HIFLEX HOUSE,

TELFORD ROAD, CHURCHFIELDS INDUSTRIAL ESTATE, SALISBURY, SP2 7PH

PHASE 1: ENVIRONMENTAL LIABILITY REVIEW

FOR

CUSHMAN & WAKEFIELD ON BEHALF OF THE VENDOR









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QUALITY MANAGEMENT

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EXECUTIVE SUMMARY

Overall Summary:

Based on the information reviewed to date, RPS has not identified a significant risk of third party liability or regulatory action, which could affect the site in its current use and form.
The site is unlikely to be classed as 'contaminated' under Part 2A of the EPA 1990 whilst it remains in its current use and form.
The site should be considered acceptable as security from an environmental risk perspective based on a typical lending scenario.

Section Summary:

Section	Summary
Site Details	*Area: 2.45 ha* *NGR: SU 130 297* *Current use: Manufacture of hoses and pipes* *Proposed use: Unchanged*
Site History	*The site comprised undeveloped (likely agricultural) land from c.1881 until c.1970 when a Works was developed on-site representing the current site use. The site representative reported during the site walkover that the current tenants have been present on-site since the site's development in the 1970s.* *Potentially contaminative land uses in the surrounding area have included a Works from 20m northwest (c.1977 to recent), a Factory 25m north (c.1970 to recent), a Water Board Depot 50m northeast (c.1970 to c.1993), a Garage 75m northeast (c.1970 to c.1993) and a Commercial Vehicle Works 90m northeast (c.1970 to c.1993).*
Site Inspection	*Potential sources of contamination identified during the site inspection include a pit for the storage of waste water in the west of the site. The pit is reported to be used to store waste water from washing processes on-site prior to the pumping of the waste water into an aboveground storage tank and removal by a licensed waste contractor. The waste water is reported to be likely to comprise oils and chemicals utilised in the production of the pipes/hoses. The potential for the pit to have leaked and waste water to have impacted the surrounding ground cannot be discounted.* *Diluted acids were also noted to be utilised on-site however given the acid containers, baths and waste acid are stored internally to the unit, the risk of significant leakages and contamination to the ground is considered unlikely. In addition a number of spill kits were noted internally and externally to the unit on-site and the site representative reported that a trained spill team are present on-site to deal with any spills or leaks.*

Section	Summary
Environmental Setting	*The site is industrial in use and located within a predominantly commercial / industrial area. The nearest residential properties are located from 180m south of the site.* *The site is underlain by a Secondary A Aquifer relating to the Alluvium Deposits. This is subsequently underlain by a Principal Aquifer relating to the Chalk Formation. The site is not located within a groundwater Source Protection Zone, the nearest potable groundwater abstractions is recorded 970m north of the site and underlying groundwater is classified as being of 'poor' chemical quality.* *The nearest classified surface water feature to the site is the River Nadder located from 100m south of the site.* *The River Avon Site of Special Scientific Interest and the River Avon Special Area of Conservation are located from 80m west of the site.* *The site is not located within an indicative fluvial floodplain.*
Regulatory Consultations	*Wiltshire Council Environmental Health Department have confirmed that the site has been identified as a low to medium priority under their Contaminated Land Inspection Strategy however the Council have no plans for further assessment of the site in the foreseeable future. In addition the Council has no specified concerns in regards to ground conditions on-site.*
Risk Assessment	*There is the potential for areas of contamination to exist beneath the site associated with its historical use as a Works from the 1970s and the current site uses, particularly in the vicinity of the waste water storage pit.* *The hardstanding and building cover on-site will allow a significant degree of protection to site users from any non-volatile contamination. However, there is the potential for any soil and groundwater contamination (if present) to migrate via underlying permeable geology and impact the underlying Principal Aquifer (located at depth beneath the Alluvium Deposits). RPS notes that groundwater beneath the site is recorded as 'poor' chemical quality, reducing its general sensitivity. Furthermore, given the similar land uses in the surrounding area, RPS notes that any contamination (if present) or associated impacts (i.e. to groundwater or off-site watercourses) are unlikely to be solely attributed to the subject site.* *In addition, the response from the Local Authority indicates that the site is unlikely to be investigated in the near future under Part IIA of the Environmental Protection Act 1990.* *Overall, based on the information reviewed to date, the risk of an environmental liability (e.g. third party liability or regulatory action) relating to ground contamination is considered to be* ***low to moderate*** *in its current use and form.*
Recommendations & Costings	*Whilst no significant contamination has been identified on site, given the industrial site use over an extended period of time, some degree of contamination may be present on site. As such, a prudent purchaser may wish to complete an intrusive investigation to reduce and/or confirm potential ground contamination risks. In this*

Section	Summary
	instance, a targeted intrusive investigation is recommended to be undertaken focusing on process areas and the site perimeter (to assess the potential for off-site migration).

This summary is part of RPS's Phase 1 Environmental Review and should not be used as a standalone document.

1 INTRODUCTION

1.1 RPS Consulting Services Ltd (RPS) was commissioned by ***Cushman & Wakefield on behalf of the Vendor*** to undertake an environmental review of *Hiflex House, Telford Road, Churchfields Industrial Estate, Salisbury, SP2 7PH* in relation to the proposed divestment of the site.

The principal aim of the review was to determine whether there was potential for contamination to be present which could significantly constrain the use of the site, or give rise to the risk of significant environmental liability (including bodily injury, property damage, operational losses, regulatory or third party action, reputational damage or blight).

1.2 The environmental review comprised:

i) A non-intrusive site inspection (walkover);
ii) a review of the historical land uses to assess the potential for ground contamination;
iii) a review of the environmental setting to assess the sensitivity of the surrounding area to contamination/pollution;
iv) consultation with relevant regulatory authorities to establish whether any significant environmental issues have been recorded, which may impact on the site;
v) qualitative environmental risk assessment of the site's current and proposed use; and
vi) a review of existing relevant reports (if supplied).

1.3 The environmental risk assessment presented within this report has been prepared having regard to the *contaminant-pathway-receptor* model introduced under Part 2A of the Environmental Protection Act 1990, and associated guidance on contaminated land published by the *Department of Environment, Food and Rural Affairs* [and its predecessors]. The methodology is essentially a qualitative assessment, based on the identification and evaluation of potential 'contaminant-pathway-receptor linkages'. On the basis of this risk assessment, consideration has been given to the potential for the site to be designated as 'contaminated land' (under the local authority contaminated land inspection strategy). See Appendix C for an overview of Part 2A.

1.4 The scope of the report is in general accordance with:

- British Standard on the *'Investigation of potentially contaminated sites - Code of practice' (BS10175:2011)*; and
- '*Model Procedures for the Management of Land Contamination' - Contaminated Land Report (CLR) 11*.

1.5 Where appropriate, consideration has also been given to the following:

- The potential for environmental liabilities to occur under other associated regimes, for example the Water Resources Act 1991 and the Environmental Damage Regulations 2015;
- Key environmental constraints on site redevelopment (if proposed), including the impact of other environmental issues (i.e.. flooding);
- General compliance issues for existing site activities / operations in the context of current legislation;
- Potential implications of key environmental issues significantly impacting on the value / saleability of the property; and
- The site's acceptability as security from an environmental risk perspective for normal lending arrangements / debt finance purposes.

Although not part of the scope of this report, the following may be commented on for information only where readily observed, reported or identified:

- Asbestos-containing materials; and
- Japanese Knotweed (invasive plant species). It should be noted that its identification can be limited by the seasons, dense vegetation, physical, infrastructural, health & safety and other constraints.

Details of the limitations of this type of assessment are described in Appendix D.

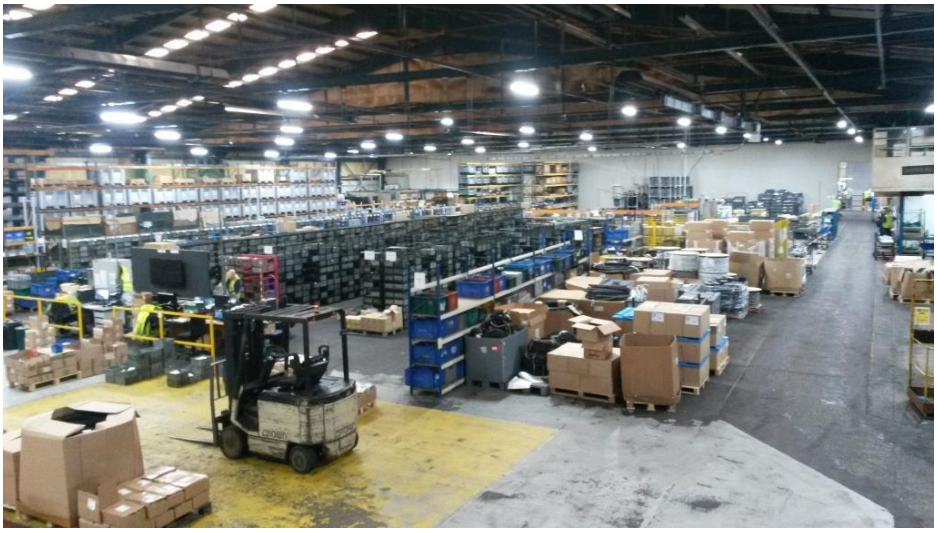
2 LAND USE

2.1 Site Inspection

This section of the report is based upon observations made during a site visit on the 15th February 2018. This included an inspection of the internal and external parts of the buildings on-site and associated exterior areas.

