CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN (CEMP): BIODIVERSITY

REVISION 4

COLES AUTOMOTIVE PROPERTY LTD.

UNIT 2 (EAST)
SOUTHDOWNS ENTERPRISE PARK
SHOREHAM ROAD
HENFIELD WEST SUSSEX

16TH APRIL 2024

REF: 19019

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1. INTRODUCTION

Background

1.1 CT Ecology Limited was commissioned by Coles Automotive Property Ltd. to compile a Construction Environment Management Plan (CEMP): Biodiversity in relation to land within the east of Southdowns Enterprise Park in Henfield, West Sussex (hereafter referred to as "the site"). This document is required as part of a Minor Material Amendment application to alter the layout of the car parking area and landscaping areas around the front of Unit 2 (east).

1.2 A CEMP (Biodiversity) has been previously compiled for the wider site in relation to the development of Southdowns Enterprise Park, which was informed by previous ecology surveys to include the following: initial Preliminary Ecological Appraisal (CT Ecology, 2019a), the Reptile and Bat Survey Report (CT Ecology, 2019b) and the Bat Roost Characterisation Survey Report (CT Ecology, September 2019c).

1.3 An update Preliminary Ecological Assessment (PEA) of the current application site took place in September 2023 (CT Ecology 2023) which has been used to inform this method statement document.

Site Description

1.4 Southdowns Enterprise Park is in a rural location within the southern extent of Henfield in the Horsham District of West Sussex. The site is accessed from the A2037, Shoreham Road.

1.5 The survey area is a broadly rectangular shaped parcel of land within the eastern extent of the wider Enterprise Park, extending over approximately 0.2 hectares (ha) at National Grid Reference TQ218 144.

1.6 The application site comprises recently colonised ephemeral and tall ruderal vegetation and areas of semi-improved grassland together with scattered trees and scrub around the site boundaries. The survey area has been subject to regular disturbance since 2020 when construction of the wider business park began, with the main site access for the wider business park originally extending through the current application site. Shoreham Road is to the east, agricultural land is to the north, the wider Enterprise Park is to the south and west.

1.7 In the wider surrounds, commercial units are to the south. Agricultural fields and associated tree lines and hedgerows dominate the landscape together with woodland blocks and scattered residential properties. Henfield Business Park is to the east of Shoreham Road and Henfield village is to the north.

Proposed Works

1.8 Current proposals are for the construction of a new commercial unit with associated parking and landscaping. The current development will require the removal of discrete areas of recently colonised ephemeral and ruderal vegetation together with discrete areas of semi-improved grassland. Boundary scrub and trees will be retained as part of the proposals.

2. ECOLOGICAL/BIODIVERSITY FEATURES

2.1 A Preliminary Ecological Assessment (PEA) of the site took place in September 2023.

2.2 Following the recommendations made in the PEA report, a series of measures are described in this document to protect ecological features identified at the site, including:

- Trees/Hedgerow/Scrub – retention of trees, scrub and new hedgerow planting along the northern and eastern boundaries of the site;
- Bats – suitable foraging and commuting habitat is present on-site (associated with the site boundaries) and immediately adjacent to the site. The northern site boundary provides connectivity to compensatory bat roost provision in the north-west corner of the wider site, created as mitigation for loss of a bat roost as part of the wider Southdowns Enterprise Park development;
- Great crested newts – the site is located within an Amber/Green zone for great crested newts which indicates that suitable habitat is present in the landscape. The site supports limited and sub-optimal terrestrial habitat which has been subject to extensive disturbance since 2019, and there is a limited number of ponds in the wider landscape which all serve to reduce the suitability of the site. However the location of the site in a potential Amber zone means that potential presence of this species albeit in small numbers cannot be scoped out.
- widespread reptiles – the site previously supported a Low population of slow worm (*Anguis fragilis*) and a Low population of grass snake (*Natrix helvetica*). Populations were displaced as part of the wider Southdowns Enterprise Park development but there is potential for small numbers of individuals to re-occupy areas of ruderal vegetation which has developed in the eastern extent of the site; and
- birds – general nesting opportunities are supported around the site boundaries for a restricted range of widespread bird species.

2.3 Biodiversity objectives were determined through consideration of the information collated during the ecological surveys at the site. These are detailed in Table 2.1 below.

