

Gourock Pierhead Regeneration

Environmental and Public Realm Improvements

Pollution Prevention Statement



FAIRHURST

CONTROL SHEET

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DRAFT	Name	Signature	Date
Prepared by	James Jamieson	<i>James Jamieson</i>	01/03/2012
Reviewed by	Dominic Waugh	<i>D. Waugh</i>	01/03/2012
Approved by	Miles Walker	<i>Miles Walker</i>	01/03/2012

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C O N T E N T S

1	Introduction	1
2	Proposed Development	2
3	Pollution Prevention	3
4	Conclusions	8

APPENDIX A – DETAILS OF RELEVANT GUIDANCE

APPENDIX B – DIAGRAMS

1.0 Introduction

- 1.1 Fairhurst have been appointed by Riverside Inverclyde (RI) to undertake an Environmental Impact Assessment (EIA), presented within an Environmental Statement (ES), of the first phase of a programme of regeneration activity in and around Gourock Pierhead. This programme of regeneration work aims to:
- Improve the amenity of the area for residents, business and visitors;
 - Promote sustainable development by increasing the viability of the town centre as a local shopping area, providing appropriate residential accommodation and improving leisure options;
 - Increase spend in the town by passing tourist or day tripper traffic particularly those using the transport facilities or National Cycle Route; and
 - Promote the growth of appropriate new or existing businesses.
- 1.2 The ES assesses the likely significant effects on the environment of the first phase of the programme of regeneration work described above. Detailed planning permission is now being sought for this first phase. This first phase consists of the following development, which for the avoidance of doubt and hereafter is referred to as “the Proposals”:
- Streetscape improvements along the south side of Kempock Street;
 - Realigned pedestrian and vehicular access junctions to the train station and Kempock Street car parks;
 - A new vehicular access junction to the station car park at the south east edge of the site;
 - Environmental improvements, soft landscaping and hard landscaping throughout the site;
 - Reconfiguration of the two car parks;
 - A new area of open space / public realm at the northern corner of the station car park;
 - A new link road on ‘reclaimed land’, supported by rock revetments, across the existing beach area. This will join the two car parks, extend the Kempock Street car park and create a one way traffic movement system through the town centre; and
 - A new slipway for recreational access to the sea.
- 1.3 Fairhurst have prepared this Pollution Prevention Statement (PPS) following a request from the Scottish Environment Protection Agency (SEPA) during the scoping stage of the EIA process.
- 1.4 Fairhurst have based this PPS predominantly on the requirements, advice and guidance set out in Pollution Prevention Guidelines (PPG). Refer to Appendix A for details of these documents and where they can be obtained. This PPS sets out the general principles upon which the Proposals will be based upon in terms of pollution prevention, and provides as much detail as is possible at this stage.
- 1.5 It is likely that this PPS will form the basis of the Construction Environmental Management Plan (CEMP). Fairhurst consider that it is likely that the CEMP will be prepared by the appointed contractor in due course and will build upon this PPS (in terms of pollution and environmental issues).
- 1.6 Between these two documents, Fairhurst consider that a robust range of pollution prevention and mitigation measures will be set out in line with the relevant legislation, policies and guidance.

2.0 Proposed Development

2.1 The proposed development will comprise of the following aspects, (and this is reflected by the application for detailed planning permission which this Environmental Statement (ES) relates to):

- Streetscape improvements along the south side of Kempock Street;
- Realigned pedestrian and vehicular access junctions to the train station and Kempock Street car parks;
- A new vehicular access junction to the station car park at the south east edge of the site;
- Environmental improvements, soft landscaping and hard landscaping throughout the site;
- Reconfiguration of the two car parks;
- A new area of open space / public realm at the northern corner of the station car park;
- A new link road on 'reclaimed land', supported by rock revetments, across the existing beach area. This will join the two car parks, extend the Kempock Street car park and create a one way traffic movement system in the town centre; and
- A new slipway for recreational access to the sea.

2.2 This EIA assesses the effects of both the construction and the operation / use of the proposals. With this in mind, the following information is provided at this stage in terms of the likely construction processes and operations which will be used to develop the proposals. Reference should be made to the detailed planning application which includes drawings and plans etc of the various aspects of the proposals as detailed above.

Streetscape Improvements along Kempock Street

2.3 The streetscape improvements will largely consist of alterations to parking bays and lane delineation. This will be achieved through repainting and minor physical alterations.

