

# **SITE CONDITION REPORT TEMPLATE**

For full details, see H5 *SCR guide for applicants* v2.0 4 August 2008

**COMPLETE SECTIONS 1-3 AND SUBMIT WITH APPLICATION**

**DURING THE LIFE OF THE PERMIT: MAINTAIN SECTIONS 4-7**

**AT SURRENDER: ADD NEW DOC REFERENCE IN 1.0; COMPLETE SECTIONS 8-10; & SUBMIT WITH YOUR SURRENDER APPLICATION.**

<b>1.0 SITE DETAILS</b>	
Name of the applicant	Silica Developments Limited
Activity address	Gate 4, Shoreham Port, Brighton Terminal, Basin Road South, Shoreham, BN41 1WF
National grid reference	TQ25713 04807
Document reference and dates for Site Condition Report at permit application and surrender	SDL-SBS-SCR-V1 June 2024
Document references for site plans (including location and boundaries)	SDL-SBS-EP-01

**Note:**

In Part A of the application form you must give us details of the site's location and provide us with a site plan. We need a detailed site plan (or plans) showing:

- Site location, the area covered by the site condition report, and the location and nature of the activities and/or waste facilities on the site.
- Locations of receptors, sources of emissions/releases, and monitoring points.
- Site drainage.
- Site surfacing.

If this information is not shown on the site plan required by Part A of the application form then you should submit the additional plan or plans with this site condition report.

<b>2.0 Condition of the land at permit issue</b>	
Environmental setting including: <ul style="list-style-type: none"> <li>• geology</li> <li>• hydrogeology</li> <li>• surface waters</li> </ul>	<p>The Bedrock Geology comprises of the Lambeth Group (Clay, silt and sand).</p> <p>The superficial deposits are the Beach and Tidal Flat Deposits (Clay, silt, sand and gravel).</p> <p>The underlying superficial deposits are a Secondary (undifferentiated) Aquifer. The bedrock geology is a Secondary A aquifer.</p> <p>The groundwater vulnerability is Medium-High.</p> <p>There are no Groundwater Source Protection Zones in the vicinity of the site.</p> <p>The Canal, which forms part of the port, is immediately north of the site.</p>
Pollution history including: <ul style="list-style-type: none"> <li>• pollution incidents that may have affected land</li> </ul>	<p>The site is within Shoreham Port.</p> <p>The land has been used for storage associated with Port for many years.</p>

<ul style="list-style-type: none"> <li>• historical land-uses and associated contaminants</li> <li>• any visual/olfactory evidence of existing contamination</li> <li>• evidence of damage to pollution prevention measures</li> </ul>	<p>The storage bays have been on site since at least 2007.</p> <p>Stobart Biomass started to use the site from 2011 operating under a low risk waste position.</p> <p>In January 2012, a Standard Rules Environmental Permit was issued to Stobart Biomass. This was varied in 2018 to a bespoke permit.</p> <p>The name on the permit was changed to Esken Renewables Limited in October 2022.</p> <p>The site was used by the permit operator to produce and store biomass pending export via the docks. No more than 4750 tonnes could be stored at any one time.</p> <p>In 2022 Silica Developments Limited leased the land from Shoreham Port. At the time of occupation, Esken had removed all biomass from the site. The concrete hardstanding was intact.</p> <p>Silica Developments started to use the large bay for storing waste glass, prior to export. This activity was carried out using a S2 Exemption registered with the Environment Agency (WEX337202). This was registered on 13 August 2022.</p> <p>This exemption allows operators to store waste glass (EWC191205). However, in November 2023, the Environment Agency issued draft guidance on the classification of waste glass generated from Material Recycling Facilities (MRF). Such glass should be coded as follows:</p> <p>191212 – Mixed waste containing glass.</p> <p>This guidance changed the operation and the Local Area Office de-registered the exemption.</p> <p>However, the local area office has issued a Local Enforcement Position, which allows Silica Developments to store waste glass as follows:</p> <p>191205 – Glass screenings 191212 – Mixed waste containing glass.</p> <p>The land has been used for bulk storage and transfer to ships that dock alongside. A loading machine works along the dock wall, loading material from the storage bay into the ship.</p> <p>The land comprises of a concrete base with legio bricks forming the bay walls.</p>
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	<p>Neither the use of the site for biomass storage or waste glass storage are considered to be high risk waste streams that could cause contamination.</p> <p>Site visit carried out on 30 April 2024.</p> <p>The concrete is in tact and there was no visual or olfactory evidence of contamination.</p> <p>There are 6m high concrete walls around the perimeter within legio blocks forming dividing walls.</p>
Evidence of historic contamination, for example, historical site investigation, assessment, remediation and verification reports (where available)	There is no evidence of historic contamination.
Baseline soil and groundwater reference data	It is not proposed to obtain any baseline data.
<b>Supporting information</b>	<ul style="list-style-type: none"> <li>• Source information identifying environmental setting and pollution incidents</li> <li>• Historical Ordnance Survey plans</li> <li>• Site reconnaissance</li> <li>• Historical investigation / assessment / remediation / verification reports</li> <li>• Baseline soil and groundwater reference data</li> </ul>

