

Consultation Response from: KC Environmental Health (Pollution & Noise Control)		
2021/94344 – Former North Bierley Waste Water Treatment Works, Oakenshaw, BD12 7ET		
Discharge condition 8 (Construction Environmental Management Plan) and 26 (Construction Surface Water Drainage) on (phase 4 of) previous permission 2016/92298 for outline application for re-development of former waste water treatment works following demolition of existing structures to provide employment uses (use classes B1(c), B2 and B8)		
Date Responded: 8 th February 2022	Responding Officer: Natalie Heaney	Responding Ref: WK/202141296
Condition 26 is outside the remit of Environmental Health. Condition 8 - Construction Environment Management Plan To discharge Condition 8, a Construction Environment Management Plan by GMI Construction Group, dated 2nd November 2021 (ref: Rev 4) has been submitted. Our comments relate to those within the remit of Environmental Health, these are, working hours, noise and vibration from construction activities and vehicle movements, dust from construction activities and vehicle movements and artificial lighting used in connection with all construction-related activities and site security. There are other aspects of the statement that are outside the remit of Environmental Health and may be subject to comments from other consultees. According to the report site deliveries and traffic and plant movement activities on-site will be restricted to 8:00 hrs to 18:30 hrs Monday to Friday and 08:30 hrs to 14:00 hrs on Saturday. There will be no deliveries or noisy construction activities permitted on Sundays or Bank Holidays. In addition, '<i>noisy activities</i>' will be restricted to the specified working hours of Monday to Friday 08.00 hrs to 18:30 hrs and Saturday 08.30 hrs to 13:00 hrs. On Sundays or Bank Holidays, no noisy construction activities will be permitted. Section 5.2 of the report considers noise, vibration, and stray lighting. The authors acknowledge that if controls are not implemented, there is a risk of nuisance. In the case of noise, the report specifies that '<i>peak noise levels</i>' will not be reached. Noisy operations will be limited to working hours (as previously specified) and several mitigating measures will be used. These include, but are not restricted to, ensuring that plant and equipment are in good working order and are well maintained, employing screening such as straw bales or acoustic barriers between plant and sensitive areas where necessary, and training on-site staff about excessive noise. Concerning vibration, on Page 9 of the report, it is specified that any work undertaken within 30m of the properties located on the Northwest corner of the site will require a vibration assessment to be made. This will include baseline readings when construction is not underway to set an acceptable limit for vibration when plant is in operation. The report also advises that if the limit is exceeded, the monitoring device will alert the site manager, and work in the area will be halted. Artificial lighting is also dealt with on Page 9 of the report which indicates that there are no		

plans to work on site during the hours of darkness. However, should lighting be required for security reasons, the lights will be directed downward to limit the spread of light to the compound, which will be positioned well within the development close to the Yorkshire Water compound. The report continues to advise that during the winter months, working hours will be decreased to accommodate daylight hours as lighting such a large area is considered impractical. The report concludes that these measures should keep obtrusive illumination from becoming a problem.

Finally, dust mitigation measures are detailed. Several mitigation measures are detailed including, installing wheel washing facilities, minimising drop heights, dampening down activities, storing dry materials in buildings or away from the wind, prohibiting onsite fires/burning and sheeting of all dry materials leaving the site.

Comments

We do not accept the Construction Environment Management Plan by GMI Construction Group, dated 2nd November 2021 (ref: Rev 4). Several areas have been identified that require additional information to satisfy the condition. For clarity, these are listed point-by-point:

1. Plant movement activities and site deliveries have the potential for nuisance. The report indicates that on Saturdays site deliveries and traffic/plant movement activities on site will be restricted to 8.30am to 2:00pm. We do not accept these hours.

To safeguard the amenities of the occupiers of nearby properties, noisy construction-related activities should not take place outside the hours of 07.30 to 18.00 hours Mondays to Fridays, 08.30 to 13.00 hours, Saturdays with no working on Sundays or Public Holidays. The construction management plan should be updated to reflect this.

2. There is insufficient information concerning artificial lighting. Whilst it is encouraging to read any lighting will be sensitively placed, it is unclear how the lights will be operated should they be utilised. We expect light controls to be fitted so lighting can be adjusted to ensure that they are only activated from activity on the development site. Moreover, given the size of the site the use of localised lighting has not been considered and it seems unclear why security lighting would not be utilised in a development of this size. We require additional details on how obtrusive artificial light (including that used for security purposes) will be operated and minimised during the development.
3. We consider there to be a lack of guidance referenced in the construction management plan. As such the report does not appear to be informed by codes of practice that we consider relevant to a robust construction management plan. Whilst there is a consideration for some guidance and regulations i.e., the Control of Vibration at Work Regulations 2005, these do not relate to safeguarding surrounding amenity. We expect a robust construction management plan to be informed by and demonstrate an understanding of, certain codes of practice.
4. No site plan has been provided showing the location of any control measures or the location of welfare facilities, lighting, compounds etc. These should be included in the construction management plan.
5. An acoustic barrier is referenced in Section 5.2 of the report. However, no additional

information has been provided. Additional information for this point is necessary.

6. The report specifies that peak noise levels will not be reached. However, no information is provided regarding the threshold level of noise and how this will be monitored. Likewise, there is reference to vibration monitoring, but it is unclear how this will take place. We require additional information on these points. The applicant should consult best practice guidance such as the British Standards (BS) codes of practice for the control of noise and vibration on construction and open sites (BS 5228-1: 2009 + A1: 2014 and BS 5228-2: 2009) for further information.

Overall, we do not accept the Construction Environment Management Plan by GMI Construction Group, dated 2nd November 2021 (ref: Rev 4) and consider the information insufficient to satisfy the requirements of Condition 8. Therefore, we recommend that Condition 8 must remain until further notice.

Recommendations

Condition 8 - Construction Environment Management Plan

We do not accept the Construction Environment Management Plan by GMI Construction Group, dated 2nd November 2021 (ref: Rev 4) submitted and consider the information insufficient. Therefore, we recommend that Condition 8 must remain until further notice.