Realigned and New Junctions

2.4 The realignment of junctions will be undertaken by extending and altering the existing public highway using standard road construction methods. Existing surface water arrangements will be used unless specifically noted.

2.5 The new junction at the south east edge of the site will be used for vehicles to access the reconfigured station car park. Again, this will be constructed using standard road construction methods. Vehicles will not be able to exit the car park via this junction. Alterations to the junctions around Kempock Place will be achieved by painting the road or undertaking other minor physical alterations.

Environmental Improvements and New Areas of Open Space

2.6 Public realm / open space improvements will consist of areas of new and enhanced open space, planting, soft landscaping and hard landscaping. This includes an area of open space in the northern corner of the site at the pierhead where a 'feature' public realm area is proposed. The rearrangement of junctions will facilitate environmental improvements, especially around the junction at the south west corner of the site.

Reconfiguration of the Car Parks

2.7 It is not proposed to resurface the car parks. In order to reconfigure them, the painted layout will be altered to improve circulation and parking capacity etc. There will be new areas of landscaping and pedestrian circulation areas, especially in the station car park

(to facilitate ease of movement to and from the station). Surface water drainage will not be altered significantly, and existing outfalls will be used.

New Link Road and Land Reclamation etc

- 2.8 Fairhurst Drawing 87097 / 7201 shows a typical make up of the proposed land reclamation and link road, which will connect the two car park areas and facilitate the proposed one way traffic circulation system.
- 2.9 At this stage, it is anticipated that material will be deposited to both exclude the sea and create a development platform before primary and secondary rock armour is placed in front of this platform to create the revetment. Geotextile material will be incorporated into the make up of this aspect of the proposals. The platform will then be further upfilled and the proposed road (which will extend through the Kempock Street car park) built on top of this platform using standard road construction methods. This will create a road which is similar to nearby adopted public highways. Surface water from the new road and car park extension will be discharged to the sea via gulleys, and filter trenches, as appropriate. There will be no alterations to existing sea walls other than cosmetic connections and interfaces at street level. This aspect of the proposals will not extend beyond the Mean Low Water Springs level.
- 2.10 The general level of the extension to the car park and the new link road will be approximately 4.5m AOD. A wall of 1.2 metre in height will be incorporated into the design of the link road and the car park extension.
- 2.11 It is likely that rock importation will be via road, and the route will be via the public highway, onto the site via the existing station car park junction.

New Slipway

- 2.12 This will allow A new slipway is proposed at the eastern end of the new link road. This will allow continued access to the sea for recreational users (small boats, kayaks etc). This will be constructed in concrete and, again, will not extend beyond the Mean Low Water Springs level.

Phasing

- 2.13 The proposals will be constructed in one overall phase, with no significant pauses in the construction process anticipated. At this stage, it is anticipated that the final stage of the construction phase will be the construction of the junction at the station car park.

Construction Timescales

- 2.14 It is anticipated that construction of the proposals will commence in September 2012. The construction phase is expected to last for a period of 18 months.

3.0 Pollution Prevention

Introduction – Pollution, Pollutants and Receptors

- 3.1 Pollution can be defined as “the release of any substance that can harm people or animals, plants, soil, water or air” (PPG 6 – Working at Construction and Demolition Sites).

3.2 PPG 6 also identifies the following (non-exhaustive list) as common pollutants;

- Silt;
- Oil (including fuel);
- Cement;
- Concrete;
- Grout;
- Chemicals;
- Sewage;
- Waste Materials;
- Dust; and
- Smoke.

3.3 PPG 6 identifies the following as being at risk of pollution;

- Water Environment (surface and ground water);
- Land and Soil;
- Air Quality; and
- People.

Pollution Prevention Planning

3.4 Fairhurst consider that the preparation of the CEMP will result in effective pre-construction planning, in terms of pollution prevention. This will include, in line with PPG 6, reviewing the planning and environmental information and conditions associated with the planning consent.

3.5 Processes and activities which may result in pollution, as well as potential receptors of pollution such as ground and surface water, will be identified to determine how to manage risks appropriately.

3.6 Deliveries to site will be carefully controlled, with these undertaken as far from the sea and other watercourses as possible. Delivery times will be defined, and are likely to be controlled by condition attached to the planning consent. Delivery and storage areas will be carefully designated, and delivery vessels (barrels, drums etc) inspected to avoid leakages etc.

3.7 Delivery of potentially polluting materials will be stored in a designated area and checked regularly. Arrangements will be put in place to prevent excess mud being transported onto the public road network (likely to be wheel washing and / or road sweeping). A suitable speed limit will be enforced within the site to reduce dust disturbance.

