Former Howard Kent Storage Yard
5 Brighton Road
Shoreham-by-Sea
West Sussex

Remediation Strategy

Report Beneficiary:
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c/o Phlorum Ltd
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Project Reference: C16692

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TABLE OF CONTENTS

1. INTRODUCTION 2

2. SITE LOCATION 3

3. RISK ASSESSMENT 3

3.1 Preliminary Risk Assessment 3

3.2 Quantitative Risk Assessment 3

4. REMEDIATION STRATEGY 4

4.1 Options Appraisal 4

4.2 Protection of Human Health 4

4.3 Protection of Controlled Waters 5

4.4 Protection of Services 5

4.5 Protection of Construction Workers 5

4.6 Watching Brief on Development Works 6

5. VERIFICATION PLAN 7

5.1 Stripped Formations and Placement of Geotextile Marker 7

5.2 Cover System Depth 7

5.3 Services 7

5.4 Imported Materials 7

6. POST REMEDIATION RISK ASSESSMENT 9

7. REGULATORY APPROVAL 9

FIGURES AND APPENDICES

FIGURES

Figure 1 Site Location Plan

APPENDIX A

Proposed Development Layout

Visualisation – Proposed Aerial Views

APPENDIX B

Quantitative Conceptual Model

APPENDIX C

Checklist for Verification Report(s)

1. INTRODUCTION

It is proposed to redevelop the former Howard Kent storage yard site at 5 Brighton Road, Shoreham-by-Sea, West Sussex. The proposed mixed-use development will be between 3 and 8 storeys in height and is to comprise 21 townhouses, a block of 24 flats, as well as commercial units. A new riverside walk, children's play area, and areas of communal and decorative landscaping are also proposed. The plans do not include any areas of private garden. A copy of the proposed development layout, obtained from the local planning portal, is presented in Appendix A. A visualisation of landscaping proposals is also included in Appendix A.

It is understood that the development has been approved via planning appeal, under Adur & Worthing Councils Ref. No. AWDM/1962/22 with Appeal Condition 6 imposed with respect to contaminated land.

The following reports have been prepared for the site with respect to contaminated land:

- Land Contamination Preliminary Risk Assessment[1]
- Combined Geotechnical and Ground Contamination Risk Assessment[2]

The ground contamination risk assessment report identified complete pollutant linkages and concluded that remedial measures were necessary as part of the development.

Ashdown Site Investigation Ltd., in association with Phlorum, was requested to prepare a remediation strategy for the site on the basis of the earlier risk assessment report.

The scope of the works covered by this report, and the terms and conditions under which they were undertaken, were set out within the offer letter Q14220, dated 25th June 2024. The instruction to proceed was received on behalf of the client.

[1] Phlorum Ltd., Project No. 10500 Rev0, dated 22nd March 2021.
[2] Ashdown Site Investigation Ltd., Project Ref: P16596, Report Ref: R16194, dated 7th June 2024

2. SITE LOCATION

The site is located at 5 Brighton Road, Shoreham-by-Sea, West Sussex, and is centred on the approximate Ordnance Survey national grid reference 523324, 104938. A site location plan is presented as Figure 1.

3. RISK ASSESSMENT

3.1 Preliminary Risk Assessment

The preliminary risk assessment identified that the site was historically used as a ship building yard, a sawing and planning mills and more recently as a car park.

3.2 Quantitative Risk Assessment

3.2.1 Ground Conditions

The ground investigation comprised the drilling of a number of dynamic sampler boreholes and a single mechanically dug trial pit.

Made ground, generally comprising sandy gravel and/or gravelly sandy clay, was recorded to depths of between 0.50m and 1.50m below ground level. The gravel fraction comprised variable quantities of flint, chalk, concrete, brick, charcoal-like material, sandstone, asphalt, crystalline rock and shell fragments.

Underlying the made ground, the investigation progressed into sandy, locally clayey gravel deposits with occasional gravelly sandy clay soils of the Beach and Tidal Flat Deposits. These deposits generally extended to the full depth of the ground investigation, but were penetrated at some locations at depths of between 3.10 and 4.10m, where they were underlain by chalk deposits.

Based on the groundwater data obtained by a datalogger installed, the groundwater table is tidally influenced, but there is a permanent groundwater table at around 3m below ground level.

