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Subject: Hearing 3, Day 1 - Written Comments/Questions regarding Lodway Farm Construction Compound - W E Ovel
Date: 11 January 2021 19:04:21

Please find below the questions and comments with respect to the Lodway Farm Construction Compound that I briefly introduced today at Issue Specific Hearing 2, Day 1, Agenda item 5, Construction Practices.

Ref: DCO, Section 5.4, Construction Strategy

1. Size of Compound

a. Why is the Lodway compound so large? (8.9 hectares by my calculation). This encompasses most of the Lodway Farm greenfield space. The Lodway Compound should be as small as possible to minimise its environmental impact.

b. Could it be smaller? (Ref, page 33, states that a minimum storage area of 40 metres by 135 metres would be required for waste material storage at the Portbury Dock collard. Storage of waste material seems to be potentially the biggest driver in terms of the surface area required for the compound. By my calculation this is about 0.5 hectare, which would equate to just 6% of the proposed Lodway Compound area. If there are other activities that require very large areas then I would appreciate knowing what they are.

c. Could the area of land to the north of the M5 overbridge and under the M5 road bridge be used more intensively for construction activity purposes in order to off-load the Lodway Farm compound?

2. Storage of Waste Material from the Disused Railway

a. The waste material is acknowledged to be probably contaminated (Ref, page 33). At Ref, page 34, several possibilities for storage and disposal of the potentially contaminated waste are put forward but a decision on which method will be used or even preferred is deferred until a later date. The Lodway Compound lies to the south and west of, and in close proximity to, the Pill/Easton-in-Gordano residential areas. The prevailing wind direction is south-westerly. There is a credible risk that if the waste is stored at Lodway Farm, contaminated dust could blow it over those residential areas with consequent health hazards.

(1) Storage at Lodway Farm should be the option of last resort

(2) If there is no alternative, the waste should be stored as far away from housing as physically possibly

(3) Waste should be removed from the site within an agreed, short, time period (I deliberately avoid saying as soon as possible because that could mean years)

3. Removal of Waste Material. Ref page 36, Option 2d - Temporary Siding at Lodway - discusses the possibility of a temporary junction or turnout adjacent to the Lodway Compound. From the point of view of minimising the number of HGV movements, this would clearly be by far the best option. The number of movements is estimated at Ref,

page 38, as amounting to 1200 to 1800 journeys by 20 tonne tipper trucks. The uncertainty surrounding this option should be resolved and it should become the preferred option.

4. HGV Access to Lodway Farm via The Breaches. It was explained by the applicant today that the haul road would be too narrow to accommodate simultaneously both HGVs and other construction traffic, hence there was a need for worker's vehicles to access the compound via an alternative route. The only option presented for this access is via the Lodway Farm access off The Breaches. This is as maybe, but it does not explain why there also has to be access for HGVs via the Breaches. As stated by the other two Pill residents who spoke this afternoon, this route is totally unsuitable for HGV use. Is there an expectation that the haul road will become unavailable, thus necessitating an alternative route? If so, any large scale diversion of HGVs to this route would be intolerable for residents, not only because of the impracticability of using the Breaches, but also the extensive use of the narrow village roads that would be entailed, whichever direction they approached from. HGV access via the Breaches should be excluded from Construction and Transport Plans, with no exceptions allowed.

5. Construction Compound Noise. The proposed boundaries for the Construction Compound about the adjacent residential property boundaries. Given the proposed working hours and the likely nature of the activity involving heavy machinery, it is guaranteed that it will generate a considerable noise nuisance. This is exacerbated by the prevailing wind direction. Whilst the need for a construction compound in this location is reluctantly conceded, it should be as small in area as possible to enable the required activities to be conducted and with the noisiest activity taking place as far from residential areas as possible. This should be done to make the noise nuisance situation as tolerable as possible for the neighbouring residents who will have to bear it for up to years once construction starts. This same consideration of small size, as far away as possible, also applies to minimise the effect of light and air pollution on the local population.

6. Wildlife. Although today's agenda item related to the construction practices, I would like to add, the the sake of completeness regarding this submission about Lodway Farm, that there are also significant concerns within the local community about the impact of the compound and associated activities on the wildlife of the area. Of particular concern is the very large, nationally significant toad population that is resident on the farm and migrates annually across the line of the railway. Clearly, there is going to be a massive, long term change to the circumstances of this population but, once again, the impact should be minimised as far as possible, by keeping the size of the compound as small as possible

Bill Ovel

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