3.8 Management of silty water will be carefully considered before and during the works. Silt generating activities, potential pathways and suitable mitigation measures (silt traps etc) will be identified and implemented.

3.9 Plant, wheel and boot washing will be undertaken at least ten metres from watercourses and the sea. Any run off will be collected in a sump, with the solids removed regularly and the water recycled.

3.10 Preparation for pollution prevention will include the preparation of the CEMP, which will build on the initial recommendations set out in this PPS. This is likely to form the Environmental Plan for the site and will include the following, in line with PPG 6;

- Specific method statements;
- Control measures;
- Inspection processes;
- Designation of 'responsible person';
- Management and training of staff for pollution events;
- Reduction of pollution risk;
- Water cleaning and management; and
- Consideration of climatic effects (time of year, prevailing wind direction etc).

3.11 Site security will be carefully considered with access to the site and potentially hazardous materials carefully controlled. The CEMP will include communication methods and channels to ensure all site staff are aware of the potential pollution issues and the relevant prevention / control measures.

Site Drainage

3.12 It has been confirmed with Inverclyde Council and SEPA that Sustainable Drainage Systems (SuDS) are not required for the discharge of surface water into the sea. However, drainage issues will be considered in the incident planning and the drainage guidance (from PPG 6) enclosed in Diagram 1 in Appendix A. This will be taken into consideration when undertaking detailed / construction level design and preparing the CEMP.

Excavations

3.13 It is noted that excavations on the site, especially those required for the construction of the link road aspect of the Proposals, may generate pollution by:

- Generating dust;
- Producing silty water;
- Mobilising sediment etc into the marine environment; and
- Uncovering / disturbing unexpected finds in the ground (considered in detail in the ES).

3.14 The consideration and mitigation of drainage issues will be important in terms of preventing pollution from excavation work. Suspended solids will be allowed to settle, then disposed of, prior to discharge of the water into water courses (the sea in this case).

3.15 The timing (in terms of tidal movements) and the order of works in the marine environment will be carefully considered to minimise the potential for sediment to be mobilised into the marine environment. Reference should be made to the ES for detailed consideration of this issue.

3.16 The use of the following mitigation / prevention measures may also be appropriate:

- Cut-off trenches;
- Minimise exposed earth to reduce silt generation and transportation; and
- Protect watercourses with silt traps.

Materials Storage, Stockpiles and Exposed Ground

3.17 The generation of dust and run-off, which can then enter watercourses or the sea, from stockpiled materials will be prevented through inclusion of the following means as appropriate:

- Location of stockpiles away from watercourses;
 - Ensure stability of stockpiles (i.e. on level ground, avoid steep sided piles etc); and
 - Store materials on impermeable ground and use bunds as appropriate.
- 3.18 Stockpiles on the site will be prevented from drying out through damping down or covering to reduce dust generation and the materials being eroded as washed into watercourses by precipitation and surface water run-off.
- 3.19 The order of the various aspects of the works will be carefully considered to prevent extensive stockpiling of materials. If stockpiles are to be used for extensive periods of time, seeding will be considered to bind soils together and reduce loss through wind blow and surface water. Other forms of slope stabilisation will be considered as appropriate.
- 3.20 Water will be directed away from stockpiles to prevent erosion and cut-off trenches / siltation traps employed as appropriate. Silt fencing may be appropriate around the base of stockpiles.

Oil Use, Storage and Refuelling

- 3.21 The appointed contractor will comply with the relevant legislation relating to oil storage and use. Oil stores will be located to ensure safety and security. High risk storage locations will be avoided, such as:
- Where storage facilities are at risk of damage, for example, through vehicle collision;
 - Locations less than ten metres from watercourse / sea;
 - Where spillages could soak into the ground;
 - Where tank vent pipe outlet can not be seen from filling point; and
 - In flood risk areas.
- 3.22 Fixed oil storage locations will be carefully considered in terms of their weight and the base for the facility etc. Secondary storage will be incorporated into oil storage as required, and oily water disposed of legally.
- 3.23 The CEMP will include details of oil storage and procedures for receiving deliveries of oil safely. This will always be supervised and over-ordering will be avoided to minimise the quantity of oil stored on site.
- 3.24 Where possible, dispensing pumps will be used for refuelling vehicles and plant to avoid accidental spillage. This will also negate the need to use a gravity fed fueling system with an elevated tank.
- 3.25 Refuelling will be undertaken in a designated area. When not possible, suitable prevention measures will be used, such as drip trays and using funnels etc.
- 3.26 All oil storage facilities will be inspected regularly, and maintenance carried out immediately. Oil levels will be checked frequently, with any abnormal changes noted (which could indicate a leak or other problem) investigated.

