

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/15/00740	Your Ref:	APP/15/00542
EH Case Officer Extn:	44 6677	Date:	09 June 2015
DC Case Officer:	Sally Smith		
DC Case Officer Extn:	44 6522		
Application Number:	APP/15/00542		
Site Address:	3 Downley Road, Havant, PO9 2NJ		
Proposed Development:	Application to determine whether prior approval is required for the method of demolition of the steel gas holder, the boiler house and brick building and any proposed restoration of the site.		

Observations / Comments:

Summary

Whether the proposed works are required for demolition is ultimately a planning question that falls outside the remit of Environmental Health to comment upon.

In the event that an application is required, it is likely that Environmental Health would at that stage seek a more detailed consideration of odour mitigation, alongside a reasonable restriction on the hours of operation to minimise noise in line with the example provided (to apply in particular to operations at height using cold cutting / grinding equipment).

From experience of similar sites, a degree of contamination is considered likely to be present at the site (within the wider site, e.g. boilerhouse, and under/in the vicinity of the holder). However, the scope of works proposed under this application is unlikely to lead to an increase in the level of environmental risk posed by the site, and will not hamper future works to quantify & mitigate those risks. Deferral of further investigations & implementation of a remedial scheme to a time that post-dates completion of demolition works would enable more comprehensive site coverage and access for treatment (if necessary).

Within the scope of this application, I have no adverse comments with regards contamination. It is acknowledged that the site represents a credible potential contamination risk to a sensitive surface water receptor, and on this basis that further investigation will be necessary at an appropriate time in future. In the event that a full application is required for approval of the demolition activities, it is unlikely that conditions relating to ground contamination will be requested.

The submitted documentation represents in-principle examples, and not firm proposals as such - referrals are made to environmental risk assessment (HAZDEM) and method statements (assumed to include both generic & site specific provisions, as implied by the HAZDEM process

described), but no documentation has been provided. Pollution control provisions are likely to largely fall within the remit of other regulators, and I do not consider it necessary to seek to control these aspects through the planning system.

Specific comments / rationale to the above is provided in the sections below - for completeness of records.

Ground Contamination

I have had opportunity to review this application, alongside the supporting information submitted – it is assumed that the description "Leigh Park Gas Holder" refers specifically to the Downley Rd. site, but note that the statement is based upon a generic proforma document.

The process outline is provided by means of Brief produced for a 'similar' holder in Weymouth - but this notably contains significantly less detail than was provided with the SGN application for demolition of the Palmers Rd. holder, where generic demolition method statement was provided.

The Weymouth site was also entirely above ground, so would differ in both demolition process (required steps / activities) and risks. The Downley holder is considered to be very similar (in construction, scale and environmental context) to the Palmers Road holder in Emsworth - the area is generally characterised by commercial / industrial land uses, but residential property exists within 50m, and the principle receptor from a contamination perspective is a local surface water (main river, the Lavant) located ~30m from the holder.

The submitted information is considerably more generic than provided previously for the Emsworth application - but as the method statement submitted with that application was identified as 'generic', it is assumed that very similar working practices, procedures & mitigation measures will apply. Working on this assumption, my comments are consequently very similar to those made in respect of the Emsworth application.

The documentation is to a large degree generic, being non-specific with respect to the construction of internal elements, e.g. tank basin. It would appear from the documentation provided that it is not proposed to break-out below-ground elements – the Weymouth example refers to cleaning, dewatering, filtration & desludging - whereas the 'leigh park document does not refer to these specifics - instead referring to 'method statements' that have not been provided.

It is assumed that in accordance with the generic statement reviewed previously, that the tank basin will be 'cleaned', & filled to ground level with inert fill materials arising from demolition of brick structures on site. It could be argued that from a contamination perspective, the removal of sludge from below-ground tank elements represents a site betterment – preventing ongoing augmentation of (any existing) soil contamination. In this way the activities proposed could be argued to amount to 'primary source removal' works, but do not amount to a 'remediation' of the site.

