

Brighton Marina to River Adur FCERM Detailed CEMP Stage 1 Area 2A

Draft Report

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**Brighton & Hove
City Council**

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Abbreviations

ADC	Adur District Council
BPM	Best Practicable Means
BHCC	Brighton Hove City Council
CEMP	Construction Environmental Management Plan
FCERM	Flood and Coastal Erosion Risk Management
GPP	Guidance for Pollution Prevention
HGV	Heavy Goods Vehicle
INNS	Invasive Non-Native Species
JBA	JBA Consulting
LWS	Local Wildlife Site
PPE	Personal Protective Equipment
SMP	Shoreline Management Plan
WTN	Waste Transfer Note

1 Introduction

1.1 Background

This Detailed Construction Environmental Management Plan (CEMP) has been prepared to support Stage 1 of the proposed works within Area 2A along the Shoreham Frontage as part of the Brighton Marina to River Adur Flood and Coastal Erosion Risk Management Strategy (FCERM).

Stage 1 of the works comprises construction of the handrailing and bike stand to the western extent of area 2A. Future stages of the proposed works within area 2A will comprise the installation of a new rock armour revetment, footpath and access steps, for which an additional CEMP will be produced.

The site is located within Adur District Council, and planning permission has been granted for the full Area 2A scheme, refer AWDM/1363/24.

A marine licence has been granted by the Marine Management Organisation for the Area 2 Shoreham frontage scheme, refer MLA/2024/00584 and L/2025/00056/1. However, the Stage 1 works are situated above mean high water therefore do not fall within the jurisdiction of the MMO.

This Detailed CEMP addresses the environmental constraints and mitigation measures related to the construction works for Stage 1 of the Area 2 proposed works under the Brighton Marina to River Adur FCERM.

The CEMP aims to ensure that construction activities cause minimum disruption to local residents and members of the public by supporting a safe and secure working environment. It aims to ensure compliance with any relevant legislation, government and industry standards and planning policy, along with ensuring that relevant mitigation measures set out in technical reports submitted alongside the planning application are implemented during all construction activities.

This CEMP includes the following:

- Description of the site location
- Description of the proposed scheme
- Description of construction works
- A description of the potential environmental impacts and required measures for avoiding or minimising these impacts

1.2 Planning permission

Planning permission has been granted for the full Area 2A scheme, refer AWDM/1363/24. This detailed CEMP is provided to satisfy Condition 3, as follows:

No development shall take place, including any works of demolition, until a Construction Management Plan has been submitted to and approved in writing by the Local Planning Authority. Thereafter the approved Plan shall be implemented and adhered to throughout the entire construction period. The Plan shall provide details as appropriate but not necessarily be restricted to the following matters:

- *the anticipated number, frequency and types of vehicles used during construction;*
- *the method of access and routing of vehicles during construction;*
- *the parking of vehicles by site operatives and visitors;*
- *the loading and unloading of plant, materials and waste;*
- *the storage of plant and materials used in construction of the development;*
- *the erection and maintenance of security hoarding;*

- *the provision of wheel washing facilities and other works required to mitigate the impact of construction upon the public highway (including the provision of temporary Traffic Regulation Orders);*
- *details of public engagement both prior to and during construction works.*

Reason: In the interests of highway safety and the amenities of the area having regard to policies 15, 28 and 34 of the Adur Local Plan.

2 The Proposed Development and Site Context

2.1 Site Location



Figure 1 Area 2A Site Location (extract from Magic maps)



Figure 2 Area 2A Works Layout Sketch showing easternmost enclosure. The fenced enclosure will progress westward as the works proceed.

