



## Grove Farm, Little Bealings, Suffolk

# Construction Environment Management Plan (Biodiversity)

**Client:** Mr J Blundell

**Author:** Liz Lord BSc (Hons) MCIEEM

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Pond House  
Earls Hall Drive  
Clacton  
CO16 8BP

T: 07434 672196

E: [brooks.liz@gmail.com](mailto:brooks.liz@gmail.com)

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## DISTRIBUTION LIST

This document forms part of the discharge of planning condition 4 of planning permissions DC/22/3733/P3Q and DC/22/2077/P3Q, and planning condition 5 of DC/22/0107/P3Q and as such will be distributed to:

- East Suffolk Council
- Mr J Blundell
- Site Manager / Principle Contractor (to be confirmed)

All contractors present on site will be provided with a copy of this document, and a copy will be available in the site office at all times.



# 1.0 SUMMARY

## Works Summary

1.1 Following ecology surveys of the site in 2017, the following features were identified as potentially ecologically sensitive with specific working measures and (in some cases) timings required:

- **River Fynn corridor, water voles & otters** – no direct impacts predicted on either the river, its tributaries, or water voles and otters, however measures are necessary to ensure the river corridor and the species which may be present here are not directly or indirectly adversely affected by the development works;
- **Woody vegetation & buildings** – woody vegetation clearance and commencement of building works would ideally be timed between September and February inclusive to avoid the bird nesting season. If this is not possible, immediately prior to commencement of works a check for nesting birds should be undertaken by a suitably experienced ecologist;
- **Reptiles** – whilst the site provided suboptimal habitat for reptiles in 2017, and continues to do so in 2023, continued regular management of the vegetation to a height of <10cm is necessary to ensure reptiles do not colonise the site. Some precautionary methods for clearance of longer margins of nettles, hogweed, horsetail etc are also deemed necessary;
- **Hedgehogs** – this Priority species may be present on site, and is at risk of harm during clearance of scrubby margins and through entrapment within open excavations; and
- **Roosting bats** – two trees within the red line boundary were identified as being of medium (moderate) suitability for bats. These trees are not currently proposed for removal.

1.2 A site visit in August 2023 confirmed that the above measures remain relevant.



## 2.0 INTRODUCTION

### Overview

2.1 This report has been prepared by Liz Lord to ensure compliance with condition 4 of planning permissions DC/22/3733/P3Q and DC/22/2077/P3Q, and planning condition 5 of DC/22/0107/P3Q relating to land and buildings at Grove Farm, The Street, Little Bealings, Suffolk IP13 6LT. Permitted development has been granted for the conversion of three agricultural buildings (Barns A, B and C) into three separate residential dwellings.

2.2 Conditions 4 / 5 of the three permissions each state:

*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 ecological receptors are adequately protected as part of the development.*



### Relevant Documents & Qualifications

- 2.3 This report refers to and incorporates information presented in the Preliminary Ecological Appraisal (PEA) dated 2<sup>nd</sup> March 2017 by Greenlight Environmental Consultancy.
- 2.4 This CEMP is written by Liz Lord, who has been a professional ecologist since 2005, and holds current Natural England licences to survey bats - Class Licence Reg. No. 2015-13305-CLS-CLS; great crested newts - Class Licence Reg. No. 2020-44816-CLS-CLS; and barn owls – Class Licence Reg. No. CL29/00160. Liz is a full member of CIEEM.
- 2.5 Due to the PEA having been carried out in 2017, an updated site visit was undertaken on 15<sup>th</sup> August 2023. Up to date photographs of the site are provided in Appendix 1.