Table 2.1: Biodiversity Objectives

Ecological Feature	Target
Boundary Trees/Scrub/Hedgerow	No net loss of habitat. Increase in species diversity and available habitat opportunities post development.

Ecological Feature	Target
Bats	No net loss of foraging/commuting habitat. No fragmentation in foraging/commuting habitat. Increase in plant species diversity and available foraging/commuting habitat for a range of bat species.
Great Crested Newt	No risk of killing/injury, maintain favourable conservation status. No net loss of foraging/commuting habitat. No fragmentation in foraging/commuting habitat. Increase in available foraging/commuting habitat.
Widespread Reptiles	No risk of killing/injury, maintain favourable conservation status. Increase the quality of available habitat opportunities.
Widespread Nesting Birds Common	No disturbance to active nests, and increase the availability of suitable bird nesting habitat.

3. IMPACTS

3.1 Potentially damaging construction activities are listed below. These have been identified from: the proposed site layout as detailed in Appendix A; proposed construction practices; and current guidance on activities/operations likely to result in impacts to ecological features (CIEEM, 2016):

- Movement of machinery and vehicles;
- site clearance;
- clearance of vegetation to include strimming of ruderal vegetation;
- digging/excavation or infilling;
- pollution/silt runoff;
- dust/air pollution;
- noise;
- lighting;
- use of cranes;
- dumping, spreading, discharge or storage of materials;
- construction of access roads, areas of hardstanding and buildings;
- laying of pipes and cables;
- erection of permanent or temporary structures; and
- engineering works including drilling.

3.2 Taking into consideration the expected zone of influence of each of these activities, potential direct or indirect impacts resulting from the proposed construction activities have then been identified in the absence of mitigation. These include (but are not limited to) short-term impacts (i.e., disturbance) and long-term impacts (i.e., modification, loss, and fragmentation/ isolation).

3.3 Aspects of ecological structure and function considered when predicting impacts included available resources, environmental processes, ecological processes, human influences, historical context, ecological relationships, ecological role or function, ecosystem properties and other environmental influences, in accordance with current guidelines (CIEEM, 2016).

3.4 Potential impacts on ecological/biodiversity features (in the absence of mitigation) are summarised in Table 3.1 below.

Table 3.1: Potential Impacts on Ecological Features

Ecological Feature	Potential Impact
Boundary Trees/Hedgerow/Scrub	Yes- potential for works within tree/hedgerow root zones during construction activities/site clearance. Minor adverse, temporary, reversible impact.
Bats	Yes- works may result in the loss of suitable foraging and commuting habitat. Minor adverse, temporary, reversible impact.
Great Crested Newt	Yes- a) works may result in the killing/injury of individuals. Significant adverse, permanent, irreversible impact; b) works may serve to reduce the availability of suitable habitat. Minor adverse, permanent, reversible impact.
Widespread Reptiles	Yes- a) works may result in the killing/injury of individuals. Significant adverse, permanent, irreversible impact; b) works may serve to reduce the availability of suitable habitat. Minor adverse, permanent, reversible impact.
Widespread Nesting Birds Common	Yes – potential disturbance of active nesting birds during site clearance. Minor adverse, temporary, irreversible impact.

4. MITIGATION

4.1 For each potential impact identified, all mitigation options provided follow the established mitigation hierarchy as set out in BS 42020:2013 (BSI, 2013). This seeks as a preference to avoid impacts, then to mitigate unavoidable impacts, and as a last resort, to compensate for unavoidable residual impacts that remain after avoidance and mitigation measures. All mitigation measures follow current best practice guidance (CIEEM, 2014), and are proportionate to the level of impact identified and to the nature and scale of the proposed works.

Boundary Trees/Scrub/Hedgerow

Avoidance

4.2 Tree Protection fencing will be set out in accordance with BS 5837:2012 around all retained boundary trees and associated scrub and hedgerow features, in order to protect these habitats from accidental damage during construction activities. Temporary protective barriers will be installed as detailed in BS5837:2012 Fig 2, on the alignment detailed on drawing PDA-ENT-TS-001 Rev A, accompanying the current planning application. Please refer to the Landscape Strategy Plan: PDA-ENT-LD-001-5 REV F (Furse Landscape Architects Ltd. 2024) for the locations of existing trees to be retained.