2.2 Overview of Proposed Development

The open coast frontage between the River Adur and Brighton Marina is at risk of flooding from wave overtopping. There are significant erosive forces at the Shoreham end of the frontage. There is a natural drift of sediment along the South coast, Brighton included, from west to east. The supply of natural sediment drift material to the western beaches of the study area (Shoreham frontage) is impeded by the mouth of the River Adur and associated training walls. Limited sediment supply, coupled with wave action, has resulted in significant erosive forces at the western end of the frontage. As a result, the residual life of the existing defences is inadequate. The open coast frontage is also at risk of flooding from wave overtopping due to a combination of significant variations in defence heights and beach widths, poor maintenance, and deterioration of defence assets. The Brighton Marina to River Adur FCERM therefore aims to manage risks associated with flooding and coastal erosion through the implementation of coastal defences to achieve a consistent standard of protection along the frontage.

The current defences offer some protection, but due to the rate of erosion will reduce in effectiveness over time. Therefore, the purpose of the proposed scheme is to protect the current defences by slowing the rates of erosion on the beach material.

The proposed Stage 1 works comprise the installation of handrails and a bike stand and will comprise the following.

Handrails

- Installation of Key Klamp handrailing along the existing sea-wall concrete capping beam.
 - The handrail posts are to be fixed by drilling into the capping beam and securing with appropriate bolt fixings.
 - In areas where the handrail crosses made ground and no concrete wall is present, the Key Klamp posts are to be installed in new concrete footings. This will involve excavating localised holes, positioning the handrail bases, and casting them into concrete to provide a stable footing.

Bike Stands

- Removal of the existing earth/shingle bund to create a level platform for installation of the new bike stands.
 - Excavated material is to be reused on-site by spreading the shingle immediately to the south on the existing bund, under supervision and guidance of the Environmental Clerk of Works.
- Installation of new bike stands by casting the bases into concrete footings.

- Once set, the self-binding gravel surface is to be laid over and finished flush around the installed stands. The resurfaced area is to be neatly edged with flat-top edging stones or kerbs to retain the gravel and provide a clean boundary.

