From:	Bowie, David
Sent:	25 July 2019 18:09
To:	peter.barnett@adur-worthing.gov.uk
Cc:	Planning SE; Franklin, Richard; Cleaver, Elizabeth
Subject:	AWDM/0929/19 - Brighton And Hove Albion Training Ground, 60 Mash Barn Lane, Lancing, West Sussex
Flag Status:	Flagged

For the attention of: Peter Barnett

Planning Application No: AWDM/0929/19

Site: Brighton And Hove Albion Training Ground, 60 Mash Barn Lane, Lancing, West Sussex

Development: Approval of Details Reserved by Conditions 5 (SUDS maintenance) and **11 (construction method statement)** of Application No. AWDM/0236/19.

Highways England Ref: HAMIS 84904; Tracker #8066

Dear Mr Barnett

Thank you for your email of 4 July 2019 sending further information provided by the applicant in support of Condition 11 (Construction Management Plan). This has been provided following our consultation response of 14 June which noted that insufficient information had been provided to discharge condition 11.

We have reviewed the additional information provided which comprises an updated Environmental Management Plan (EMP) dated 2/7/2019, Traffic Management Plan (TMP) dated 2/7/19 and Construction Phase Health and Safety Plan (H&SP) dated 2/7/19.

The requirements of Condition 11 are set out below, along with our comments (in blue text) on whether the information provided to date meets each requirement.

No development shall take place until a Construction Management Plan has been submitted to and approved in writing by the local planning authority, who shall consult with Highways England. Thereafter the approved Plan shall be implemented and adhered to throughout the entire construction period. The Plan shall provide details as appropriate but not necessarily be restricted to the following matters:-

- *the anticipated number, frequency, types and timing of vehicles used during construction (construction vehicles should avoid the network peak hours of 0800-0900 and 1700-1800 where practicable)*

  There is very limited information on this point. The EMP section 3.12 sets out the delivery requirements for skips, loads of aggregate, concrete trucks, excavators, dumpers, telehandler and crane during the first 6 months of construction. However there are no details of the numbers and types of construction traffic using the public highway to access the site on a daily basis during site operational times and there is no mention of site staff vehicles. There is no statement of an intention to avoid (where practicable) construction/delivery vehicles using the highway during network peak hours.

- *the parking of vehicles by site operatives and visitors*
  The TMP Appendix A – Traffic Management Layout Drawing indicates a location for operative and visitor parking. It would be useful to understand how many spaces will be provided on site.

- *the loading, unloading and storage of plant, materials and waste*
  The TMP Appendix A – Traffic Management Layout Drawing indicates a location for storage, loading and unloading of materials and plant and a spoil tipping area.

- *the erection and maintenance of security hoarding or other appropriate security barriers*
  The TMP Appendix A – Traffic Management Layout Drawing and H&SP Appendix 7 indicate hoarding around the construction area which is at the southern end of the site well away from the A27. We are therefore not concerned about the risks of this hoarding blowing onto the A27 highway.

- *the provision of wheel washing facilities and other works required to mitigate the impact of construction upon the public highway (including the provision of temporary Traffic Regulation Orders)*
  The TMP section 2.7 states that wheel cleaning jet wash will be provided at the site Gatehouse and road sweepers will be hired as necessary and can be provided in 24 hours. However no information has been provided about the temporary Traffic Regulation Orders (TTRO) which may need to be ready for the works start. If it anticipated that there will be no need of a TTRO it should be mentioned that any Traffic Management requirements on the A27 can be provided without the necessity of a TTRO – for example reduced speed limit for the duration of the works. If during the works period it is determined that a TTRO is required for reasons of safety or otherwise the applicant should be aware that the TTRO process can take around 13 weeks to complete. Overall therefore there is currently insufficient information on this point.

- *measures to reduce dust, dirt and any other airborne contaminants and to reduce as far as reasonably possible these passing beyond the site boundaries, which shall include sheeted loads and dampening stockpiles where necessary*
  This is included in the EMP section 3.1 'Air Quality' and H&SP section 4.1. The A27 should be considered a sensitive receptor with regard to dust and other airborne contaminants.

- *the implementation of noise control measures such as use of alternative vehicle reversing warning systems*
  Not required by Highways England. No comment.

- *details of public engagement both prior to and during construction works*
  Not required by Highways England. No comment.

Highways England's position is that there is still information needed to meet the requirements of Condition 11. Therefore, Condition 11 should **not** be discharged until the outstanding information has been provided to and agreed by us.

Please continue to refrain from discharging Condition 11 and please forward our comments on Condition 11 to the applicant. If you, or the applicant, have any queries regarding our response, please contact us at PlanningSE@highwaysengland.co.uk

Kind regards,

David
David Bowie

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