

From: Fitzgerald, David
Sent: 21 June 2023 09:28
To: Crowther, Beth
Cc: [Redacted text]
Subject: RE: APP/20/01093 Sinah Lane Condition 6

Dear Beth

I write after reviewing the Construction Environmental Management Plan (CEMP) for "Pebble Walk" Sinah Lane, Hayling Island, dated the 18.05.2023 which has been submitted, to update the current plan approved. I visited the site 14th June 2023, to understand how the CEMP is currently being applied.

I would recommend **refusal** for the following reasons:

1)General

The wording of CEMP must be amended so a copy of the CEMP is kept on site and all times. During visit to the site a copy of the current CEMP was not present. Therefore it could not be followed and understood by staff on the ground.

2)Section 7 Dust Suppression, mitigation and avoidance measures

- The wording must be altered from stating "**Would**" to "**Shall**" in the first sentence
- The CEMP makes reference to BRE 456-Control of Dust from Construction and Demolition Activities. The document that I reviewed there is no requirement for staff on have a copy of this document on site to review , this must be changed, so a copy of the BRE guidance is at site
- The Cemp states "**Visual monitoring would be carried out at sensitive locations on a daily basis**" this be change to the following "**Visual monitoring must be carried out at sensitive locations, on a daily basis in a written record. The records must note the following:**
 - a) the name of the person carrying out observations
 - b) time of observations
 - c) The wind direction,
 - d) The corrective actions that were undertaken
 - e) Identify, where the sensitive locations are

The records must be kept on site and be available to reviewed by Officers of the Council. Records must be kept for a minimum of 2 years

Section 7 also does not take account or record the controls required caused by the removal of the piles of soil that, close to the northern boundary. The site foreman stated this to be around 120 – 140 lorries movements off site.

Currently as the CEMP is worded assumes that the control of dust and avoidance measures on the site are always the same. The CEMP must be a **living document** and the company must included this in the CEMP otherwise this is not an enforceable condition.

3) Section13 Number, type and of vehicles

This section of the CEMP is worded as way as is not enforceable. Please reword so this section can be enforced. Regarding vehicle movements, written records of the movements need to be recorded daily and kept. This critical given the large number of vehicles movements required, to remove the excess soil from the site described above

4 Section18 Protection of SPA birds

The council would expect that the CEMP details compliance with the following:

During the months of October to March (inclusive) noise from development hereby approved in any part the Special Protection Area (SPA) or SPA supporting habitat for overwintering birds shall not exceed L_A (max) (fast) (1 hour) 69 dB.

Equipment, positioning, calibration, weather parameters and qualification of operators shall be as per BS4142:2014.

Measurements shall always be recorded and available to the Local Planning Authority along with calibration details and details including qualification of the operator taking the readings

Areas of failure, to comply with current approved CEMP

Areas of the current CEMP where compliance is currently not being achieved, at the time of my visit

- a) the CEMP states that there will be a separate jet wash areas to clean tyres off. During my attendance on 14th June no jet wash on site or a dedicated area set aside for this. This is a breach of the existing CEMP. Section
- b) The large piles of Soil, close to northern boundary are due to be removed from the site by lorry according to the site Foreman this will be 120 -140 lorries to remove the volume on soil from site. Section 13 states the maximum numbers, given estimation from the site foremen of 120 -140 lorries movements are going to be required, how is the going to be achieved without breaching section 13 ?

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My working pattern – Monday – Friday