3.2.2 Summary of Quantitative Risk Assessment

The ground investigation recorded the made ground soils to contain concentrations of lead and PAH compounds in excess of published soil screening values (SSV) for a residential development.

Concentrations of petroleum hydrocarbons and BTEX compounds were also recorded above the threshold values for the use of PE and PVC water supply pipework.

The quantitative conceptual model for the proposed development is presented in Appendix B.

4. REMEDIATION STRATEGY

Current best practice guidance recommends that any remedial action proposed for the site should be justified. The requirement for remedial action is considered to be justified due to the identification of complete pollutant linkages.

The remediation works have been developed to meet the technical objectives for the development, the major drivers behind which are:

- To achieve successful remediation within a particular timescale and budget;
- Familiarity with the methodology by the developer/ground worker;
- Confidence that the remediation can be carried out by good technical practices; and
- Likely success of the style of remediation.

It is noted that the risk assessment report has not yet been approved by the regulators. The remediation strategy proposed is subject to their approval of the risk assessment. Additional measures may be required following comment from the regulators.

4.1 Options Appraisal

The driver for remediation at the site is the presence of made ground soils containing concentrations of lead and PAH compounds considered to pose an unacceptable level of risk to human health in the context of the development. There are no in situ or ex situ remediation techniques available to reduce the concentrations of lead and PAH compounds within the made ground soils to below that of the published screening values.

The method chosen for remediation must be achievable by the groundworker, using techniques that they are familiar with. It is therefore considered that the remediation proposals could either comprise the complete removal of the contaminant source (the made ground soils), or the provision of a cover system to sever the contaminant pathways in areas where the end users may reasonably be expected to be exposed to the soils or soil derived dust.

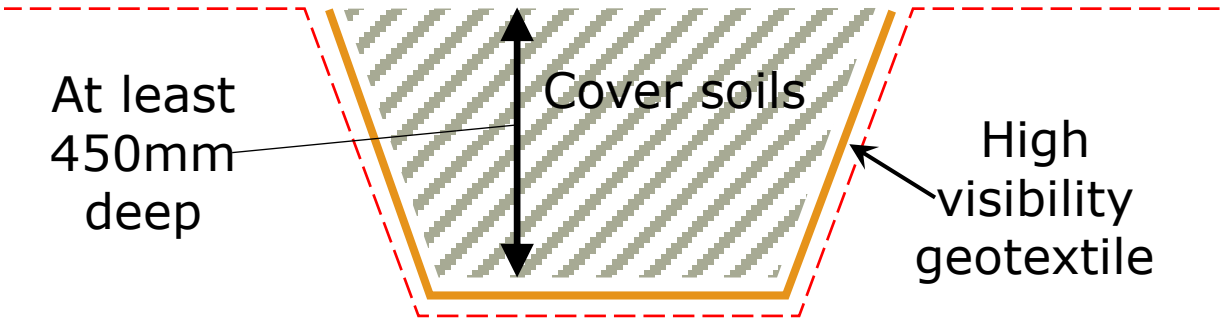
Given the development proposal and the depth of made ground soils recorded during the ground investigation, the provision of a cover system is considered to represent the better approach to reducing the risk to end users of the site to an acceptable level as the complete removal of all made ground would be hugely disruptive, and would likely cause considerable issues with the proposed construction works.

4.2 Protection of Human Health

Within all proposed areas of soft landscaping a cover system of at least 450mm of verified "clean" topsoil and/or subsoil underlain by a high visibility geotextile marker should be provided.

The geotextile marker should lap up the sides of the excavation to prevent future intermixing between the cover system soils and the residual made ground.

A schematic cross section of the cover system construction is shown below.



The depth of the cover system specified represents "two spade depths" to allow for planting of trees, shrubs etc. without residents coming into contact with the contaminated soils remaining at depth.

Where any tree planting is proposed within areas of landscaping, then the depth of the cover system should be locally deepened to that required for the tree pit.

Elsewhere on the site the presence of building cover, roadways, car parking and permanent access ways comprising hard cover will also act to sever the contaminant pathways and thereby reduce the risk to end users to an acceptable level.

4.3 Protection of Controlled Waters

The risk assessment did not identify any unacceptable risks to controlled waters beneath the site and therefore no specific remedial works are considered necessary in this regard.