RPS understands that the site is proposed to remain in its current use and form.

The site location and site boundary plans are shown in Appendix A. Selected photos are shown in Appendix B.



General view of the site. For further photos see Appendix B.

2.1.1 The Site

Section	Description
Background:	The site is located to the southwest of Salisbury city centre at National Grid Reference SU 130 297. It is roughly rectangular in shape and occupies an area of approximately 2.45 ha.
Site Layout:	The site comprised approximately 85% building and hardstanding cover with a large warehouse in the east to centre of the site and associated service yard areas in the west, north and south of the site. Car parking areas were also provided in the west and north of the site and a small club house building was located in the west. Vehicular access to the site was provided from Brunel Road in the west. Pedestrian access was gained from Telford Road to the north of the site. The site demonstrated a generally flat topography with a slight slope down onto the site from Brunel Road.
Activity / Operations:	The site was occupied by *Hiflex Europe – Argus Fluidhandling Ltd* for the manufacture of products including hydraulic hoses. The site representative reported that the site has since its development in the 1970s been in use by the current tenants.

Section	Description
	The main site building comprised office accommodation at the front of the building arranged over ground and first floor levels with a large warehouse to the rear. The warehouse comprised the majority of the building footprint (80%) and was separated into three main areas. The warehouse area to the rear of the office accommodation comprised a storage area for the storage of machinery (not in use), products and waste. To the south of this was the main manufacturing area which comprised numerous machines for the manufacture of products including hoses and pipes. The southern area of the warehouse comprised the distribution centre where products were stored and sorted before distribution. A number of smaller rooms were located to the west of the storage area, including a clean room, maintenance store and maintenance office, a tool shop room was also located to the north of the storage area. An acid treatment room comprising two acid baths utilised for the cleaning of products which have been brazed was also located in the west of the warehouse (see Photo 1 in Appendix B). A furnace (understood to no longer be in use) was located in the acid baths room with aboveground pipework leading to a plating room. Plating is no longer undertaken on-site and the room is now utilised for the storage of waste acid in IBCs (intermediate bulk containers) (see Photo 2 in Appendix B). A small former club house was located in the west of the site. At the time of the site walkover, the building was utilised as a boxing gym. A small sprinkler pump house was also located in the west of the site, housing the sprinkler systems pump engine. The site representative reported that an underground water tank, associated with the sprinkler system is located below the pump house. Car parking for staff and customers was provided in the west and north of the site. Service yard areas for the storage of waste and unloading / loading of vehicles were located in the west and south of the site.
Building Structure(s):	The office area appeared to be of brick construction with the warehouse area formed of steal framed construction with brick and corrugated metal cladding and corrugated metal pitched roofing. The building was gas heated.
Surface Cover:	Building cover comprised approximately 45% of the site area. Hardstanding comprised approximately 40%. The car parking areas were laid to generally good quality asphalt. The service yard areas were laid to a mix of concrete slabs, tarmacadam and asphalt. Some pitting and cracks were noted in the service yard area hardstanding. Soft landscaping in the form of maintained grassed areas and overgrown vegetation comprised 15% of the site area, and was predominantly located on the northern edge and western edge to southwestern corner of the site.
Drainage:	No drainage plans were provided to RPS for review. The site representative reported that two oil interceptors were present within the drainage system on-site in the north and the south of the site. The interceptors were reported to be checked regularly.
Storage / Tanks:	Four approximately 205 litre capacity metal drums of oil were noted internally within the manufacturing area (see 3 Photo in Appendix B). Two of the drums were located on plastic spill pallets with hoses leading from the drums for the dispensing of oil. No significant staining was noted in the vicinity. Two metal baths reported to comprising diluted hydrochloric acid and caustic soda were noted in the acid room (see 1 Photo in Appendix B). The site representative also reported that 25 litre containers of hydrochloric acid are stored in a designated locked unit within the room for the refilling of the baths when required.

Section	Description
	A 205 litre drum of houghto-clean (cleaning chemical) was located within a plastic drip tray for use in the clean room on-site. Two approximately 100 litre diesel tanks were noted within the sprinkler pump engine room to power the engine. The site representative reported that the sprinkler system is usually powered by electricity with the diesel as a backup. No staining was noted on the good quality hardstanding in the tanks vicinity. Oxygen and Acetylene cylinders for use in welding processes were stored, when not in use, in metal locked cages located in the southern service yard at the other side of the service yard to the site building (see 4 Photo in Appendix B). Spill kits were noted to be present across the site both within the warehouse unit and externally in the service yard.
Waste:	Waste wash water from the cleaning of manufactured products on-site was reported to be pumped into a pit/sump (see 5 Photo in Appendix B) located externally to the west of the building. The pit was located below a canopy in the waste storage area. The pit appeared to be concrete lined. The site representative reported that the waste water in the pit is then pumped into the large above ground storage tank located above the pit. The tank is emptied by a licensed waste contractor (GSC) when required. Waste water was reported to be likely to comprise oil and chemical residue. A waste storage area was located externally to the west of the main building under a canopy. Hazardous water included waste wash water (detailed above), waste hydrochloric acid containers, yellow bagged chemical waste (products which have come into contact with acid or oil products), waste oil drums, waste chemical containers, waste fluorescents light tubes and waste metal. Waste metal was stored in metal skips and the fluorescent light tubes were stored in metal drums. Yellow bagged chemical waste and products which have come into contact with hydraulic oil such as protection matts were stored on plastic spill pallets (see Photo 6 in Appendix B). All waste was reported to be collected by a licensed waste contractor. Waste acid chemicals were reported to be pumped into Intermediate Bulk Containers (IBCs) which are stored internally in lined shallow pits in the former plating room (see Photo 2 in Appendix B). The IBCs are emptied by a licensed waste contractor when required. Empty pallets and general waste (in metal bins) were stored in the southern service yard. Empty acetylene and oxygen cylinders were also stored in the southern service yard in locked metal cages on the other side of the service yard to the building. Cardboard, paper and plastic for recycling were stored internally to the unit in the storage warehouse area.
Air Emissions:	No air conditioning units or industrial activities resulting in air emissions were noted / reported to be present on-site.
Electricity Sub-stations / Transformers:	A substation operated by *SSE Power Distribution* was noted to the west of the site building.
Visual Evidence of Contamination:	RPS did not observe any significant visual or olfactory evidence of contamination in external areas during the site walkover. Staining of parts of the covered internal concrete flooring was noted internally to the unit. However, given the absence of drains and the good condition of the concrete flooring, this is not considered to represent a significant issue.
Statutory	RPS is not aware of any complaints relating to statutory nuisance at the site.

Section	Description
Nuisance:	
Other Issues:	No *Japanese Knotweed* (invasive plant species) was readily identified on the site at the time of the walkover. Asbestos containing materials were reported to be present on-site including within the boiler room.

2.1.2 The Surrounding Area

The site is located in an area of predominantly industrial / commercial land uses. At the time of the site inspection, neighbouring land consisted of the following:

Direction	Description
North:	*Gresham* (design and manufacture power solutions), *Tool Station* (tool suppliers)
East:	Commercial trade units including *JSC Edmundson* (electrical wholesales) and *Ford* (vehicle sales)
South:	Woodland with River Nadder beyond
West:	*Nissan* (vehicle sales), *Nicholas & Harris* (commercial bakery), *Abicare Services* (cleaning service head office), *Test Valley* (packaging manufacture)

2.2 Site History

2.2.1 Historical Map Review

The following review is based on past editions of readily available Ordnance Survey (OS) maps. These include scales of 1:1,250, 1:2,500 and 1:10,000 dated 1881 to 2014. Extracts from selected historical maps are shown in Appendix A.