## 3.0 BACKGROUND

### Site Description

- 3.1 The site supports a central row of disused agricultural buildings formerly used for livestock, in a moderate state of repair. The buildings are constructed of a combination of brick, breeze block, corrugated tin / fibreboard / polythene sheets, plyboard cladding and wooden slats, set across modern wood and metal frames. The buildings are accessed via a central track, with improved grassland, semi-improved grassland, woodland, streams, ditches and the River Fynn stretching beyond the buildings to the north and south. Further detailed habitat descriptions and images are provided in the 2017 PEA by Greenlight Environmental Consultancy, with updated photographs provided in Appendix 1 of this CEMP.
- 3.2 The site is located on the southern edge of the village of Little Bealings, which itself lies on the outskirts of Ipswich. The Street and associated residential dwellings lie to the east, a railway to the south, and semi-improved grassland to the west. To the north of the site runs the River Fynn, with arable fields immediately beyond. The site is accessed via an existing concrete driveway to the east, running off The Street.
- 3.3 An aerial location plan is provided below.



Fig 1: Aerial plan, with red line boundary outlined in red, and construction zone boundary (for buildings A, C and E) outlined in blue. Aerial photograph sourced from Google Earth Pro



## Biodiversity Features

- 3.4 With the exception of the River Fynn corridor and an area of broadleaved woodland in the south western corner of the site, neither of which will be directly affected by the proposals, no Priority Habitats were recorded on site or immediately adjacent.
- 3.5 The following issues were identified and recommendations given with respect to roosting bats, nesting birds, hedgehogs and reptiles:
- The River Fynn habitat corridor should be protected by the implementation of a Construction Environmental Management Plan. To avoid potential direct impacts upon water voles and otters, this should include the installation of temporary protective fencing to maintain a 6m wide buffer zone from the River Fynn;
  - Building works and woody vegetation clearance should ideally commence during September to February inclusive to avoid the bird nesting season. If this is not possible, immediately prior to commencement of works a check for nesting birds should be undertaken by a suitably experienced ecologist. Any active nests will need to be left in situ until the young have left the nest;
  - Grass and weedy vegetation across the site is to be cut and maintained at a maximum height of 10cm until the start of works, to prevent the site becoming suitable for reptiles;
  - To avoid harm to hedgehogs in both the long and short term, open excavations should be covered overnight, construction materials should be stored off the ground on pallets, and nocturnal illumination of the site should be minimised (the latter also applies to foraging and commuting bats); and
  - In the event that two trees identified as having medium bat roost potential are to be removed, further bat surveys should be conducted. However, it is confirmed that these trees will not be removed or adversely affected by the proposals and therefore no further works are necessary in this regard.
- 3.6 These recommendations were provided in the PEA report to avoid damage to the River Fynn corridor and the habitats and species present here, to avoid harm or disturbance of roosting bats, avoid harm to reptiles, avoid disturbance or harm to hedgehogs and to avoid disturbance or harm to nesting birds.
- 3.7 The recommendations were applied to all of the building plots, and since all will be developed at the same time and by the same company, this CEMP also applies to all of the building plots.



## 4.0 IDENTIFIED RISKS & WORKING MEASURES

### RISKS

4.1 Those construction activities considered to present a risk to any of the above, are:

- All works associated with site clearance – movement of machinery, vegetation strimming, scrub removal
- All works associated with building demolition, stripping, conversion
- Digging / excavations
- Dust / air pollution
- Ground pollution / runoff
- Noise
- Lighting
- Use of cranes
- Storage / dumping of materials
- Laying of pipes and cables
- General construction

The risks above are generally limited to land within the construction boundary, however threats from machinery movement, storage / dumping of materials, ground pollution / runoff and laying of pipes and cables extend across the wider red line boundary, which include the corridor of the River Fynn.

4.2 Table 1, overleaf, highlights the relevant risks for each identified ecological feature, and the associated avoidance / mitigation measures required.

### Relevant Legislation

- 4.3 All **reptile** species are protected against harm under the Wildlife and Countryside Act 1981 (as amended).
- 4.4 **Water voles** are protected against harm under the Wildlife and Countryside Act 1981 (as amended), whilst **otters** are similarly protected by this Act and also against disturbance under the Conservation of Habitats and Species Regulations 2017 (as amended).
- 4.5 All **breeding wild birds** and their nests, eggs and young are protected against harm under the Wildlife and Countryside Act 1981 (as amended).