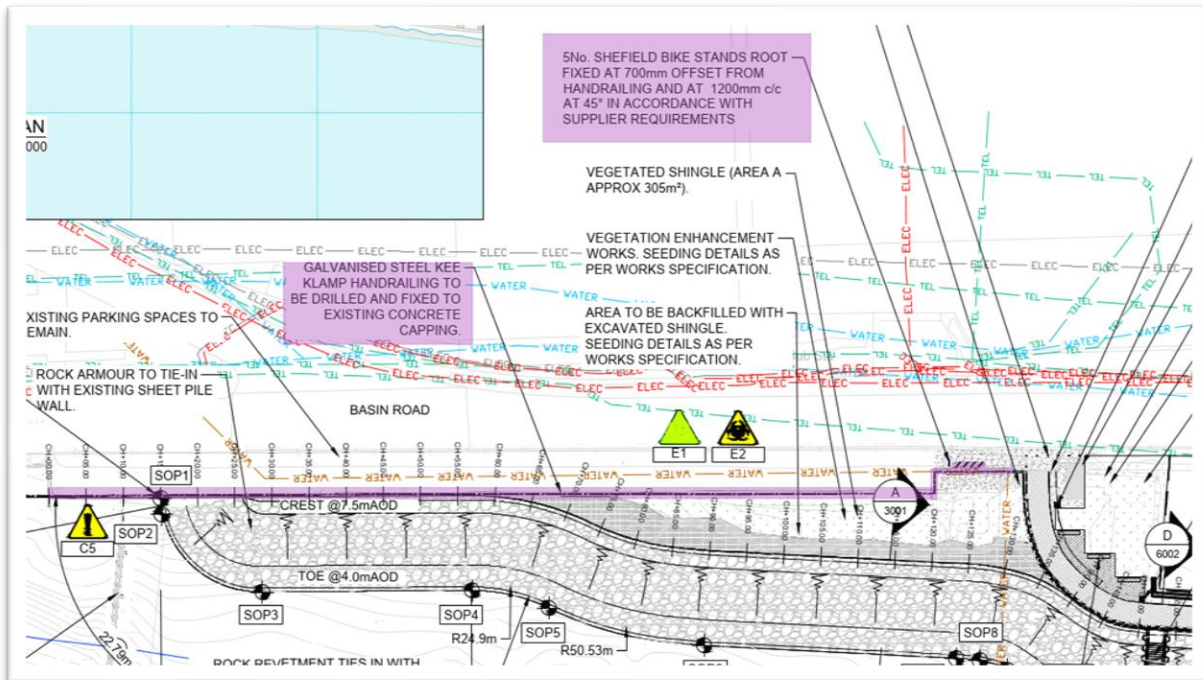


Figure 3: Area 2A works to install Key Klamp handrailing and Sheffield bike stands, as highlighted. Refer to DWG "BHCC-JBA-00-02-DR-C-2001-A4-C01-Area_2A_General_Arrangement_Sht_1_of_3".

3 Construction Programme and Activities

3.1 Construction Programme

The construction works on site will last 2-3 weeks and will be completed within April and May – subject to permission to proceed from Shoreham Port and Brighton and Hove City Council.

3.2 Construction activities

3.2.1 Parking closure

Van Oord will arrange with Shoreham Port Authority to close an approximate 30m stretch of the car parking bays south of Basin Road South. The closure will start at the eastern end and progress westward as the works proceed. This keeps the majority of parking bays open at any one time.

3.2.2 Mobilise to site

A hiab lorry will transport a small towable welfare unit / office, a 5t excavator and fencing to the site and unload. It will use its crane arm to move aside the large concrete blocks currently on the bike stand area. Operatives will arrive in a van.

3.2.3 Establish the working area

Operatives will set out Heras fencing around the 30m working area, safely segregating the works from the public.

3.2.4 Install bike stands

The 5t excavator will clear shingle beneath the bike stand footprint. As this is vegetated shingle, it will dig plants and material carefully and place them on the adjacent beach where the plants may survive.

The excavator will then excavate / break out any existing hard standard to the formation level (likely 300mm depth). This material will be removed from site as waste. The new bike stand bases will be cast in concrete, poured from a mini-mixer. Once sufficiently cured, the new formation around the bike stands will be placed and compacted, then topped with the self-binding gravel.

3.2.5 Installing handrails

Whilst the bike stand is being constructed, a separate gang will drill and fix the handrail to the existing concrete upstand wall. They will use hand tools to drill the fixings and will lift rail sections by hand.

Once a 30m stretch of handrail has been installed, the fenced enclosure will be moved to the next 30m section and so on until the entire length of handrail is complete.

3.3 Construction Traffic

Construction traffic will consist of:

- A hiab lorry to transport construction equipment and fencing to the site. 4 trips (2 to mobilise + 2 to demobilise).
- A works van to transport operatives. Daily transport to site.
- A site supervisors car. Daily site transport to site.
- A mini-mixer concrete lorry to pour the bike stand base. Single visit.

- Delivery vehicles (likely vans) to transport materials and handrail to site. 1 per day.

All vehicles will access via the Basin Road South and be banked into / out of site by a Traffic Marshall. It is not expected that this will interrupt normal traffic along the road.

Van Oord's team will park within the fenced compound. Any additional visitors will use the paid parking adjacent to the works area.

The concrete delivery and other material deliveries will be banked into the fenced working area and will pour / be unloaded.

3.4 Materials storage

There will be very limited materials stored on site. The materials for the bike stands (sub-base stone, self-compacting gravel and concrete) will be placed on the same day as delivery.

Handrailing and bike stands will be delivered daily from Van Oord's main compound on Hove seafront.

Petrol for the drills and chemical fixing for the bolts will be stored in a bunded section inside the works van and will return to Van Oord's main compound on Hove seafront.

3.5 Site security

As stated above, the site will be surrounded with full height Heras fencing. The gate will be locked when not in use. Van Oord will place intruder alarms within the fenced area which will warn anybody trying to access the site out of hours and will call a mobile security guard who will attend.

3.6 Wheel wash and impacts on Basin Road South

It is not expected that the works will interrupt normal traffic on Basin Road South. All works will be accessed from the parking bays which will need to be closed with agreement from Shoreham Port. As the works will be almost entirely on hard standing, a wheel wash is not required. Any debris created that does spread onto the carriageway will be swept clear by Operatives when it is safe to do so.

