

From: Paul White2
Sent: 02 December 2020 21:44
To: Eaves, David
Cc: Richard Couchman
Subject: RE: Planning Application APP/18/00244 Colt International Ltd, New Lane, Havant, PO9 2LY

Evening David,

Further to your email, please find attached the amended information for condition 14. I've also attached an email from HCC confirming they are happy with the revised information.

I have reviewed the comments raised by the Environmental Health and can confirm the follow. These are included within the revised CEMP (highlighted in yellow for ease of reference)

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.

Response:

5.7 Contaminated Land Procedures

- 5.7.1 Should any areas of contamination be encountered, the LPA will be notified immediately and these will be dealt with in an appropriate manner.

There are only 2 areas of concern WS02 (Commercial area) and WS16 (Residential area)
This have been included within the SI report and both hotspots have been removed.
It should be noted that the lower section of site has been capped with min. 200mm 6f2 material to prevent any cross contamination of soils.

- 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.

Response:

5.8 Hydrology & Water Quality

- 5.8.1 The following generic mitigation measures are proposed to protect the water environment:

- All site works will be undertaken with suitable temporary drainage measures in place. The site has a capping of 6f2 across the complete site the existing levels have been reviewed to avoid any runoff into the existing monsoon drain. We have also installed a terram barrier within the monsoon drainage as part of the upfront enabling works. This is still in place and will remain for the length of the build.

- As part of the enabling works we have installed drainage channels throughout the site to control the level of water run off into the monsoon section of drain.
 - Strict control of the site boundaries will be enforced by the Site Manager, including minimal land clearance and restrictions on the use of machinery near water bodies.
 - The design of the SUDS and the use of pollution prevention control measures will ensure that the development does not affect groundwater,
 - Cleared land should be replanted or vegetated as soon as practicable to minimise the extent of exposed land and the volume of surface water run-off.
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- 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.

Response:

5.11 Emergency Procedures

5.11.2 A set of standardised emergency response procedures will govern the management of environmental incidents. Construction contractors will be required to adhere to and implement these procedures and ensure that site operatives are familiar with the emergency arrangements.

Within the site inductions, all persons will be made aware of the emergency response procedures, and the appointed persons on site.

Each site has a spill response procedures that will be actioned in the event of any Environmental Incidents.

Condition 21 vehicle parking/material storage

Response:

I have addresses all the concerns of the Environmental Officer within the attached CEMP and CPP.

I trust I have supplied sufficient information within the above to satisfy conditions 14, 18 & 21.

I'm happy to discuss if you feel you require further information.

Regards

Paul White

Technical Manager

Direct: 01489 861400
Mobile: 07590 226785

Drew Smith Limited

Drew Smith House, Mill Court, The Sawmills, Durley,
Southampton, Hampshire SO32 2EJ

