Consultation Response from: KC Environmental Health (Pollution & Noise Control)		
2021/94705 Land at Hart Street, Newsome, Huddersfield, HD4 6LS		
Discharge of conditions 5 (Construction Environmental Management Plan) and 6 (Construction Management Plan) of previous reserved matters approval 2021/91638 pursuant to outline permission 2016/91479 (appeal APP/Z4718/W/17/3173711) for erection of 22 dwellings		
Responding Date: 17th March 2022	**Responding Officer:** Shirley Reynolds	**Responding Ref:** WK2021/43301

Comments

We have reviewed Application 2021/94705, this response is in regard to the Discharge of Condition 5, Construction Environment Management Plan (CEMP).

To assist with the discharge of condition 5, the following information has been submitted:

- Construction Management Plan (CMP) Rev. 1 by Urban, dated Thursday 9th December 2021
- Construction Environmental Management Plan: Revision 1 (CEMP), by Urban, dated Thursday 9th December 2021

We have reviewed the submitted documents in relation to the following areas which are within the remit of Environmental Health.

- Noise and vibration from construction activities and vehicle movements
- Dust from construction activities
- Stray light and glare from artificial lighting used on site

These documents demonstrate how construction site noise, dust and lighting are to be controlled so as not to impact the amenity of neighbouring properties during the development

Hours of operation

The revised Construction Management Plan sets out the working hours for the site:
07:30 to 18:30 hours Monday to Friday,
08:00 to 13:00 hours on Saturdays, with no working on Sundays and Bank Holidays.

A period of 30 minutes before and at the end of the working shift to start up and close down is described which will effectively extend the working day to 07:00 to 19:00 hours Monday to Friday, 07:30 to 13:30 hours on Saturdays, with no working on Sundays and Bank Holidays. The site has numerous residential properties to the boundaries that may be affected by noise and disturbance from the construction activities and the extended hours of operation suggested are not acceptable.

Fugitive Dust control

Methods for dust control on site have been identified including:

- site entrances being kept clear
- access roads being developed for HGV movements
- the use of a road sweeper and wheel wash facilities
- cutting operations to have water spray dust suppression in situ

We are concerned that the on-site remediation of silt from the pond will create dust. The response from Environmental Health dated 10th March 2022 in regard to the discharge of condition 6 (Contaminated Land), highlighted a lack of information in regard to detailed methodology for the proposed periodic characterisation of the stabilised material, methods to control dust and odour. Construction management includes all elements of site preparation and demolition before construction begins. Therefore, we do not accept the general terminology used in 9.2 of the CEMP "Dust generated through all work activities will be controlled at the source, so far as reasonably practicable using recognised methods and in line with legislative requirements.", as this does not meet the site-specific details of fugitive dust control required in this case. We require site specific details regarding dust control measures which references appropriate guidance and methodologies.

Construction Noise and Vibration

The Construction Plan states that operations will be undertaken in line with BS 5228-1:2009 Code of practice for noise and vibration control on construction and open sites. Silencers, screens and enclosures will be utilised where necessary and noise levels will be monitored and recorded at the site boundary.

Temporary Artificial Lighting

Temporary lighting within the compound is to be controlled using timers to minimise the effect on nearby residents. No perimeter lighting is going to be used.

Monitoring and Communication

The scheme is to be registered with the Considerate Constructor Scheme (CCS) and the schemes code of practice is to be adopted, which ensures good communication with local residents and requires monitoring and complaint records to be kept. Responsible Staff have been identified and the Project Manager is responsible for training of staff in regard to the CEMP. Local residents will be updated via a regular newsletter and the contact number for enquiries will be identified at the site entrance.

Recommendations

Having reviewed the revised CMP and CEMP document we accept the controls put in place with regard to noise and vibration from construction activities and vehicle movements and temporary artificial lighting.

We consider the information provided in the revised documents insufficient to protect the amenity of nearby sensitive receptors from fugitive dust emissions.

Further information with regard to the site-specific control of fugitive dust emissions is required therefore, we are unable to recommend the Discharge of Condition 5 at this time. The condition to provide a Construction Environment Management plan must remain in place.