4.4 Protection of Services

Unless confirmed otherwise in writing by the water supply company, it should be assumed that barrier pipe is required for all new water supply connections.

All other service providers' requirements must be fully adhered to in order to reduce the risk to end users and services to an acceptable level.

Details of any measures required by service providers and confirmation of their implementation should be included within the verification report.

4.5 Protection of Construction Workers

All construction workers must undertake their own risk assessment, based upon the works to be carried out and the proposed method by which this will be achieved, in accordance with current health and safety legislation. Their assessment should take into account all available information about the site, including that present within this and previous reports prepared for the site.

Appropriate working procedures and PPE should be adopted to ensure the health and safety of the site operatives. Instruction should be given in the recognition of potentially hazardous materials. All site personnel should be appropriately briefed on the discovery strategy (watching brief), presented below, and what actions they must take in the event that further evidence of contamination is identified or suspected.

4.6 Watching Brief on Development Works

If, during the course of the site clearance and development works, any materials not previously identified by the investigation that are suspected of being 'contaminants' are encountered, then the following procedure should apply:

- All works in that area should cease and the site manager should be informed.
- Advice should be sought from suitably qualified and experienced personnel as to whether any further site inspection, sampling, testing and/or assessment is deemed necessary.
- If required, the conclusions of any assessment and any proposed remedial works (if required) should be agreed by the local authority.
- If necessary, full details of any remedial works should be included in the verification report for the site.

Suspected 'contamination' may take the following form, though it is noted that this list is not exhaustive and site operatives should ask if they are at all unsure of any findings:

- Soil or water looks oily and/or has an oily odour
- Soil or water has a solvent type of odour
- Significant quantities of man-made materials within fill such as paint cans, car parts, glass fragments
- Suspected asbestos containing materials (insulating boards, cement, loose fibres etc.)
- Significant volumes of clinker like or ashy material
- Sand bags, and/or subsurface concrete structures
- Animal carcasses or evidence of animal burial pits

5. VERIFICATION PLAN

A checklist summarising the requirements of the verification report is presented within Appendix C.

Depending on the development programme, it may be necessary for interim verification reports to be produced for parts of the site prior to the completion of all development works.

5.1 Stripped Formations and Placement of Geotextile Marker

For all areas where remediation works are required, the formation level will be inspected prior to placement of any cover soils to confirm that the areas are sufficiently deep to enable placement of the required thickness of cover soils, and to document the placement of the high visibility geotextile marker.

A photographic record of all stripped formations will be maintained for inclusion in the verification report.

If for any reason the above inspections are not undertaken for areas where remediation works are required, retrospective verification will be carried out by way of the excavation of trial pits to expose the geotextile in representative locations. In such circumstances these works may be undertaken in conjunction with the works detailed in Section 5.2.

5.2 Cover System Depth

The final depth of cover material placed in all required areas should be confirmed by use of tape measurements made within excavations to the base of the cover soils.

Photographic evidence of the depth of cover soils present will be included in the verification report.

5.3 Services

Confirmation of any service providers' requirements and evidence to demonstrate adherence to them should be included in the verification report.

5.4 Imported Materials

Any imported material from a potentially contaminated (e.g. industrial) site should be rejected. It is recommended that chemical testing results are obtained and supplied for comment prior to accepting the soils on site. Obtaining such results does not negate the need to carry out sampling and testing of the soils, once brought onto the site.

Once imported materials have been brought to site they should be stockpiled and protected from cross contamination with any other materials already on site. They will then be inspected, sampled and tested by Ashdown Site Investigation Ltd.

5.4.1 Soils for use in soft covered areas.

The table below summarises the soil screening values[3] against which any imported soils will be assessed.

Table 1. Calculated soil screening values for imported soils

Contaminant	Screening Value (mg/kg)	Contaminant	Screening Value (mg/kg)
Arsenic	40	Fluorene	2800
Cadmium	85	Phenanthrene	1300
Chromium	910	Anthracene	31000
Copper	7100	Fluoranthene	1500
Lead	310	Pyrene	3700
Mercury	56	Benz(a)anthracene	11
Nickel	180	Chrysene	30
Selenium	430	Benzo(b)fluoranthene	3.9
Zinc	40000	Benzo(k)fluoranthene	110
Hexavalent Chromium	6	Benzo(a)pyrene	3.2
Water Soluble Boron	11000	Indeno(123-cd)pyrene	45
Naphthalene	2.3	Dibenz(ah)anthracene	0.31
Acenaphthylene	2900	Benzo(ghi)perylene	360
Acenaphthene	3000	Asbestos	None detected

It is noted that the SSV are only protective of long-term risk to human health and do not necessarily represent suitable concentrations for planting or landscaping. If necessary, a horticulturalist should be consulted in this regard.

