

# Integrated and sustainable management of post-industrial coasts.

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The authors declare a potential conflict of interest and state it below

Author Bardos was employed by the company r3 environmental technology ltd. The remaining authors declare that the research was conducted in the absence of any commercial or financial relationships that could be construed as a potential conflict of interest.'

### *Author contribution statement*

PB, KS, and AC conceived of the initial idea, and outlined the brief, which was then co-developed by all authors. PB and AC led on the gentle remediation and sustainability linkages approaches, KS on coastal landfills and dredged sediment management, RW on coastal management and ecology, and BM on renewables and US-based examples. All authors contributed to manuscript writing and revision, and read and approved the submitted version. AC finalised and co-ordinated submission of the manuscript. The opinions given in this article are those of the authors, and do not necessarily reflect those of their employers.

### *Keywords*

Risk Management, coastal management, Gentle remediation options, Sustainable Remediation, Sustainability linkage, Coastal landfill sites, Phytomanagement, Brownfield

### *Abstract*

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The sustainable management of post-industrial coasts is a major emerging issue globally. Along such coasts, there may be a significant legacy of both contaminated land (including historic landfills and non-managed waste disposal) and contaminated sediments in and around urban and industrial areas, which require new strategies for cost-effective and integrated risk management under future sea-level rise and climate change scenarios. Here, we review current approaches to managing contamination in post-industrial coastlines, discuss emerging integrated management strategies (building on low input approaches to sustainable brownfields regeneration) and present an approach and framework for assessing and comparing different scenarios for coastal brownfield regeneration to soft re-use and other end-points. This framework can be applied to explore the opportunities for synergy and realisation of wider environmental, economic and societal benefits between coastal protection, dredged material re-use and the management of brownfield land. As such, the approach we propose supports planning and options appraisal to realise maximum benefit and value from integrated coastal management strategies.

### *Contribution to the field*

The sustainable management of post-industrial coasts is a major emerging issue globally. Along these coasts, following decline of heavy industry, there may be a significant legacy of both contaminated land (including historic landfills and unmanaged waste disposal) and contaminated sediments in and around urban and industrial areas. These legacy, contaminated, materials require new strategies for cost-effective and integrated risk management under future sea-level rise and climate change scenarios. In this article, we review current approaches to managing contamination and legacy materials in post-industrial coastlines, discuss emerging integrated management strategies (building on low input approaches to sustainable brownfields regeneration) and review a new approach and framework for assessing and comparing different scenarios for coastal brownfield regeneration to soft re-use and other end-points. This framework can be applied to explore opportunities for synergy between different approaches and sites, and the realisation of wider environmental, economic and societal benefits between coastal protection, dredged material re-use and the management of brownfield land. As such, the method we propose supports planning and options appraisal to realise maximum resilience, benefit and value from integrated coastal management strategies.

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## Keywords:

Risk management; Coastal management; Gentle remediation options; sustainable remediation; sustainability linkage; Coastal Landfill Sites; Phytomanagement; Brownfield.

## Abstract:

The sustainable management of post-industrial coasts is a major emerging issue globally. Along such coasts, there may be a significant legacy of both contaminated land (including historic landfills and non-managed waste disposal) and contaminated sediments in and around urban and industrial areas, which require new strategies for cost-effective and integrated risk management under future sea-level rise and climate change scenarios. Here, we review current approaches to managing contamination in post-industrial coastlines, discuss emerging integrated management strategies (building on low input approaches to sustainable brownfields regeneration) and present an approach and framework for assessing and comparing different scenarios for coastal brownfield regeneration to soft re-use and other end-points. This framework can be applied to explore the opportunities for synergy and realisation of wider environmental, economic and societal benefits between coastal protection, dredged material re-use and the management of brownfield land. As such, the approach we propose supports planning and options appraisal to realise maximum benefit and value from integrated coastal management strategies.

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## 1. Introduction.

