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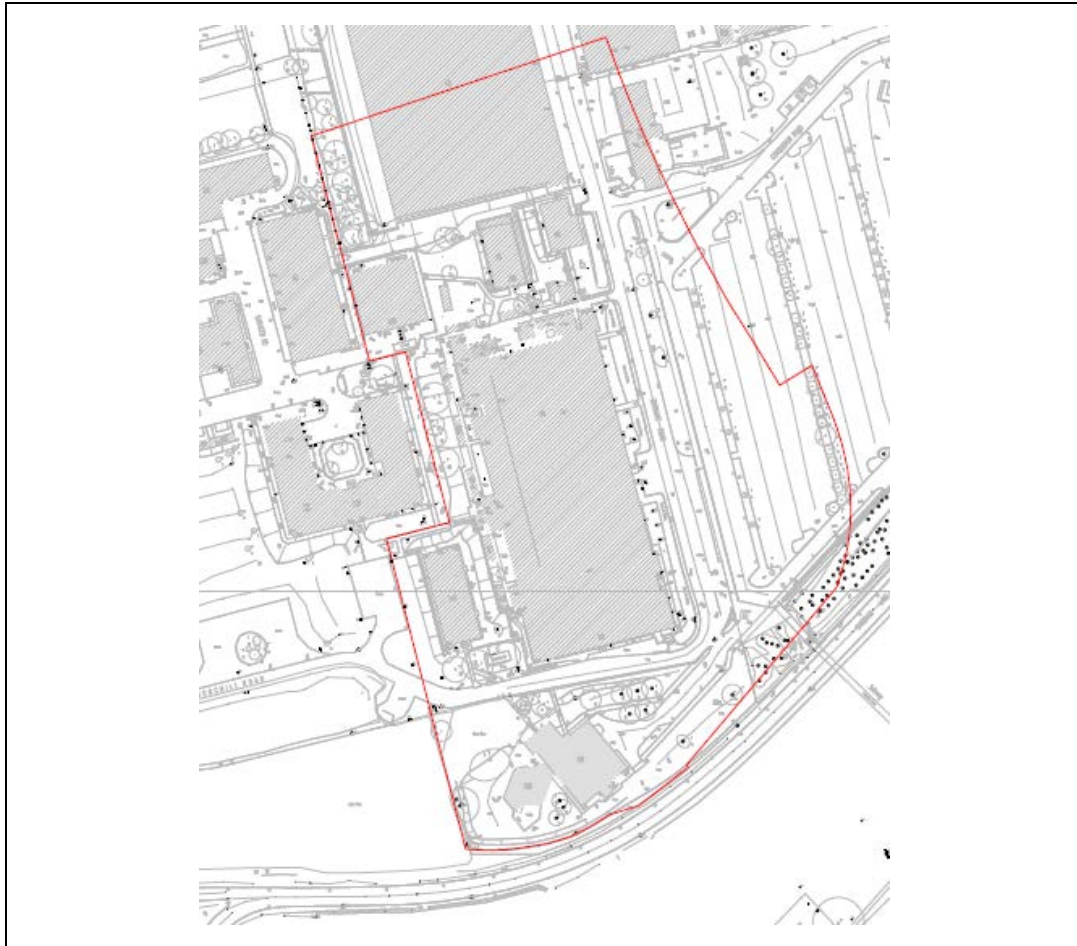
Phase I

# Environmental Risk Assessment

Longcross Film Studios, Chobham Lane, Longcross, Chertsey, KT16 0EE

**A REPORT PREPARED  
FOR AND ON BEHALF OF  
ARK DATA CENTRES LIMITED  
C/O HURLEY PALMER FLATT**

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SIGNATURE:

