should be carried out, to check for new badger setts.</li> <li>• All excavations and trenches should be covered at night or fitted with a ramp to allow animals to escape.</li> <li>• All open drainage pipes should be capped at night.</li> <li>• All chemicals should be locked away and stored securely where animals cannot reach them.</li> <li>• All contractors and estate workers should be briefed on the potential presence of badger setts.</li> <li>• Heavy machinery should keep 30 metres or more from any badger setts.</li> <li>• Work using power tools within 20 metres of any badger setts should be minimised.</li> <li>• If badger setts are discovered within close proximity to areas where landscaping/excavation/digging will occur, advice should be sought from the ECoW, prior to commencement of works.</li> </ul>
<b>Bats</b>	Protection of protected species	<ul style="list-style-type: none"> <li>• Prior to demolition, the Meter House is registered under the Bat Mitigation Class Licence (BMCL).</li> <li>• Once the site registration is in place, the roof tiles and fascias should be removed by hand under the supervision of the named ecologist (ECoW).</li> </ul>

Receptor	Activity	Mitigation or Control Measure
<b>Birds &amp; Mammals</b>	Protection of protected species	<ul style="list-style-type: none"> <li>Areas of vegetation to be cleared should be removed outside the nesting bird season where possible (widely accepted to be March to August inclusive). Where this is not possible, the vegetation must be checked by a suitably qualified ecologist, prior to clearance.</li> <li>If a nest is found, the ecologist will establish a suitably sized buffer around the nest using high visibility tape.</li> <li>No work may be carried out in the buffer zone, and no traffic, machinery or building materials may enter or be stored within the buffer at any time.</li> <li>The buffer must stay in place until the ecologist confirms that the nest is no longer in use.</li> <li>Check all areas beforehand for woven nests using brush cutters, chainsaws and strimmers, to ensure woven nests and/or animals are not present.</li> </ul>
<b>Additional measures</b>	Protection of protected species	<ul style="list-style-type: none"> <li>Large earth piles/bunds should not be created onsite; these provide future habitat for badgers etc.</li> <li>Building materials such as stone, bricks, wood etc. should be stored on raised pallets so as not to provide refugia for reptiles, amphibians etc.</li> <li>Trenches or large excavations will be covered overnight during the groundworks and construction phases to prevent wildlife such as badgers or hedgehogs falling in and failing to escape. If this is not possible then a strategically placed plank will be installed to provide a means of escape. Any large bore pipes should be capped at the end of the day to reduce the potential for badgers and other wildlife entering and becoming trapped.</li> <li>No lighting should be introduced to the site during the groundworks and construction phases of the proposed development.</li> </ul>

## APPENDICES

### Conditions for Main House 213587 (date of Permission 15 Sept 2023)

7 CEMP: Biodiversity - No development shall take place (including demolition, ground works, vegetation clearance) until a 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 during 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 persons 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.

The approved 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 ensure that the proposal is in accordance with ODPM circular 2006/05 guidance on protected species and local plan policies CP7 and TB23.

### Conditions for Estate Management 213610 (date of Permission 15 Sept 2023)

6 CEMP - No development shall take place (including demolition, ground works, vegetation clearance) until a 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 during 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 persons 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.

The approved 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.