Sea-level rise and the increasing magnitude and frequency of coastal storm surges, and consequent impacts (including coastal erosion, and saline flooding or inundation of urban areas and coastal assets), are major challenges for the sustainable development of coastal areas and communities over the 21<sup>st</sup> century. Many coastlines in areas subject to former extensive urban and industrial development (post-industrial coasts) contain a significant legacy of brownfield land<sup>1</sup>, including areas of land contaminated with a range of toxic organic, inorganic and microbial (and other) contaminants, and land areas which have been subject to historic landfill and unmanaged waste disposal (Brand et al. 2017, O'Connor et al. 2019). Erosion, reworking and remobilisation of contaminants, solid particulates, debris (e.g., asbestos), pathogens and plastics from this land and solid waste material could pose a significant risk to human and ecological health. For each individual site, contaminant load may not be significant. However, on regional, national and global scales the problem may be underestimated (O'Shea et al. 2018). For example, in England there are > 1200 vulnerable coastal landfills with 1 in 10 of these sites at risk of erosion over the next few decades (Brand et al. 2017) and more widely across Europe, there are ca. 10,000 historic landfills containing industrial, domestic and hazardous waste in coastal and riparian areas prone to flooding and/or erosion (Wille, 2018).

In addition, industrialised coasts and estuaries may host significant volumes of historically contaminated subtidal and intertidal sediments (Vane et al., 2015). These sediments may cause continuing contamination of coastal systems even after primary contaminant discharges have ceased, due to advective sediment mixing and supply of reworked, secondary contamination from erosion of contaminated sediments elsewhere along the coast or estuary (e.g. Machado et al. 2015; Cundy and Croudace 2017; Premier et al. 2019). This diffuse legacy pollution is considered to be one of the major causes for the UK's rivers and transitional waters failing ecological and chemical water quality standards (Defra 2012). Removal or dredging, and subsequent safe disposal or beneficial re-use, of these contaminated sediments pose major ongoing challenges. These challenges may be particularly severe where dredged sediments are required for beach nourishment, land reclamation and land raising as part of climate change adaptation strategies. In addition, an expected change in coastal erosion and sedimentation patterns, including an increased frequency of extreme events, may mean that more reactive dredging is needed than currently required, whereas in other cases proactive dredging may be more appropriate to deal with the implications of long-term seasonal changes in flow (Hakstege 2013).

Achieving sustainability had been considered an integral outcome of brownfields or contaminated site management (including at coastal sites) since its inception in the 1970s, as through this process under-utilised or damaged land was returned to the land use cycle, avoiding greenfield use (Bardos et al. 2016). From the late 1990s however this assumption began to be questioned, in recognition of the realisation that poorly selected, designed or implemented remediation and site management activities may in fact cause greater impact than the contamination or other land issues that they seek to address. This has led to an emerging international literature and (recently) consensus on sustainable remediation, which has focused on promoting "the use of more sustainable practices during environmental clean-up activities, with the objective of balancing economic viability, conservation of natural resources and biodiversity, and the enhancement of the quality of life in surrounding communities" (Bardos

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<sup>1</sup> Sites that have been affected by the former uses of the site and surrounding land, are derelict or underused, may have real or perceived contamination problems, are mainly in developed urban areas and require intervention to bring them back to beneficial use. CABERNET, 2007

92 et al. 2016, ISO 2017). For coastal brownfields (that are often fragmented, may be sited in post-  
93 industrial areas subject to declining property values, and may be at real or perceived risk of  
94 flooding or erosion) remediation and regeneration for so-called “hard” re-use (e.g. housing or  
95 infrastructure developments) may be problematic. Indeed Leger et al., (2016) noted that  
96 economic circumstances and frequent policy shifts have impeded the redevelopment of  
97 brownfield land in coastal areas, and there is a need for new imaginative approaches that will  
98 help coastal communities realise the undoubted benefits of redevelopment of brownfield sites.  
99

100 One such set of approaches are those combining risk management with nature-based  
101 approaches or “soft” re-use (e.g. redevelopment of brownfield as green space, habitat, or for  
102 biomass and other natural product generation). This includes the use of so-called low input or  
103 gentle remediation approaches: “risk management strategies or technologies involving plant  
104 (phyto-), fungi (myco-), and/or bacteria-based methods that result in a net gain (or at least no  
105 gross reduction) in soil function as well as effective risk management” (Cundy et al. 2016).  
106 Soft re-use has historically tended to be overlooked in brownfields management (Bardos et al.  
107 2016). However, in response to the sustainable development vision, there is a broad agreement  
108 among stakeholders that soft re-use of brownfields can bring significant environmental,  
109 societal and economic benefits (Bardos et al. 2011; 2016; Cundy et al. 2016), as evidenced by  
110 a number of case studies and practical applications (e.g. Cundy et al. 2013; 2016, Li et al.  
111 2019). The soft re-use approach also broadly aligns with an emergence and increased utilisation  
112 of soft-engineering coastal management approaches such as managed realignment and other  
113 habitat recreation, which offer potential synergies (or possibly conflicts in some situations)  
114 with brownfields and contaminated sediments management.  
115