For and on behalf of  
Paragon Building Consultancy Limited

**H** Critical or high risk issue for urgent management attention

**MH** Moderate to high risk issue considered as a significant management item



**M** Medium risk issue for ongoing management or action

**LM** Low to medium risk issue that may require management or action

**L** Low risk item or for information only

## DASHBOARD SUMMARY

### KEY ISSUES

	<p>The following issues represent the key matters for consideration as a result of our Phase 1 Environmental Audit with regards to ground conditions as part of the proposed development of a data centre.</p>	
1.	<p>The Phase 1 preliminary risk assessment has identified that the site has a medium risk, resulting from residual contamination from the historical uses of the site. There are also potential sources of contamination on site as a result of the site's current land use.</p>	
2.	<p>A slope has been identified along the western part of the site. It is understood that a retaining wall is to be constructed in this area. As such, further investigation is required to provide information on the slope to advise on the retaining wall design.</p>	

### ENVIRONMENTAL RISK RATING

Based on the findings of this report, there are likely to be viable pollutant linkages associated with the proposed development site that would be considered as posing significant harm to human health or Controlled Waters.

Therefore, the risk associated with the development is **medium** and requires further investigation for land contamination purposes.

### RECOMMENDATIONS

An intrusive Phase 2 Investigation is recommended to determine the geotechnical and geoenvironmental risks associated with the site. It is recommended that this includes:

- Drilling by means of a sonic drilling rig to advance through the Bagshot Formation and provide high quality samples for geotechnical testing. Boreholes to have in-situ testing and some to be installed with groundwater/gas monitoring wells;
- Windowless Sampler Boreholes to increase the sampling coverage and allow sampling of shallow soils. Boreholes to include in-situ geotechnical testing and installation of groundwater/gas monitoring wells;
- In-situ CBR testing for road and pavement design;
- Trial pitting across the site to increase the sampling coverage;
- Foundation inspection pits to confirm the foundations of buildings on top of the slope;

- Soil sampling and laboratory testing including standard contaminant suites (asbestos screening, heavy metals, Total Petroleum Hydrocarbons (TPH), Polyaromatic Hydrocarbons (PAH), Total Organic Carbon (TOC), phenol and cyanide.
- Geotechnical laboratory testing to be based on geology, but assumed to include Atterberg testing on cohesive deposits, Particle Size Distribution on granular deposits, sulphate testing, and triaxial testing on U100 samples (if recovered);
- Gas and groundwater monitoring; and
- Groundwater testing (if encountered) for a standard contaminant suite, similar to that set out above for the soils.
- An ecology survey may be required prior to the commencement of development and specialise advice should be sought in this regard.

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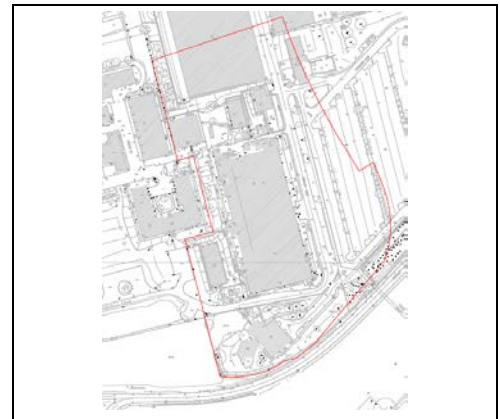
## APPENDIX 7: EXTENT OF SURVEY LIMITATIONS