On-site Land Use and Features	Dates	
	From	To
The site comprised undeveloped (likely agricultural) land with a rectangular structure marked in the northwest of the site. Two further ancillary structures were marked in the west of the site by 1901.	c.1881	c.1925
Then the ancillary structures were no longer marked.	c.1925	c.1951
Then three drains were marked as extending onto the site from the east.	c.1951	c.1970
Then the majority of the site comprised an Engineering Works with associated external areas to the west.	c.1970	c.1993
Then a building marked as a Club was developed in the west of the site and the Engineering Works was marked as a Works.	c.1993	Present

Surrounding Land Uses (250m radius)	Orientation	Approx. Distance	Dates	
			From	To
Works	Northwest	20m	c.1977	Recent
Factory	North	25m	c.1970	Recent
Electricity Substation	Southwest	40m	c.1993	Recent
Water Board Depot	Northeast	50m	c.1970	c.1993
Garage	Northeast	75m	c.1970	c.1993
Commercial Vehicle Works	Northeast	90m	c.1970	c.1993
Garage	East	110m	c.1993	Recent
Factory	Northeast	120m	c.1970	Recent
Depot	East	130m	c.1993	Recent
Churchfields Farm	Northeast	140m	c.1901	c.1970
Refuse Tip	East	140m	c.1970	c.1977
Works	Northeast	150m	c.1970	Recent
Warehouse	Northeast	160m	c.1970	Recent
Engineering Works / Works	Northeast	160m	c.1970	Recent
Electricity Substation	Northeast	190m	c.1970	c.1993
Factory	Northeast	190m	c.1970	c.1993

2.2.2 Site Planning History

Relevant planning records for the site, obtained from Wiltshire Council Planning Department are summarised as follows:

Planning Reference	Application Details	Date Approved
C105	Erection of factory and offices	October 1968
C907	Addition of effluent treatment plant building, works toilet and sub-station block and sprinkler pump house to underground water reservoir	March 1970
C386	Two storey office block and factory	May 1973
75/220	Covered lean-to to keep factory dry and to prevent pollution to storm water drain	May 1975
78/361	Erection of recreation and social club	May 1978
S/1989/1907	Separation of existing site, enlargement of existing vehicular access at Brunel Road.	January 1990
S/1990/0371	Enclosure of existing goods despatch area canopy, swarf canopy bay 3, goods intake bay canopy bay 1	April 1990
90/1523	Construction of four industrial units with B1 use at Site 2	May 1991
S/1997/1045	Research and development extension to existing production workshop.	August 1997

No documentation was available for review for any applications prior to 1997.

Planning Application Ref: S/1997/1045 included a planning condition (Condition 3) requiring the undertaking of a site investigation and assessment, to ascertain any potential landfill gas problems. If landfill gas problems were identified a scheme to alleviate such problems was required to be submitted and approved by the Local Planning Authority.

Documentation included within the planning application indicated that condition 3 was approved for discharge without a site assessment by the Environment Agency and Environmental Health Department given that:

- The former landfill was located over 200m from the site;
- The proposed extension would form part of a much larger building including offices developed in 1974;
- In July 1997 engineers dug a trail pit on site to a depth of 2.5m to ascertain bearing capacity and no evidence of gases was identified.

3 ENVIRONMENTAL SETTING, REGULATORY CONSULTATIONS & ADDITIONAL INFORMATION

3.1 Geology & Hydrogeology

3.1.1. Published Mapping

Based on British Geological Survey mapping (1:50,000-scale) and the Environment Agency's Groundwater Vulnerability mapping (1:100,000-scale), the stratigraphic sequence and aquifer / groundwater classifications beneath the site are as follows:

Strata	Age	Description & approximate thickness	Aquifer Classification
Made Ground	*N/A*	Likely to be up to a few metres in thickness beneath the site.	N/A
Alluvium	*Quaternary*	This comprises clay, sand and gravel and is likely to be a few metres in thickness beneath the site.	Secondary A
Seaford Chalk Formation (part of White Chalk Subgroup)	*Cretaceous*	This comprises chalk and is likely to be of significant thickness beneath the site.	Principal

The site is located above a Secondary A Aquifer relating to the Alluvium deposits. These formations comprise permeable layers capable of supporting water supplies at a local scale, in some cases forming an important source of base flow to rivers.

This is underlain by a Principal Aquifer relating to the Seaford Chalk Formation. These formations provide a high level of water storage and may support water supply and / or river base flow on a strategic scale.

According to Environment Agency data, the site not located within a groundwater Source Protection Zone.

Under the Water Framework Directive, the Environment Agency's local River Basin Management Plan classifies groundwater chemical quality beneath the site as 'poor' quality.

3.1.2. Previous Investigation Reports / Borehole Records

Made Ground is likely to be present across the site as a result of past construction activities. No site investigation reports have been reviewed to verify this.

3.2 Water

3.2.1 Surface Water

Under the Water Framework Directive, the Environment Agency identifies three watercourses within 1km of the site which are classified within the local River Basin Management Plan. A list of nearby watercourses and water bodies is as follows:

Watercourse / body	Quality Classification	Approx. Distance & Direction from Site
River Nadder	Ecological Quality: Moderate Chemical Quality: Good	100m South
Harnham Brook	Not Classified	145m South
Numerous drains	Not Classified	335m East
Numerous drains	Not Classified	340m Northwest
Hampshire Avon	Ecological Quality: Moderate Chemical Quality: Good	800m Southeast
Hampshire Avon – Nine Mile River confluence	Ecological Quality: Moderate Chemical Quality: Good	960m Northeast

3.2.2 River / Coastal Flood Risk

According to the Environment Agency flood map, the site is not located within an indicative fluvial floodplain.

3.2.3 Water Abstractions

Information provided by the Environment Agency indicates that there are records of six licensed groundwater abstractions and one licensed surface water abstraction within 2km of the site. The details of these are as follows:

Licence Holder	Source	Use	Approx. Distance & Direction from Site
Salisbury District Council	River Nadder	Transfer between Sources	290m East
Bemerton Farms	Groundwater	General Farming and Domestic	355m Southwest
Bemerton Farms	Groundwater	General Use Relating to Secondary Category	355m Southwest
Wessex Water Services Ltd	Groundwater	Potable Water Supply	970m North
John Jeffrey (Auctioneers Ltd)	Groundwater	General Use Relating to Secondary Category	1355m West
Country Homes & Gardens plc	Groundwater	Spray Irrigation	1570m West
Salisbury & South Wiltshire Golf Club	Groundwater	Spray Irrigation	1795m West

3.3 Sensitive Sites / Designated Protected Areas

Natural England data indicates that there are two Sites of Special Scientific Interest (SSSI) within 1km of the site. The River Avon SSS1 and the West Harnham Chalk Pit SSSI are located from 80m west

and 775m south, respectively of the site. The River Avon Special Area of Conservation is located from 80m west of the site and the Avon Valley Environmentally Sensitive Area is located from 285m east.

No other Sites of Special Scientific Interest, Special Protection Areas (SPA), Special Areas of Conservation (SAC), wetland site designated of international importance under the Ramsar Convention (RAMSAR), Nature Reserves or other protected / sensitive environmental areas have been identified within 1km of the site.

Historic England data identified no World Heritage Sites, Listed Buildings or Scheduled Monuments are located within the surrounding area.

3.4 Landfills and Waste Sites

Information provided by a number of sources (detailed below) shows that there are two recorded licensed or known historical landfill sites and three licensed waste treatment / transfer sites recorded within 500m of the site.

Source of Record	Licence Details	Waste Type and Details	Approx. Distance & Direction from Site
Landfill Sites			
Environment Agency / BGS	Churchfields Tip, Brunel Road Salisbury Corporation	Commercial, Household, Liquid Sludge/ refuse tip Recorded 1968 to 1974	Adjacent to south (including very southern edge of the site)
Local Authority	Salisbury District Council	Refuse disposal	140m East
Scrap Yards & Waste Transfer / Treatment Sites			
Environment Agency	Chuchfields Depot Salisbury District Council	Physical Treatment Facility License issued 2009	115m East
	Stephenson Road Hills Minerals & Waste Limited	Household, Commercial & Industrial Waste Transfer Station License effective 2000	260m East
	Salisbury H R C Hills Minerals & Waste Limited	Household Waste Amenity Site License effective 2002	260m East

3.5 Regulatory Consultations / Local Authority Responses

3.5.1 Environmental Health Department

The Environmental Health Department at Wiltshire Council was consulted regarding any known contamination issues at the site. The Council advised as follows:

- The site is not the subject of any contaminated land investigations and has not been determined as 'contaminated land' under Part IIA of the Environmental Protection Act 1990.
- The site is yet to be prioritised for further assessment by the Council under their Contaminated Land Inspection Strategy, however the Environmental Health Officer reported that given the site's industrial use it is likely to be of low to medium priority. Furthermore, the Officer reported that the site is unlikely to be inspected in the foreseeable future.
- The Council has no specific concerns in regards to ground conditions at the site.
- If the site were to be redeveloped to a more sensitive end use then a site investigation would be required.