116 Here, we present an approach and framework for assessing and comparing different scenarios  
117 for coastal brownfield regeneration to soft re-use and other end-points, based around  
118 “sustainability linkages”, which draws on concepts and case studies from sustainable  
119 remediation and low input approaches to sustainable brownfields regeneration. Following a  
120 review of contemporary responses and challenges to the management of contaminated land and  
121 sediments in and around coastal urban and industrial areas, we examine (and present examples  
122 of) the potential synergies and wider benefits from integrated low input approaches. We then  
123 present and discuss the sustainability linkages approach, based on sustainability assessment  
124 criteria produced by the UK Sustainable Remediation Forum (SuRF-UK), as a potential  
125 planning and decisional aid to support integrated and sustainable management of post-  
126 industrial coasts.  
127

## 128 **2. Contemporary responses and challenges**

129

130 Historically estuaries and coasts have frequently been areas for waste disposal due to their  
131 proximity to industrial and commercial centres, the perceived low value of coastal wetland  
132 habitats, and due to the ability of tidal flushing to rapidly dilute and disperse contaminants so  
133 reducing acute impact. This occurred through either the use of adjacent land for landfilling of  
134 solid wastes and industrial activities or the discharge of contaminated effluent streams and  
135 particulates. There are potentially millions of landfill and waste disposal sites along coastlines  
136 globally that are at risk of marine inundation, erosion or catastrophic failure. Most of these pre-  
137 date environmental regulation developed in the latter half of the 20<sup>th</sup> Century with little attempt  
138 to isolate solid, liquid or gaseous contaminants from the surrounding environment and these  
139 are generally described as ‘historic’ or ‘legacy’ landfills (Brand et al. 2017). In lower and  
140 middle income economies this is of even greater concern. Rapid economic development has  
141 been accompanied by increasing waste production and globally solid wastes are being

142 generated faster than any other environmental pollutant (Hoornweg et al., 2013). Lack of  
143 regulation and poor infrastructure means many solid waste disposal sites are frequently  
144 uncontrolled (Gupta et al., 2015; Gu et al., 2015) and ‘open’ waste sites are a major source of  
145 marine litter, contaminate water bodies through the release of wide-ranging wastes and  
146 pollution (e.g., metals, batteries, tyres) and present significant human health risk (Ferronato  
147 and Toretta 2019). This has recently been recognised as a significant issue in the management  
148 of plastic debris, where mismanaged land-based wastes are estimated to contribute significantly  
149 to marine plastics debris inputs and without significant infrastructure improvements to waste  
150 management, the cumulative release of plastics will increase by an order of magnitude by 2025  
151 (Jambeck et al. 2015; Waldschlaeger et al. 2020). For 2010, the top 10 countries ranked by  
152 mass of mismanaged plastic waste were China, Indonesia, the Philippines, Vietnam, Sri Lanka,  
153 Thailand, Egypt, Malaysia, Nigeria and Bangladesh. Apart from Egypt and Malaysia, these  
154 countries all showed a percentage of mismanaged waste exceeding 75% (as a proportion of  
155 total waste), with a number handling additional waste imported for processing from Western  
156 nations. Historic and uncontrolled waste disposal sites present two significant potential  
157 contaminant pathways to the marine environment that need to be managed. Firstly, as solid  
158 wastes degrade, soluble contaminants (leachates) migrate through the waste and surrounding  
159 inter-tidal sediments before entering groundwater and the marine environment, and secondly,  
160 solid particulate wastes can be released directly to coastal waters.

161  
162 As a means of managing soluble leachates there is an assumption that contaminant impact  
163 would be mitigated via natural attenuation through either the precipitation of contaminants in  
164 anoxic inter-tidal sediments and/or sorption to fine-grained mineralogical and organic material  
165 (Michalak and Kitanidis, 2002; Njue et al. 2012). The release of any remaining soluble  
166 contaminants in the leachate plume present above natural background would then be diluted  
167 by tidal flushing. However, there is evidence that this ‘do nothing’ approach has resulted in  
168 localised ‘hot spots’ of estuarine sediment contamination (Cox and Preda, 2005; O’Shea et al.  
169 2018) and long term ammonia release (Goody et al. 2014). Future climate change scenarios  
170 also increase the likelihood for tidal flooding and enhanced leachate generation. However, it is  
171 generally recognised that following decades of burial leachate is likely to be relatively dilute  
172 and any release would be rapidly dispersed in coastal waters (Beaven et al. 2020; Brand and  
173 Spencer, 2020).