## PHASE 1 ENVIRONMENTAL AUDIT REPORT

CLIENT NAME: Ark Data Centres Limited C/O  
Hurley Palmer Flatt

PROPERTY ADDRESS: Longcross Film Studios  
Chobham Lane, Longcross, Chertsey

INSPECTION DATE: 11 June 2020



### 1.0 KEY AUDIT FINDINGS

<b>1.1</b>	<b>Introduction</b>
1.1.1	This assessment has been carried out in general accordance with current UK best practice, requirements of the National Planning Policy Framework (NPPF) and guidance as given in the Contaminated Land Risk Management CLRM (CLR11 currently under revision), Contaminated Land Exposure Assessment (CLEA) framework, Part 2A of the Environmental Protection Act (EPA) 1990, DEFRA (2012) Part 2A Contaminated Land Statutory Guidance and CIRIA Contaminated Land Risk Assessment Guide to Good Practice C552 (2001).
<b>1.2</b>	<b>Development Proposals</b>
1.2.1	The Client intends to redevelop the site and construct a Data Centre with HV Energy Centre, generator and water tanks. At the time of writing no planning application has been made. However, proposed development plans are provided as Figure 2 in the Appendices. It is intended that this report be submitted in support of a planning application for this development.
<b>1.3</b>	<b>Environmental Site Assessment</b>
1.3.1	The site walkover identified that the site is part of the wider extents of the Longcross Film Studios. The site is situated in the south-western part of the studios and is formed of an area of car parking to the east of Durrant Road, a private road into the secure studios area. There are some areas (in the north of the demise) where Special FX works take place and so there are drums and Intermediate Bulk Containers (IBCs) of substances such as paints and varnishes near to warehouses, which are now vacant and await demolition.
1.3.2	There is a large slab area where former structures above have been demolished. Between this and the Special FX warehouse there are some slab areas where former buildings have been demolished (Buildings 60 and 61) with landscaping and trees in between.
1.3.3	In the south of the site area there was a studios canteen building (Building 100 and 101) which have since been demolished. There remains hard standing and soft landscaping with trees.

1.3.4	In the west of the demise there is a former office building (Building 114) which has since been subject to demolition. Along this flank is a slope which adjoins the main slab area.
1.3.5	Externally there are roadways and footpaths and areas of hard and soft landscaping. A steep slope is present in the western part of the site.
1.3.6	The property is immediately surrounded by other buildings associated with the film studio to the north. Infrastructure and the M3 is located to the south and east. The west of the site is flanked by an office (Building 124) and other studios land.
1.3.7	Some 235m west of the site there is an access road, Burma Road, where there are old signs indicating military use / MOD land. This road is now used as an access road for Crest Nicholson who are currently redeveloping wider parts of the studios. There are trees and wooded areas along Burma Road and nesting birds were observed. Chobham Common is also present to the west of Burma Road. Chobham Common is a biological Site of Special Scientific Interest, a Nature Conservation Review site, Grade I and a National Nature Reserve.
1.3.8	Further details on the site's description are provided in Appendix 2 together with a site layout plan (Figure 1).
<b>1.4</b>	<b>Historical Land Use</b>
1.4.1	Historical mapping indicated that the site was open, undeveloped woodland / scrubland for most of its history until structures were recorded on site on mapping editions from 2002 onwards. It is understood from anecdotal evidence that there was some informal landfilling on the wider film studios (off site). It is known from online research that the site was a military site long before this used for research and experiment relating to vehicles and tanks. Between 1941 and 2005 the site was used by various government military agencies until it became the Defence Evaluation & Research Agency site (DERA) and finally the Defence Logistics Organisation (DLO) Chertsey. The most recent use of the site was for the testing, evaluation and certification of the full range of British Army vehicles. It is understood that the site was later sold off and was then used by Longcross Film Studios. Historical map extracts are provided in Appendix 3.
1.4.2	The site was largely surrounded by undeveloped land / green belt and Chobham Common to the west. Longcross Station and railway were present beyond the studios to the north. The land to the east of the site were used for military use historically; there were also barracks buildings to the south.
<b>1.5</b>	<b>Potential Sources of Current and Historical Contamination</b>
1.5.1	Based on the current and historical land uses, it is likely that the following contaminants could be identified on site: <ul style="list-style-type: none"> <li>• Total Petroleum Hydrocarbons;</li> <li>• Polycyclic Aromatic Hydrocarbons;</li> <li>• Heavy Metals;</li> <li>• Asbestos; and</li> <li>• Ground gas.</li> </ul>