Mitigation

4.3 None proposed.

Compensation

4.4 Additional tree planting is included in the landscaping scheme. Please refer to the Landscape Strategy Plan: PDA-ENT-LD-001-5 REV F (Furse Landscape Architects Ltd. 2024) for the locations of new tree planting in addition to the accompanying Biodiversity Enhancement Plan (CT Ecology 2024).

Bats

Avoidance

4.5 As detailed above, all mature boundary trees and hedgerows will be protected with Temporary protective barriers. Fencing will be erected in accordance with BS 5837:2012 to protect any foraging and commuting routes from disturbance.

4.6 In addition, there will not be any night lighting or night working during the construction phase, to avoid indirect impacts to surrounding habitats and species (i.e., bats) that may use these features. Night time hours fall between 18.00 and 08.00. As an additional safeguard for bats during the time of year when dusk occurs prior to 18.00; during winter months and the latter part of autumn and early spring, the use of directional lighting will be used throughout the construction period. This will serve to ensure that bat foraging and commuting routes associated with the site boundaries are not directly illuminated prior to 18.00.

Mitigation

4.7 None proposed.

Compensation

4.8 Additional planting will serve to enhance potential bat foraging and commuting routes associated with the boundary features. Details on bat friendly landscaping is described in the Biodiversity Enhancement Plan (CT Ecology 2023).

4.9 In order to minimise the impacts of any artificial lighting associated with the development, boundary features including the tree lines to the north and east of the site will not be directly illuminated or experience significant light spillage. All lighting across the site will be installed in order to limit upward and outward light spillage.

Great Crested Newt

Avoidance

4.10 To avoid the risk of killing/injury to great crested newts, Reasonable Avoidance Measures (RAMs) will be used as detailed in the PEA report (CT Ecology 2023). These measures will include contractors sensitively proceeding with site clearance in accordance with this CEMP and under the supervision of a suitably qualified (and licenced) Ecological Clerk of Works (ECoW). The duration and frequency of attendance will be dependent on the programme of works for site clearance, but the ECoW will need to attend until all habitats are made unsuitable for great crested newts. Details of the RAMs are provided below:

Site Preparation

* Phased habitat clearance will be undertaken throughout the application site prior to the start of any construction activities commencing in order to remove all potentially suitable cover opportunities;

- this work will be carried out under guidance from a suitably qualified ecologist (and licenced GCN ecologist);
- phased habitat clearance must be carried out in the active period for great crested newts, taken to extend between **March and October** inclusive;
- in the first phase, all standing vegetation within the working footprint should be reduced in height to approximately 250mm above ground level. Vegetation should be cleared using hand tools, such as chainsaws and strimmers. All cut vegetation should be removed from the site;
- the second phase should then be undertaken the following day. Vegetation should be cut to ground level using the same method as detailed above;
- the top soil/surface material must then be removed under an ecological watching brief using an excavator or similar. The ecologist will check the top soil for sheltering newts and any other debris that is exposed by the excavator. This must be undertaken in the active period for newts with ground clearance works possible between **March** and **October** inclusive;
- if any newts are found during the site preparation works then all activities must cease immediately and the working methodology updated accordingly. This may include the need to obtain a great crested newt licence; and
- any other species found during the site preparation phase will be removed from the site and relocated to suitable cover within the wider estate/adjacent retained features.

Site Storage

- All materials and machinery will be stored on existing areas of hardstanding. Migration by great crested newts is considered highly unlikely through the western extent of the site which is isolated by hardstanding and associated buildings to the south and west;
- no barrier effects are predicted and any great crested newts can travel freely through the area should they choose to do so;
- in addition, all stored materials will be raised off the ground on pallets or skids to further remove any refuge potential for great crested newts; and
- aggregates such as gravel and sand must be delivered in bulk bags and stored on pallets rather than piled on site to create potentially suitable 'refuge piles'.

Construction/Installation Phase

- Any excavations required to facilitate construction of the new unit must be back-filled overnight, if this isn't possible then earth ramps/ planks of wood or similar must be left in the trench(es) to allow animals, including great crested newts, to easily climb out;
- the landowner/contractor must inspect any excavations each morning to check that great crested newts are not present;
- if any newts are found during the construction phase, then all activities must cease immediately and the project ecologist contacted for advice. An appropriate working methodology will need to be devised and this may include the need to obtain a great crested newt licence to enable activities to continue; and
- any other species found during the site preparation phase will be removed from the site and relocated to suitable cover within the wider estate/adjacent retained features.

