Adur Valley Solar Farm

on behalf of Enso Green Holdings Y Limited

Condition 4: Construction Environmental Management Plan (CEMP)



avian ecology

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V1	19/02/2025	Draft	Z Hinchcliffe *MRes BSc (Hons.)*	K. Doneo *MSc, BSc (Hons.), MCIEEM*

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1 INTRODUCTION

1.1 Background

1.1.1 This Construction Environmental Management Plan (CEMP) has been prepared to discharge Condition 4 of planning permission (Application Reference: DC/22/0100) for the installation of a solar farm with associated infrastructure (the 'Consented Development') on land north of Huddlestone Farm, Horsham Road, Steyning, West Sussex (the 'Site').

1.1.2 This document provides the management framework required for the planning and implementation of construction activities in accordance with the biodiversity commitments which have been identified at planning.

1.1.3 Condition 4 states that '*Pre-Commencement Condition: A construction environmental management plan (CEMP: Biodiversity) shall be 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.'

1.1.4 The purpose of this CEMP is to set out suitable measures to avoid the risk of adverse impacts on sensitive ecological receptors, identify biodiversity protection zones and ensure legal compliance in relation to protected habitats and species. It describes the checks and monitoring that will be implemented to ensure works are being undertaken in accordance with these requirements, together with measures to ensure that appropriate corrective actions or mitigation measures are taken where necessary.

1.1.5 The Site Manager and all site personnel will be responsible for the implementation of the CEMP and will comply with all conditions of the planning permission and the relevant provisions contained in the reports submitted in accordance with those conditions. The CEMP will be monitored regularly throughout the works.

1.1.6 This CEMP is to be read in conjunction with the Ecological Assessment Report (EAR) (Avian Ecology 2022[1]) and *Landscape and Ecology Enhancement Plan (Drawing No: 1270/10a)*.

2 PROPOSED WORKS

2.1.1 The Consented Development requires the use of chemicals, equipment, tools and concrete / hardstanding and requires washing down of tools, equipment and work surfaces that might contain contaminants. Suitable mitigation and protection measures will be implemented to ensure no impacts are associated with these tasks for construction.

2.1.2 It is anticipated that construction will comprise the creation of:

- Solar arrays and associated infrastructure;
- Access tracks;
- Foundation inverters and associated equipment; and,
- Temporary compound to include:
  - Portable buildings to be used as offices, welfare and toilet facilities;
  - Containerised storage areas;
  - Parking for construction and worker vehicles;
  - Temporary hardstanding; and,
  - Temporary gated compound.

3 CONSTRUCTION MANAGEMENT

3.1.1 This section details the responsibilities of the various roles involved in the construction of the Consented Development. All those involved have responsibility for ensuring compliance with the CEMP.

3.2 Developer / Owner

3.2.1 Enso Green Holdings Y Limited will appoint an engineering, procurement and construction (EPC) contractor to undertake relevant environmental tasks as detailed within this document prior to, during and upon completion of the construction works.

3.2.2 The Developer / Owner will be responsible for obtaining all necessary consents, licences and permissions for their activities as required by current legislation governing the protection of the environment.

3.3 Contractor

3.3.1 The appointed Contractor will consider all of the mitigation measures and best practice construction methods detailed within this CEMP in their design and in any detailed environmental plans as required by the Contract.

[1] Avian Ecology Ltd. (2022) Ecological Assessment Report – Adur Valley Solar Farm, on behalf of Enso Energy.

3.4 Site Manager (Principal or EPC Contractor)

3.4.1 The appointed Site Manager (Principal or EPC Contractor) will be responsible for protecting site personnel and the general public during the construction works. Their responsibilities will also include relevant safeguards in relation to wildlife and ecology as set out in this CEMP and accompanying *Landscape and Ecology Enhancement Plan*[2].

3.4.2 Appropriate induction training will be given to all persons visiting and working on the Site, the Contractor and any subcontractors will fully comply with the site rules.

3.4.3 The Site Manager (Principal or EPC Contractor) will be responsible for any environmental incident over and above basic spill kits. The Site Manager (Principal or EPC Contractor) will outline to site staff who their professional responder is and ensure their availability 24 hours a day, seven days a week.

