Mr Paul Burke

Tentelow Lane Football Field, Osterley Sports Club, Southall, Middlesex, UB2 4LW

Environmental Permit Application

Non Technical Summary

Application ref. *EPR/GB3204HS/A001*
Our ref. 73260

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INTRODUCTION

Site:

Mr Paul Burke is applying for a bespoke environmental permit for use of waste in a deposit for recovery operation, for construction of earth bunds for amenity improvements at Osterley Sports Club, Tentelow Lane, Southall, Middlesex, UB2 4LW. Mr Burke is a contractor to the site, and currently holds a U1 and an S2 exemption for the site, to support enabling works including the construction of a temporary roadway.

Purpose of application:

The application is for Use of wastes for reclamation, restoration or improvement of land in order to use clean excavated soils (17 05 04) to construct the bunds – up to 100,000 tonnes pa (Tier3, A25).

Pre-application discussions and authorisation:

Environment Agency:

The use of material as a recovery operation and the Standard Rules (SR2015 No.39) available for this activity for use of material in construction, reclamation, restoration or improvement of land has been discussed with the Environment Agency (Robert Devonshire, Hertfordshire & North London). Mr Devonshire has confirmed that to undertake this activity the site should secure a bespoke Deposit for Recovery environmental permit (A25), as the standard rules location criteria were not met (see below). The EA advised that a waste recovery plan must be prepared, but declined a pre-application meeting and suggested the waste recovery plan be submitted with the application for review on the basis of minimal risk and impact.

The site does not pass the location screening for application of the standard rules on the following basis;

- the proximity of a Local Wildlife Site (LWS) – Tentelow Lane Woodland and Meadow
- the London Borough of Ealing is designated as an Air Quality Management Area (for PM10).

The works to be undertaken on site are the formation of grassed earth bunds around the edge of a sports ground for amenity improvements. Site plans of the proposed bunds, a level distance diagram and a plan showing the permitted area boundary have been submitted with the permit application.

The EA were a consultee and given opportunity to comment on development at the planning stage.

Ealing Council:

Planning permission has been granted by Ealing Council (Ref. 173108VAR) for the site to include use of clean naturally occurring material other than soil (topsoil). The materials will be selected from sites producing excavated raw materials from construction materials, operating within the environmental permitting regime or to materials management plans where appropriate. The site will be regulated by the Contaminated Land Officer, London Borough of

Ealing (currently James Potter), and this application has been notified to Mr Potter and supported.

Discharge of the planning conditions will include conditions 3 and 4 which apply and manage land quality controls – requiring records of 'clean naturally occurring materials' and chemical testing of the materials to be reported to the Council, and approval of;

Construction methods

Construction hours and vehicle movements

Machinery specifications

Timing of grass seed to be spread across bunds following formation

The planning permission has been granted having full regard to the following polices:

INFORMATIVES

1 The decision to grant planning permission has been made having full regard to National Policy, the London Plan, local policies and to all relevant material considerations. With respect to this application, the following Policies have been taken into consideration:
Ealing Development (Core) Strategy (2012):
- Policy 1.1 - Spatial Vision for Ealing
- Policy 1.2 - Delivery of the Spatial Vision for Ealing

Ealing Development Management Development Plan Document (2013):
- Policy 2.18 - Green Infrastructure
- Policy 5.10 - Urban Greening
- Policy 5.21 - Contaminated Land
- Policy 7A - Amenity
- Policy 7B - Design Amenity
- Policy 7.4 - Local Character
- Policy 7C - Heritage
- Policy 7D - Open Space
- SPG 9: Trees and Development Guidelines
- SPG 10: Noise and Vibration

PURPOSE OF IMPROVEMENT TO LAND

AMENITY BENEFITS

The purpose of the earth bunds is to;

Improve the experience of spectators, and the capacity for viewing of the pitches, benefitting the popularity and health of the club.

Noise abatement of noise from the pitches in play (the removal of the source of noise is not practicable in this scenario).

