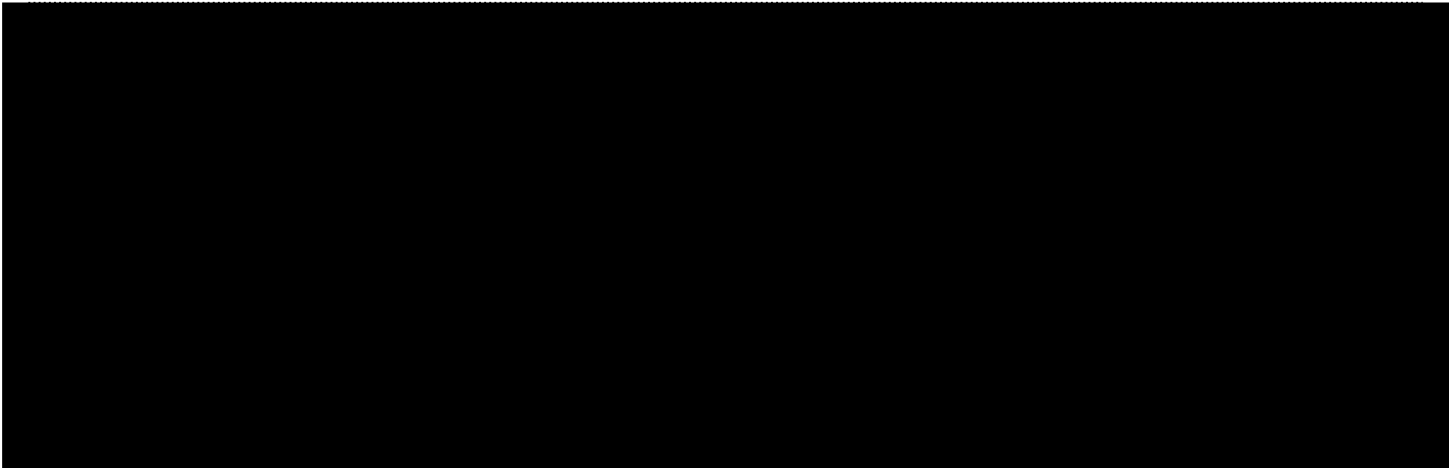



From: Colin Giddings
Sent: 25 July 2018 14:03
To: Anita Gardner
Subject: LU/191/18/DOC

Hi Anita,

I've had a quick look at the conditions discharge documents which relate to EH/Site Licensing and would comment as follows:

Condition 5 –CMP

in order for the site to become a residential mobile home park some hard-standings for the mobile homes will be required. The original application specified pitches 9.5m x 16.5m, which would take, as an absolute minimum, 16cubic metres of concrete, plus hard-core, etc. The CMP described seems to look only at the office building phase.

Although the potential for noise and dust nuisance can be dealt with under Environmental Protection Act powers it would be best if the CMP follows the example attached, or other locally approved plan.

Condition 6 – Lighting

When operating as a residential mobile home park the site's licence will contain specific conditions based on the current Model Standards. The standard for lighting states: *Roads, communal footpaths and pavements shall be adequately lit between dusk and dawn to allow the safe movement of pedestrians and vehicles around the site during the hours of darkness.*

The guidance accompanying the Standards states: *The lighting provided for communal paths and roads should be adequate to allow safe movement around the site during the hours of darkness. Many sites use low lighters rather than traditional street lamps and these work well as long as they are well maintained and plants/vegetation are not*

allowed to grow around them and stop them emitting light effectively. The lighting must be fit for purpose i.e. to allow vehicles and pedestrians to navigate around the site between dusk and dawn

The proposed scheme using luminaires that are solar powered and just 170mm high is unlikely to meet these criteria, especially outside of the summer. If the Condition is discharged by allowing the proposal there will need to be supplemental lighting installed to meet the licence conditions. It would be better if the accepted scheme meets the future licence conditions.

Condition 8 – Cycle Store

There is mention of a plan for the proposed wooden structure but I have not had sight of this. The site will need to comply with spacing and safety standards when in operation. Without details of the proposed structure I cannot comment further.

Condition 9 – Sewage Treatment

There is insufficient detail to comment on the proposal. A Bio Pure unit will be satisfactory in principle but details of the model proposed are required in order to determine whether there is sufficient capacity for an office plus eight, two-bedroomed units.

Do let me know if any queries,

kind regards, Colin

Normally working Thursdays, Fridays and alternate Wednesdays

Colin Giddings | Sr. Environmental Health Officer, [Arun District Council](#) | Location: Third Floor, Arun Civic Centre, Maltravers Road, Littlehampton, BN17 5LF

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Construction Code of Practice

For small developments



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1. Introduction

This code is intended to give guidance to contractors on the measures that Arun District Council expects them to take to minimise the environmental impacts of their work on the local community. The term 'contractor' applies to all contractors and sub contractors engaged in construction, demolition or building-related repairs and associated activities. This code may also be used by the Planning Service when considering whether contractors are complying with the National Planning Policy Framework (NPPF) and the National Planning Practice Guidance (NPPG).