3.4.4 All standard safety procedures as laid down in the appropriate guidelines for the type of work will be adhered to at all times. To prevent vandalism and accidental harm to people and wildlife, the Site and associated plant and machinery will be secured during non-working hours. In addition, the Site will have a 24 hour a day security presence at the key access points to deter any criminal activity.

3.4.5 The Site Manager (Principal or EPC Contractor) will ensure that measures are in place to allow all vehicles to safely enter and exit the Site. All loading and unloading of HGVs will be undertaken within the works/Site boundary. Upon exit, all lorries will be fully sheeted and pass through a wheel washing installation prior to departure.

3.4.6 During construction, phase segregation of waste (wood, metal, general etc.) disposal will be via an approved contractor and documents (waste transfer notes) will be employed. Please refer to **Section 5.6** for more details.

3.4.7 On completion of construction works, all plant, surplus materials, rubbish and temporary works will be removed, and the Site left in a clean, safe and tidy condition.

3.4.8 All necessary and reasonable measures will be taken to minimise fire risk and comply with the requirements of the local fire authority. Open fires are prohibited at all times and there will be no burning of rubbish on Site.

3.5 Ecological Clerk of Works

3.5.1 A suitably experienced Ecological Clerk of Works (ECoW) will be appointed to provide ecological and environmental advice during construction. The ECoW will monitor construction to ensure compliance with the CEMP and help to reduce risks and delays dynamically during construction phase. Any breaches of the CEMP will be reported by the ECoW to the Site Manager (Principal or EPC Contractor) who has the authority to halt construction works.

3.6 Communication of Construction Environmental Management Plan

3.6.1 The Site Manager (Principal or EPC Contractor) will manage and co-ordinate on-Site environmental activities and act as a point of contact for local residents to ensure that any concerns are resolved quickly and efficiently. The Site Manager will be responsible for conducting inductions and briefings for all staff and visitors, meeting environmental and ecological obligations, resolving, reporting, and monitoring any environmental incidents, and ensuring adherence to waste management procedures.

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[2] Avian Ecology (2025). Adur Valley, Solar PV and Battery: Landscape and Ecology Enhancement Plan. Reference 1270/10a.

3.6.2 The requirements of the CEMP and other environmental responsibilities will be communicated by Site Manager (Principal or EPC Contractor) to employees and sub-contractors by:

- Site Induction and briefings;
- Risk Assessment & Method Statements for works likely to pose environmental issues;
- Toolbox talks; and,
- Environmental Monitoring and reporting (by site team).

3.6.3 All environmental incidents will be reported and recorded. A full investigation will be conducted where appropriate, and corrective action will be applied. Records will be kept for all environmental occurrences including but not restricted to potential hazards, near misses, incidents; and complaints.

4 PRELIMINARY SURVEYS

4.1.1 This section details the surveys that will be conducted prior to the start on construction. These surveys will inform the design of the Consented Development and any additional required mitigation to be implemented during construction.

4.1.2 The pre-construction surveys and checks to be undertaken include:

- A badger survey to check for active or any newly constructed setts (between the initial baseline survey and the construction start date) within at least 30m of construction areas within the Site;
- A nesting bird check within 48 hours of any vegetation anticipated to be removed (if within the breeding bird season March-August inclusive); and,
- A check for protected species, including great crested newt (GCN) and hazel dormouse, during any hedgerow removal, as part of works under a Reasonable Avoidance Measures (RAMs) Method Statement (See **Annex 1**).

5 CONSTRUCTION ECOLOGY MANAGEMENT PLAN

5.1.1 This section details the required measures to ensure adequate protection, mitigation and compensation for protected species, priority species and priority habitats.

5.2 Noise and Vibration (Construction Works)

5.2.1 During construction activities, noise and vibration will be minimised wherever possible and will be undertaken in accordance with the best practicable means (as defined in Section 72 of the Control of Pollution Act 1974) during core working hours. Manufacturers' recommendations with regards to vibration levels from machinery shall be adhered to.

5.2.2 All plant will be properly maintained and contractors will comply with the terms laid down in the current approved Code of Practice Order 2015 and BS 5228: Part 1: *Noise Control on Construction and Open Sites*[3].

5.2.3 All plant and machinery in use shall be properly silenced and maintained in accordance with the manufacturers' instructions.