- The Council is not aware of any Statutory Nuisances in relation to the site.

3.6 Pollution Incidents

Environment Agency data indicates that there are no records of 'major' or 'significant' pollution incidents within 500m of the site.

3.7 Authorised Processes

3.7.1 Environmental Permits

Environment Agency and Local Authority data indicates that there are two Part A(1), Part A(2) and Part B processes regulated by an Environmental Permit (under the Environmental Permitting Regulations 2016) within 500m of the subject site. These are outlined in the table below:

Licence Holder	Permitted Activity	Approx. Distance & Direction from Site
M G Cannon	Respraying of road vehicles	140m Northeast
Hanson Premix	Use of bulk cement	355m Northeast

3.7.2 COMAH Sites

There are no records of any operations under the Control of Major Accident Hazards (COMAH) Regulations within 500m of the site.

3.8 Radon

According to the Indicative Atlas of Radon in England and Wales published by the Health Protection Agency (now Public Health England) and the British Geological Survey, the site is not located in an area at risk from radon gas.

3.9 Coal Authority

The site is not located in an area potentially affected by coal mining activities.

4 ENVIRONMENTAL RISK ASSESSMENT

4.1 Background

This Risk Assessment consists of an appraisal of the *contaminant-pathway-receptor* 'linkages' which is central to the approach used to determine the existence of 'contaminated land' according to the definition under Part 2A of the Environmental Protection Act 1990. For a risk to exist (under Part 2A), all three of the following components must be present to facilitate a potential 'pollutant linkage'.

- **Contaminant** referring to the source of contamination (Hazard).
- **Pathway** for the contaminant to move/migrate to receptor(s).
- **Receptor** (Target) that could be affected by the contaminant(s).

Receptors include human beings, other living organisms, crops, controlled waters and buildings / structures. The assessment includes a qualitative review for the 'significant possibility of significant harm' (SPOSH). The mere presence of a contaminant / hazard at a site does not mean that there will necessarily be related risks or that the site will be designated as 'contaminated land'. For further details see Appendix C.

In addition, the assessment includes consideration of the potential for redevelopment, the site's '*suitability for use'* and the perception by any future purchasers regarding the potential investment value.

The Risk Assessment comprises three sections:

Section 4.2: A summary of current and historical land use along with environmental sensitivity information demonstrated as a tabular *Conceptual Model* with *Contaminant*, *Pathway* and *Receptor* components (in accordance with *Model Procedures for the Management of Land Contamination' - Contaminated Land Report (CLR) 11).*

Section 4.3: An assessment of the Overall Risk compiling the findings of Section 4.2, together with the likelihood of occurrence and its commercial impact. This risk is assessed in relation to 'Ground Contamination' and 'Other Environmental Issues', and has been classified under three broad risk categories (see below).

Section 4.4: Details of notable environmental issues and any key operational issues (outside ground contamination aspects) are highlighted in this section.

- **Low risk -** it is considered unlikely that issues within the category will give rise to significant harm or a liability/cost for the owner of the site.
- **Moderate risk -** it is possible, but not certain that issues within the category will give rise to significant harm or a liability/cost for the owner of the site
- **High risk -** there is a high potential that issues within the category will give rise to significant harm or a liability/cost for the owner of the site.

4.2 Conceptual Model

Contaminant Source: *(e.g. Land Use)*

The site has been occupied by a works for the manufacture of hose and pipe products including hydraulic hoses since it was first developed in the 1970s. Historical mapping indicates an Engineering Works was developed on-site in c.1970 prior to which the site comprised undeveloped land. Information from Wiltshire Council Planning Department indicates a Factory with Offices was developed on-site in the 1970s. Given the use of the site as a Works/Factory for over 30 years, there is the potential for a degree of contamination to be present beneath the site.

Current potential sources of contamination noted on-site during the site walkover include a pit for the storage of waste water in the west of the site. The pit is reported to be used to store waste water from washing processes on-site before the water is pumped into an aboveground storage tank and removed by a licensed waste contractor. The waste water is reported to comprise oils and chemicals utilised in the production of the pipes/hoses. As such, the potential for the pit to have leaked and waste water to have impacted the surrounding ground cannot be discounted.

Diluted acids were also noted to be utilised on-site, however given the acid containers, baths and waste acid are stored internally to the unit, the risk of significant leakages and contamination to the ground is considered unlikely. In addition, a number of spill kits were noted internally and externally to the unit on-site and the site representative reported that a trained spill team are present on-site to deal with any spills or leaks.

A landfill is recorded adjacent to the south of the site (extending onto the very southern edge of the site boundary). The landfill is recorded as operating from 1968 to 1974 accepting commercial, household and liquid sludge, representing a potential source of contamination and ground gas.

Potential current and historical sources of contamination identified in the surrounding area include a Works located 20m northwest (c.1977 to recent), a Factory 25m north (c.1970 to recent), a Water Board Depot 50m northeast (c.1970 to c.1993), a Garage 75m northeast (c.1970 to c.1993) and a Commercial Vehicle Works 90m northeast (c.1970 to c.1993).

Overall, the likelihood of localised areas of significant contamination existing beneath parts of the site is considered to be moderate.

Pathways:

Any permeable Made Ground and the permeable Alluvium deposits beneath the site could potentially facilitate the vertical migration of contamination (if present) to deeper groundwater resources and the lateral migration to off-site receptors (surface water).

The site comprises predominant building and hardstanding cover which will afford a significant degree of protection to site users from direct contact with any non-volatile contamination (if present) beneath the site and restrict the rainfall infiltration, and in turn subsequent leaching of any contamination (if present) beneath the site.

Given the distance of the nearest surface water feature (over 100m), the River Nadder, from the site and the substantial vegetation and uneven ground located between the site and the river, the risk of surface water run-off flowing to the River Nadder is considered unlikely. However, shallow groundwater in the area may flow towards the River Nadder, therefore there is the potential for any contamination (if present) beneath the site to migrate and impact surface water resources.

Receptors: *(i.e. Environmental Sensitivity)*

The site is currently industrial in use (i.e. reduced sensitivity) and is located within a predominantly commercial and industrial area. The closest residential properties (with gardens) are located from 180m south of the site beyond the River Nadder.

The site is located above a Secondary A Aquifer relating to the Alluvium Deposits, which is underlain by a Principal Aquifer relating to the Chalk Formations. The site is not located within a groundwater Source Protection Zone, the underlying groundwater is recorded as being of 'poor' chemical quality and the nearest potable water abstractions is located 970m north of the site.

The nearest surface water feature to the site is the River Nadder located from 100m south of the site. The site is not located within an indicative floodplain.

The River Avon Site of Special Scientific Interest and the River Avon Special Area of Conservation are located from 80m west of the site.

Overall, the sensitivity of the environmental setting if considered to be low to moderate.

Note: Operational health and safety issues are beyond the remit of this report.

4.3 Overall Risk

Risk Assessment:	**Rating: Low / Moderate**

There is the potential for contamination to be present beneath the site and in the vicinity as a result of the use of site and surrounding area for commercial/ industrial activities since the 1970s. Given the underlying permeable geology and any permeable Made Ground (if present), there is the potential for contamination (if present) to migrate beneath the site and impact sensitive receptors including the underlying groundwater. However, given the similar land uses in the surrounding area, RPS notes that any contamination (if present) or associated impacts (i.e. to groundwater or off-site watercourses) are unlikely to be solely attributed to the subject site. Furthermore, the underlying groundwater is classified as being of 'poor' quality, most likely due to a legacy of industrial operations undertaken within the wider area. This reduces the overall sensitivity of groundwater in the area. In addition, the site has been in a similar industrial use for 30 years with no pollution incidents or issues reported.

The site comprises predominant building and hardstanding cover which will afford a significant level of protection to site users from any non-volatile contamination (if present). Whilst areas of soft landscaping are present on-site, given the sites commercial use, the risk of site users coming into contact with any contamination (if present) is considered unlikely.

Furthermore, Wiltshire Council Environmental Health Department have confirmed that the Council have no plans for further assessment of the site in the foreseeable future under their Contaminated Land Inspection Strategy and the Council has no specific concerns in regards to ground conditions on-site.