Create a more substantive boundary on the southeastern border of the pitches with the neighbouring farmers' cattle grazing fields. The pitches are also used for archery practice, and children will be deterred from crossing the fence line. *NB the farmer Mr Julian Sutton, Osterley Park Farm has been informed and is welcoming of the planned work.*

The banks on the northeastern and northwestern sides will provide additional security to the sports ground. These boundaries should prevent fly tipping, which has occurred in the past.

The whole project will provide a more secure and pleasant area for the public and for neighbouring housing on the northeastern and northwestern sides, e.g. for dog walking.

CHOICE OF MATERIAL

The construction of the earth bunds will require almost exclusively material types 17 05 04 soil and stones (from construction and demolition sites) not containing hazardous substances. The material is chosen for its properties in construction – to achieve the design, the stability and integrity of the material is ideal. Using topsoils alone for the creation of the bunds would not achieve the compaction needed and would risk erosion and instability.

A layer of topsoil (approximately 2 inches) will be used to cover and seed the bunds, to fill small holes and to provide a surface to allow grass seed to catch. Topsoil itself would be too porous to construct the mounds effectively.

A Waste Recovery Plan providing further information regarding the properties of the material has been included with the application.

The material is suitable for its intended purpose, and will not cause environmental pollution, as demonstrated below.

ORIGIN OF MATERIAL

The material will be excavated, soils and other naturally occurring material sourced from building sites. Soil analysis reports are available from the sites of origin. Mr Burke will review reports and specify the cubage of material wanted, ensuring the material is clean and that no contaminated soils will be used on site.

VOLUME OF MATERIAL

The size of the bunds is shown on the site plan, and the bunds are designed to reach 2m above ground level on the eastern and southern sections.

Up to 100,000 tonnes pa will be required.

The design and gradient of the bunds will be signed off by Ealing Council during the construction phase. Delivered loads (~20 tonnes each) will be limited to 10, 000 per year.

DEFINITION OF RECOVERY

Waste serving a useful purpose by replacing other material which would otherwise have been used – to fulfil a particular function (at plant or in wider economy). Waste Framework Directive Article 3 (15)

The project and construction of the bunds has been commissioned by Osterley Sports Club as amenity improvements are needed for those using and neighbouring the club.

The material used will be recovered and reused for a specific function, from construction activity in the wider economy.

Once the type and waste code of the material has been verified, the material is reused without any further treatment.

The recovery activities, as listed in the Environmental Permitting regime will be;

R5 Recycling or reclamation of other inorganic materials

R10 Land treatment resulting in benefit to agriculture or ecological improvement

R13 Storage of material pending R5 and R10

ENVIRONMENTAL RISK ASSESSMENT

An site specific environmental risk assessment (based on the Environment Agency risk assessment for the operation of the standard rules permit for this activity) has been developed for the site and submitted with the application. A Conceptual Site Model – Environmental Setting and Site Design Report (ESSD) has been developed, explaining the minimal risk to the underlying and surface hydrogeology and contaminant exposure pathways for users of the site. The composition (inert) of the material used eliminates these risks, and will be verified additionally by Ealing Council via the planning conditions.

In addition;

LOCATION RISK ASSESSMENT

A location screening, in accordance with condition 2.4 of Standard Rules (SR2015 No.39) has been conducted, and the following have been highlighted;

1. Tentelow Lane Woodland and Meadow Local Wildlife Site (LWS)

Tentelow Lane Woodland and Meadow LWS is located to the south of the site in Osterley Park.

Vehicles delivering material will enter the site directly off Tentelow Lane (running north - north west in relation to the site). The bunds will be constructed from the existing land level up. All storage, movement and construction will take place within the boundaries of the site and permitted area. Minimal disturbance from the work is anticipated as described below under operating techniques.