5.2.4 The following actions will be implemented to manage noise levels:

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[3] British Standards Institution. (2009). BS 5228-1:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites. Part 1: Noise. Retrieved from https://www.warrington.gov.uk/sites/default/files/2020-08/cf53_bs_5228_pt1-2009a1-2014.pdf

- Noise rating of equipment will inform equipment selection (where it is necessary to use equipment with high noise levels, mitigation measures will be adopted, e.g. limited periods of operations);
- All plant and equipment will be suitably sited, operated and serviced in order to minimise noise and vibration;
- Unnecessary revving of engines will be avoided
- Drop heights of materials will be minimised; and,
- All plant and equipment will be turned off when not in use.

5.3 Air Quality

5.3.1 With the exception of vehicular movements on Site and associated construction machinery, there are no construction processes that have emissions to air. Given the ground condition of the Site, it is not anticipated that any significant dust issues are to arise during the construction phases. If conditions on-Site are very dry then water misting/spraying will be employed to dampen ground to avoid any dust nuisance.

5.3.2 Wheel washing facilities will be provided; the dry wheel washing comprises of a track that vehicles cross for the debris to be collected and will be located close to the Site access. All operatives exiting the Site in vehicles will be required to use the wheel cleaning facilities to remove dirt and mud that has accumulated on the vehicle by cleaning the wheels and underside of the vehicle. Signage will be provided directing vehicle operatives to use the facilities and appropriate methods (such as silt traps and cut off drains) will be used as necessary ensure that any contaminants do not enter the environment or overflow back into the Site or onto neighbouring land, in particular neighbouring designated sites as identified within the Ecological Assessment Report.

5.3.3 Vehicles carrying material on and / or off-Site will be sheeted to prevent the spread of dust.

5.4 Water Quality and Drainage

5.4.1 During construction, the Contractors will implement working methods to protect surface water and groundwater resources (and associated habitats and species) from pollution, in line with current guidance and good practice[4].

5.4.2 Waste storage and concrete washout areas will be designated to minimise areas prone to contamination. Where there is increased risk of contained spillage, additional precautions will be taken which are detailed further below. Fuels, lubricants and chemicals will be stored in accordance with the appropriate Environment Agency Environmental Management Guidance (such as Control of substances hazardous to health (COSHH) guidelines)[5] with an impermeable base and suitable bunding to prevent discharge.

5.4.3 All works will be undertaken in a manner to ensure that existing watercourses and drainage are not polluted, dirtied or obstructed during the construction period.

5.4.4 If any pollution incident occurs, then the Site Manager (Principal or EPC Contractor) shall advise the Environment Agency and the Local Planning Authority immediately and take prompt action to minimise the impact and prevent re-occurrence. A common cause of pollution from sites is through

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[4] Environment Agency. (2024). *Protect groundwater and prevent groundwater pollution*. Retrieved from https://www.gov.uk/government/publications/protect-groundwater-and-prevent-groundwater-pollution/protect-groundwater-and-prevent-groundwater-pollution (accessed February 2025).

[5] Available online at: https://www.legislation.gov.uk/uksi/2002/2677/regulation/7 (accessed February 2025).

vandalism. Therefore, as stated above the Contractor shall ensure that Site is adequately protected by the provision of secure fences and locked accesses where possible.

5.4.5 The measures adopted during the proposed works will include (but not limited to):

- Site workers will be informed about the potential for encountering localised contamination through toolbox talks. High standards of personal hygiene will be maintained, including the provision of on-Site welfare facilities. The use of appropriate levels of personal protective equipment (PPE) will be strictly enforced;
- Waste storage and concrete washout areas to be designated to minimise areas prone to contamination;
- Fuels, lubricants and chemicals will be stored in a place containing an impermeable base and suitable bunding in accordance with current legislation;
- Spill kits, drip trays and plant nappies will be available on-Site to ensure that any accidental spillage can be promptly dealt with;
- The Site will be secured at all times and staff will be trained and made aware of the actions to take in the event of a spillage of potential contaminants. Emergency procedures to be implemented in the event of a spillage or leakage of any polluting material such as fuel, oil or silt-laden drainage will be in place on Site;
- Public roads and accesses will be regularly maintained and cleaned so they are kept free from deposits in order to prevent silt, oil or other materials entering any drain and / or watercourse;
- Any lorry wheel cleaning facilities shall be securely constructed; overflow and effluent will be contained for proper treatment and disposal;
- Dewatering activities will discharge to settlement tanks prior to discharge to a surface water sewer to minimise risk of sedimentation to downstream watercourses; and,
- The groundwater inflow into any deep excavation will be managed to minimise the volume of inflow (and therefore the volume of water requiring removal).