All soils must be free from any visual or olfactory evidence of suspected petroleum hydrocarbon contamination and should contain no significant quantity of putrescible material (incl. wood or paper). Along with testing for the contaminants listed above, testing should also be undertaken to confirm the absence of any significant concentrations of petroleum hydrocarbons.

All soils used as surface dressing or as part of the cover system must be free from propagules of aggressive weeds, fragments of glass, bricks, concrete, wire or other potentially hazardous foreign matter and bulk vegetative growth, in order to ensure negligible risk of subsequent weed problems (introduced in the soil) or traumatic injury.

In the event that any individual sample of imported material records concentrations of contaminants above the screening values listed above, the following method of assessment will be undertaken:

- Statistical analysis of the results, along with an assessment of whether any statistical 'outliers' should be removed from the dataset and treated as 'hotspots'. If the data indicates that the majority of the soil mass as a whole may be considered to contain contaminant concentrations below the screening values then it may be deemed suitable to remain.
- Depending on the findings of the analysis additional testing (which may include retests of the original sample) may be undertaken along with further analysis of the results to determine if this is representative of a widespread issue, or may be attributed to a smaller part of the site, or batch of imported soils.
- Liaison with the regulators may be undertaken to agree whether or not the materials are to be considered suitable to remain.

[3] Comprising 'Suitable For Use Levels' (S4ULs), 'The LQM/CIEH Suitable 4 Use Levels, 2015' and for lead, the Category 4 Screening Level (C4SL), SP1010: Development of Category 4 Screening Levels for Assessment of Land Affected by Contamination. Final Project Report, published by DEFRA, 2014.

Where testing and analysis identify a significant failure and the procedures above do not provide sufficient evidence that the imported materials are suitable to remain, then the imported soils will be removed and replaced with other suitable soils.

6. POST REMEDIATION RISK ASSESSMENT

The remedial works set out in this report are considered to remove or sever the identified pollutant linkages. A post remediation conceptual model is presented in the following table.

Table 2. Post Remediation Conceptual Model for End Users – Potential Pollutant Linkages and Assessment of Risk

Contaminant Source	Remedial Measures	Potential Pathway(s)	Assessment of Risk to Human Health
Made ground containing elevated concentrations of lead and PAH compounds.	Placement of 450mm of verified cover soils over a high visibility geotextile marker within all soft landscaped areas.	Pathways severed by remedial measures.	No significant pollutant linkages identified.
	Provision of building cover, roadways, car parking and permanent access ways comprising hard cover elsewhere on site.	Pathways severed by construction works.	
Concentrations of petroleum hydrocarbons and BTEX above the threshold for PE and PVC water supply pipework.	Provision of barrier pipework or other pipework acceptable to local water supply company.	Pathways severed by remedial measures or construction works.	No significant pollutant linkages identified.

7. REGULATORY APPROVAL

This report and the previous reports should be submitted to the local authority in relation to discharge of condition 6.