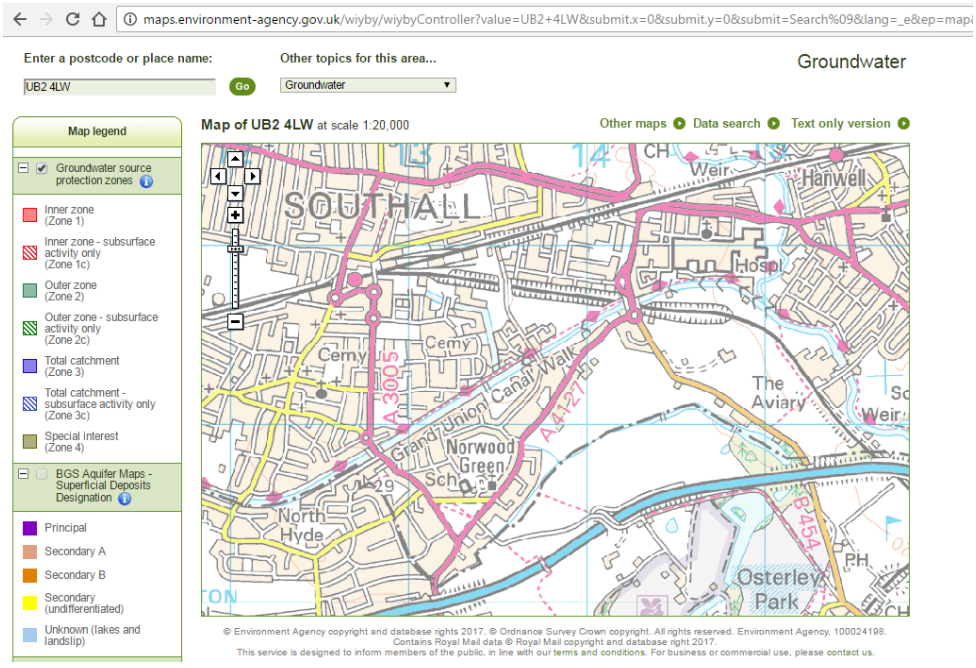
2. London Borough of Ealing Air Quality Management Area (PM10).

PM10 is a measure of respirable harmful dusts, arising from industrial or economic activities. The likelihood of harmful dusts being raised from this activity is low, as the construction is from clean earth materials. There are no processing or combustion activities on site. There will be mobile plant operating on site, running on diesel, and delivery lorries entering site. The planned works have been assessed by Ealing Council and approved. Precautions against raising normal earthworks dust has been described below. Neighbours and workers are not at risk from air quality impacts from this activity.

The deposit will not be 2m or more below ground level and as such will not require gas monitoring.

GROUNDWATER

The activity will not take place in an SPZ1:



There will be no abstraction from or discharge to any surface or groundwater.

Any water used will be fresh water from taps/ hose pipe, and attenuated by the ground.

OPERATING TECHNIQUES

The project is planned with operating procedures in place to minimise the risk of pollution from the activities, to air, land and water, and to minimise disturbance to neighbouring properties/ users.

These operating techniques are explained in further detail in the Environmental Management System Summary provided with the application.

SELECTION OF MATERIALS

Uncontaminated materials will be selected from sites producing clean excavated, naturally occurring materials from construction sites, as specified by Mr Burke. Soil sample/ borehole analysis of representative samples are available to verify the material types and contamination levels.

As stated the majority of material is expected to fall under 17 05 04.

However, in the interests of a level regulatory playing field the waste codes available for the standard rules are sought for the permit.

WASTE ACCEPTANCE

Mr Burke will be present for the receipt of all loads. A copy of the conveyance note (waste transfer note) will be inspected. Each load will be visually/ physically verified to ensure it is the material specified. Material containing any unwanted items, such that may rise to the surface on the bunds and cause safety hazards for users (e.g. large bricks or items that could be tripped upon or make the banks uneven) would be rejected and removed.

DELIVERY OF MATERIAL

For the delivery of each load the driver will report to Mr Burke and be directed to tip the material near to where it will be used, to minimise the movements of the on-site tipper lorry. All delivery areas will be accessible by temporary roadway, around the perimeters of the football fields for each bund needed, and within the permitted area boundary. Paperwork (conveyance notes) will be collected in the site office but will be duplicated off site for contingency purposes.