Mitigation

None proposed.

Compensation

4.11 Following the construction phase, retained and reinstated boundary habitats will be re-seeded with a wildflower seed mix in order to enhance the quality and quantity of grassland habitat currently available at the site and to improve connectivity for this species around the site margins post works. The locations of the proposed new grassland areas are shown on the Landscape Strategy Plan: PDA-ENT-LD-001-5 REV F (Furse Landscape Architects Ltd. 2024) and the Biodiversity Enhancement Plan (CT Ecology 2024).

Widespread Reptiles

Avoidance

4.12 To avoid the risk of killing/injury to common reptiles, Reasonable Avoidance Measures (RAMs) compiled in respect to great crested newts and as detailed above will also serve to protect reptiles during works.

Mitigation

None proposed.

Compensation

4.13 Following the construction phase, retained and reinstated boundary habitats will be re-seeded with a wildflower seed mix in order to enhance the quality and quantity of grassland habitat currently available at the site and to improve the habitat mosaic supported around the site boundaries and improve connectivity for this species around the site margins post works. The locations of the proposed new grassland areas are shown on the Landscape Strategy Plan: PDA-ENT-LD-001-5 REV F (Furse Landscape Architects Ltd. 2024) and the Biodiversity Enhancement Plan (CT Ecology 2024).

Birds (General Nesting)

Avoidance

4.14 All potentially suitable breeding bird habitat (boundary scrub and trees) will be fully retained as part of the works. The tree protection fencing will serve to protect these areas from encroachment by machinery and materials during works. To prevent contractors from accidentally straying into the retained areas, these will be clearly delineated (i.e., with high visibility fencing).

Mitigation

4.15 None proposed.

Compensation

4.16 Additional tree and shrub planting will be incorporated into the proposed landscaping throughout the site which will provide cover (and foraging resources) for a range of widespread bird species. These features are shown on the Landscape Strategy Plan: PDA-ENT-LD-001-5 REV F (Furse Landscape Architects Ltd. 2024).

4.17 Additional bird boxes have also been included in the Biodiversity Enhancement plan (CT Ecology 2024).

Other

4.18 If at any time, evidence of a previously unidentified protected species is encountered then works must immediately cease and an ecologist consulted in order to ascertain the best way to proceed with the works which may involve the need for additional mitigation.

5. SCOPE OF WORKS AND SCHEDULE

5.1 The scope of works will involve site clearance to facilitate construction activities, with the retention and enhancement of habitats around all site boundaries. There will be no additional land take, beyond the proposed development boundary, for the purposes of site compounds or storage areas.

5.2 The site boundary together with the location and extent of associated ecological features and mitigation prescriptions are shown in Figures 1 and 2 in Appendix A.

5.3 The mitigation and enhancements will be undertaken in accordance with the proposed programme of works. The programme will take into account seasonal constraints, the expected timetable of works (i.e., when site clearance needs to be undertaken, and when construction works are due to commence) and any other timing considerations.

5.4 The Principal Contractor and the Project Ecologist will review the scope of works, design a timetable to agree and ensure appropriate on-site supervision is provided to avoid/mitigate impacts on protected species as outlined above (see Mitigation). The timetable for ecological supervision must be agreed prior to works commencing on site.

6. MECHANISMS TO SECURE DELIVERY

6.1 Prior to the commencement of any works on site, including the setting up of site compounds and access onto the site, the Principal Contractor (and any personnel appointed by the Principal Contractor) will receive a formal briefing by the project ecologist. This briefing will detail all relevant protected species issues as set out within this CEMP. A copy of this document must be read and understood by all contractors conducting the works.

6.2 The Principal Contractor will then be responsible for relaying any necessary information to contractors on site, either employed by them directly or third parties. Advice will be sought from CT Ecology in the event of complex issues arising or in cases where there is any doubt as to the action to be taken. Any proposed deviation from this CEMP will be discussed with CT Ecology prior to seeking approval from the Local Planning Authority as necessary.

6.3 The client as detailed within this document, are responsible for arranging site access and contractors accordingly.

6.4 The client or a third party employed to undertake specific services, will be responsible for implementing all of the necessary avoidance / mitigation / enhancement measures detailed within this CEMP. These actions will proceed under ecological supervision where relevant.