Nuisance

- 3.27 Barriers will be employed as appropriate to prevent the detrimental effects of dust. The effects of lighting will be mitigated by screening, effective programming of works and directional lighting.

- 3.28 Plant and vehicles etc will be maintained in good condition to avoid excess generation of smoke.
- 3.29 Effective planning and preparation of the CEMP will prevent nuisance. It will be made clear who the 'designated person' is during the works should there be a problem that needs to be brought to the contractor's attention.
- 3.30 Conditions set out in the planning consent relating to hours of working and other mitigation measures will be complied with as appropriate.

Cement, Concrete and Grout

- 3.31 The highly alkaline and corrosive nature of cement, concrete and grout can cause serious damage to watercourses and the ground as well as ecological receptors in the water environment such as fish populations. Wash waters from concrete and cement works will not be discharged into the marine environment.
- 3.32 Excess materials will be returned, and dry materials stored as inert rubble.
- 3.33 Concrete and cement mixing and washing areas will;
- Be located on an impermeable surface;
 - Be more than 10 metres from watercourses / the sea;
 - Incorporate settlement and re-circulation systems for water reuse;
 - Have a contained area for washing concrete batching plant / lorries etc; and
 - Collect wash waters and discharge to foul sewer / dispose off site (with required licenses etc).
- 3.34 Best practice will be employed when undertaking work with concrete in the marine environment. The potential environmental effects of this aspect of the construction works will be carefully considered, and specific details will be set out in the CEMP.

Chemicals and Hazardous Substances

- 3.35 Safety Data Sheets will be supplied with all hazardous materials and chemicals, and the contractor will comply with the requirements of these.
- 3.36 In addition to the above, the following precautions will be undertaken;
- All chemicals and materials will be stored away from watercourses and the sea on an impermeable, bunded surface;
 - Materials will be stored in an area not at risk of damage, for example through vehicle collision;
 - Materials will be stored securely, labeled clearly and sealed when not being used;
 - Redundant / damaged containers will be disposed of in line with best practice;
 - Emergency plans and staff training will be undertaken as appropriate;
 - Incident / emergency kit will be made available;
 - Staff will be trained how to respond to and deal with spillages and other incidents;
 - Storage facilities will be locked when not being used;
 - Over-ordering will be avoided and only the necessary amount of materials used / moved around etc;
 - Materials will be returned to storage once used; and
 - Secondary containers and drip trays etc will be used as appropriate.

Waste Storage and Disposal

- 3.37 The waste 'Duty of Care' will be complied with during works:
- Waste will be stored safely and securely;
 - Bins and skips will be checked regularly to prevent liquid waste leaching into the ground or watercourses;
 - Waste contractors will be required to comply with the Duty of Care, and waste will only be passed on to authorised bodies;
 - Appropriate documentation, in line with the Duty of Care, will be prepared for each load / assignment of waste;
 - Hazardous waste will not be mixed in with non-hazardous waste;
 - Waste transfer documentation will be kept for a minimum of two years; and
 - Waste consignment documentation will be kept for a minimum of three years.
- 3.38 More generally, a Site Waste Management Plan will be incorporated into the CEMP, waste will be avoided by all practical means and storage areas, bins and skips will be kept locked.

Contingency Plans and Incident Response

- 3.39 An appropriately experienced and qualified member of the site staff will be appointed as the 'responsible person'. A pollution incident response plan will be prepared (in conjunction with the relevant regulators) and incorporated into the CEMP. This will outline the actions to take in the event of a pollution incident, taking into consideration the specific issues associated with the project and the site.
- 3.40 Tool box talks will be undertaken to make sure all site staff are aware of the steps to be taken in the event of a pollution incident.
- 3.41 Contingency planning for the site will include deploying booms where appropriate and feasible as well as undertaking regular visual inspections.