174  
175 The management of solid waste release has perhaps received more consideration, and for  
176 controlled disposal sites solid waste is usually isolated from the marine environment by  
177 installing a physical barrier such as a hard engineered coastal defence or through geographic  
178 location by placing landfills on cliff tops above mean high water (Nicholls et al. 2020).  
179 However, with sea level rise and increased frequency and intensity of storm surges and coastal  
180 erosion, there are multiple scenarios for contaminant release through; 1) over-topping of  
181 barriers and inundation with saline waters, 2) damage to coastal defences and waste release, 3)  
182 catastrophic failure of coastal defences and 4) cliff failure (Beaven et al. 2020). In the UK, 1  
183 in 10 vulnerable historic coastal landfills are at risk of erosion if coastal defences are not  
184 maintained (Brand et al. 2017) and there is also increasing evidence that extreme flood and  
185 erosion events can result in catastrophic failure and release large volumes of solid waste. For  
186 example, 13 toxic waste sites were flooded in Texas by Hurricane Harvey in 2017 (US EPA,  
187 2017) and more recently, in New Zealand, floods washed out a closed landfill on the Fox River  
188 releasing solid wastes over an area *ca.* 1000 ha and impacting 63 km of coastline (Department  
189 of Conservation 2019). Even following decades of burial landfill waste can be highly toxic,  
190 with the release of matrix material, textiles, wood, paper, asbestos and plastics all presenting  
191 significant ecological risk (Brand and Spencer 2019; Su et al. 2019).

192

193 For coastal brownfield sites more generally, there is a risk that coastal and climatic change may  
194 undermine remediation and risk management strategies previously used at contaminated sites,  
195 particularly where risk management strategies have involved source stabilisation or pathway  
196 management (i.e. strategies where contaminants have been stabilised or managed *in-situ* and  
197 remain in the subsurface). The U.S. Sustainable Remediation Forum (SuRF) spearheaded three  
198 years of collaborative research and knowledge exchange that culminated in: Resilient  
199 Remediation: Addressing Extreme Weather and Climate Change, Creating Community Value  
200 (Maco et al. 2018). They found that “At hazardous sites, climate change and extreme weather  
201 events can undermine the effectiveness of the original site remediation design and can also  
202 impact contaminant toxicity, exposure, organism sensitivity, fate and transport, and long-term  
203 operations, management, and stewardship of remediation sites”. For example, a detailed  
204 modelling study at a Superfund site impacted by Hurricane Florence showed that, “in general,  
205 higher-infiltration events could mobilise vadose-zone residual contaminants, raising  
206 contaminant concentrations in groundwater for a prolonged period.” Further, in the US nearly  
207 two million people, the majority in low-income communities, live within 1 mile of one of 327  
208 Superfund sites in areas prone to flooding or vulnerable to sea-level rise caused by climate  
209 change (Maco et al. 2018). In October 2019 the U.S. Government Accounting Office identified  
210 that *ca.* 60 % of all non- federal National Priorities List (most contaminated sites) are located  
211 in areas that may be impacted by potential climate change impacts of flooding, storm surge,  
212 wildfires, and sea level rise (US GAO 2019). The majority of sites are located in coastal areas  
213 (Figure 1), with 7% of sites expected to be inundated by a sea-level rise of 3 ft (0.9 m), and  
214 11.9% at risk of flooding from Category 4 or 5 hurricane surges.