1.5.2	It is possible that similar contaminants may arise from the wider extent of the MOD / film studio land that is present to the east of the site, although there is a significant change in site levels with the subject site being positioned at high elevation than the land to the east so the migration of contaminants from off-site sources may be restricted in the shallow subsurface.
<b>1.6</b>	<b>Environmental Setting</b>
1.6.1	Geological environmental and mapping data records summarised in Appendix 4 and Appendix 5 respectively indicate that the site is underlain by River Terrace Deposits (Sand and Gravel) in the western part of the site. This is classified as a Secondary (A) Aquifer of high permeability. The River Terrace Deposits are underlain by the Windlesham Formation (Sand, Silt and Clay) and Bagshot Formation (Sand) which are both classified as Secondary (A) Aquifers of high permeability. There are no groundwater abstractions within a 1km radius of the site, and the site is not located within a Source Protection Zone for groundwater. The nearest surface water feature is an unnamed inland river approximately 180m west of the site.
1.6.2	A number of borehole records have been obtained from BGS records that are situated within 50m of the site. The records indicate the ground conditions comprise Made Ground to 3m bgl over Sand, described as 'peaty, black with layers of brown/green silty sand and stones and roots', over the Bagshot Beds, described as 'orange-brown, grey-green silty and clayey with stones', to the base of the borehole at 15m. Groundwater was noted at 3m bgl.
<b>1.7</b>	<b>Flood Risk</b>
1.7.1	The Environment Agency website indicates that the flood risk at the site is less than 1 in 1,000 chance of flooding in any year. The site has marginal areas shown to be susceptible to surface water flooding, however this is limited to external areas. The site is shown to be susceptible to groundwater flooding, however the BGS confidence rating in the result is low.
<b>1.8</b>	<b>Waste</b>
1.8.1	A landfill has been identified 450m northwest of the site. The record indicates that the landfill received industrial, commercial and household waste between 1960 and 1978. The potential for ground gas to migrate onto site from the landfill is limited due to the distance, however ground gas monitoring was recommended to be completed as part of future investigations as a precautionary measure and due the likelihood of Made Ground being present.
<b>1.9</b>	<b>Environmental Databases &amp; Previous Reports</b>
1.9.1	No significant issues of environmental concern have been identified from third party databases or information searches.
1.9.2	The site is not located in a radon affected area.
1.9.3	The site is not located in a coal affected area.



<p>1.9.4</p>	<p>We have been provided with an earlier environmental report for review: Entec UK Limited (1999). DERA Chertsey Land Quality Assessment. Dated 4 October 1999. Although Paragon cannot be held responsible for the accuracy of the work of others, the following key points and extracts have been noted:</p> <ul style="list-style-type: none"> <li>• The report did not identify significant contamination in the development area. Within the wider film studios and Crest housing development area, concentrations of petroleum hydrocarbons, PCBs, and faecal coliforms were identified within the soil and cadmium and nickel within the groundwater.</li> <li>• Explosive residues were only identified near Building 120 which is situated off-site.</li> <li>• No recommendations were made within the development area. Recommendations were made for remediation within the wider film studios and Crest housing development area.</li> </ul>
<p>1.9.5</p>	<p>The following data is obtained from the Groundsure report, obtained to complete this risk assessment, which is based on natural subsidence information provided by the British Geological Survey.</p> <p>The maximum Shrink-Swell hazard rating identified on the study site – <b>Very Low</b></p> <p>The maximum Landslide hazard rating identified on the study site - <b>Very Low</b></p> <p>The maximum Soluble Rocks hazard rating identified on the study site - <b>Negligible</b></p> <p>The maximum Compressible Ground hazard rating identified on the study site - <b>Negligible</b></p> <p>The maximum Collapsible Rocks hazard rating identified on the study site - <b>Very Low</b></p> <p>The maximum Running Sand hazard rating identified on the study site - <b>Low</b></p>
<p>1.9.6</p>	<p>Based on the foregoing, geotechnical risk assessment and detailed investigations are required.</p>
<p><b>1.10</b></p>	<p><b>Regulatory Consultation</b></p>
<p>1.10.1</p>	<p>The Contaminated Land Officer (of Runnymede Borough Council) has not been contacted directly at this time. In addition, no formal planning application has been made. It is intended that this document will be submitted to Runnymede Borough Council as part of an application.</p>
<p>1.10.2</p>	<p>The Environment Agency has not been contacted at this stage.</p>

**2.0 ENVIRONMENTAL RISK ASSESMENT**

<p><b>2.1</b></p>	<p><b>Qualitative Risk Assessment of Pollutant Linkages</b></p>
<p>2.1.1</p>	<p>In order to assess the risks associated with the presence of ground contamination, the linkages between the sources and potential receptors need to be established and evaluated. This is in accordance with Part 2A of the Environmental Protection Act (EPA) 1990, which provides a statutory definition of Contaminated Land. To fall within this definition it is necessary that, as a result of the condition of the land, substances may be present on or under the land such that:</p> <ul style="list-style-type: none"> <li>• Significant harm is being caused or there is a significant possibility of such harm being caused; or</li> <li>• Significant pollution of controlled waters is being caused, or there is a significant possibility of such pollution being caused.</li> </ul>

