

From: Kate Giddings

Sent: 09 September 2019 13:28

To: Anita Gardner <Anita.Gardner@arun.gov.uk>

Cc: Planning.Responses <Planning.Responses@arun.gov.uk>

Subject: LU/248/19/DOC - Land at Toddington Farm, north and west of 1-3 Toddington Lane, Wick, BN17 7PP

Dear Anita,

In relation to the above application to discharge of condition 10, Randall and Chisnall Construction Ltd.'s Construction, Environment and Management Plan, dated May 2019 has now been reviewed. It is assumed that an amended version of this report will be supplied when the missing information is determined (Key Dates, drain locations, service locations, H&S consultant etc.) however in the meantime, Environmental Health is not able to recommend discharge of this condition, based on the following:

- 1.5 Existing Structures – copy of the assessment of potential asbestos containing material (ACM) on site and any associated remedial measures provided to this Department
- 1.6 Ground Conditions – copies of the contaminated land reports provided to this Department for assessment, including the remediation strategy when published.
- 1.8 Working Restrictions – to clarify, the hours of operation as outlined within this section are 07.30 – 18.00 hours Monday – Friday, 08.00 – 13.00 hours Saturday and no working on Sundays or Bank Holiday Mondays. No deliveries will be made before 08.00 hours. This should be amended to exclude working on any Bank holiday; not just Mondays.
- 2.3 Traffic Management – The second paragraph states that the delivery times will be adhered during school term time. This should be amended to ensure that the specific delivery times are followed, irrespective of school term times. The penultimate paragraph states that deliveries will be undertaken during 'off peak' road network times (not between 06.00 – 10.00 hours or between 16.00 – 20.00 hours). This should be clarified to reflect that deliveries should not take place before 08.00 hours and no work (including deliveries) should take place after 18.00 hours Monday – Friday, after 13.00 hours Saturday or at all on Sundays and Bank Holidays.
- 2.4 Wheel Washing – what provisions will be made for the disposal of wheel wash water?
- 3.2 Health and Safety Goals – the Health and Safety (DSE) Regulations were amended in 2002, the Environmental Protection Act was published in 1990.

- 5.2 Dealing with services – there is mention of ‘silenced’ generators being utilised on site – how are they silenced, how will their location be considered and will there be any provision for fuel leakages and/or spills?
- 5.3 Adjacent Land Use – how will noise, dust and vibration be monitored and managed? Will contact details of the person(s) responsible for the site operation be available for neighbouring residents, for example, via leaflets/business cards or displayed on a contact boards at the site access?
- 6.1 Removal of Asbestos – as outlined in section 1.5, this Department will need to see the pre-demolition asbestos survey and associated ACM remedial measures plan.
- 6.2 Dealing with Contaminated Land – this section should be amended to state: If during development, any visible contaminated or odorous material, (for example, asbestos containing material, stained soil, petrol / diesel / solvent odour, underground tanks or associated pipework) not previously identified, is found to be present at the site, no further development (unless otherwise expressly agreed in writing with the Local Planning Authority) shall be carried out until it has been fully investigated using suitably qualified independent consultant(s). The Local Planning Authority must be informed immediately of the nature and degree of the contamination present and a method statement detailing how the unsuspected contamination shall be dealt with must be prepared and submitted to the Local Planning Authority for approval in writing before being implemented. If no such material is identified during the development, a statement to this effect must be submitted in writing to the Local Planning Authority.
- 6.5 Reducing Noise and Vibration – this section states that noisy activities on Saturdays and Sundays will be discussed and agreed with the employer in advance. This statement should be amended to reflect that no work will be carried out on site on Sundays or Bank Holidays. How will noise and vibration be monitored/assessed?
- 6.6 HAVS – how is this being implemented?
- 6.9 Hot Works – what arrangements have been made for implementing a hot work permit system?
- 6.10 LPG – is this applicable to the site?
- 6.11 Any Other Significant Health Risks – how and how frequently will dust emissions be monitored by the Site Manager? Will materials moving to and from site be covered? This section should be updated to reflect that the health risks may impact on neighbouring properties. The reference to Threal’s Lane and a property known as ‘Pentlow’ indicates that some of the information in this report has been copied from a CMP written for a different site. Whilst this is not necessarily an issue, it is of concern that the site specific risks may therefore have not been correctly considered.
- 7.0 Construction Environment Management Plan – as a similar vein to comments relating to section 6.11, the points contained within this section read as conditions imposed by a Local Authority, rather than as a management plan. This section also reiterates the reference to Threal’s Lane which I believe is in West Chiltington, therefore not in ADC’s district or near the site in question. There is also a reference to making data available to Horsham District Council Officers, which is not relevant to this site. The points within this section should therefore be re-worded to demonstrate how they are applicable to the site in question.

Many thanks,

Kate.

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