Given a construction date of between 1953 & 1960, it is possible that the below ground tank elements are constructed in brick (porous), but also possible that a reinforced concrete basin is in place on site. Depending on condition, both constructions could result in leakage – if the tank is leaking, dewatering, sludge removal & backfilling with an inert granular material is considered more likely to result in some desorption & back flow of any contamination present within local soils, than an increase in the influence of any factors driving migration of hazardous materials from the tank to the soils, or contaminants within the soils towards a sensitive receptor (e.g. the Lavant). If the tank is not leaking, a potential source is to be removed that has not yet impacted

the local soils - again, representing site betterment. The submitted documents are explicit in that no significant excavations are anticipated. As a result, it is not expected that significantly contaminated soils will be encountered during the demolition works.

Reference is made to 'environmental risk assessments' to consider the potential effects on nearby sensitive receptors. This acknowledges the likelihood of encountering hazardous materials during the course of the works, but the statement is of limited scope "encountered during the course of the works" would exclude contamination "likely to be present" either in the vicinity of the tank, or on the wider site.

In the event that an application is required, the undertaking of an environmental risk assessment is considered to be a sensible precaution, though following a review of the generic demolition method statement, I do not anticipate any significant negative impacts as a direct consequence of the demolition activities (e.g. contaminant mobilisation); though this may depend upon site restoration proposals, as the completed site is likely to have a significantly reduced degree of non-porous land cover (increasing infiltration, and potentially mobilising contaminants present within soils). I am however mindful that the tank basin is to remain in situ, and that the tank is likely to (currently) contain a significant volume of water (i.e. significantly increased head, compared with rainwater infiltration pressure) - for these reasons I do not consider it likely that the change in surface cover will introduce a significant influence on contaminant migration (direction / rate).

No change in land use classification is anticipated, at least in the near term &/or under the scope of this application. There is therefore no material change in the risk profile of the site - no new receptors are being introduced (no increase in site sensitivity), and it is unlikely that the works will increase the risk to environmental receptors (Lavant, at around 30m from the site).

The demolition works proposed would resolve / address site constraints (e.g. gas pipelines) that would hamper comprehensive site investigation. It is therefore considered appropriate to defer a further intrusive investigation until the demolition activities have been completed, and site plant rationalisation has been undertaken. It is understood that there are no specific or immediate plans for development of the site. In the absence of any evidence of contamination or environmental harm arising from contamination at the site - I am content for investigation of potential contamination to be dealt with in connection with future development.

Control of Pollution

The generic demolition method statement (that I assume will apply) contains several provisions with respect to the control of pollution (risk) during dewatering & sludge removal. These matters fall largely under the remit of the Environment Agency, which is likely to require a consent to cover the discharges from the Water Treatment Unit(s) to foul sewer, a condition of which is likely to be the monitoring of effluent quality. On the assumption that the applicant will obtain all necessary regulatory consents, I have no adverse comments to make with respect to the method statement – pollution control measures, monitoring, record keeping, and communication provisions included in standard method statements (provided previously, and assumed to apply in this case) are considered to be appropriate.

Other issues

I note that the cutting of roof panels will utilise cold cutting equipment (for health & safety reasons) – this will place a source of significant noise at height, and may result in some local complaints. The generation of noise is likely to be unavoidable, and I note that the example brief for Weymouth self-restricts operations to within acceptable working hours (07:00-18:00 Mon-Fri,

08:00am-13:00pm Sat, no working Sun/BH's). Haulage movements are similarly restricted to 10:00am-15:30pm Mon-Fri. In the event that planning consent is required for demolition, Environmental Health would likely seek a formal restriction on operating hours to mitigate the impact, but it is unlikely that this would propose more restrictive hours than those included in the example brief.

The generic method statement also makes provision for health & safety requirements with regards ventilation – personal gas monitoring, creation of passive stack ventilation to facilitate work, mechanical ventilation provision if necessary, site permit to work system etc. This acknowledges the possibility of significant localised concentrations of methane (CH₄) and hydrogen sulphide (H₂S) – and the latter has the potential for significant odour. The example brief includes ad-hoc provision for deployment of a mobile odouriser to mitigate odour problems.

In the event that a full/formal planning application is required for the demolition works, it is possible that Environmental Health would seek a more detailed consideration of odour issues and/or measures for odour mitigation (for example, management of desiccated sludge cake) either as a pre-commencement condition, or to be submitted with the application.



Mr. Jonathan Driver
Environmental Control Officer