4.6 All UK **bat** species are protected against disturbance, harm and loss of / damage / obstruction of roosts under the Conservation of Habitats and Species Regulations 2017 (as amended) and by the Wildlife and Countryside Act 1981 (as amended).

**Table 1: Identified risks to ecological features**

Ecological Feature	Identified Risks	Avoidance / Mitigation
<p><b>River Fynn corridor</b></p> <p><b>Water voles &amp; otters</b></p>	<p>Direct harm from moving machinery. Direct harm via chemical and sediment run-off. Indirect disturbance via noise and dust.</p>	<p>Fencing of river corridor with heras fencing and warning signs to prevent machinery access.</p> <p>Storage of fuel, oil and chemicals away from river corridor and in a designated bunded area. Re-fuelling to take place in this area only.</p> <p>Washing of machinery, cement mixers etc in bunded area only.</p>
<p><b>Nesting birds</b></p>	<p>Direct harm and / or disturbance from all building conversion works and scrub removal. Indirect disturbance via noise and dust</p>	<p>Appropriate timing of work or pre-clearance / building checks</p>
<p><b>Reptiles</b></p>	<p>Direct harm from moving machinery, strimming, scrub / debris removal and topsoil removal. Direct harm from storage / dumping of materials and from machinery movement across offsite grassland. Indirect harm via entrapment within trenches and foundations etc. Direct harm via contact with chemical substances such as wet cement</p>	<p>Maintenance of vegetation across the site at heights of 10cm or less via regular cutting to discourage reptiles from colonising the site</p>
<p><b>Hedgehogs</b></p>	<p>Direct harm via contact with chemical substances such as wet cement</p> <p>Disturbance when sheltering</p> <p>Disturbance from artificial lighting</p>	<p>Covering of wet cement overnight</p> <p>Store materials off ground on raised pallets. Cut brambles to 150mm &amp; check for hedgehogs at ground level before completing scrub removal</p> <p>No night time working</p>
<p><b>Foraging / commuting bats</b></p>	<p>Disturbance from artificial lighting</p>	<p>No night time working</p>



## Risk Areas

- 4.7 Three distinct risk zones were recorded on site (as shown in Fig. 2, below), with each area identified as having different risks.