3.7 Public engagement during works

Van Oord will coordinate with Shoreham Port Authority to place notices of upcoming parking closure. They will also produce a site noticeboard to fix to fencing and supply information for social media posts about the works. Operatives on site will be briefed on project details from Brighton and Hove City Council and if asked by the public, will explain the works.

4 Environmental Management and Mitigation Measures

This detailed CEMP has been completed for the proposed development in collaboration with the appointed contractor, Van Oord / Mackley, who will adopt the plan prior to the commencement of the works.

Along with published guidance documents, the CEMP outlines specific practices and policies which have been identified as relevant for this project. Potential environmental impacts have been identified through several environmental assessment reports produced to support the planning application for the proposed development. A range of 'standard' or best practice mitigation and construction management measures were accounted for in the environmental assessment reports, and it is assumed that these will be implemented during construction of the Proposed Development.

The appointed contractor will also be responsible for working in accordance with the environmental controls documented in the CEMP.

The following sections of this detailed CEMP describe the general mitigation and management measures to be included in the CEMP as a minimum to ensure the protection of the environment from potential adverse effects from the proposed development.

3.1 Noise and Vibration

The installation of the handrailing and bike stand will likely result in temporary increases in noise and vibration in the area immediately surrounding the site. It is possible that surrounding receptors will experience audible, but intermittent, noise from activities on the site including HGV movements. However, this should be considered against the existing baseline noise influenced by industrial activities in the adjacent Shoreham Port.

To ensure the impacts are minimised, best practicable means (BPM) will be applied during construction works to minimise noise and vibration at sensitive receptors. BPM are defined in Section 72 of the Control of Pollution Act 1974 and Section 79 of the Environmental Protection Act 1990 as those measures which are "reasonably practicable having regard among other things to local conditions and circumstances, to the current state of technical knowledge and financial implications." the following measures will be put in place by the contractor to minimise noise and vibration during construction.

- Machinery and equipment will be regularly inspected to ensure it is within normal working order and meets manufacturers standards. Any associated noise attenuation measures, such as exhaust silencers, shall remain fitted at all times.
- Work will only be carried out during agreed working hours
- Plant and machinery will be turned off when not in use.
- Construction staff will be informed about the need to minimise noise as well as about the health hazards of exposure to excessive noise.
- Construction staff will not use loud equipment for an unnecessary period of time.
- Prior to particularly loud periods of work starting, notice will be given out to neighbouring residents and business owners.
- Recording process for any noise complaints and reporting to the contractor for immediate investigation.

3.2 Air Quality and Dust

Air quality is expected to be impacted during the construction phase with the generation of fumes from machinery as well as airborne dust particulates. The appointed contractor will aim to control and limit dust, air quality, odour and exhaust emissions during construction works as far as reasonably practicable using the following mitigation measures.

- All equipment and machinery will be inspected regularly to ensure conditions fall in line with relevant standards.
- Machinery and equipment will not be used unnecessarily or outside of agreed working hours.
- Ensure all vehicles switch off engines when stationary – no idling vehicles.
- Storage of sand and any aggregates in bunded areas.
- Covering any vehicles leaving the site carrying waste.

3.3 Visual impact

The beachscape is expected to be negatively impacted during the construction phase as barriers, vehicles and machinery are put into action. The finished Stage 1 development is not expected to significantly impact visual amenity of the beachscape as it will form a minor change to the existing car parking area. Appropriate controls will be put in place to protect nearby visual receptors, namely residents, commercial receptors and users of local roads and paths. These include:

- Use of screens where topographical barriers are not available or applicable during the construction phase.
- Eradication of visual scars from the construction phase, such as infilling pits.
- Careful maintenance of equipment and rigid adherence to a pre-determined risk assessment during the construction phase to avoid potentially visually harmful practices such as spills and accidents with large machinery.
- Hours of construction activity will be restricted in accordance with guidance from Brighton and Hove City Council and Adur District Council.