Overall, whilst there is the potential for contamination to be present beneath areas of the site, given the site and surrounding areas commercial / industrial uses and the absence of Local Authority concern, the risk of an environmental liability (e.g. third party liability or regulatory action) relating to ground contamination is considered to be **low to moderate** in its current use and form.

4.4 Other Environmental Issues:

Given the age of the building it is likely that Asbestos Containing Materials are present.

5 CONCLUSIONS & RECOMMENDATIONS

5.1 Conclusions

The following conclusions have been drawn from the observations recorded and the information collated and reviewed as part of this Risk Assessment:

The site is unlikely to be classed as 'contaminated' under Part 2A of the EPA 1990 whilst it remains in its current use and form.

Overall, RPS has not identified a significant risk of third party liability or regulatory action associated with ground contamination, which could affect the site whilst it remains in its current use and.

The likelihood of ground contamination issues significantly affecting value / saleability is considered to be low / moderate for its continued use. It is considered that the site should be considered acceptable as a security from an environmental risk perspective based on a typical lending scenario.

5.2 Risk Management Recommendations

5.2.1 Ground Contamination

Whilst no significant contamination has been identified on site, given the industrial site use over an extended period of time, some degree of contamination may be present. As such a prudent purchaser may wish to complete an intrusive investigation to reduce and/or confirm potential ground contamination risks. In this instance, a targeted intrusive investigation is recommended to be undertaken focusing on process areas and the site perimeter (to assess the potential for off-site migration).

5.2.2 Other Environmental Considerations

We recommend the following actions to reduce or clarify other potential environmental risks at the site:

- Given the age of the building, it is possible that asbestos containing material is present within the building fabric. Under current legislation (The Control of Asbestos Regulations 2012 and HSE Guidance Note HSG264), any property where asbestos-containing materials may be present, legally requires an asbestos management plan (AMP) and should be recorded in an asbestos register. (Likely tenant issue, dependent on terms of lease.)
- The waste water pit on-site should be subject to integrity testing to ensure that no leaks exist. If the pit is found to be damaged, further work may be required to determine the extent of any spillages that may have taken place.
- RPS understands that an oil interceptor is present on the site. The oil interceptor should be emptied and cleaned on a regular basis (approximately every 3-6 months). All relevant paperwork should be kept in a dedicated file on site.

APPENDIX A

Site Location, Flood Risk and Historical Plans

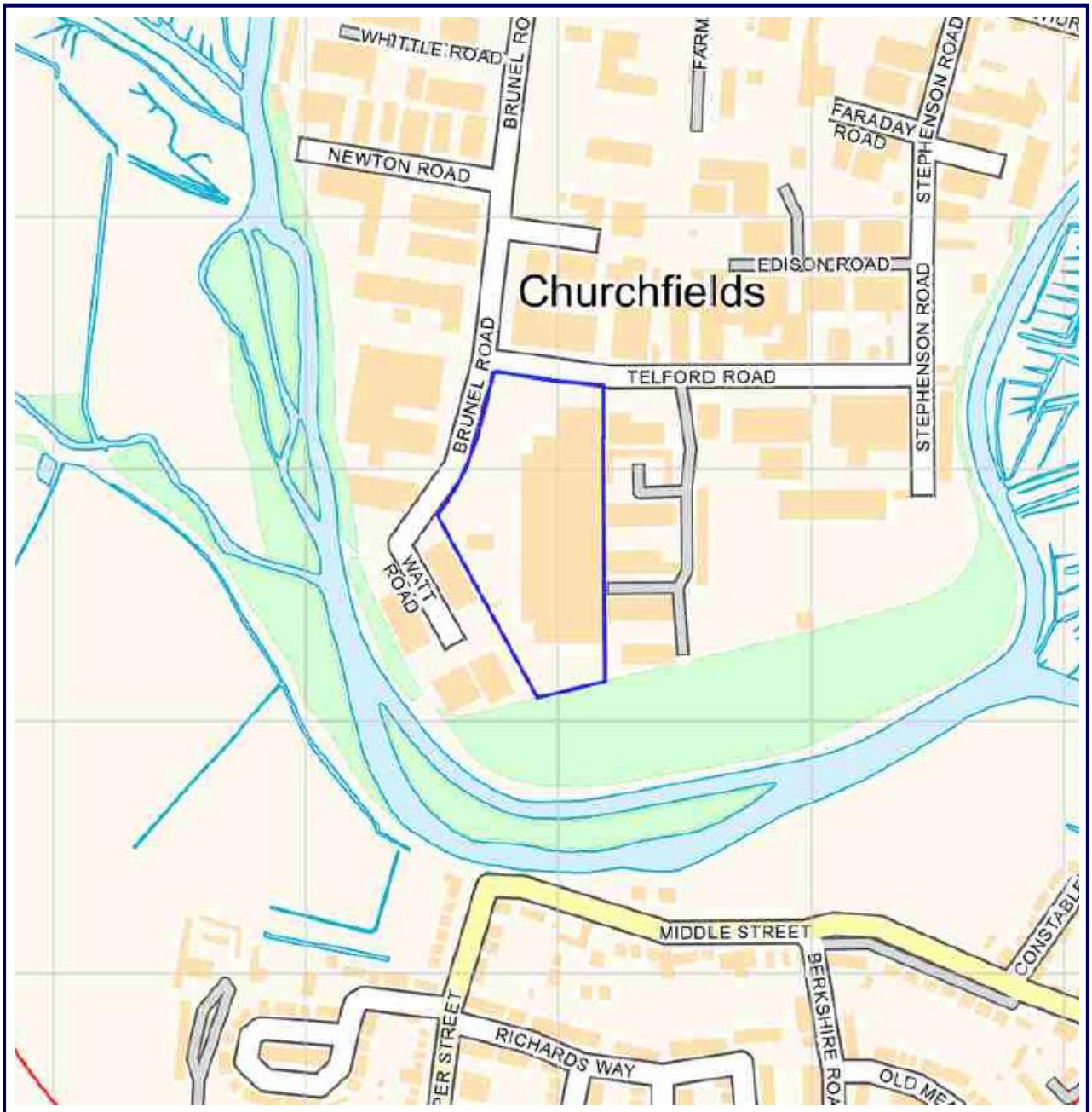


Figure 1: Site Location Plan **Map Date:** 2014 **Scale:** Not to scale	RPS 35 New Bridge Street London EC4V 6BW ☎ 020-7280-3240 www.rpsgroup.com

