From: Paul Littlefair
Sent: 22 August 2013 10:57
To: County Planning
Subject: PLAN/WR220 (Dase)
Importance: High

Representation relating to the above application.
From;
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22nd August 2013

Your Reference PLAN/WR220 Dase Engineering

My interest.
My property backs on to the chalk pit adjacent to Dase Engineering site, close enough to be effected by the noise and fumes from their operations. My background is Safety and Environment, not planning, so I apologise if any of the points below are not technically relevant to the application.

General Points.
The site is barely 200 metres from North Springs and the Portsmouth Water pumping station. I trust they have been fully consulted and have no concerns relating to this application.

In my comments below when I refer to "The Site" I will always mean the entire Dase quarry site, not the footprint of the building or immediately adjacent area where contaminants may be stored.

NOTES ON PLANNING APPLICATION:

Item 12
I'm surprised a potentially seriously contaminated site (see notes on item 14 below) has only an uncontrolled soakaway.

Item 13
Bats are frequently seen in the area and there are bat boxes on trees in the adjoining ex Gas Board quarry. An independent bat survey of trees on the planning site is probably warranted.
Some newts were known to be on the adjacent Gas Board quarry. A survey may be desirable to check whether they are still there.

Items 14
BJC item 3.5 clearly indicates the probability of the site being contaminated, although BJC 4.6 attempts to minimise risk. Historically this was the end of a railway siding which, at various times, served as a supply line to the then location of the coke works, and supply to the town petrol storage depot. I am not aware that any contamination survey, or decontamination work, has ever taken place on this site since those days.

Item 15
The site (not the building footprint) has a considerable number of trees, see BJC 2.5 3.6. & 4.11
Some large trees are indeed close to the proposed building, 6 metres above but probably less than that in linear distance. These roots of these large trees are integral to the stability of the high chalk bank referred to. A combination of large trees and a potentially unstable chalk wall could pose a threat the proposed shed, the contaminants thereabouts, and any personnel in the area. The minimum precaution should be an independent professional check of the adjacent chalk walks for signs of collapse, or potential collapse, combined with an inspection of the trees and roots systems in the chalk. (I appreciate these last comments may more be appropriate, at your discretion, to another aspect of the planning application).

Item 16
There are two areas of concern in this section. Firstly there is no reference either to water based contaminants, i.e. cooling system contents which are likely to contain high levels of antifreeze and/or various inhibitors, or to vehicle air-conditioning units. Modern vehicles will contain R-134A refrigerant but early vehicles may contain R-12, Dichlorodifluoromethane, a hazardous CFC.
The second concern relates to the type, size and suitability of the contaminant storage containers. Please see notes on BJC 2.2, 4.4 & 4.5

NOTES ON BRYAN JEZEPH CONSULTANCY STATEMENT:

Item 2.2
This section fails to state that an impervious concrete, or other suitable material, base is to be, or has been, used. Given that the various oils are "stored in containers in *or adjacent to* the building (my italics) this base should be over the entire area of storage and have an appropriate bund.

Item 3.6
The reference to "houses situated *some way to the south*" (my italics) seems to me to be disingenuous. The gardens of these properties directly back on to the site boundary immediately behind the proposed structure, and, using estate plans, I would estimate the domestic buildings to be about 16 metres from the boundary.
Unfortunately the drawing Nos. 001-010 (coloured plan item) and 001-012 seem to have, literally, marginalised the nearest domestic properties. Perhaps this could be rectified in order to provide a truer indication of the nearby properties.
A more appropriate location for the development would be in the northernmost corner of the site, well away from any domestic property. This would minimise the risk to domestic properties, particularly from fire.

Item 3.8
I trust the documents referred to in this section are presented with the planning application, and that appropriate risk assessments are in place for emergency services, particularly fire service, to have access to the site at all times. In particular it is important that large vehicles are not immobilised in the entrance of the site, for example over weekends for site security, if a key holder is not available in the immediate neighbourhood.

Item 4.4
It is stated that the total storage for petrol and diesel is 50 gallons, combined in a single tank (planning item 16). This quantity is justified by stating [previous] owners drain the tanks, an operation not to be encouraged. If there is any possibility of vehicles from road traffic accidents being brought to the site it should be considered that a single large car, S.U.V. or van could contain up to 18, perhaps 20, gallons of fuel.
It is assumed that the specification for suitable containers of the contaminants mentioned in 4.4 & 4.5 are included in the documents referred to in section 3.8

Item 4.5
It is far from clear how many containers are involved, what sizes they are, or where precisely they will be kept.

Item 4.6
See comments re. planning application Item 14 (above)

Item 4.11
See comments re. planning application items15 (above)