

From: Ballam, Rachel
Sent: 07 Aug 2018 02:57:48
To: Rachel.Ballam@havant.gov.uk,
Subject: FW: APP/13/00804 - Woodcroft Farm Development Site
Attachments:

Hi Rachel,

Thanks for the confirmation. I can confirm that discharge of c11 & c 12 in relation to the phase 2A area is acceptable, and that I've no objection to the commencement of construction of this phase. Similarly, the proposed discovery strategy is appropriate to the base level of risk (likelihood of deposits of contamination impacted soils being present-) in this area.

I have reviewed the SuDS and CEMP information;

CEMP:

- Principle pollution control risk driver is the karstic topography and protection of the aquifer. Measures 3.5, 3.7-3.9, and security principles outlined in measures 3.1-3.12 inclusive are considered to be relevant to this risk. The plan notably omits any specific information relating to the (re-)fuelling of plant, and the keeping of spill kits in the vicinity of the fuel (and /or liquid flammables-) storage area. It is recommended that this be explicitly included for the avoidance of doubt.
- 1.4 recognises the routing of construction traffic to be both relevant & material to the plan. c.28 & c.6 specifically refer to construction traffic. There is no specific proposal within the CEMP relating to traffic routing, however I assume that the hand-annotated map (ref: 1924-A-1011-M, at p17of18) constitutes the proposal to avoid Woodcroft land, as required by c.28. Whether this is sufficient to satisfy the reason for specifically covering routing as a CEMP topic under c.6 should be determined in consultation with the consultee that requested the proposal.
- As regards traffic and other related issues (e.g. dust), I note that there is no provision relating to construction site speed limits to minimise mobilisation of dust to air. 5mph on within-site tracks is recommended.
- 3.14 refers to the road sweeper being made available should the proposed wheel-wash prove inadequate. It is assumed that the scope of this provision would include the regular sweeping of the highway to the maximum extent of the 'trackout' problem in the event that this becomes necessary.
- 3.15 refers to dust control by means of spraying. Security hoarding (solid panel) can be very effective at minimising dust egress from site activity. I note from 3.10 that Heras fencing is proposed along the 'rear and sides' of the site. Having checked aerial photography, I note that a substantial vegetative buffer is present on the Northern boundary of phase 2A, which should be effective in the interception of airborne dust. If this buffer is not being retained, the applicant should consider erecting solid panel hoarding on this boundary to minimise dust nuisance to the properties on James Copse Road.
- Inclusion of the word 'general' at 3.18 is taken to mean that operation outside the stated hours will be an exception – but that some flexibility is to be retained for operational resilience. Whilst I understand the need to maintain the provision for exceptions (and do not object to an exception clause for unusual circumstances), it does 'water-down' this provision, and in the absence of a specific caveat (e.g. 'operation outside these hours not to exceed 3 occasions per month', etc.) may hamper enforceability.

CEMP are typically living documents, so can be updated at any time. Ideally (however) the above recommendations would be incorporated within a revised draft to be listed as an approved document.

SuDS:

- I note the LLFA comments, which are comprehensive, and highlight a number of areas where additional detail is required. I have no material comments to make beyond those of the LLFA.
- From a pollution control perspective, the system of interconnected retention basins and pollution valve are considered sufficient to manage to low pollution risk which the consented landuse represents.

Best Regards,

Jon

Jonathan Driver
Environmental Control Officer

Havant Borough Council Environmental Health
Public Service Plaza, Civic Centre Road, Havant, Hants PO9 2AX

Tel (Direct Dial): 023 9244 6677
Tel (Mobile) : 07877 971 106
Tel (Team Admin): 023 9244 6670

Email: jonathan.driver@havant.gov.uk

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