5.4.6 The Consented Development once constructed will contain impermeable surfaces and structures (inverter substations). The implementation of surface water drainage systems will incorporate pollution control measures.

5.4.7 Surface water runoff and drainage management measures form part of the embedded design, including the use of swales to attenuate flows, and measures to prevent silt-laden or polluted runoff during construction or operation of the solar farm. These measures are described separately but in summary include:

- Phasing of construction to minimise compaction of the soil during the works;
- Installation of permeable tracks;
- Constructed using low ground pressure equipment off the tracks, and establishing access rules to minimising repeat trafficking of routes; and,
- Daily monitoring of watercourses to identify any issues relating to runoff and silt to allow immediate contingency control measures to be set in place.

5.4.8 It is noted that current agricultural practices across the Site present their own risk to adjacent watercourses and other habitats in relation to soils and surface water runoff, with regular ploughing, use of heavy agricultural machinery and periods when soils are exposed and devoid of vegetation cover. Construction disturbance relating to the solar farm will be temporary and not dissimilar to existing levels resulting from agricultural practices that currently or have historically taken place. Once complete, the Site will maintain permanent grassland cover and will no longer be subject to regular

soil disturbance or compaction from machinery and hence there will be no significant effects on adjacent habitats or the species they support.

5.4.9 Foul water from the development including that from cleaning and wash down will be discharged to an onsite foul water sewer system and the relevant consents sought from Southern Water.

5.5 Wildlife and Biodiversity

5.5.1 The provisions of the *Landscape and Ecology Enhancement Plan* and associated notes and reports shall be followed to protect wildlife and biodiversity. This will ensure that construction activities do not impact protected species or their habitats, and that compliance is made with the Wildlife and Countryside Act 1981 (as amended)[6], the Protection of Badgers Act 1992[7] and the Conservation of Habitat and Species Regulation 2017 (as amended)[8].

Good Practice to be Employed

5.5.2 Site staff will be briefed at induction on the requirements regarding the environmental good practice on Site including the protection of retained vegetation. Briefings and training will be repeated as required for new starters on Site and/or refreshed through Toolbox Talks or similar when Site conditions or special measures are changed or updated.

5.5.3 Standard measures to ensure runoff control and pollution prevention will be implemented; these measures will safeguard the nearby watercourses and wetland features and associated habitats and species.

5.5.4 Security fencing located around the Site perimeter will have mammal gaps or gates positioned at several locations along the base of fences to maintain dispersal route and connectivity around the Site and into the wider landscape. The exact locations of these gaps/gates will be determined once the pre-commencement badger survey has been completed and will be positioned based on the survey results (such as the presence of any existing mammal paths and cut throughs).

Designated Sites and Habitats

5.5.5 No designated sites will be directly affected by the Consented Development.

5.5.6 Five statutory designated sites are located within 5km of the Site, with the closest being South Downs National Park located 1.9km south-west of the Site.

5.5.7 Any disturbance to the wider area as a result of the Consented Development will be limited to the construction phase. Disturbance will be localised and statutory designed sites are considered to be of sufficient distance away that no direct impacts are anticipated.

5.5.8 Three non-statutory designated are present within 2km of the Site (River Adur Water Meadows and Wyckham Wood Local Wildlife Site (LWS) being located immediately east of the Site boundary). No impacts on statutory or non-statutory designated sites for nature conservation are anticipated with the retention and protection of field boundary habitats, and the implementation of pollution prevention and surface water runoff management measures. Clearly delineated working areas will be made with 20m buffers (minimum) clearly marked out to avoid disturbance or encroachment on to designated sites. Temporary heras fencing, or similar, will be installed to demarcate the standoff buffers surrounding the River Adur Water Meadows and Wyckham Wood LWS located adjacent to the

[6] Available online at: https://www.legislation.gov.uk/ukpga/1981/69 (accessed February 2025).
[7] Available online at: https://www.legislation.gov.uk/ukpga/1992/51/contents (accessed February 2025).
[8] Available online at: https://www.legislation.gov.uk/uksi/2017/1012/contents (accessed February 2025).