4.0 Conclusions

- 4.1 The above measures have been set out in line with PPG to minimise the risk of pollution and set out contingency plans and measures in the event of a pollution event. These measures will be further developed once a contractor has been appointed to construct the approved scheme.
- 4.2 It should also be noted that a full EIA has been undertaken. This includes detailed mitigation measures to prevent any significant negative effects on the environment.
- 4.3 Fairhurst note that it will be necessary to submit a CEMP for approval by the Planning Authority (in consultation with other regulators such as SEPA) before construction works can start. At this stage, Fairhurst consider that this PPS forms the basis from which detailed mitigation measures can be set out, in due course, in the form of the CEMP.

APPENDIX A – DETAILS OF RELEVANT GUIDANCE



The following guidance documents have been taken into consideration during the preparation of this PPS;

PPG 1 – General Guide to the Prevention of Pollution

PPG 5 – Works and Maintenance in or Near Water

PPG 6 – Working at Construction and Demolition Sites

These documents can be accessed at;

http://www.sepa.org.uk/about_us/publications/guidance/ppgs.aspx

APPENDIX B – DIAGRAMS



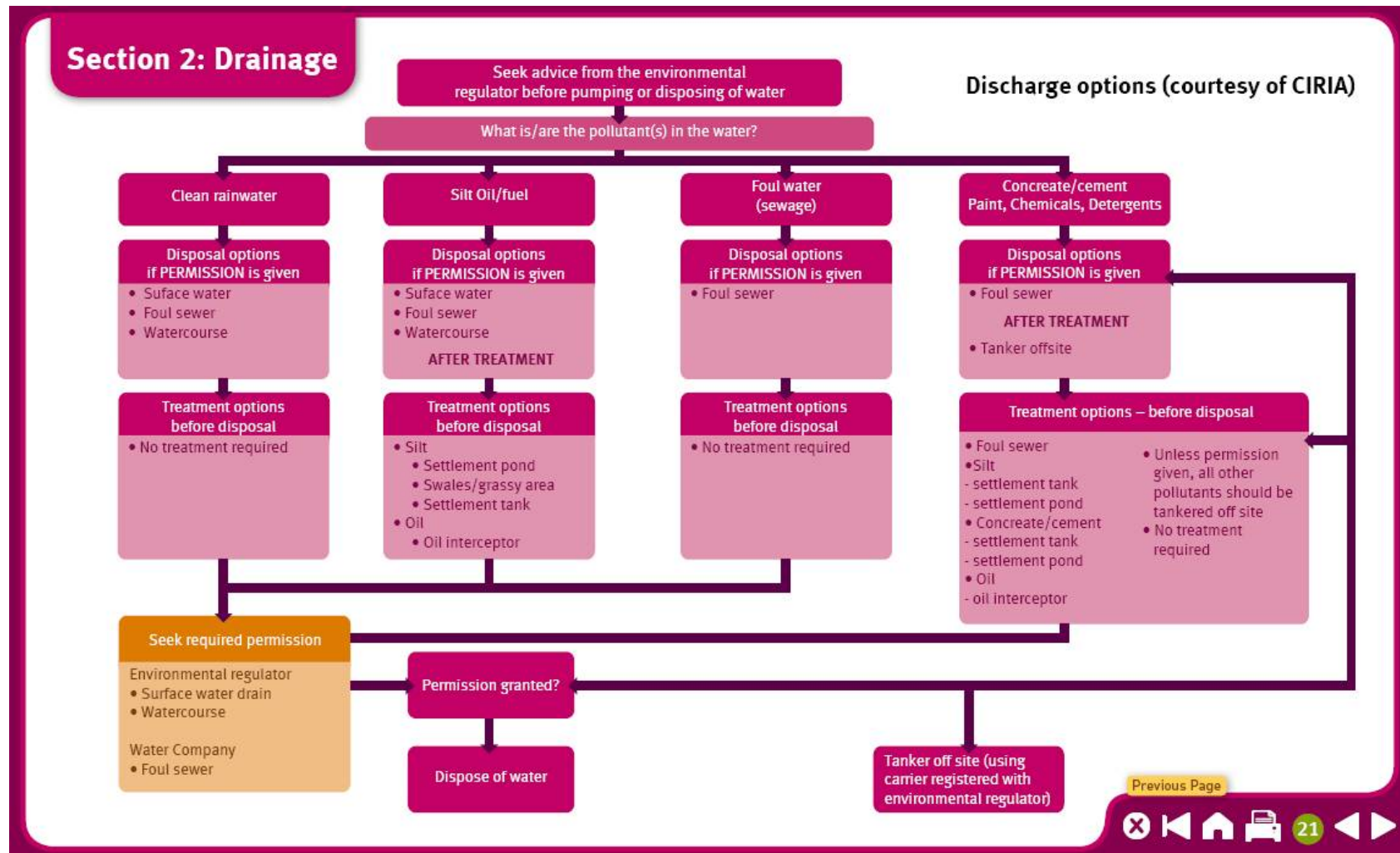


Diagram 1 – Discharge Options (source: PPG6 – Working at Construction and Demolition Sites)