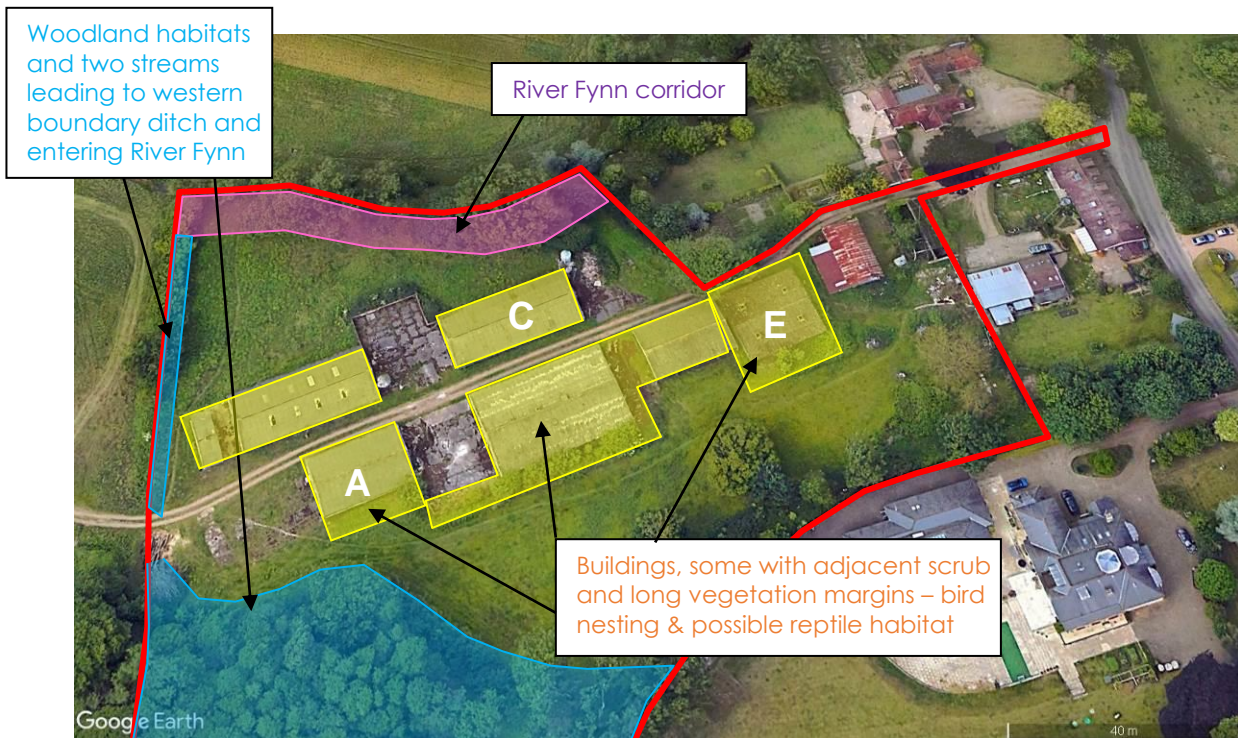


Figure 2: Identified risk zones with respect to priority habitats and protected species. Aerial sourced from Google Earth Pro

## WORKING MEASURES

- 4.8 The measures required on site to avoid an offence under the relevant legislation are detailed below and overleaf.

### River Fynn corridor / water voles / otters

- 4.9 Heras fencing panels with informative warning signs detailing the purpose of the fencing will be erected in a continuous line across the northern construction zone boundary (see Figure 3, overleaf) to create an exclusion zone. Heras fencing panels will also run across the edge of the woodland and streams in the south western corner of the site, to prevent access and damage to both trees and the streams which lead into the River Fynn.
- 4.10 No worker or machinery will enter these exclusion areas without prior agreement from the ecologist. The heras panels will be supported with scaffolding props or similar to prevent the fencing being moved or knocked over. Where necessary, dust suppressant sheets will be fixed to the fencing to minimise dust settling on vegetation within the exclusion zone, and in periods of very dry weather bare ground will be damped down to reduce levels of dust produced on site.



- 4.11 Cement, fuel and other potentially harmful spillable products will be stored in one of the two existing bunded concrete pads only (see Figures 3 and 4, below), well away from the river. Fuels and oils will be used in association with appropriately sized drip trays to prevent any accidental spillages or leaks reaching the river.
- 4.12 Washing of concrete mixers or similar will take place on one of the two existing bunded concrete pads only.
- 4.13 No fires will take place on site.
- 4.14 Piles of soil or sand, particles of which are easily washed away during heavy rainfall, will either be stored on the southern side of the central access track only, well away from the river corridor, or in skips / containers to prevent runoff towards and into the river.