Site to prevent any encroachment. Locations of non-statutory designated sites located on or directly adjacent to the Site are included in **Figure 1.**

5.5.9 Protections relating to habitats include implementing tree protection measures in line with *BS 5837:2012: Trees in relation to design, demolition and construction*[9]. The development has been designed to avoid woodland / tree removal, with any necessary habitat removal to be compensated for upon the completion of construction, helping to safeguard retained terrestrial habitats within the Site, and within the surrounding environment.

5.5.10 During the operation of the solar farm over time, dirt and dust can accumulate on the glass surface of the module, reducing its power output. Periodic cleaning of PV modules where required will be undertaken with a soft brush and using soft, clean water. No chemicals are required.

5.5.11 Standard measures to ensure runoff control and pollution prevention will be implemented Site-wide; these measures will safeguard on-Site ditches and boundary habitats as well as off-Site habitats and species.

Birds

5.5.12 Site clearance works should be undertaken outside of the breeding bird season as reasonably practicable. The breeding bird season is generally considered to be 1st March to 31st August inclusive, however it is important to note that some species can nest outside of the defined period. Where vegetation removal cannot be avoided, a suitably experienced ecologist will be appointed to undertake a pre-site clearance survey to identify the presence of any wild bird and/ or nests being built or in use. Only once the appointed ecologist is satisfied that an offence under Part 1 of the Wildlife and Countryside Act 1981 (as amended) will not occur, may works proceed.

5.5.13 Should any active nests be found, an exclusion zone (this distance is species and habitat/site specific) must be employed around the nest site in consultation with the advising ecologist. Any works within that exclusion zone cannot be undertaken until all young birds have successfully fledged (i.e. the nest becomes inactive). Furthermore, should ornithological checks reveal the presence of any bird species listed on Schedule 1 of the Wildlife and Countryside Act (1981) as amended, then further advice will be required depending on the specific circumstances and risk of disturbing that breeding attempt.

Bats

5.5.14 Protection of hedgerows and all mature trees on Site or on adjacent land will safeguard potential roost sites and maintain foraging and commuting opportunities.

5.5.15 Small-scale works around existing farm access routes involving up to 5m of hedgerow may require removal as a result of proposed works. Should any trees be proposed to be affected, then an Preliminary Roost Assessment (PRA) will be undertaken in advance of any removal. If any impacted tree is considered to support potential roosting bats, then a suitable check for roosting bats will be conducted. If bats are confirmed to be roosting within any tree suspected to be impacted by the proposed works, the data gathered would be used to inform potential design amendments in order to avoid or reduce impacts, or failing that, support a licence application to Natural England to destroy/disturb the bat roost.

5.5.16 Works will be undertaken during daylight hours as far as practicable. Minimal lighting is required during construction and / or operation of the Consented Development, but any required will be employed in a sensitive manner and directed away from field boundary habitats to maintain bat

[9] Available online at: https://www.bathnes.gov.uk/sites/default/files/2020-01/BS5837%202012%20Trees.pdf (accessed February 2025).

foraging and commuting routes as dark corridors. This will be achieved in line with BCT guidance (2023) *Bats and Artificial Lighting at Night*[10].

Badger

5.5.17 Two outlying badger setts were found within the Site during field surveys during April 2021. As a result, the layout of the Site has been designed to provide at least 30m protection zone(s)from either of these setts.

5.5.18 Perimeter fencing will have gaps / mammal gates of suitable size to be used by badgers (and other mammals) positioned at several locations along the base of fences in order to allow badgers to continue to move around and use the Site throughout construction and operation periods.

5.5.19 Additionally, a pre-construction badger survey will be undertaken immediately prior to works commencing, to check for active or any newly constructed setts within at least 30m of construction areas.

5.5.20 If baseline conditions have altered and significant disturbance to badgers or their setts is considered likely during the proposed works, one or both of the following options will be incorporated:

- The development design will be amended to avoid works which may impact upon badgers and their setts (e.g. alteration of the configuration of panels and/or fencing); and/or,
- A disturbance licence will be obtained from Natural England before construction commences.