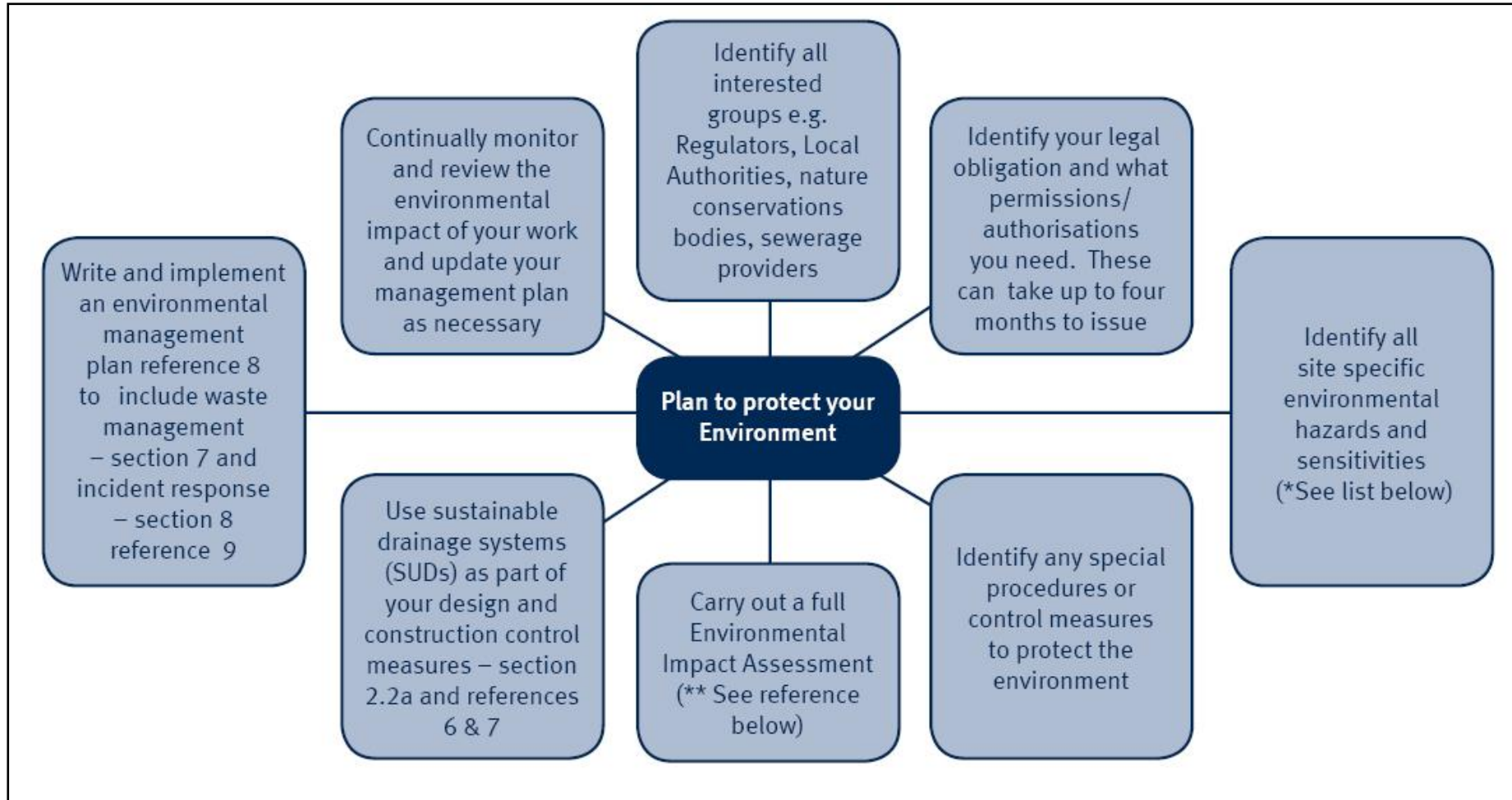


Diagram 2 – Framework for Management of Environmental Hazards (source: PPG5 – Works and Maintenance in or Near Water)

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