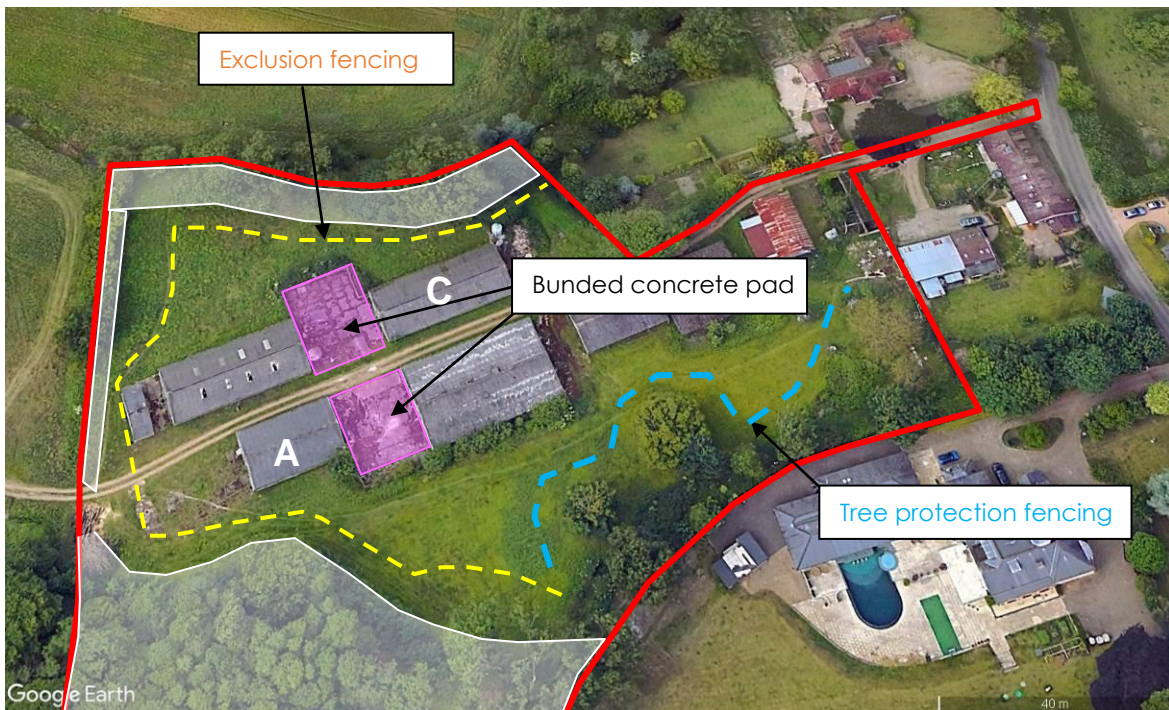


Figure 3: Locations of heras panel exclusion fencing, shown dashed yellow. Tree protection fencing shown dashed blue. Note that the path of the exclusion fencing allows for continued access to the western public footpath. Aerial sourced from Google Earth Pro



Figure 4: Existing concrete bunded area immediately west of Building C



### Nesting Birds

- 4.15 All of the buildings provide potential nesting habitat for birds, and small stands of scrub / self-sown saplings are present immediately to the rear (south) of Buildings A and E. Works to all buildings and removal of this woody vegetation clearance works will be:
- 1) carried out during September to February inclusive to avoid the bird nesting season
- OR
- 2) carried out only following confirmation in writing from an ecologist that the buildings and vegetation to be removed are not being used by nesting birds. In the event of nesting bird presence, works to the relevant areas will be delayed until the young have left the nest. This will be regularly reviewed and confirmed in writing by an ecologist.
- 4.16 There are no trees present within the construction zone. Where not already part of an exclusion zone, trees outside of the construction zone will be surrounded by heras panels supported by scaffold poles to prevent damage to the trees or compaction of root zones by use or storage of machinery.

### Commuting / Foraging Bats

- 4.17 There will be no site works at night, to avoid artificial illumination of the site.

### Reptiles

- 4.18 Grassland across the site has been maintained at a height of c.10cm or less, and this will continue via regularly cutting as often as is necessary.
- 4.19 As a precaution, clearance of the narrow margins of taller ruderal vegetation around the bunded concrete pads and around the buildings will be carried out using hand tools only. Vegetation will be strimmed to 150mm height, and at least two hours later strimmed to ground level. Such works will take place only between April and mid-October during suitable weather conditions i.e. dry, bright, with temperatures of 10°C or more.