5.5.21 Those works requiring any construction activities close to field boundaries will be done in accordance with Reasonable Avoidance Measures (RAMS) (See **Annex 1**). An implemented RAMs will safeguard any badger that may be active outside normal construction hours, including covering stockpiling of earth (if applicable), covering of trenches / excavations and/or suitable escape ramps, safe storage of chemicals and reporting to the Site Manager / ECoW of any new setts or suspected new setts.

Amphibians

5.5.22 No ponds are present within the immediate boundary of the Site. However, three ponds are located within 250m of the Site boundary. These were sampled and GCN were not confirmed present following negative results of environmental DNA (eDNA) surveys of these ponds.

5.5.23 Land occupied by the Consented Development is dominated by arable habitats which are considered to offer negligible to low habitat suitability to GCN. With the potential exception of small 5m sections of hedgerow within the Site, all suitable boundary habitats will remain unaffected during works. Those works requiring hedgerow removal identified for removal will be done in accordance with RAMS (See **Annex 1**).

5.5.24 Neighbouring terrestrial habitat will not be directly or indirectly affected by the Consented Development with perimeter fencing and pollution prevention measures in place.

5.5.25 Furthermore, habitats underneath the solar panels will be enhanced to create grassland habitats which will improve and increase the overall available terrestrial habitats for amphibians.

Reptiles

5.5.26 Land within the Site is dominated by arable farmland, which is intensively managed and considered to be low suitability habitat for reptiles. More favourable habitat is present along hedgerow bases, field

[10]Bat Conservation Trust and Institution of Lighting Professionals. (2023). *Guidance Note 08/23: Bats and artificial lighting at night.* https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/ (Accessed February 2025).

margins, and woodland edges which will be either enhanced or retained and safeguarded during the works.

5.5.27 With the potential exception of small 5m sections of hedgerow within the Site, all suitable boundary habitats will remain unaffected during works. Those works requiring hedgerow removal identified for removal will be done in accordance with RAMS (See **Annex 1**).

5.5.28 Neighbouring terrestrial habitat will not be directly or indirectly affected by the Consented Development with perimeter fencing and pollution prevention measures in place.

Water Vole & Otter

5.5.29 All proposed works are situated over 5m from watercourses and ditches within the Site and therefore will not impact water voles or otters if present within the Site.

5.5.30 Standard good practice measures will be employed to ensure runoff control and pollution prevention to protect aquatic / bankside habitats both on Site and in the wider ditch and watercourse network. This includes any watercourses associated with the River Adur which is located 375m east of the Site.

Other species

5.5.31 The dominant agricultural landscape is considered to be of moderate potential for brown hare and low potential for Western hedgehog. Although the majority of the Site lacks suitable potential, linear habitats and woodland habitats provide potential suitable habitat for hazel dormouse. With the potential exception of small 5m sections of hedgerow within the Site, all suitable boundary habitats will remain unaffected during works. Those works requiring hedgerow removal identified for removal will be done in accordance with RAMS (See **Annex 1**).

Invasive non-native species

5.5.32 No invasive non-native plant species were identified within the Site, during baseline surveys.

5.5.33 It is an offence to plant or otherwise cause to grow in the wild species listed within Schedule 9; this includes allowing the species to grow/spread, spreading the species or transferring polluted ground material from one area to another. Any waste containing these species can only be removed from site under appropriate waste management documentation (under the Environmental Protection Act 1990[11]).

5.5.34 Should any new area of invasive species be encountered or suspected on-Site, prior to or during construction, the advice of a suitably qualified ecologist should be sought, and the appropriate measures taken.

5.6 Materials and Waste

5.6.1 Materials supplied and used on Site will be recorded, with surplus materials reused or recycled where possible. Material that cannot be reused or recycled will be disposed of in accordance with current legislation[12]. Construction waste generated is expected to be restricted to normal construction wastes which will be sorted and either recycled or disposed of offsite to an appropriately licensed landfill by the Contractor.

[11] Available online at: https://www.legislation.gov.uk/ukpga/1990/43/contents (accessed February 2025).
[12] Available online at: https://www.hse.gov.uk/construction/safetytopics/storage.htm (accessed February 2025).

5.6.2 Waste management will be in compliance with the Environmental Protection Act 1990[15] and in accordance with the 'Waste Management - A Duty of Care - A Code of Practice'[13].

5.6.3 Welfare facilities will be self-contained with all discharge of waste water to sealed tanks which will be regularly emptied off-site in an authorised manner. All other waste will be collected in skips and removed from Site at appropriate intervals to an authorised site.