<b>3.0 Permitted activities</b>	
Permitted activities	<p>The site has an Environmental Permit (DB3137WY). This is no longer used by Esken. There is no lease in place for Esken to use this land.</p> <p>The activities and waste types listed under this permit will not be used by Silica.</p> <p>Silica will use part of the permitted site for bulking storage and transfer of waste glass only.</p> <p>This position has been agreed with the Environment Agency EPR/WP3326SW/P001.</p>
Non-permitted activities undertaken	
Document references for:	<p>Plan showing layout is SDL-SBS-LAY-01.</p> <p>The Risk Assessment is provided within document SDL-SBS-ERA-01.</p>
<ul style="list-style-type: none"> <li>• plan showing activity layout; and</li> <li>• environmental risk assessment.</li> </ul>	

**Note:**

In Part B of the application form you must tell us about the activities that you will undertake at the site. You must also give us an environmental risk assessment. This risk assessment must be based on our guidance (*Environmental Risk Assessment - EPR H1*) or use an equivalent approach.

It is essential that you identify in your environmental risk assessment all the substances used and produced that could pollute the soil or groundwater if there were an accident, or if measures to protect land fail.

These include substances that would be classified as 'dangerous' under the Control of Major Accident Hazards (COMAH) regulations and also raw materials, fuels, intermediates, products, wastes and effluents.

If your submitted environmental risk assessment does not adequately address the risks to soil and groundwater we may need to request further information from you or even refuse your permit application.

<b>4.0 Changes to the activity</b>	
<b>Have there been any changes to the activity boundary?</b>	The boundary was changed November 2020.
<b>Have there been any changes to the permitted activities?</b>	If yes, provide a description of the changes to the permitted activities
<b>Have any 'dangerous substances' not identified in the Application Site Condition Report been used or produced as a result of the permitted activities?</b>	If yes, list of them
<b>Checklist of supporting information</b>	<ul style="list-style-type: none"> <li>• Plan showing any changes to the boundary (where relevant)</li> <li>• Description of the changes to the permitted activities (where relevant)</li> <li>• List of 'dangerous substances' used/produced by the permitted activities that were not identified in the Application Site Condition Report (where relevant)</li> </ul>

<b>5.0 Measures taken to protect land</b>	
Use records that you collected during the life of the permit to summarise whether pollution prevention measures worked. If you can't, you need to collect land and/or groundwater data to assess whether the land has deteriorated.	
<b>Checklist of supporting information</b>	<ul style="list-style-type: none"> <li>• Inspection records and summary of findings of inspections for all pollution prevention measures</li> <li>• Records of maintenance, repair and replacement of pollution prevention measures</li> </ul>

<b>6.0 Pollution incidents that may have had an impact on land, and their remediation</b>	
Summarise any pollution incidents that may have damaged the land. Describe how you investigated and remedied each one. If you can't, you need to collect land and /or groundwater reference data to assess whether the land has deteriorated while you've been there.	
<b>Checklist of supporting information</b>	<ul style="list-style-type: none"> <li>• Records of pollution incidents that may have impacted on land</li> <li>• Records of their investigation and remediation</li> </ul>

## 7.0 Soil gas and water quality monitoring (where undertaken)

Provide details of any soil gas and/or water monitoring you did. Include a summary of the findings. Say whether it shows that the land deteriorated as a result of the permitted activities. If it did, outline how you investigated and remedied this.

<b>Checklist of supporting information</b>	<ul style="list-style-type: none"><li>• <b>Description of soil gas and/or water monitoring undertaken</b></li><li>• <b>Monitoring results (including graphs)</b></li></ul>
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## 8.0 Decommissioning and removal of pollution risk

Describe how the site was decommissioned. Demonstrate that all sources of pollution risk have been removed. Describe whether the decommissioning had any impact on the land. Outline how you investigated and remedied this.

<b>Checklist of supporting information</b>	<ul style="list-style-type: none"><li>• Site closure plan</li><li>• List of potential sources of pollution risk</li><li>• Investigation and remediation reports (where relevant)</li></ul>
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## 9.0 Reference data and remediation (where relevant)

Say whether you had to collect land and/or groundwater data. Or say that you didn't need to because the information from sections 3, 4, 5 and 6 of the Surrender Site Condition Report shows that the land has not deteriorated.

If you did collect land and/or groundwater reference data, summarise what this entailed, and what your data found. Say whether the data shows that the condition of the land has deteriorated, or whether the land at the site is in a "satisfactory state". If it isn't, summarise what you did to remedy this. Confirm that the land is now in a "satisfactory state" at surrender.

<b>Checklist of supporting information</b>	<ul style="list-style-type: none"><li>• Land and/or groundwater data collected at application (if collected)</li><li>• Land and/or groundwater data collected at surrender (where needed)</li><li>• Assessment of satisfactory state</li><li>• Remediation and verification reports (where undertaken)</li></ul>
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## 10.0 Statement of site condition

Using the information from sections 3 to 7, give a statement about the condition of the land at the site. This should confirm that:

- the permitted activities have stopped
- decommissioning is complete, and the pollution risk has been removed
- the land is in a satisfactory condition.