2.1.2	Risk from contamination is assessed by consideration of possible linkages between contaminant sources and potential pathways between them. A contaminant linkage must exist in relation to particular land before the land can be considered potentially to be contaminated land under Part 2A, including evidence of the actual presence of contaminants.
2.1.3	This assessment is based on the potential current and historical sources identified, the site's environmental setting and the development proposals to evaluate the potential source-pathway-receptor linkages, which must exist to define a site as contaminated land. The risk assessment considers the site within an area context and assesses potential risks to identified receptors in relation to the existing site setting and the proposed development.
<b>2.2</b>	<b>Potential Contaminants of Concern</b>
2.2.1	<p>Based on the above, the potential contaminants of concern that require further investigation are associated with Made Ground due to the historical uses of the site and changes in elevation. Contaminants of concern include:</p> <ul style="list-style-type: none"> <li>• Total Petroleum Hydrocarbons;</li> <li>• Polycyclic Aromatic Hydrocarbons;</li> <li>• Heavy Metals;</li> <li>• Asbestos; and</li> <li>• Ground gas.</li> </ul>
2.2.2	Polychlorinated Biphenyls (PCBs), vapours, Volatile Organic Compounds (VOCs), and explosive residues have not been listed as a potential source as these were not identified within the development area in the previous investigation by Entec.
<b>2.3</b>	<b>Potential Active Pathways</b>
2.3.1	Inhalation / ingestion / dermal contact to future site users is likely to be minimal following completion of the development as extensive hardstanding will prevent site users coming into contact with residual underlying contaminants. As soft landscaped areas are proposed, confirmation that contamination is absent from such areas should be sought by means of investigation. If contamination is present, these areas should be capped with a clean cover system.
2.3.2	There is the potential for wider site users to be exposed to translocated particulates / fibres during the development, however, it is anticipated that with control measures in place the pathways can be broken.
2.3.3	Inhalation / ingestion / dermal contact to current site workers and construction workers may occur during construction. However, it is anticipated that with control measures in place the pathway can be broken.

2.3.4	<p>The development may require piling and as such may inadvertently produce a preferential pathway for contaminants to migrate into the deeper geology, which are classified moderately sensitive aquifers – see below. It is not yet clear at what depth the groundwater table is at and whether there is an appreciable flow direction. As such, the potential for migration of dissolved phase contamination off the site in groundwater cannot be entirely discounted at this stage. The SSSI would be considered as up-gradient and therefore unlikely to be at risk of site derived contamination impacts (if any). However, there are new residential dwellings down-gradient of the development area which would need to be assessed, albeit the risk is probably minimal since the residential area is some 380m from the development site.</p>
<b>2.4</b>	<p><b>Potential Receptors</b></p>
2.4.1	<p>The key receptors that have been identified for this site are the construction workers and offsite workers during the redevelopment and future site users and landscape/maintenance workers once the development is complete.</p>
2.4.2	<p>Property including site structures and services and plants/landscaping are considered a receptor as they may be in contact with contaminated soils.</p>
2.4.3	<p>Whilst there are no groundwater abstractions within a 1km radius of the site, and the site is not located within a Source Protection Zone for groundwater, the geology underlying the site (River Terrace Deposits, Windlesham Formation and Bagshot Formation) are classified as a Secondary (A) Aquifer of high permeability.</p>
2.4.4	<p>The nearest surface water feature is an unnamed inland river approximately 180m west of the site.</p>
2.4.5	<p>There are also off-site residential properties, currently being constructed by Crest, which are situated some 380m from the site.</p>
<b>2.5</b>	<p><b>Risk Evaluation</b></p>
2.5.1	<p>CIRIA C552 (2001) has been used to define the risk rating presented in the Preliminary Qualitative Risk Assessment below in Table 1. The methodology and definition of risk associated with these linkages is set out in detail in Appendix 6. In summary, an evaluation of each viable pollutant linkage is made in relation to the ‘probability of a risk being realised’ (P) against the ‘consequence of a risk being realised’ (C) to establish a ‘risk classification’ (R). From this, the potential risk management requirements are established.</p>
2.5.2	<p>A simplified diagrammatic representation of the CSM is also provided in Appendix 6.</p>

