

Dear Steve,

Condition 12 - Construction and Environmental Management Plan

The Waterman Construction and Environment Management Plan (ref. 21641100-WAT-XX-XX-RP-1-P01, June 2025) has been reviewed. I am satisfied that the document broadly meets the requirements of Condition 12; however, clarification and further information are required before the condition can be discharged.

The proposed working hours are 07:30–18:00 Monday to Friday and 08:00–12:30 on Saturdays. The CEMP must explicitly commit to ensuring that no plant, machinery or equipment that is audible beyond the site boundary shall operate before 08:00 on any day. This includes warm-up, idling, testing and loading.

Section 3 (Community liaison and communication) uses conditional language such as “would be provided/installed”, which introduces uncertainty regarding commitment and enforceability. The CEMP must clearly commit to the measures proposed. All uses of “would” in this section must be changed to “shall”.

Section 5.10 of the CEMP refers to “screening either by site perimeter, site welfare offices or specific hoarding or enclosures” as part of the dust and noise control strategy. This contradicts Section 2.3, which states that “heras fencing will be installed only” at the perimeter. Heras fencing provides security but is not suitable as a dust or acoustic screen. The CEMP must be amended to clearly identify where screening, hoarding and/or enclosures shall be used to minimise dust and noise emissions. Where hoarding is proposed for noise control, details must be provided of the mass per m² and how joints, edges and gaps will be sealed to ensure acoustic integrity.

The noise control measures presented in the CEMP are generic and do not demonstrate that Best Practicable Means will be applied. Further information is required, including: a list of the specific plant, machinery and equipment to be used on site; the associated noise data (e.g., BS 5228 sound power or sound pressure levels); predicted noise levels at the nearest sensitive receptors; and evidence that the proposed mitigation will be effective. Due to the proximity of nearby residential properties, on-site noise monitoring will be required. The CEMP must therefore include the proposed locations of noise monitoring, baseline ambient noise levels obtained prior to construction, and noise trigger/threshold values that will be used to initiate further mitigation.

While the CEMP includes many of the dust control measures listed in Section 6.1 of the Stantec Air Quality Assessment (ref. 50641/3001), it does not commit to implementing all of them. The planning condition requires that the CEMP incorporate the full suite of measures set out in that section. The CEMP must therefore be amended to include all

the relevant dust mitigation measures detailed in the Air Quality Assessment to ensure full compliance.

The submission of an updated CEMP that addresses all of the matters outlined above is required before Environmental Health (Pollution) can support the discharge of this condition.

Kind regards,

Craig Milligan

Environmental Health Officer