5.6.4 For waste materials that do arise as a consequence of the works, the following measures will be adopted:

- All waste streams will be segregated;
- Reusing suitable infrastructure and resources already available within the Site where possible to minimise the use of natural resources and unnecessary materials (e.g. reusing excavated soil for fill requirements)
- All waste will be stored safely and securely to prevent damage to health, or escape into the environment. Consideration will be given to prevent the theft of waste, acts of vandalism and scavenging by animals. Separate containers for different waste will be labelled to avoid confusion;
- Waste Management (Duty of Care) training for nominated site operatives;
- Nominated person(s) on Site for the signing-off of Waste Transfer Notes;
- Records of waste transfer will be maintained up to date and easily retrievable in order that waste officers from the Environment Agency can inspect them at any time; and,
- Rubbish will be removed regularly, and the Site will be kept clean and tidy.

[13]Available online at: https://consult.defra.gov.uk/waste/the-revised-waste-duty-of-care-code-of-practice/#:~:text=The%20Duty%20of%20Care%20is,waste%2C%20known%20as%20controlled%20waste (accessed February 2025).

6 MONITORING

6.1.1 In order to ensure that the objectives and mitigation measures which are set out in this CEMP are met, implemented as appropriate and managed effectively, Enso Green Holdings Y Limited proposes to ensure that frequent meetings are in place with the appointed Site Manager (Principal or EPC Contractor) prior to and during the construction of the Consented Development.

6.1.2 Monitoring and reporting will be conducted throughout the construction phase to demonstrate the effectiveness of the measures outlined in the detailed CEMPs and related construction controls. This will also enable corrective actions to be taken when necessary

6.1.3 The meetings would have the following responsibilities:

- Communicate and monitor the CEMP and its mitigation measures;
- Ensure records of Heavy Goods Vehicle (HGV) movements are continually maintained and reported;
- Discuss any complaints which require intervention as well as discuss all complaints raised by the site staff;
- Record all near misses, incidents and hazards and resolve issues as informed by contractors, stakeholders and the public; and
- Monitor, review and improve, where necessary, the CEMP and associated mitigation measures.

6.1.4 In addition, compliance checks will be dynamically undertaken by a suitably experienced person (ECoW/Ecologist) when on Site (e.g. for supervision under RAMS etc) during construction, otherwise a walkover will be undertaken every three months during construction. Upon completion of construction works, a compliance report will be provided to the local planning authority.

ANNEX 1: Outline Reasonable Avoidance Measures (RAMS) Method Statement

The following Method Statement outlines suitable measures to be implemented during construction works associated with the proposed solar development to avoid the disturbance, injury or killing of individual Western hedgehog *Erinaceus europaeus,* hazel dormouse *Muscardinus avellanarius*, amphibians (including great crested newt *Triturus cristatus*) and common reptile species*.*

Measures to ensure the favourable conservation status of the species during the Consented Development must reflect legislation and guidance application at the time and the construction phase will be undertaken following RAMS under the supervision of an Ecological Clerk of Works (ECoW) as required to provide advice. Should RAMs be considered insufficient for great crested newts, certain works may require to be undertaken under a Low Impact Class Licence (LICL) or full European Protected Species Mitigation (EPSM) licence from Natural England, either of which would be supported by a presence/absence environmental DNA survey and detailed Method Statement.

These RAMs relate to minor or short term destructive or disturbance works (e.g. grid connection, cable laying, ground mountings) will also follow this Method Statement to ensure legal compliance and to ensure the objectives are achieved.

Amphibians, Reptiles & Western Hedgehog

Summary of Method Statement

It is currently understood that no hedgerow removal is required within the Consented Development, however construction along the cable route may see excavation occur within 5m of hedgerows and within small sections of potentially suitable tussocky grassland. These RAMS are to be used as a precautionary measure to guide works.

Vegetation clearance including grasslands greater than 15cm in height will be supervised by a suitably licensed ecologist and/or accredited agent.

Method Statement

This Method Statement should be followed for the construction works and associated minor short term destructive habitat clearance works within the Site in order to ensure legal compliance and to ensure the objectives are achieved.