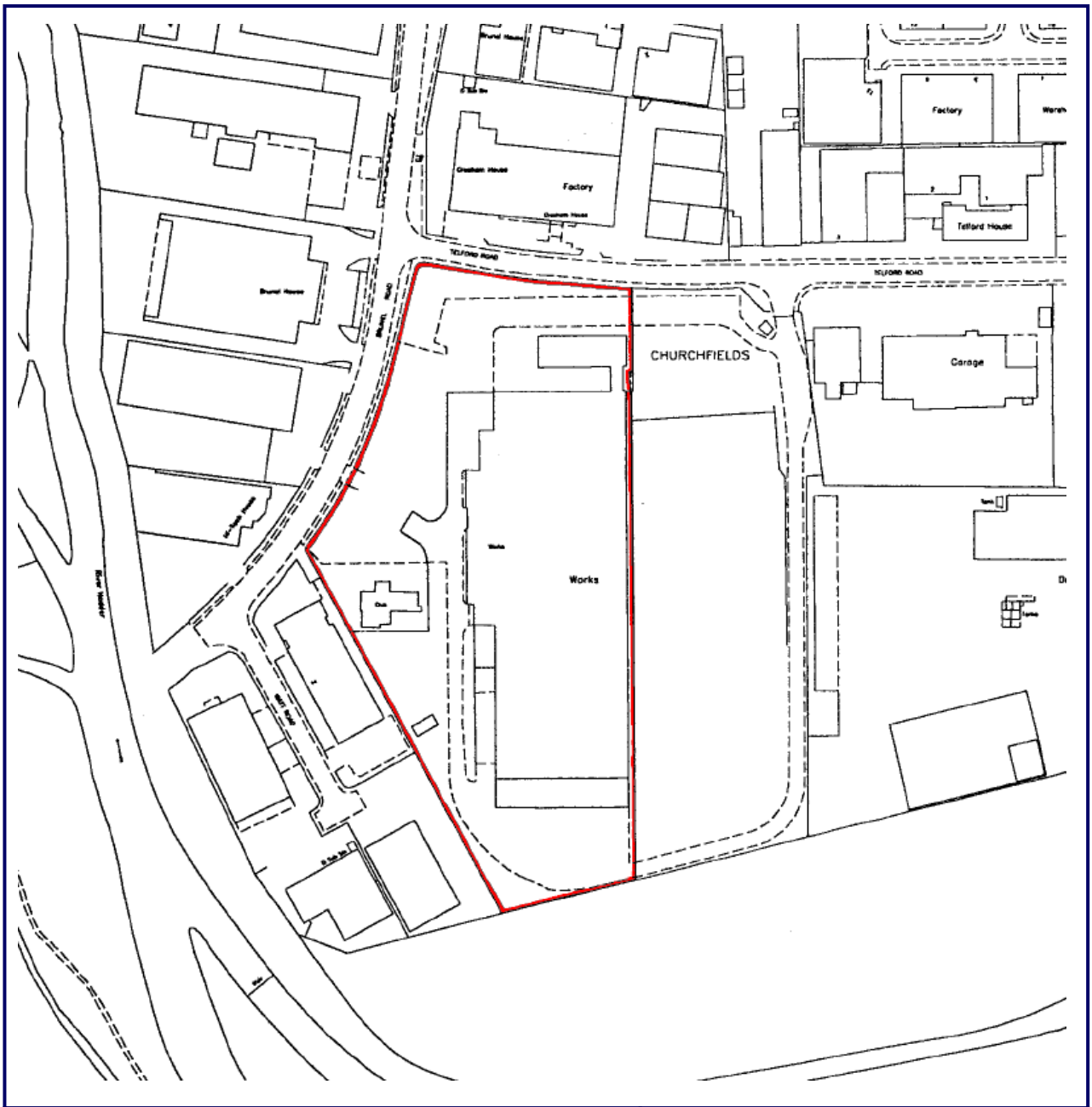


Figure 2: Site Boundary Plan **Map Date:** Current **Scale:** Not to scale	RPS 35 New Bridge Street London EC4V 6BW ☎ 020-7280-3240 www.rpsgroup.com

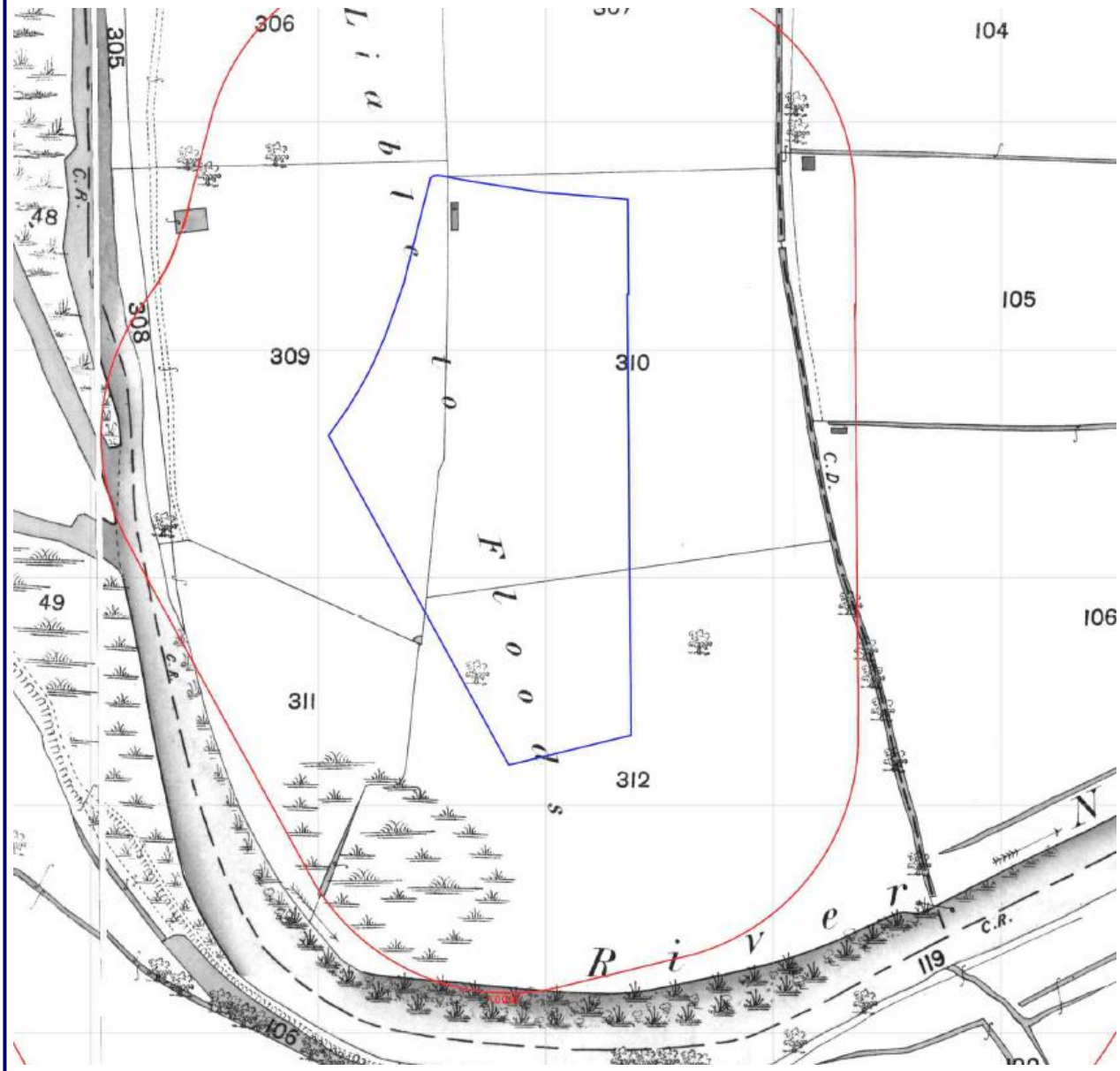


Figure 3: Historical Map Extract **Map Date:** 1881 **Scale:** Not to scale	RPS 35 New Bridge Street London EC4V 6BW ☎ 020-7280-3240 🌍 www.rpsgroup.com