4.1 Ecology

An investigation into the baseline of the surrounding ecology identified that there were potentially vulnerable receptors that the scheme should consider mitigation for, namely:

- Vegetated shingle habitat supporting Buck's-horn Plantain *Plantago coronopus*, Ribbed Melilot *Melilotus officinalis*, Sea Couch *Elymus athericus* and Yellow Horned-poppy *Glaucium flavum* located on the mound proposed for the bike stand within Area 2A.
- Protected species recorded mainly included different bird species such as Herring Gull *Larus argentatus*, Great Black-backed Gull *Larus marinus*, Black-headed Gull *Chroicocephalus ridibundus* and Turnstone *Arenaria interpres*. These species were likely using the foreshore and beach crests for foraging, but unlikely to have been breeding in the vicinity.

A small area (55.5m²) of coastal vegetated shingle is proposed to be translocated, to facilitate the bike stand area. This mound should be stripped of the top 15cm of soil/shingle, which should be stockpiled to one side. The material underneath should then be moved to the area immediately south of the proposed bike stand area and piled. The stripped topsoil/shingle should then be spread on top of the pile. By taking this approach, the seedbank has a chance to re-establish in the new mound area.

The contractor will ensure that all activities associated with the construction that may have a negative impact on ecology (i.e. through direct impacts on habitats or species, or through exposure to pollutants, dust and noise) will be monitored and appropriate mitigation measures implemented to reduce the impact to acceptable levels. As outlined in the Ecological Impact Assessment which accompanies the planning application, mitigation measures will be implemented including:

- Implementing good construction practice throughout the works to reduce the risk of dust and a pollution incident. Working practice guidance to be followed includes, but is not limited to topics covered as Guidance for Pollution Prevention (GPPs) - <http://www.netregs.org.uk/environmental-topics/pollution-prevention-guidelines-ppgs-and-replacement-series/guidance-for-pollution-prevention-gpps-full-list/>.
- Equipment to be washed and cleaned after every use, implementing the check, clean dry approach.
- Cleaning areas will be designated at all site egress points for plant and machinery. The cleaning area will be covered in a heavy-duty impermeable sheet. All PPE, machinery and tools used to carry out the works will be cleaned thoroughly with stiff-haired brushes in a designated area following completion of control measures.
- Equipment and machinery to be stored on site.
- It should be ensured that no bird nests are present on site before works commence, by undertaking a pre-works nesting bird check. Should any nests be identified, they are to be safeguarded until the chicks have fledged to ensure that there are no direct impacts upon nesting birds. In this instance, it is entirely possible that Ringed Plover nests could be present on areas of bare shingle.
- Any vegetation clearance of dense scrub required to facilitate the works should be undertaken between November and February, where possible. If vegetation clearance is required during the breeding bird season, generally taken to be March to September (e.g. specifically for areas of dense scrub, an ecologist should be present on site to supervise). If any nests are found, no removal will take place until young have successfully fledged. In this instance, no areas of dense scrub suitable for breeding birds is proposed to be removed.
- Where works are undertaken during the winter period, a pre-works check for any roosting/feeding waders for species such as Turnstone and Ringed Plover on the foreshore will be undertaken. If any birds are present, then they will be allowed to rest/feed before works commence.
- Fencing will be erected around all other stands of existing retained coastal vegetated shingle, to protect against damage of this habitat type during construction. Storage of all materials, parking of vehicles and any compound areas are to be restricted to existing areas of hardstanding. Pollution prevention measures will be implemented during construction to mitigate against damage to designated sites and habitats from pollution events.
- Any material accidentally contaminated during the works by potentially polluting substances such as fuels and oils should be removed from site to an appropriate licenced facility for disposal.
- Locating any chemical, fuel and oil stores on impervious bases within a secured bund with a storage capacity 110% of the stored volume.
- Using biodegradable oils and fuels where possible.
- Placing drip trays underneath any standing machinery to prevent pollution by oil/fuel leaks. Refuelling of vehicles and machinery will be carried out on an impermeable surface in one designated area well away from any watercourse or drainage (at least 10m).
- Operators will check their vehicles on a daily basis before starting work to confirm the absence of leakages. Any leakages will be reported immediately.
- Dust particles to be managed by dampening down works areas, to prevent spread of dust particles into designated sites.
- A pre-construction check of worksite in areas where INNS are potentially present.