6.5 A suitably qualified and experienced ecologist, licensed/accredited where necessary, will be provided and act as an ECoW. The role of the ECoW is in accordance with BS 42020:2013 (BSI, 2013) and will satisfy the following requirement:

> *'An ecological Clerk of works should be able to demonstrate a level of experience and competence commensurate with the complexity of the role needed on site to deal with the wide range of ecological issues likely to be encountered and to adapt to new and unforeseen challenges raised by development activities*.'

7. REFERENCES

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Appendix A
Site Plans

Figure 1: Landscape Strategy Plan

28m2 HIghway Spec Verge Seed mix
6m2 HIghway Spec Verge Seed mix
1No Quercus robur 18-20cmg (Detail 3101)
1 No Quercus robur 18-20cm (Detail 3102)
50m2 Wild flower grass seed mix
76 Grn mcr 1L
29 Brgn S 1-2L
CYCLE STORE
(No Dig Foundations See Dwg 001-6 for Detail)
Senlac Hedge (Maintained @ 1.5m High)
4No Crns sn 50-60cm
12No Crtg mn 50-60cm
2No Cryls av 40-50cm
4No Eny er 50-60cm
2No Il aq 30-40cm
6No Lgs vl 50-60cm
6No Rhmns ct 50-60cm
2No Rs cn 50-60cm
4No Vb op 60-80cm
1No Quercus robur 'Fastigiata' Koster 18-20cmg (Detail 3101)
Unit 1 & 2 - 418m²
7No Crns sn MWF
3No Brg of
3No Brg of
6No Lvn dn PB
3No Dryp affns TK
U/P 21No Allm sc
2No Acer campestre 18-20cmg (Detail 3105)
260m2 Wild flower grass seed mix
2No Carpinus betulus 18-20cmg (Detail 3105)
VISION SPLAY
2No Rsm of A
U/P 3No Scb cc
3No Rsc ac
7No Vnc mn
8No Brgn S
Raised Paved Areas
7No Crns sn MWF
U/P 15No Prm vl
Senlac Hedge (Maintained @ 1.5m High)
11No Crns sn 50-60cm
34No Crtg mn 50-60cm
6No Cryls av 40-50cm
11No Eny er 50-60cm
6No Il aq 30-40cm
17No Lgs vl 50-60cm
17No Rhmns ct 50-60cm
6No Rs cn 50-60cm
11No Vb op 60-80cm
Unit 4 - Coles - 260.8m²
1No Acer platanoides 'Deborah' 16-18cmg (Detail 3102)
U/P 7No Plcr dy
7No Rsc ac
7No Quercus robur 'Fastigiata' Koster 18-20cmg (Detail 3101)
31 Crns sn MWF
8No Rsm of A
U/P 13No Ech vlg
U/P 130No Prm vl
5No Brg of
6No Vb Intn
6No Dryp fl C
10No Rsc ac
13No Rsm of A
21No Lvn dn PB
33No Brgn S
33No Crns sn MWF
82No Brgn S
U/P 58No Grn mcr
21No Crns sn MWF
U/P 12No Scb cc
71 Brgn S 1-2L
56No Vnc mn
38 Prm vl 1L
2.0 0.0 5.0 10.0 15.0 20.0