2.5.3

**Table 1 Preliminary Qualitative Risk Assessment**

Receptor	Sources	Pathways	P	C	R	Justification
<b>Human Health</b>						
Construction workers and off site workers	Organic and inorganic contamination from the historical development of the site as MOD land	Direct contact, ingestion, and inhalation via outdoor soils or translocated soil and dust indoors.	Likely	Medium	M	<p><b>Moderate risk:</b> Ingestion, inhalation and dermal contact with contaminated soils in excavations or stockpiles cannot be discounted. Asbestos fibres and residual contaminants may be present onsite.</p> <p>Personal Protective Equipment (PPE) and Risk Assessments and Method Statements are required during construction to mitigate risk.</p> <p>There is the potential for current wider users of the film studios to be exposed to translocated particulates / fibres during the development, however, it is anticipated that with control measures in place the pathway can be broken.</p>
	Ground gas from Made Ground	Inhalation, migration through granular and fractured soils into confined spaces.	Likely	Medium	M	<p><b>Moderate risk:</b> There is potential for ground gas at the site due to historical site uses.</p> <p>Personal Protective Equipment (PPE) and Risk Assessments and Method Statements are required during construction to mitigate risk.</p>
Future site users including maintenance / landscape workers	Organic and inorganic contamination in soils and groundwater from the historical development of the site as MOD land	Direct contact, ingestion, and inhalation of outdoor soils or translocated soil and dust indoors.	Likely	Medium	M	<p><b>Moderate risk:</b> With respect to the future development, areas of risk to future site users are likely to be restricted to areas of soft landscaping. To manage the risk, these areas would be subjected to chemical testing followed by installation of 'clean', imported capping topsoil. Contaminants within areas beneath the proposed buildings and roads are not considered to be accessible and therefore do not present a risk to future site users.</p> <p>If asbestos is located on site, the asbestos register will be updated.</p> <p>Future maintenance of the landscaped areas is to be managed by use of Personal Protective Equipment (PPE).</p>
	Ground gas from Made Ground	Inhalation, migration through granular and fractured soils into confined spaces.	Likely	Medium	M	<p><b>Moderate risk:</b> There is potential for ground gas at the site due to the historical uses of the site. Gas monitoring has been recommended as part of an intrusive investigation at the site to determine a suitable management strategy.</p>