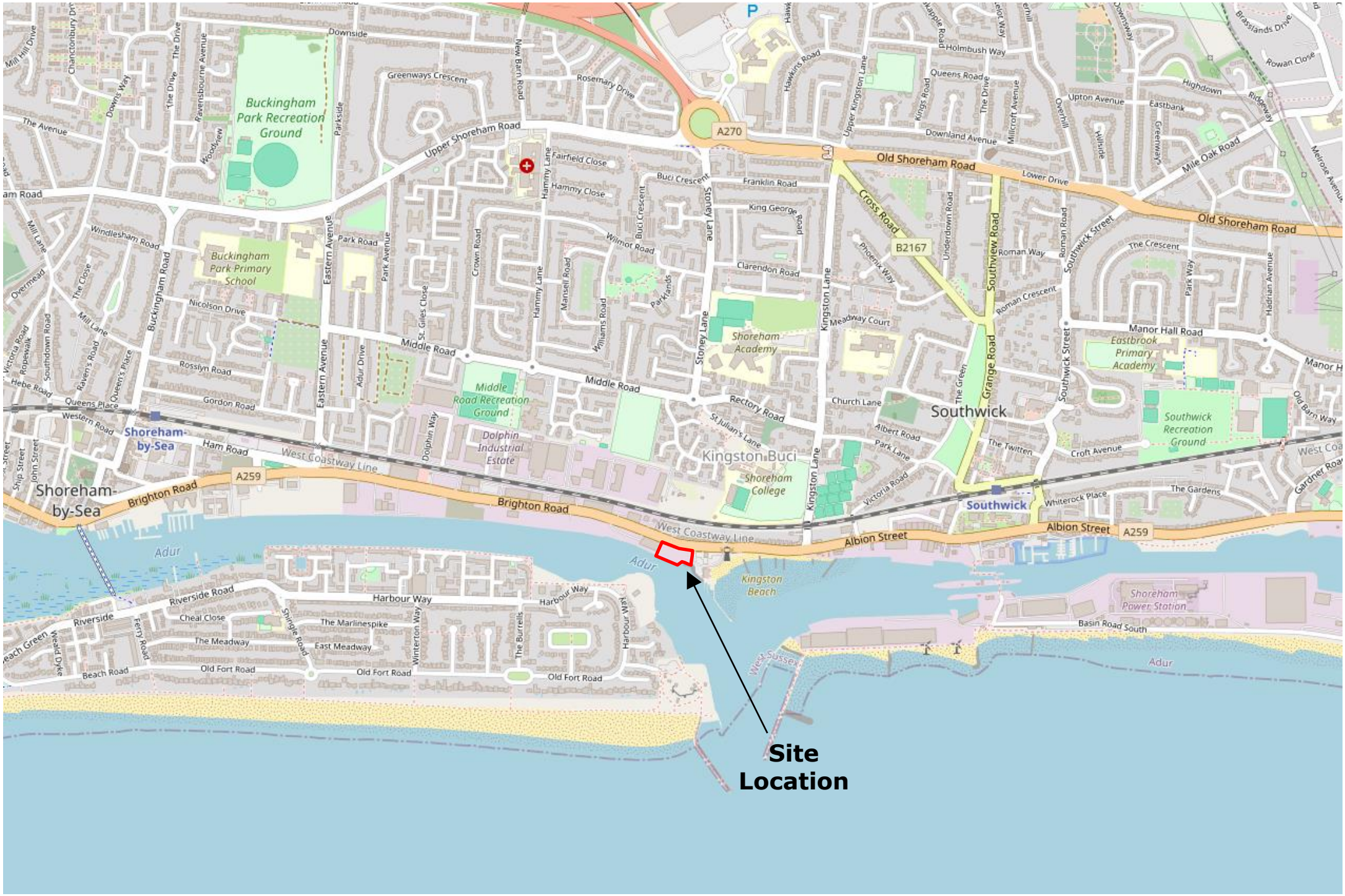
The conclusions drawn and recommendations made within this report should be considered as provisional until such time as the report has been approved by regulators and any other warrantors.

Copies of comments from regulators/warrantors (if provided) should be included within the verification report.

Ashdown Site Investigation Ltd.

FIGURES

Figure 1 Site Location Plan



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ASHDOWN SITE INVESTIGATION LIMITED	Site Location Plan	Site Name	Figure No.	Project Reference
		Former Howard Kent Storage Yard, 5 Brighton Road, Shoreham-by-Sea, West Sussex	1	C16692

APPENDIX A

Proposed Development Layout
Visualisation – Proposed Aerial Views

Only figured dimensions are to be used. All dimensions to be checked on site.

Please note: Refer to 'type' of drawing below; planning drawings should only be treated as such.

