

18th September 2026

Ref: 415001-00022_097
Your Ref: LU/301/24/PLArun District Council – Planning Policy
Maltravers Road
Littlehampton
BN17 5LF

Dear Sir / Madam,

ENVIRONMENTAL IMPROVEMENT (REMEDIATION) WORKS AT THE FORMER GASHOLDER STATION, HARWOOD ROAD, LITTLEHAMPTON BN17 7AU

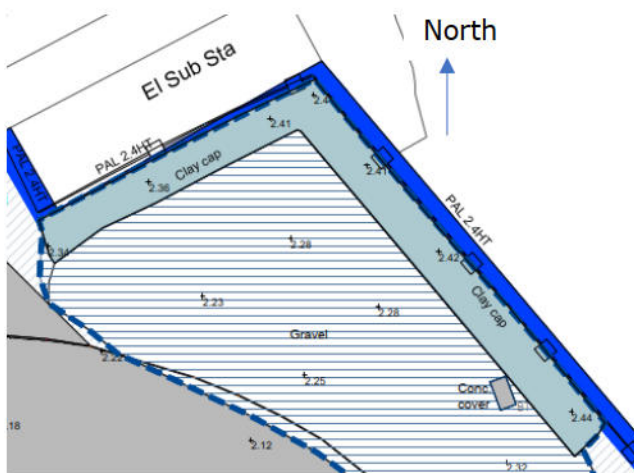
Following the receipt of comments from Environmental Health and the Environment Agency relating to *Condition 3 – Verification Report*, please find below Worley Consulting responses.

Environment Health Comment

Clarification is required regarding the clay cut off wall. The approved remediation strategy specifies installation along the north and west boundaries of Area C, whereas the Verification Report records installation along the north and east boundaries. This may be clerical error, but confirmation is required as to which is correct.

Worley Consulting Response

The clay cut-off wall was installed along the northern extent of Area C, extending along both the northwestern and northeastern boundaries, as shown in the verification drawing below. The wall was installed in accordance with the approved design and remediation strategy. The apparent discrepancy arises from differences in the description of the wall alignment rather than any variation from the approved design. The verification report correctly reflects the as-built installation, and no deviation from the approved remediation measures occurred.



Environment Health Comment

The Verification Report records that material beneath the concrete cable housing box was retained insitu because of the presence of services. An assessment of the residual contamination risks associated with this material is required, together with confirmation that's its retention does not compromise the remediation objectives.

Worley Consulting Response

The telecommunications cable box contains live services within the chamber concrete cover. The material beneath the chamber was therefore left in situ to avoid undermining or disturbing the cable box and associated services. The cable box occupies approximately 0.35% of the total Area C remediated. Consequently, the very small volume of material potentially remaining in situ does not compromise the overall remediation objectives or the effectiveness of the remedial works.



Environment Health Comment

The approved remediation strategy required all fill material within the gasholder tank to be excavated down to the base of the concrete slab, with all steel lifts removed. However, the verification report states that the steel base and tank walls were retained insitu. This discrepancy is particularly significant because pockets of tar were observed leaching through the made ground adjacent to a locally degraded section of the cast iron tank wall.

Environment Agency Comment

As above, plus.....This observation is of particular concern, as it indicates the potential presence of gross contamination associated with, or beyond, the retained gasholder structure. By retaining the former gasholder structure in situ, it has not been possible to verify the condition of material immediately outside the tank walls, nor to demonstrate whether gross contamination remains present in these areas or the extent of any such areas. Consequently, we consider this to be a significant departure from the approved remediation strategy. The available information does not provide sufficient evidence to demonstrate that contamination associated with this principal source area has been adequately characterised, removed, or rendered acceptable from a controlled waters perspective. We therefore require the applicant to provide a strategy to address this issue, and provide verification that no significant contamination remains beyond the tank walls.

Worley Consulting Response

Retaining the steel base and associated support structures, where present, is a recognised and widely accepted approach when remediating former underground tanks. It is common practice for these steel elements to remain in situ following remediation, as their presence does not adversely affect the effectiveness of the remedial works or the achievement of the remediation objectives. The insitu steel base and side walls (where present, reference the below photo showing the wall had previously been removed/damaged in parts) also provides stability to the excavation.

The small, limited area of tar-impacted material shown below was isolated by the placement of a clay capping layer. This clay barrier prevents any potential migration of contaminants into the tank void and eliminates direct contact between the impacted material and the imported fill.

The voluntary remedial works were designed to address the identified contaminant linkages associated with the below-ground tank and the localised area of impact in the northern corner of the site. The remediation strategy was focused on the known contaminant sources and pathways accessible at the time.



If you have any queries regarding the above information, please do not hesitate to get in touch.

Yours faithfully,


Charnia Kirk

Technical Director