The Council has specific powers under the Control of Pollution Act 1974 and the Environmental Protection Act 1990 to deal with noise and environmental nuisance. The expectation under the legislation is that 'best practicable means' (BPM) will be used to prevent nuisance occurring. The Council requires all contractors to apply BPM to their work programme and techniques, irrespective of the size of the demolition/construction work being undertaken.

Adherence to this code will demonstrate a commitment to BPM and will subsequently minimise the environmental disturbance to local residents, reducing the need for enforcement action. You may contact the Environmental Health Service to discuss this Construction Code of Practice, by telephone on 01903737500 or email at pollution@arun.gov.uk

2. General Principles

2.1. Hours of Work

Where residential occupiers are likely to be affected by noise, the hours of work will normally be restricted to:

Monday to Friday:	08:00am – 18:00pm
Saturday:	08:00am – 13:00pm
Sunday and Public Holidays:	No work where noise is audible at the site boundary

All vehicles and plant arriving to, and leaving the site will comply with the same restrictions on hours. The main contractor will be held responsible for ensuring that these instructions are given to all drivers, including those making deliveries.

The hours of work may be varied according to local circumstances. However, any works outside of these hours will require prior approval from the Environmental Health Service and/or Planning Service. It should also be noted that approval will only be granted under exceptional circumstances and will always be conditional on the contractor informing local residents in advance of the proposed activity.

2.2. Publicity

The Council considers that liaison with local residents who may be affected by construction works is essential. The local residents should be informed of the nature

of the works, proposed hours of work and their expected duration. Communication to local residents should always include the name and telephone number of a main contact. This contact person should be able to provide further information to any resident following an enquiry and have the ability to deal with any complaints or emergencies should they arise.

2.3. Operation

Where noise, dust and air pollution are likely to affect local residents the contractor will be held responsible for ensuring that:

- All plant and equipment, including any on hire, is checked to ensure it is in good working order and conforms to the manufacturers' standards.
- Equipment is properly silenced and meets statutory emission standards.
- Effective methods of work are adopted to prevent dust from becoming airborne at source.
- Before works commence, the site workforce are fully briefed on the need to keep all noise generated to a minimum. Shouting and raised voices are not permitted other than in cases where warnings of danger must be given. Radios are not played at a volume that is likely to cause disturbance to local residents.
- Hoardings are frequently inspected, repaired and repainted as necessary.
- Toilet and washing facilities are provided, kept clean and properly maintained.

2.4. Monitoring

Where local residents are likely to be affected, working methods that minimise noise, dust and air pollution impacts need to be used at all times. Measures included in this code are not exhaustive and additional measures can be used which will reduce environmental impacts further. The effectiveness of all measures shall be monitored frequently by the main contractor, reviewed at least weekly and may be subject to inspection by officers of Arun District Council.

3. Noise and Vibration

3.1. Plant and Equipment

- Noisy plant or equipment should be sited as far away as is practicable from sensitive buildings. The use of barriers, such as soil mounds, site huts, acoustic sheds or partitions to reduce the effects on noise sensitive areas, is to be employed wherever practicable.
- Wherever practicable all plant and equipment is to be powered by mains electricity in preference to locally powered sources such as diesel generators. Hand tools should also be electrically powered rather than petrol or diesel driven.
- Plant shall be maintained in good workmanlike condition so that extraneous noise from mechanical vibration, creaking and squeaking is kept to a minimum.
- Vehicles and mechanical plant used for the purpose of the works shall be fitted with effective exhaust silencers, maintained in good and efficient working order and operated to minimise noise emissions. The contractor will ensure that all plant complies with the relevant statutory and manufacturers' requirements.

- Care shall be taken when loading or unloading vehicles, dismantling scaffolding or moving materials, etc. to reduce impact noise.
- Machines in intermittent use should be shut down in the intervening periods, or throttled down to a minimum. Noise emitting equipment that is required to run continuously may have to be housed in suitable enclosures.
- Equipment which breaks concrete, brickwork or masonry by bending or by bursting shall be used in preference to percussive tools as far as practicable.
- The use of radios on site is a common source of complaint and while we have no desire to prohibit their use we would ask that care be taken to limit volume to a level where it does not cause disturbance to any residents nearby.

3.2. Piling

- In assessing the impact of any piling operations, the contractor will comply with the recommendations set out in the relevant current British Standard BS5228 Part 4 'Code of practice for noise and vibration control applicable to piling operations'.
- Where practicable pile driving shall be by jacking. The use of conventional impact hammers should, wherever possible, be avoided. Any pile driving is to be carried out by plant equipped with a recognised noise reducing system.
- In some circumstances the Council may specify when piling can occur.

3.3. Traffic movement

- Access to the site is to be located to ensure disturbance from vehicles entering or leaving the site is kept to a minimum so not to disrupt persons in nearby noise sensitive buildings.
- All vehicles will enter and exit the site in a forward direction except where space restrictions do not allow.
- Wherever practicable all loading and unloading of vehicles will take place on site.
- Vehicles that cannot immediately enter or leave the site must switch off their engines.
- The contractor will be responsible for all vehicles delivering to or exiting from the work site and shall comply with the time restrictions set out in 2.1.