Plant selection subject to discussion with landscape consultants



KEY

- MARSHALL'S ARGENT DRIVESETT DARK PAVING
- MARSHALL'S ARGENT DRIVESETT LIGHT PAVING
- MARSHALL'S BRINDLE DRIVELINE PAVING
- TARMAC
- CHILDRENS PLAY AREA
- PLANTING BEDS
- (S) SEATING
- A TREE A
- B TREE B
- C TREE C

1: ROAD SIDE & DRIVEWAY PLANTING

Evergreen to hold shape & colour throughout year, selection to suit location, varied scale, planted in drifts. Indicative plants:

Prunus Laurocerasus 'Otto Luykens'
Viburnum Davidii
Euonymus Japonica
Euonymus Fortunii 'Emerald Gaiety'
Sarcocco Hookeriana

2: COURTYARD PLANTERS

Generally evergreen small scale shrubs & low level ground cover plants with varied colour flowering to suit location. Indicative plants:

Euonymus Japonica
Euonymus Fortunii 'Emerald Gaiety'
Escalloris Red Dream
Halimim
Vinca Minor Atropurpurea
Lithodoro Diffusa Heavenly blue

3: RIVERSIDE WALK PLANTING

The intention is to maintain continuity with the HK development by continuing the tarmac surface and agreeing a common balustrade to the river. Accordingly it is also proposed that the planting will have a similar feel with the inclusion of mostly evergreen grasses & small scale shrubs suitable for the location. Planting to the edged with small stones to give definte but rough edge to the river walk. Indicativ plants:

Sesleria Caeuloa
Festicu Glauca 'Elijah Blue'
Carex Dipsacea
Juncus Effusus f Spiralis

4: CAR PARK

As suggested at the Design Review Panel, create a green wall in the flats car park by ivy cladding.

Hedera Hibernica (Irish Ivy) is salt tolerant & suitable for coastal locations

4: TREES

Evergreen

A : Quercus Ilex
B : Arbutus Unedo
C: Pinus Mungo

+PL Strategic landscape plan - scale 1: 200 at A1

Scale in Metres
0 1 2 3 4 5 10 15 20

APPLICATION FOR DETAILED
PLANNING CONSENT

LRA-R RETINUE
01273 446 890 WWW.LRA-RETINUE.CO.UK

J O B FORMER HOWARD KENT SITE 5 BRIGHTON ROAD SHOREHAM	CHECKED LRA
	DRAWN MC
CLIENT CAYUGA DEVELOPMENTS LTD	DATE 11-22
	SCALE 1:200 @ A1 1:400 @ A3
DRAWING STRATEGIC LANDSCAPE PLAN	REVISION
	NUMBER 1545 PA 044

24 Windlesham Road, Brighton, East Sussex BN1 3AG. UK
LRA-Retinue registered in England and Wales 12353276

Only figured dimensions are to be used. All dimensions to be checked on site.

Please note: Refer to 'type' of drawing below; planning drawings should only be treated as such.

Notes

Habitable rooms on the north elevation facing the A259 and parts of the east & west elevations will require enhanced double glazing



+EL South elevation, riverside - scale 1: 200 at A1

Scale in Metres

0 1 2 3 4 5 10 15 20



+SX Section A-A - scale 1: 200 at A1

Scale in Metres

0 1 2 3 4 5 10 15 20

APPLICATION FOR DETAILED
PLANNING CONSENT

LRA-R RETINUE

01273 446 890 WWW.LRA-RETINUE.CO.UK

J O B FORMER HOWARD KENT SITE 5 BRIGHTON ROAD SHOREHAM	CHECKED LRA
	DRAWN MC
CLIENT CAYUGA DEVELOPMENTS LTD	DATE 11:22
	SCALE 1:200 @ A1 1:400 @ A3
DRAWING SOUTH ELEVATION RIVERSIDE & SECTION A-A	REVISION
	NUMBER 2088-PA-020

24 Windlesham Road, Brighton, East Sussex BN1 3AG. UK
LRA-Retinue registered in England and Wales 12353276

Only figured dimensions are to be used. All dimensions to be checked on site.

Please note: Refer to 'type' of drawing below; planning drawings should only be treated as such.

Notes



+PL Ground floor plan - scale 1: 200 at A1

Scale in Metres

0 1 2 3 4 5 10 15 20

N

APPLICATION FOR DETAILED
PLANNING CONSENT

LRA-R RETINUE

01273 446 890 WWW.LRA-RETINUE.CO.UK

J O B FORMER HOWARD KENT SITE 5 BRIGHTON ROAD SHOREHAM	CHECKED LRA
	DRAWN MC
CLIENT CAYUGA DEVELOPMENTS LTD	DATE 11-22
	SCALE 1:200 @ A1 1:400 @ A3
DRAWING Ground floor plan with flood gate positions, river walk width & section lines for perimeter sections highlighted	REVISION
	NUMBER 1545 PA 041

24 Windlesham Road, Brighton, East Sussex BN1 3AG, UK
LRA-Retinue registered in England and Wales 12353276

Only figured dimensions are to be used. All dimensions to be checked on site.