### Hedgehogs

- 4.20 The small areas of scrub to the rear of buildings A and C will be cut to heights of 150mm, followed by a check at ground level for sheltering hedgehogs before the remainder of the scrub is removed. Dense scrub clearance will take place between April and October inclusive only, to avoid disturbance to hibernating hedgehogs.
- 4.21 Trenches or similar deep excavations will be covered at night, or left overnight with egress boards / sloping exits to prevent wildlife becoming trapped.
- 4.22 There will be no site works at night, to avoid artificial illumination of the site.



## 5.0 IMPLEMENTATION

- 5.1 The Site Manager / Principal Contractor will be responsible for ensuring that all works are undertaken in accordance with this CEMP. The current owner, Mr Blundell is responsible for employing the contractors and arranging initial communications between the contractors and the ecologist, Liz Lord.
- 5.2 Prior to the commencement of works on site, the Site Manager / Principle Contractor and site team will receive a briefing by Liz Lord or appointed representative, which will cover all of the ecology issues contained within this CEMP.
- 5.3 A copy of this CEMP will be kept in the site office at all times and be available to all site workers.
- 5.4 The Site Manager / Principle Contractor will be responsible for relaying all relevant information to future contractors and subcontractors on site.
- 5.5 The Site Manager / Principle Contractor will be responsible for ensuring that a suitably experienced ecologist is aware of the timings of works and that the ecologist is called to attend site and supervise works or carry out checks in accordance with this CEMP.
- 5.6 Liz Lord, a suitably qualified and experienced ecologist, will be employed as an Ecological Clerk of Works (ECoW) as required to achieve and monitor the measures detailed above.
- 5.7 In the event that reptiles, nesting birds, bats or any other protected species are found unexpectedly on site at any time, all works in that area will cease until the ECoW has been contacted and has provided further advice.
- 5.8 Table 2, overleaf, provides a summary of work timings, responsibility for implementation and details whether ecologist supervision is required.



**Table 2: Work timing, supervision and responsibilities**

Ecological Feature	Work Timing	Ecologist Supervision	Responsibilities
<b>River Fynn, water voles and otters</b>	All year – exclusion fencing to be in place for duration of development  Appropriate fuel / cement / chemical / sand / soil storage to be adhered to for duration of development	No, however check / confirmation required that fencing is in place <b>prior to commencement of works</b>	Site manager
<b>Reptiles</b>	Year round – vegetation to be maintained at <10cm height from now until completion of development	No, checks immediately <b>prior to commencement of works</b> only	Site manager
	Removal of longer vegetation margins via strimming – <b>April to mid-October only</b>	No	Site manager
<b>Nesting birds</b>	Woody vegetation clearance and initial works to buildings <b>September to February only OR following check by an ecologist</b>	No, following confirmation of nesting bird absence	Site manager Ecologist (March to August)
<b>Foraging / commuting bats</b>	N/A – no night time working on site	No	Site manager
<b>Hedgehogs</b>	Year round – covering of open excavations overnight or provision of exit ramps	No	Site manager
	Staged clearance / checks of scrubby margins – <b>April to October inclusive only</b>	Yes	Site manager / ecologist



**Appendix 1:**  
**2023 Site Photographs**





Photo 1: Building A - eastern gable end



Photo 2: Building A – western gable end, with surrounding grassland and patchy hard standing



Photo 3: Building A – internal view



Photo 4: Building A – northern façade



Photo 5: Building C – south eastern facades



Photo 6: Building C – north eastern facades







Photo 7: Building C – internal view



Photo 8: Scrub and trees to east of Building C, outside of construction zone



Photo 9: Building E – south western facades, with adjacent open sided barn



Photo 10: Building E – eastern façade, with bramble scrub growing alongside building



Photo 11: Building E – vegetation to west of building and beneath adjacent barn



Photo 12: Building E – internal view





Liz Lord Ecology