SIZE OF BUNDS

The bunds have been designed to provide better security along the northwestern section, along the main ground from the car park, for visual improvement on the northestern end, and for better containment of the activities along the southwestern border.

The road, car park and training pitches are at ground level, whereas the main football ground is 1m below. This is shown on Plan 3 Ground levels. The height of the bunds will vary in each section but will be mostly up to 2m above ground level.

The gradient of the bunds will be evaluated and signed off by the Contaminated Land Officer from Ealing Council, once the first 20m slope has been constructed the Officer will advise.

NOISE AND VIBRATION

A tipper and an excavator will be operating around the site. The earth materials handled in themselves will not create any banging, scraping etc. There is a single gate for entry/ exit to the site. Lorries will be provided with a turning circle, or use the car park to turn, and reverse alarms will be kept to a minimum. Lorries will arrive at regular intervals and will not, for example, be stacked up outside the site with engines running. Tentelow Lane is ordinarily busy but not congested. It is not anticipated that the delivery vehicles will add significantly to the ambient noise levels of the road.

MUD AND DEBRIS

No vehicles will be allowed to leave site tracking excessive mud. The site will not be in operation on very wet days. A temporary roadway is provided throughout. A wheel wash will be established (Rhino), and a jet washer will be available to clean wheels on arrival/ departure.

DUST MINIMISATION

The likelihood of dust being raised from the activity is minimised by use of the temporary roadway, provided for all delivery vehicles, and kept damp and free of mud and debris using a wheel wash. The speed limit will be 5mph. A roadsweeper vehicle will also be available if required.

PLANT AND MACHINERY

The following diesel powered machinery will be used:

1x 360^{o} excavator

1x tipper lorry (9 tonne)

Jet wash

Road sweeper (if required)

2000 litres of red diesel will be stored on site for use by mobile plant. This will be maintained in double skinned, lockable drums with shut-off hose connection and a spill kit provided.

There will be no processing activities (e.g. screening or crushing) conducted on site.

The topsoil layer will be seeded by hand and raked in.

FIRE PREVENTION

The requirement for a Fire Prevention Plan has been dis-applied to deposit for recovery permits. Fire risk from the activity is considered low, nonetheless principles of fire management are to be applied to the operation including;

- Homogenous waste stream, checked on arrival
- Quarantine and rejection procedure in place
- Operating areas kept clear of debris or any combustible materials
- Mobile plant and machines well maintained, checked for leaks or build up of grease on hot exhausts every day, and parked up away from any potential ignition risks.
- Inert materials stored prior to use

It is not envisaged that the emergency services need to be advised of the work in advance.

COMPETENCE OF OPERATOR

Mr Paul Burke is an experienced practitioner. He owns and operates PSBH Ltd – offering experienced services in groundworks, construction, excavation for basements, and ground levelling work, with a full knowledge of waste material management and waste and environmental regulatory compliance from this.

Mr Burke completed the EPOC course run by CIWM, April 2018. The awarded course certificate has been included with the application.

The workers on site, operating machinery for the bund construction will be Mr Paul and Mr Steve Burke. They each hold an NPORS (National Plant Operators Registration Scheme) Operator Certificate demonstrating they are trained and competent to operate (360^{o} Excavator, Forward Tipping Dumper, Telescopic Handler).

All lorries arriving on site will report to Mr Paul Burke at the site office (temporarily constructed) and be directed where to tip. All tipping will be overseen by Mr Paul Burke.

OTHER DOCUMENTATION INCLUDED WITH THE APPLICATION

OPRA Profile Tentelow Lane
73260 Environmental Risk Assessment
73260 Waste Recovery Plan
73260 Summary of Environmental Management System (EMS)
73260 ESSD Report
73260 Site Condition Report
Site Plans 1. Plan 1 Permitted Area Boundary 2. Proposed Bunds 3. Plan 3 Ground Levels
Paul Burke EPOC certificate
NPORS Operator certificates (Steve and Paul Burke)