4. Dust and Air Pollution

4.1. Dust

Watering down of the working area, where dust is being produced, should be carried out where necessary to minimise dust transfer into neighbouring premises. Stockpiles of material shall be damped down or otherwise suitably treated to prevent the emission of dust from the site. Stockpiles should be planned and sited to minimise the potential for dust generation. The handling of materials should be kept to a minimum and when deposited onto a stockpile it should be from the minimum possible height.

Dust pollution shall be minimised by:

- Screening, if practicable, of the building or structure to be demolished with debris screens or sheets.
- Controlling the cutting or grinding of materials on the site.
- Mixing large quantities of concrete or bentonite slurries in enclosed/shielded areas.
- Properly covering skips and removal vehicles when leaving the site. Materials should be handled in such a way so that they do not give rise to excessive dust. Watering of rubble chutes should be undertaken where necessary to prevent dust emission.
- Ensuring the area around the site, including the public highway, is regularly and adequately cleaned to prevent any accumulation of dust and dirt. The use of wheel cleaning facilities and road sweeping equipment may be required.
- Taking strict measures to minimise mud on the roads. This is regarded as one of the main environmental nuisance problems arising from construction sites. Arun District Council will expect the contractor to take strict measures to minimise the problem.

Contractors are reminded that plant used for the crushing of materials must be authorised by a local authority under the Environmental Protection Act 1990 Part 1 (Prescribed Processes). All works shall be carried out in accordance with the conditions of such an authorisation. Where plant is used to recycle materials, the appropriate licence from the Environment Agency shall be obtained. The process operator should notify the local authority prior to the movement of the plant on to the site.

4.2. Sandblasting

The work area will be close-sheeted to reduce dust nuisance from grit. Routine checking is required to ensure that the sheeting remains sound or sealed during the operation. Particular attention should also be given to the working platform to ensure that it is properly sheeted or sealed to contain dust.

Non-siliceous grit should be used to avoid long term irreversible lung damage from silica dust. Proper protection is required for any structure painted with lead based paint. In cases where water is used for large scale cleaning and blasting the requirements of the Environment Agency should be followed. All grit must be prevented from falling into water courses.

4.3. Air Pollution

It is illegal to burn most types of construction or demolition waste. The only exception is plant material and untreated wood, which can be burned under a D7 exemption, which must be registered with the Environment Agency. Burning of materials on the site will not be permitted unless under a D7 exemption registered with the Environment Agency. A D7 exemption does not prevent action being taken by the Police, Fire Service or Local Authority should the burning cause a hazard to health or a nuisance.

The contractor will take all necessary precautions to prevent the occurrence of smoke emissions or fumes from the site plant or stored fuel oils for safety reasons

and to prevent such emissions or fumes drifting into residential areas. In particular, plant should be well maintained and measures taken to ensure that it is shut down in the intervening periods between works or throttled down to a minimum.

The contractor is required to use processes that do not generate hazardous fumes and/or hazardous dust.

5. Lighting

Site lighting needs to be positioned and directed so as not to intrude unnecessarily on adjacent buildings and land uses. It must not cause distraction or confusion to passing drivers on adjoining public highways. Any floodlighting which is to be used, either for site security or for night working, should be designed or installed to minimise spillage of light out of the site. Lighting should be mains powered.

6. Asbestos

Contractors are reminded that special precautions will be required to be taken if materials containing asbestos are encountered. The contractor will comply with the Control of Asbestos at Work Regulations. The contractor will observe the exposure limits and measurement methods for asbestos that are set out in the most relevant and current Health and Safety Executive Guidance Notes. The contractor will consult with the Health and Safety Executive concerning precautions required when removing asbestos material. Please note that all asbestos removal **MUST** be carried out by Registered Contractors.

7. Contaminated Land

If during site works contamination is encountered on site, which has not previously been identified, no further development can take place until a site investigation has been carried out. The investigation will survey and assess the extent of contamination. Recommendations for remediation will be submitted to and approved in writing by the Council's Environmental Health Service before further works can proceed. The contractor is reminded to consult with the Health and Safety Executive when working on land which is contaminated.

8. Disposal of Waste

Rubbish will be removed at frequent intervals and the site kept clean and tidy. Fly-tipping will not be permitted and enforcement action, including financial penalty, can be considered by the Council under the Environmental Protection Act 1990. Offences dealt with at court may involve a financial penalty and/or imprisonment, orders for payment of clean-up, investigation and prosecution costs, and forfeiture of a vehicle used in the commission of an offence. Loads must only be deposited at authorised tips or into designated barges. Deposition shall be in accordance with the

requirements of the Environment Agency, the current Environmental Legislation and Special Waste Regulations. The escape of litter from site or skips which are not adequately secured, either onto neighbouring properties or the highway, can be a source of complaint. Any site litter should be stored securely and regular scavenges should be used to ensure that loose litter is cleared away.