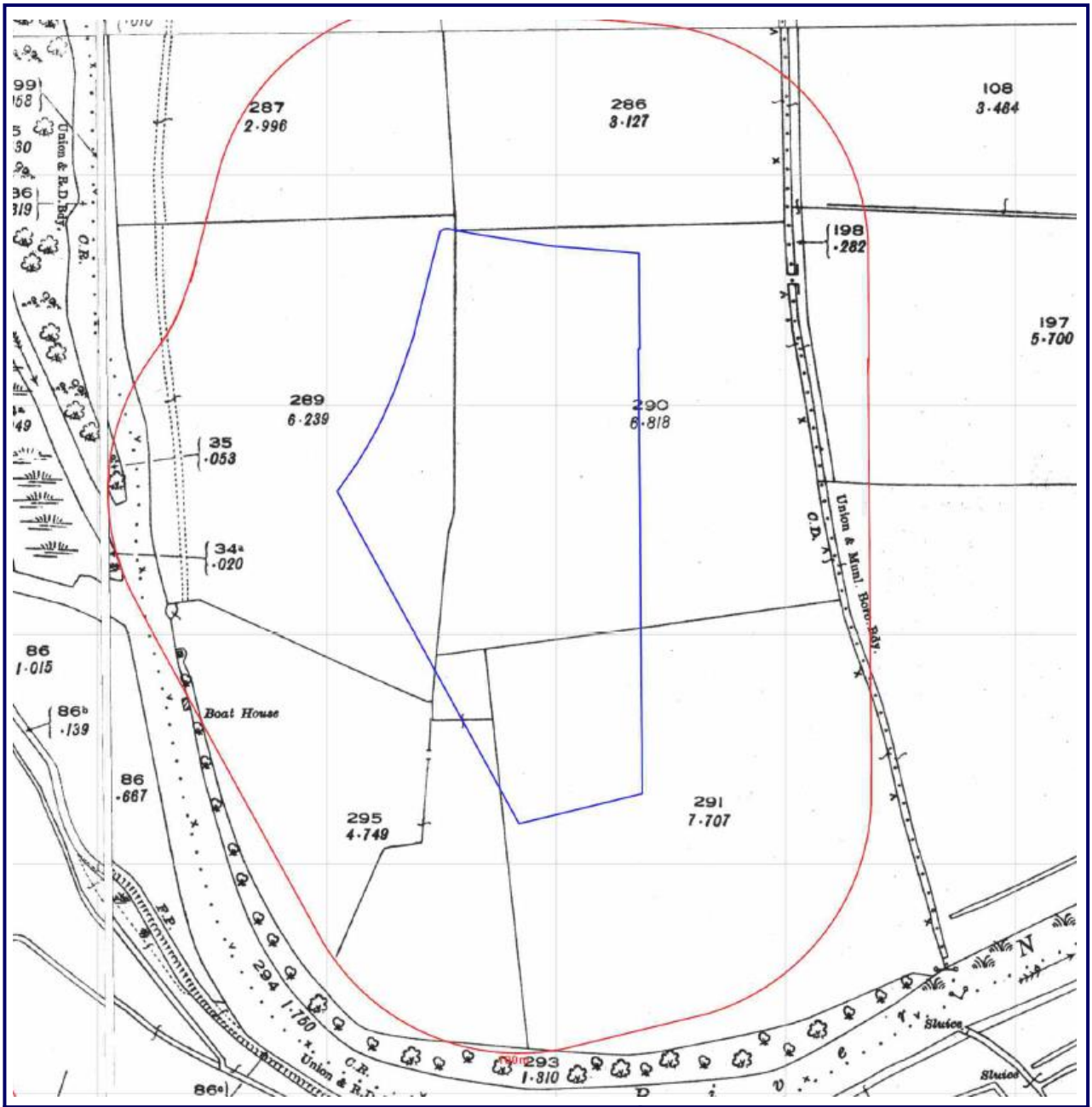


Figure 4: Historical Map Extract **Map Date:** 1925 **Scale:** Not to scale	RPS 35 New Bridge Street London EC4V 6BW ☎ 020-7280-3240 www.rpsgroup.com



Figure 5: Historical Map Extract

Map Date: 1962

Scale: Not to scale

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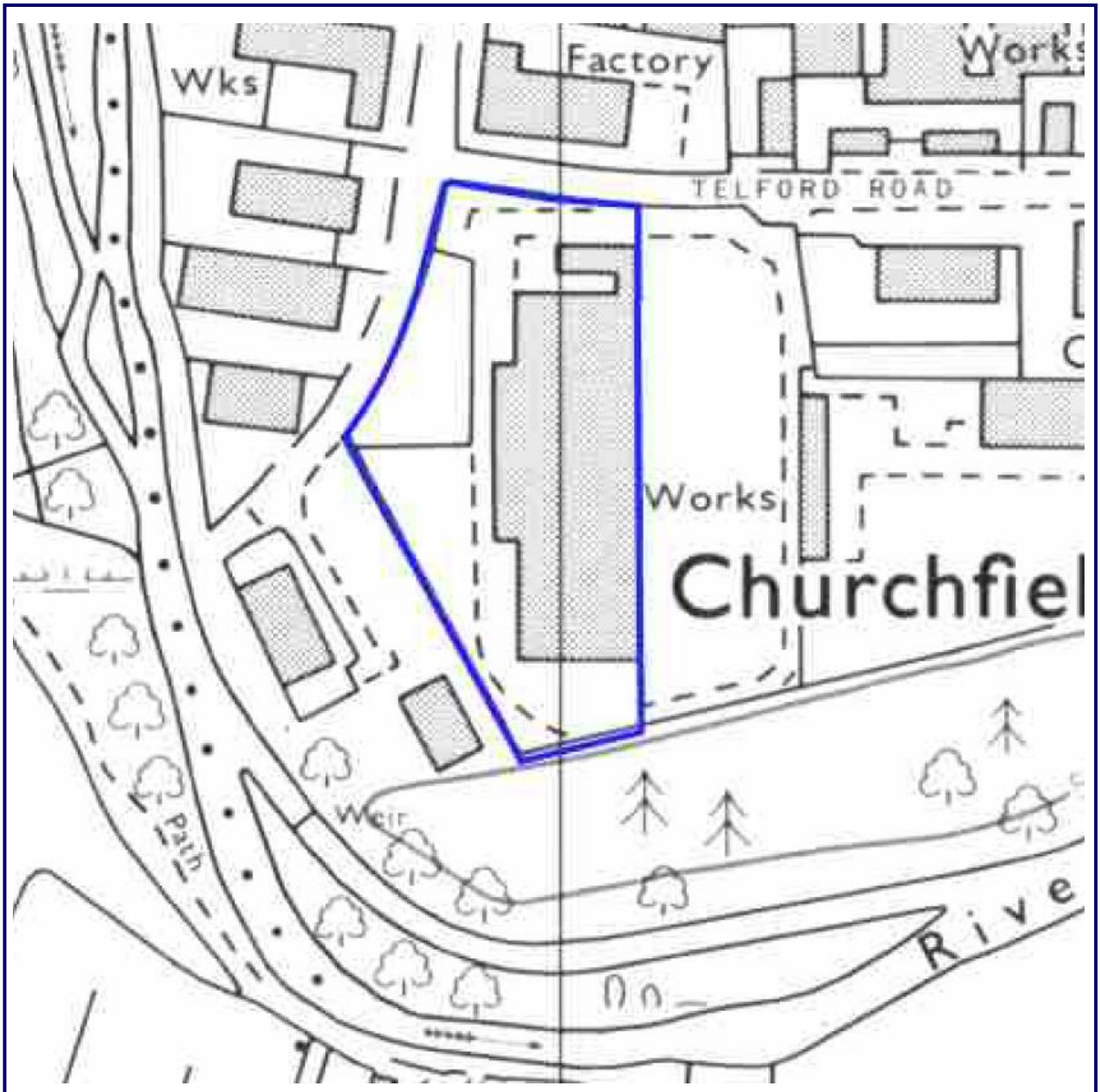

Figure 6: Historical Map Extract

Map Date: 1977

Scale: Not to scale

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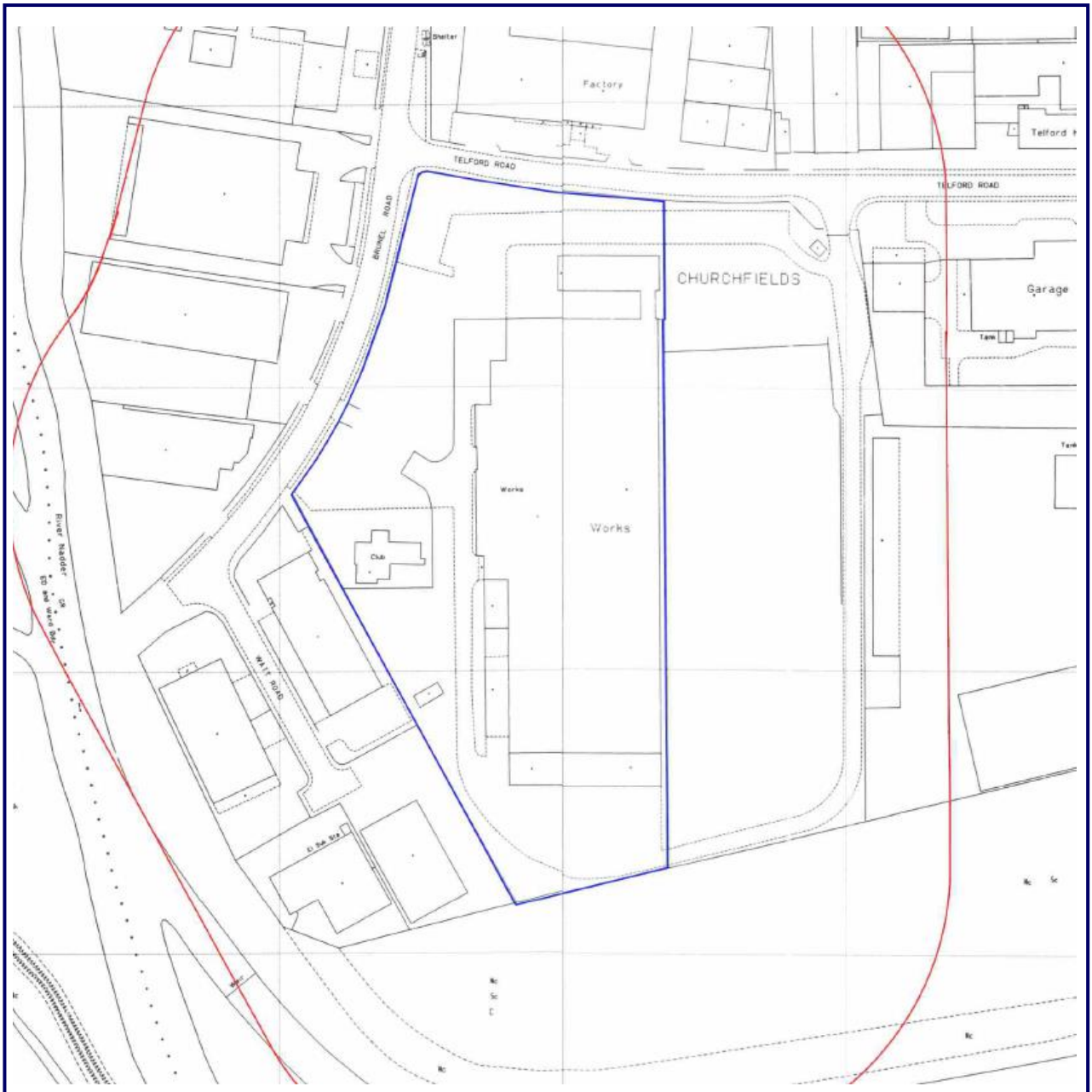

Figure 7: Historical Map Extract

Map Date: 1993

Scale: Not to scale

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Figure 8: Historical Map Extract

Map Date: 2010

Scale: Not to scale

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APPENDIX B

Photographs

Photo 1: Diluted acid baths for cleaning of brazed products.