Please note: Refer to 'type' of drawing below; planning drawings should only be treated as such.

Notes



+AI Proposed South-East aerial view



+AI Proposed South-West aerial view



+AI Proposed North-East aerial view



+AI Proposed North-West aerial view

APPLICATION FOR DETAILED
PLANNING CONSENT

LRA-R RETINUE

01273 446 890 WWW.LRA-RETINUE.CO.UK

J O B FORMER HOWARD KENT SITE 5 BRIGHTON ROAD SHOREHAM	CHECKED LRA
	DRAWN MC
CLIENT CAYUGA DEVELOPMENTS LTD	DATE 12:22
	SCALE NTS @ A1 NTS @ A3
DRAWING VISUALISATION - PROPOSED AERIAL VIEWS	REVISION
	NUMBER 2088-PA-030

24 Windlesham Road, Brighton, East Sussex BN1 3AG, UK
LRA-Retinue registered in England and Wales 12353276

APPENDIX B

Quantitative Conceptual Model

Former Howard Kent Storage Yard, 5 Brighton Road, Shoreham-by-Sea, West Sussex				Quantitative Conceptual Model		P16596	
Source	**Receptor**	**Contaminants**	**Pathway**	**Complete Linkage Present?**	**Probability**	**Consequence**	**Risk**
• Made ground containing elevated concentrations of lead and PAH compounds	End Users	Lead and PAH Compounds	Dermal contact with soil and dust (indoor & outdoor)	Yes	P3: Moderate	C3: Moderate	Moderate
			Ingestion of soil and indoor dust	Yes	P3: Moderate	C3: Moderate	Moderate
			Consumption of home-grown produce and attached soil	No private gardens proposed			N/A
			Inhalation of soil dust (indoor and outdoor)	Yes	P3: Moderate	C3: Moderate	Moderate
			Inhalation of soil vapours	Identified contaminant(s) do not pose a risk via this pathway			N/A
			Inhalation of soil gases/ Risk of explosion	Identified contaminant(s) do not pose a risk via this pathway			N/A
	End Users (via Water Supply Pipework)		Contamination of incoming services	Identified contaminant(s) do not pose a risk via this pathway			N/A
	Groundwater		Migration to groundwater	No contaminants present at concentrations posing risk to groundwater			N/A
• Concentrations of petroleum hydrocarbons and BTEX above the threshold for PE and PVC water supply pipework	End Users		Dermal contact with soil and dust (indoor & outdoor)	Identified contaminant(s) do not pose a risk via this pathway			N/A
			Ingestion of soil and indoor dust	Identified contaminant(s) do not pose a risk via this pathway			N/A
			Consumption of home-grown produce and attached soil	No private gardens proposed			N/A
			Inhalation of soil dust (indoor and outdoor)	Identified contaminant(s) do not pose a risk via this pathway			N/A
			Inhalation of soil vapours	Identified contaminant(s) do not pose a risk via this pathway			N/A
			Inhalation of soil gases/ Risk of explosion	Identified contaminant(s) do not pose a risk via this pathway			N/A
	End Users (via Water Supply Pipework)	Petroleum Hydrocarbons and BTEX	Contamination of incoming services	Yes	P3: Moderate	C3: Moderate	Moderate
	Groundwater		Migration to groundwater	No contaminants present at concentrations posing risk to groundwater			N/A

APPENDIX C

Checklist for Verification Report(s)

Item	Tick (✓)
Regulatory Comments on Remediation Strategy (If provided)	
Documentation (Including Photographs) of Stripped Formation in Soft Landscaped Areas	
Documentation (Including Photographs) of Placed High Visibility Geotextile Marker	
Documentation (Including Photographs) Confirming Depth of Cover Soils	
Laboratory Test Data for Imported Soils (Sampled on site)	
Confirmation that the local water supply company are satisfied with new water supply connections.	
Confirmation of Any Other Service Providers' Requirement Having Been Adhered to (If Imposed)	