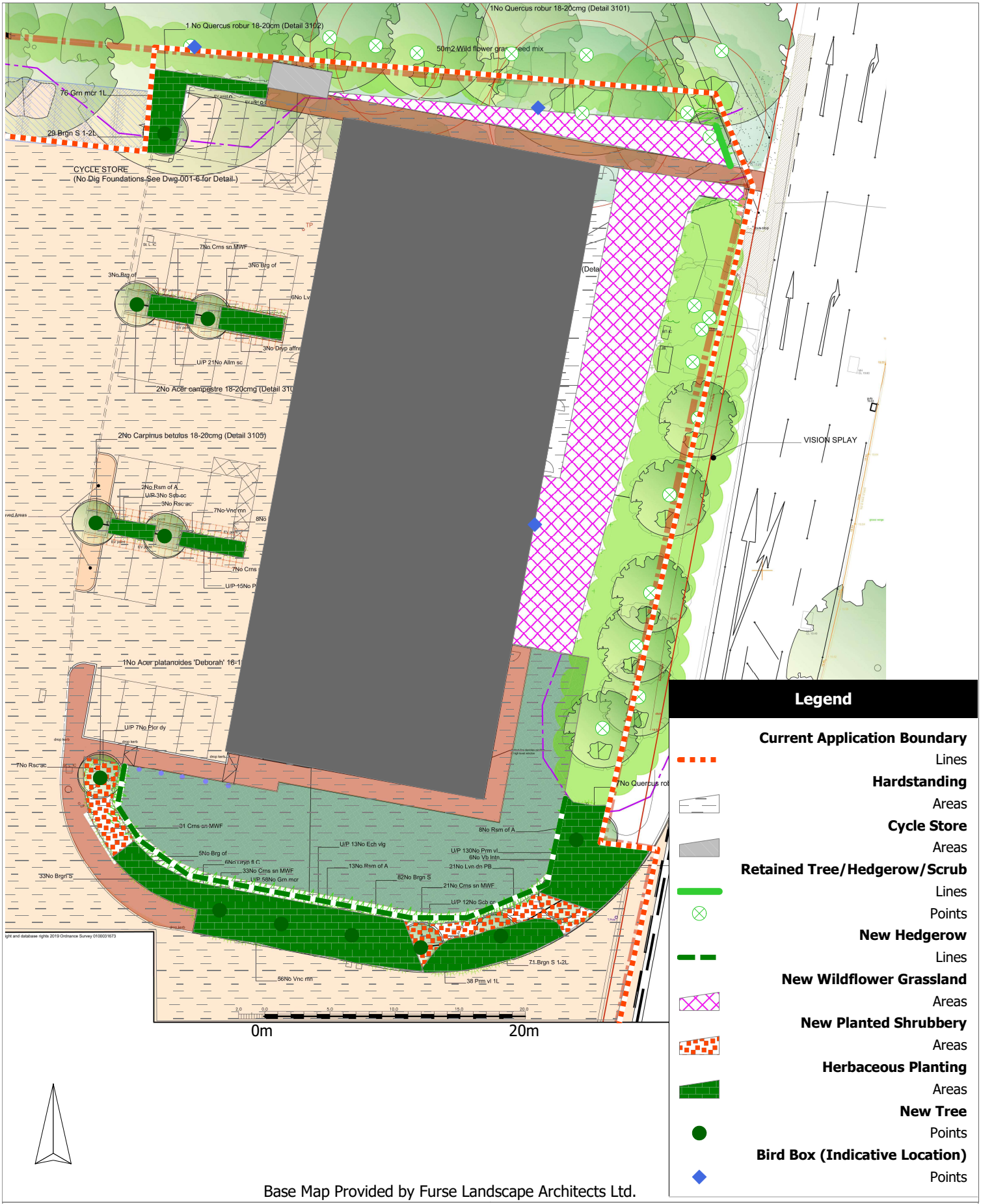
welfare
Unit 01
GIA - 418.2m² 4500 sq.ft.
B8 - Storage & Distribution Use
FFL - 19.500
Acc. w.c.
Acc. w.c.
store
Staffroom
Acc. w.c.
Acc. w.c.

welfare
Unit 02
GIA - 228.7m² 2500 sq.ft.
B8 - Storage & Distribution Use
FFL - 19.500
Staffroom
Acc. w.c.
Acc. w.c.

BUILDING 2
Unit 3 - 260.8m²
Building 2

Unit 03
GF GIA - 290.9m²
B1c - Light Industrial Use
FFL - 19.500
Workshop
Entrance Lobby
Acc. w.c.
1500x1500mm clear Circulation
st.
lift
fire escape
dashed line denotes position of high level window

fire escape
fire escape
fire escape
fire escape
drop kerb
drop kerb
drop kerb
drop kerb
St. L. IC
St. L. IC
St. L. IC
LP
LP
LP
TP
TP
BT-IC
JB
T.Pole
bus stop
ditch
ditch
ditch
grass verge
grass verge
grass verge
Bottom of Bank
Bottom of Bank
Top of Bank
Top of Bank
kerb
kerb
kerb
kerb
gully
gully
MH
MH
CL 19.60
CL 19.49
19.06
19.08
19.09
19.17
19.38
19.52
19.55
19.56
19.63
19.64
19.64
19.64
19.64
18.97
18.98
18.99
18.99
EV point
EV point
EV point



Base Map Provided by Furse Landscape Architects Ltd.

Figure 2: Unit 2 Southdowns Enterprise Park Site Enhancement Plan

Drawn by: CT
Date: 16/04/2024
Scale: See Plan

CT Ecology