2.5.4

**Table 1 Preliminary Qualitative Risk Assessment cont'd**

Receptor	Sources	Pathways	P	C	R	Justification
<b>Property</b>						
Site structures and services	TPH in site soils	Direct contact between soil and structures or services.	Low likelihood	Medium		<b>Low to moderate risk:</b> Made Ground is likely to be present as a result of the historical uses of the site. As such, chemical analysis of the soils will be required to determine the requirements for buried concrete and whether barrier pipework is required for drinking water supply pipework. By ensuring that appropriate building materials are used as part of the new development, the risks can be managed.
	Ground gas	Migration through granular and fractured soils into confined spaces.	Likely	Medium		<b>Moderate risk:</b> There is potential for ground gas at the site due to the historical uses of the site.
Off-site residential properties (380m east)	Organic and inorganic contamination	Direct contact between soil and structures or services	Low	Medium		<b>Low to moderate risk:</b> Made Ground is likely to be present as a result of the historical uses of the site. However, there is a low likelihood that off-site residential properties would be affected due to the distance from the site.
	Ground gas	Migration through granular and fractured soils into confined spaces	Low likelihood	Medium		<b>Low to moderate risk:</b> There is potential for ground gas at the site due to the historical uses of the site. However, there is a low likelihood that off-site residential properties would be affected due to the distance from the site.
Plants /Landscaping	Organic and inorganic contamination in soils	Root contact and uptake	Low likelihood	Medium		<b>Low to moderate risk:</b> There are currently some nominal areas of soft landscaping on site and areas of soft landscaping are proposed as part of the future development. Testing of the underlying soils will be required to check for the presence of contaminants and determine whether the soils are a suitable growth medium for planting. Significant issues are not anticipated, as the risks can be controlled straightforwardly during development by importing fresh topsoil as part of a capping layer.
<b>Groundwater</b>						
Secondary (A) Aquifer	Organic and inorganic contamination in soils	Soil leaching and migration of potential soil contamination	Likely	Medium		<b>Moderate Risk:</b> Leaching of mobile contaminants through soil pore space to the shallow water table and deeper aquifer cannot be discounted.  Furthermore, piling may be required onsite which may produce a preferential pathway for contaminants to migrate.
<b>Surface Waters</b>						
Unnamed Inland River (180m west)	Leachable metals and organic contamination	Soil leaching and migration into drains and sewers which discharge into the ditch.	Low likelihood	Medium		<b>Low to moderate risk:</b> Direct discharge or surface run off of contaminants to surface water features is low to moderate due to the distance between the site and inland river. Furthermore, the potential for migration of dissolved phase contamination in groundwater cannot be discounted at this stage.

### 3.0 CONCLUSIONS AND RECOMMENDATIONS

<p><b>3.1</b></p>	<p><b>Conclusions</b></p>
<p>3.1.1</p>	<p>Based on the findings of this report, there are likely to be viable pollutant linkages associated with the proposed development site that would be considered as posing significant harm to human health or Controlled Waters. As such, the risk associated with the development is <b>medium</b> and requires further investigation for land contamination purposes.</p>
<p>3.1.2</p>	<p>A slope has been identified along the western part of the site. It is understood that a retaining wall is to be constructed in this area. As such, further investigation is required to provide information on the slope to advise on the retaining wall design.</p>
<p><b>3.2</b></p>	<p><b>Recommendations</b></p>
<p>3.2.1</p>	<p>An intrusive Phase 2 Investigation is recommended to determine the geotechnical and geoenvironmental risks associated with the site. It is recommended that this includes:</p> <ul style="list-style-type: none"> <li>• Drilling by means of a sonic drilling rig to advance through the Bagshot Formation and provide high quality samples for geotechnical testing. Boreholes to have in-situ testing and some to be installed with groundwater/gas monitoring wells;</li> <li>• Windowless Sampler Boreholes to increase the sampling coverage and allow sampling of shallow soils. Boreholes to include in-situ geotechnical testing and installation of groundwater/gas monitoring wells;</li> <li>• In-situ CBR testing for road and pavement design;</li> <li>• Trial pitting across the site to increase the sampling coverage;</li> <li>• Foundation inspection pits to confirm the foundations of buildings on top of the slope;</li> <li>• Soil sampling and laboratory testing including standard contaminant suites (asbestos screening, heavy metals, Total Petroleum Hydrocarbons (TPH), Polyaromatic Hydrocarbons (PAH), Total Organic Carbon (TOC), phenol and cyanide.</li> <li>• Geotechnical laboratory testing to be based on geology, but assumed to include Atterberg testing on cohesive deposits, Particle Size Distribution on granular deposits, sulphate testing, and triaxial testing on U100 samples (if recovered);</li> <li>• Gas and groundwater monitoring; and</li> <li>• Groundwater testing (if encountered) for a standard contaminant suite, similar to that set out above for the soils.</li> </ul>
<p><b>3.3</b></p>	<p><b>Regulatory</b></p>
<p>3.3.1</p>	<p>We would recommend that this report is submitted to the Local Authority for their comments and approval.</p>

#### 4.0 CONFIRMATION OF INSTRUCTIONS

4.1	We have been instructed by Ark Data Centres Limited C/O Hurley Palmer Flatt to undertake a Phase I Environmental Audit of Longcross Film Studios, Chobham Lane, Longcross, Chertsey. The purpose of the report is to highlight environmental considerations with respect to ground conditions as part of the proposed data centre development.
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