- In the event of INNS being newly recorded within the works or access footprints, invasive species (including INNS associated with Intertidal habitats) will be demarcated and signage erected to ensure no accidental intrusion – exclusion zone to be a minimum of 7m. No tools or materials will be stored on top of or within 10m of areas of INNS.
- Cleaning areas will be designated at all site egress points for plant and machinery. The cleaning area will be covered in a heavy-duty impermeable sheet. All PPE, machinery and tools used to carry out the works will be cleaned thoroughly with stiff-haired brushes in a designated area following completion of control measures.
- Boot washes will be set up at all entry and exit points to the work site and should be used at all sites where invasive species have been identified.
- Where contaminated material will be removed from site this material will be placed in designated skips. Skips will be stored in a restricted area as close to the source of excavated material as possible to avoid contaminating uninfected areas onsite. The skip or trailer used will have a lining and will be covered with a membrane to avoid contamination during transport. The waste to be disposed of offsite will be accompanied by a Waste Transfer Note (WTN), which will also list any material that contains invasive non-native plants or their seeds.
- Biosecurity measures to avoid the introduction, movement and spread of invasive non-native species on and off the site, including cleaning vehicles, footwear, clothing and plant before entering site (use the check, clean, dry approach) and on leaving site.
- Prior to the works commencing a toolbox talk will be given highlighting the potential for American Slipper Limpet *Crepidula fornicata*, New Zealand Flatworm *Arthurdendyus triangulatus*, Australian Flatworm *Australoplana sanguinea* and Wireweed *Sargassum muticum* to be present on site during the construction phase of the works. If any of these four species are found during construction within the works area, they will be removed to prevent the spread of these species in the wild.

4.2 Archaeology

An initial investigation into the archaeological receptors at risk did not identify any potentially vulnerable receptors in the area. If, however a receptor was subsequently identified, mitigation measures would include:

- Preservation of archaeological remains in situ.
- Works are halted while archaeological finds are handed over to an investigation team to decide their level of significance. Following a decision, the find could be excavated or dismissed, upon doing so, works can continue.

4.3 Water Resources and Flood Risk

An initial flood risk assessment has identified that the Portslade and Southwick Beach area have previously been under significant risk of flooding from the sea and have since been protected by the erection of flood defences, therefore the main risk is residual risk of overtopping. However, as climate change and erosion rates increase so will the likelihood of overtopping.

The risk of surface water, sewer, groundwater, and reservoir flooding was deemed to be either low or low to moderate. The contractor will take precautions during construction activities to protect the local drainage system, nearby watercourses and groundwater from siltation or pollution. As the surrounding areas are already largely covered by impermeable surfaces the addition of the permeable rock revetments will do little to affect the drainage system with the

FRA stating the proposed development is 'water compatible' and therefore extremely unlikely to increase the risk of flooding.

Construction methods are also unlikely to increase the risk of wave overtopping, however mitigation measures will be implemented, where applicable, to protect the water environment and surface water quality during all construction activities:

- Construction vehicle and plant will be regularly maintained and supplied with spill kits and drip trays.
- Refuelling should be undertaken offsite where possible.
- Cleaning areas will be designated at all site egress points for plant and machinery. The cleaning area will be covered in a heavy-duty impermeable sheet. All PPE, machinery and tools used to carry out the works will be cleaned thoroughly with stiff-haired brushes in a designated area following completion of control measures.
- A suitable waste management programme will be put in place by the contractor.
- An emergency response kit present on site throughout the duration of the construction works, with staff trained in their use.
- Removal of any material accidentally contaminated during the works by potentially polluting substances such as fuels and oils from site to an appropriate licenced facility for disposal.
- Locating any chemical, fuel and oil stores on impervious bases within a secured bund with a storage capacity 110% of the stored volume.
- Using biodegradable oils and fuels where possible.
- Temporary construction compounds and construction equipment should not be located in places that could block the current drainage infrastructure in case of surface runoff from wave overtopping.
- Project managers should be aware of the Environment Agency's flood warnings and acted on accordingly.
- Site staff are to be made aware of flood warnings as and when they are issued
- A flood response plan will be developed for the construction of the flood and coastal erosion defence development which will detail an evacuation plan for people equipment and compounds.

4.4 Ground Conditions, contamination, and hazardous material

All construction workers will be made aware of any potential contamination issues on site and will use best practice techniques during all activities.

The operation of construction vehicles and the handling, use and storage of hazardous materials will be undertaken following the outlined measures:

- Construction vehicle and plant will be regularly maintained and supplied with spill kits and drip trays
- Refuelling should be undertaken offsite where possible.
- Cleaning areas will be designated at all site egress points for plant and machinery. The cleaning area will be covered in a heavy-duty impermeable sheet. All PPE, machinery and tools used to carry out the works will be cleaned thoroughly with stiff-haired brushes in a designated area following completion of control measures.

- An emergency response kit present on site throughout the duration of the construction works, with staff trained in their use.
- Removal of any material accidentally contaminated during the works by potentially polluting substances such as fuels and oils from site to an appropriate licenced facility for disposal.
- Locating any chemical, fuel and oil stores on impervious bases within a secured bund with a storage capacity 110% of the stored volume.
- Using biodegradable oils and fuels where possible.
- The construction works will be carried out with the least feasible disturbance of soils, thereby minimising the amount of excavated soil. The inert excavated soil will be reused within the Proposed Development wherever possible.
- Where applicable, design measures will be put forward to minimise the excavation of soil that cannot be reused due to their mechanical properties or contamination
- Excess topsoil, inert soil, and all hazardous soil waste will be separately removed off site to an appropriately licenced facility by a licensed contractor.
- Non-hazardous waste exceeding inert Waste Acceptance Criteria (WAC) will be sent to a licensed non-hazardous landfill for disposal/recovery.
- Construction personnel will be required to wear appropriate Personnel Protection Equipment (PPE) and carry out protective measures when handling hazardous waste.
- All associated hazardous waste residuals will be stored within temporary bunded storage areas prior to removal by an appropriate management contractor for off-site treatment/recycling/disposal.

4.5 Waste Management Plan

Due to the nature of the construction works, very little waste is expected to be generated.

The likely waste streams arising from the construction works required for the scheme will be considered and managed. In accordance with the waste hierarchy, waste minimisation, management and use of recycled materials will be considered through the design development and construction approach.

It is recommended that the contractor should implement environmental good practice on site which should include production of a Site Waste Management Plan, and particular attention should be given to the waste hierarchy. All waste to be removed from site will be undertaken by fully licensed waste carriers and taken to licensed waste facilities.

5 Auditing, Monitoring and Review

To meet the requirement of the CEMP, environmental monitoring of the project and its impacts will be undertaken throughout the construction phase.

The contractor will ensure that scheduled environmental monitoring is undertaken. This will enable the overall effectiveness of the environmental mitigation measures and compliance procedures to be assessed and allow any areas of noncompliance to be identified so that corrective actions can be taken.

These checks will include (but not be limited to):

- confirmation that fuel is stored appropriately
- that management rules are adhered to
- all environmental buffers are maintained
- sediment and erosion control measures of the surface water management plan are in place and functioning
- All environmental records, including completed checklists, will be retained at the site office

In addition to routine inspections, event-based checks will be undertaken by the contractor following a significant event, such as a storm or heavy rainfall.

All incidents (included near misses) should be reported

The CEMP will be updated as necessary throughout the construction period.