Photo 2: Storage of waste diluted acids in Intermediate Bulk Container.



Photo 3: Metal drums of oil located in the manufacturing area of the site.



Photo 4: Storage of gas cylinders for welding purposes to the south of the unit.



Photo 5: Pit/sump for disposal of waste water prior to pumping into the aboveground storage tank above.



Photo 6: Waste protection matts which have been in contact with oil stored in waste area in west of site.



APPENDIX C

Overview of Part 2A (The Contaminated Land Regime)

Contaminated Land: Overview of Part 2A

Introduction

Under Section 57 of the Environmental Act 1995, Part 2A was inserted into the Environmental Protection Act 1990 to include provisions for the management of contaminated land.

Subsequent regulations were first implemented in England in April 2000, Scotland in July 2000 and Wales in July 2001, providing a definition of 'contaminated land' and setting out the nature of liabilities that can be incurred by owners of contaminated land and groundwater.

According to the Act, contaminated land is defined as 'any land which appears to the local authority in whose area the land is situated to be in such a condition, by reason of substances in, on or under the land that:

a) *significant harm* is being caused or there is a *significant possibility* of such harm being caused; or
b) *significant pollution* of controlled waters is being caused or there is a significant possibility of such pollution being caused'

The Risk Assessment Methodology

Risk assessment is the process of collating known information on a hazard or set of hazards in order to estimate actual or potential risks to receptors. The receptor may be humans, a water resource, a sensitive local ecosystem or future construction materials. Receptors can be connected with the hazard via one or several exposure pathways (e.g. the pathway of direct contact). Risks are generally managed by isolating or removing the hazard, isolating the receptor, or by intercepting the exposure pathway. Without the three essential components of a source (hazard), pathway and receptor, there can be no risk. Thus, the mere presence of a hazard at a site does not mean that there will necessarily be attendant risks.

The Risk Assessment

By considering where a viable pathway exists which connects a source with a receptor, this assessment will identify where pollutant linkages may exist. A pollutant linkage is the term used by the DEFRA in their standard procedure on risk assessment. If there is no pollutant linkage, then there is no risk. Therefore, only where a viable pollutant linkage is established does this assessment go on to consider the level of risk. Risk should be based on a consideration of both:

- The likelihood of an event (probability) - takes into account both the presence of the hazard and receptor and the integrity of the pathway.
- The severity of the potential consequence - takes into account both the potential severity of the hazard and the sensitivity of the receptor.

For further information please see the Contaminated Land section on www.gov.uk/contaminated-land.

Below is an extract from the Environment Agency's '*Dealing with contaminated land in England - A review of progress from April 2000 to December 2013 with Part 2A of the Environmental Protection Act 1990*, dated April 2016.

This section provides a summary of Part 2A EPA1990. Full details of all aspects of the legislative regime can be obtained from the Environmental Protection Act 1990, the Contaminated Land (England) Regulations 2006 (as amended) and the statutory guidance (Defra 2012).

What is Part 2A
Part 2A is the primary legislation for the Contaminated Land regime. It came into force in England on 1 April 2000.

It provides a framework for identifying land where historical contamination has resulted in an unacceptable risk to human health or the environment, and aims to ensure land identified as 'contaminated land' under the regime will be remediated where possible. Local councils are the lead regulators for Part 2A.

The overarching objectives of the Government's policy on contaminated land and the Part 2A regime are to:

a. identify and remove unacceptable risks to human health and the environment.
b. seek to ensure that contaminated land is made suitable for its current use.
c. ensure that the burdens faced by individuals, companies and society as a whole are proportionate, manageable and compatible with the principles of sustainable development

How Part 2A works
The Part 2A statutory guidance requires local councils to write an inspection strategy for their areas. Inspections involve local councils looking at previous land uses and activities that may have caused contamination and assessing the potential risks from these to people and the environment. Part 2A provides a legal definition of contaminated land. The accompanying statutory guidance introduces the idea of significant contaminant linkages that must be present in order to define land as contaminated land. Where all of these conditions are met, a local council can then determine the site to be contaminated land under Part 2A.

Once a site has been determined as contaminated land decisions can be taken about how to deal with it and who should pay. In some specific circumstances (that are defined in the Contaminated Land (England) Regulations 2006) the Environment Agency becomes the enforcing authority. This happens when a site is designated by the local council as a special site.

In either case, remediation should be carried out by the appropriate person(s). There are two classes of appropriate person:

1. Class A: those persons who caused or knowingly permitted the pollution
2. Class B: a site owner or occupier – but would only be liable if a Class A appropriate person cannot be found for a particular significant contaminant linkage.

The provision for remediation follows the 'polluter pays' principle. Where an appropriate person may be unable to pay for remediation, the regulators must consider hardship. The regulator may also be able to recover costs if they do the remediation. However, where no appropriate person can be found the cost of remediation may be met by taxpayers.

Remediation can be achieved by breaking the source-contaminant-receptor linkages. For example, removing or reducing the source of contamination, blocking the pathway between the contamination and the receptor, reducing the exposure of the receptor to the contamination or removing the receptor all together.

The remedial actions are documented in one of three ways and may include a combination of further assessment, treatment or monitoring actions.

Enforcing authorities have a duty to maintain a public register that records regulatory action taken regarding the remediation of contaminated land. The register includes details of:

- remediation notices served
- appeals against remediation notices

- remediation statements and declarations
- designation of special sites
- any convictions on appropriate persons failing to comply with a remediation notice

Information can be excluded from the public register on the grounds of national security or commercial confidentiality. Local councils keep their registers at their main offices. The Environment Agency keep registers for special sites at their relevant local office.

APPENDIX D

General Notes

RPS CONSULTING SERVICES LTD

Phase 1 - Environmental Liability Review / Desk Study Environmental Review

General Notes

1. A "desk study" means that no site visits have been carried out as any part thereof, unless otherwise specified.
2. This report provides available factual data for the site obtained only from the sources described in the text and related to the site on the basis of the location information provided by the Client.
3. The desk study information is not necessarily exhaustive and further information relevant to the site may be available from other sources.
4. The accuracy of maps cannot be guaranteed and it should be recognised that different conditions on site may have existed between and subsequent to the various map surveys.
5. No intrusive surveys, sampling or analysis has been undertaken in relation to this desk study.
6. Any borehole data from British Geological Survey sources is included on the basis that: "The British Geological Survey accept no responsibility for omissions or misinterpretation of the data from their Data Bank as this may be old or obtained from non-BGS sources and may not represent current interpretation".
7. All structural and/or geotechnical issues are outside the remit of this desk study.
8. Where any data supplied by the Client or from other sources, including that from previous site investigations, have been used it has been assumed that the information is correct. No responsibility can be accepted by RPS for inaccuracies in the data supplied by any other party.
9. This report is prepared and written in the context of an agreed scope of work and should not be used in a different context. Furthermore, new / updated information, improved practices and changes in legislation may necessitate a re-interpretation of the report in whole or in part after its original submission.
10. The copyright in the written materials shall remain the property of the RPS Company but with a royalty-free perpetual licence to the Client deemed to be granted on payment in full to the RPS Company by the Client of the outstanding amounts.
11. The report is provided for sole use by the Client and is confidential to them, their professional advisors, no responsibility whatsoever for the contents of the report will be accepted to any person other than the Client. [Unless otherwise agreed]
12. Where a statement is made on the acceptability of the site as lending security from an environmental risk perspective. This is provided on the basis of ‘normal’ bank lending arrangements, which is taken to be approximately 60% loan to value ratio (LTV).
13. These terms apply in addition to the RPS “Standard Terms & Conditions" (or in addition to another written contract which may be in place instead thereof) unless specifically agreed in writing. (In the event of a conflict between these terms and the said Standard Terms & Conditions the said Standard Terms & Conditions shall prevail.) In the absence of such a written contract the Standard Terms & Conditions will apply.