From: planning@adur-worthing.gov.uk
Sent: 07 October 2022 10:41
To: planning@adur-worthing.gov.uk
Subject: Comments for Planning Application AWDM/1586/22

Flag Status: Flagged

Comments summary

Dear Sir/Madam,

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 07/10/2022 10:41 AM from Mr John Pitchford.

Application Summary

Address:	114 Old Fort Road Shoreham-by-sea West Sussex BN43 5HB
Proposal:	Approval on Details Reserved by Conditions: Condition 4 (Contamination Report & Remediation Details); Condition 7 (Construction Management Plan); Condition 8 (Landscaping) of approved application AWDM/0015/22.
Case Officer:	Peter Barnett

Click for further information

Customer Details

Name:	Mr John Pitchford
Address:	11 Godfrey's Wood, Melton IP12 1QY

Comments Details

Commenter Type:	Neighbour
Stance:	Customer objects to the Planning Application
Reasons for comment:	- Loss of General Amenity - Privacy Light and Noise
Comments:	I am making these comments on behalf of Mrs Pauline Pitchford of No.116 Old Fort Road, immediate neighbour to the application site. Subsequent to my earlier comments on the Construction Management Plan, the applicants have now submitted a Demolition Management Plan. We do have concerns that this is largely a generic document that only partly refers to the specific issues of this location. Our more detailed comments are as follows: It is not clear what what para 2.2 means? It refers to an Environmental Risk Assessment but doesn't have a verb in the sentence to say whether one exists or is to be prepared. And then it

refers to an SWMP without saying what one of those is or where it is. The conclusions of the Risk Assessment should be part of this document if the methods of dealing with the impacts are to be considered by the LPA.

Under 2.3, the paragraphs 20 and 19 appear to be extracts from the Regulations 2015 (we are not sure why one is in red and one not). Just quoting the Regulations doesn't indicate how they are to be implemented. Again, this should be clear in the Management Plan

Para 2.4 says objectives and targets will be formulated but shouldn't they be clear here so that their adequacy can be considered by the LPA?

Under the heading Nuisance to Neighbours and Pollution to the Local Environment, 3.7 refers to "the Environmental Risk Assessment will highlight potential environmental impacts and how they will be mitigated". But shouldn't this document describe what those risks are and then demonstrate to the LPA that there is a management plan to deal with them?

Under the heading Dust, Noise and Odours, para 3.9 gives some welcome measures to reduce dust, but these seem to largely relate to circumstances created by moving vehicles around on the site, not to the actual demolition processes. While the text says:
"Should any activity associated with the construction phase cause or appear likely to cause visible dust to be carried towards any sensitive boundary, the activity giving rise to emissions will be modified or suspended until the conditions have been resolved," this explicitly relates only to the construction phase, not the demolition phase.

Despite the heading, para 3.9 contains no reference to control of noise or odours (although there is some reference to odours in para 3.10). There should be reference to dealing with noise in this Plan.

Para 3.13 emphasises that there will be no soils leaving the site. However, there is soil there at present and the submitted Construction Management Plan (page 5) refers to the removal of the lawns and, presumably, the associated soils.

In conclusion, the submitted Demolition Management Plan contains a number of errors and fails to fully identify the environmental risks and necessary management of those risks.

Kind regards