The following measures will be adopted throughout the construction period of the Consented Development:

- Site operatives will be informed by 'tool box' talk of the potential for protected species to occur on-site, what to look out for and what to do in the event that animal is found.

- Vegetation clearance works should only commence after a careful visual inspection by an ECoW has determined that no animals are present. Vegetation should be reduced (by hand strimmer) to a height of c.150mm prior to ground works commencing to aid visual searches and encourage individuals to temporarily move away from the working areas.

- The proposed timing of the hedgerow removal (hedgerows base and roots) should avoid the amphibian, reptile and Western European hedgehog hibernation period (November to February inclusive) in order to prevent disturbance to hibernating animals.

- Trenches and excavations should include an escape route for animals that might enter the trench, especially if left open overnight. Ramps should be no greater than 45 degrees in angle and can include wooden planks or ramped earth. Ideally, any excavations open for a prolonged period should be covered.

- All excavations left open overnight or longer should be checked for animals prior to the continuation of works or infilling.
- Any excavated material stored overnight should be searched prior to being used as infill.
- Any brash cut down from the Site should be placed in piles either along the perimeter or in close proximity to swales, to create additional hibernacula for both amphibian and reptile species.

Should a great crested newt, reptile, Western European hedgehog or other notable species be found at any point during construction, works within suitable habitat and/or potentially disturbing works (i.e. works in close proximity or that could disturb the animal) must cease immediately and the ECoW will advise on the appropriate actions, including applying for a licence, if required.

Common and widespread amphibian species found during the visual inspection will be placed away from the development works, in terrestrial habitats which will not be impacted by the proposed works and that provide excellent connectivity with surrounding terrestrial habitats.

Hazel Dormouse

Summary of Method Statement

Any clearance of habitats potentially suitable for hazel dormouse (hedgerow and woodland) will be carried out by hand or light machinery using the 'persuasion' approach (Bright *et. al.*, 2006[14]) and under the direct supervision of a suitably licensed ecologist and/or accredited agent.

Search and Habitat Clearance

Prior to habitat clearance commencing in suitable hazel dormouse habitats, a detailed inspection of all such vegetation to be removed/impacted will be undertaken by the supervising ecologist in order to ensure no hazel dormice are present. Clearance of 100m of hedgerow for example is not likely to affect dormice in any way but should be first checked by the ecologist. Areas greater than that may require more detailed survey and advice should be sought from the ecologist before removal.

Potential impacts of killing and injury during site clearance will be mitigated using the 'persuasion' approach (Bright *et al*, 2006). This approach is normally adopted where:

- Less than 100m of hedgerow will be removed – as long as the remaining habitat is linked to a larger potential dormouse habitat.
- Less than a 50m wide strip of woodland will be removed – as long as the remaining habitat is linked to a larger dormouse habitat.

If works are proposed during the dormouse hibernation period between November – March, vegetation will be 'soft' felled in order to avoid impacts on potential dormouse hibernation habitat such as tree/hedge 'stools' and exposed roots (no ground clearance will take place in these habitats during this period). Felled tree sections may be logged into approximately 2m lengths and piled away from proposed works areas to provide wildlife habitat (including summer and winter nest/hibernation sites for dormice). As a precautionary measure, remaining stumps that may provide places of shelter should be removed the following April/May.

[14] Bright, P.W, Morris, P.A. & Mitchell-Jones, A. (2006) *Dormouse Conservation Handbook: Second Edition*. English Nature, Peterborough.

All clearance will be undertaken by an appointed contractor under the supervision of a suitably qualified/licenced ecologist using hand tools or light machinery, and will be sensitive to the likelihood of disturbing dormice. Vegetation will be gradually reduced to stump level, with all cut brash stacked in habitat piles or chipped into piles at suitable locations around the Site (outside of the Consented Development works areas in retained woodland habitats), as directed by the ECoW to provide habitat for invertebrates, small mammals (including dormice), amphibians and reptiles.

Site operatives will be informed by a 'tool box', which will detail the potential for protected species to occur on-Site, what to look out for and what to do in the event that animal is found.

If a hazel dormouse is found during site clearance or construction periods, works must stop immediately, and contact should be made with a suitably qualified/licenced ecologist for advice. Further works potentially affecting dormice would require a European Protected Species Mitigation Licence to legally proceed.

Figure 1: River Adur Water Meadows and Wyckham Wood LWS Exclusion Zone

