

I've reviewed the documents linked to the planning case, and there does not appear to be any substantive amendments to the CEMP, nor to the site material storage plan. Document dates & references appear unchanged, and differ only in terms of minor formatting – likely related to conversion to a different file format (CEMP originally submitted as an MSWord doc). Comments provided at the original consultation would therefore appear to still apply. Reproduced below for convenience;

**Condition 18 – Construction Environmental Management Plan (CEMP)**

*It is not clear that my colleague reviewed the CEMP, so I have reviewed the document for completeness. The comments of the Highways consultee in particular are noted, relating to the draft status of the document and absence of appendices. This notwithstanding, some minor observations are outlined below:*

- Section 5.7 could (possibly should) be substantially fleshed out to cover the ACM strategy, and to explicitly cover the discipline required in recording soil movements across the site to prevent subsoils generally (en masse) contaminated with Pb (or 'hotspot' PAH or TPH contamination-impacted soils) being placed as a subsoil component the clean cover system for either garden or soft landscaping areas.*
- 5.8.1 should ideally contain details of measures to protect the ordinary water course (OWC, monsoon drain) from runoff from adjacent or elevated land – e.g. creation & maintenance of a local bund, ditching or planting and maintenance of filter strip(s), for example.*
- 5.11.2 refers to response procedures which are to be produced at some future point and are not included in/with the draft CEMP. It is recognised that a CEMP is a living document, but these should ideally be included. At a minimum, the planning service should be satisfied that from an enforcement perspective the reference to these procedures at 5.11.2 of the draft CEMP is sufficient to support enforcement actions where the actions of site personnel fall short of what the planning service would regard such procedures as implicitly and reasonably comprising. Where this is not the case, it is probably safer to require that the procedure be included in the approved version of the document. I prefer to rely upon physical protections where there are OWC's on site that are connected to the main river network within a short distance (see 5.8.1,. above)*
- It is recommended that a provision be inserted into section 6.0 (Conclusions) stating that a copy of the CEMP will be maintained in the site office for ease of reference of site personnel. Given the comments of the HCC consultee, it is anticipated that amendments & additions to the CEMP will be required. I would recommend that the above-referenced amendments are sought prior to approval of the CEMP.*

**Condition 21 vehicle parking/material storage**

*It is noted that the Martin Road materials storage area is in an elevated section of the site, 7m from slope and around 18m from the on-site watercourse.*

*The advantage of a storage area on this part of the site is recognised, and I would refer the planning service to the recommendation under c.18 5.8.1, which could address concerns relating to the position of the proposed area relative to the OWC. Alternatively, I would recommend precautionary earth bunding on eastern edge of this storage area (with some contiguous protection west of it's northerly & southerly extents), and/or the planting / retention of filter strip vegetation behind (down-topographic-slope of storage area).*

*I note that the Lower storage compound/storage areas are located >100m from Lavant.*

*I note that both entrances on Martin Road are each marked up as In/out gates for vehicular access from Martin Rd. without an apparent one-way system. This being the case, I'm unclear as to why a wheel-wash is to be provided only on one of these accesses. This may represent a drafting error. It is expected that the wheel wash will either mobile, capable of serving both accesses, or the accesses operated on a one-way basis. Failing that, it would be acceptable to provide a wheel washing unit at each site egress point available to plant and delivery/operational vehicles.*

Best Regards,

Jon

**Jonathan Driver**  
**Environmental Control Officer**