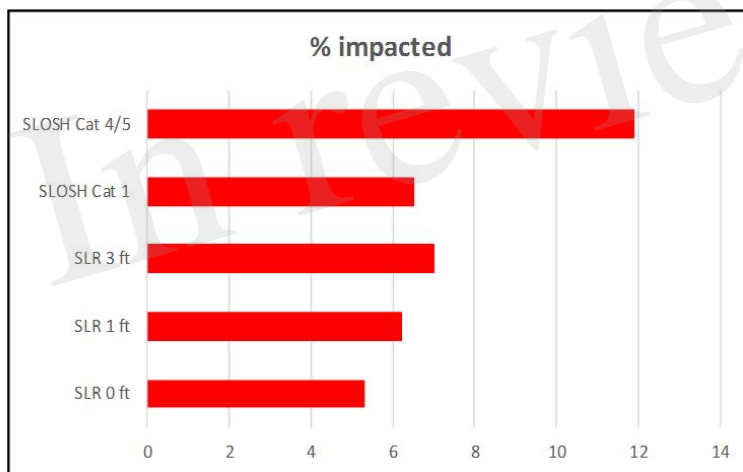
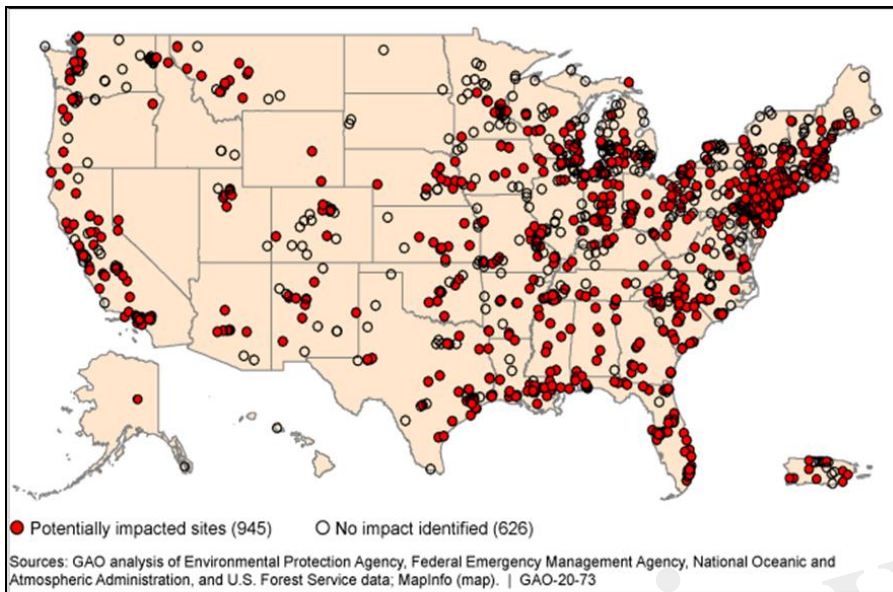
215

216 Therefore, the presence of waste and residual contamination in the coastal environment can  
217 place significant constraints on coastal managers. For example, the presence of historic  
218 landfills can preclude the selection of more sustainable coastal management approaches such  
219 as managed realignment, which adapt to sea level rise and create flood storage by moving  
220 coastal defences inland, or ‘do nothing’ approaches, where coastlines are allowed to retreat in  
221 response to natural coastal processes. In addition, estuaries are also frequently areas of  
222 significant sediment contamination resulting from decades (if not centuries) of industrial use  
223 and effluent release with pollution being a significant, long-term threat to estuarine and coastal  
224 ecosystem health (e.g. Kennish 2002). These legacy pollutants may cause deterioration in water  
225 quality and ecological health through reworking, erosion, natural advective mixing and  
226 diffusion, which may be enhanced under climate change scenarios (e.g., Machado et al., 2017),  
227 and through dredging activities whereby sediments are disturbed via mechanical means (e.g.,  
228 Spencer et al., 2006). As such, contaminated sediments have the potential to be released to  
229 marine waters or deposited on coastal floodplains and wetlands (Bert et al., 2009).

230

231 Approximately 200 million m<sup>3</sup> of sediment is dredged annually from Europe’s harbours, ports  
232 and coastal waters, and up to 50% of this is contaminated (SedNet, 2004; Todaro et al., 2016).  
233 The European Waste Directive encourages us to view these dredged materials as a resource  
234 (Apitz 2010) and if possible either reduce their production (through e.g., management of dredge  
235 licensing) and to re-use where possible. Even contaminated sediments can be treated to  
236 immobilise or transform the contaminants, and de-water and stabilise the sediments (Todaro et  
237 al. 2016). Increasingly, these sediments can then be used for coastal protection, environmental  
238 enhancement and sustainable restoration of tidal wetlands and beaches (e.g. Martin et al.,  
239 2019). However, whilst there is enormous potential to utilise dredged material as a resource,  
240 many projects are small, piecemeal and lack long term monitoring or assessment. Most projects  
241 deal only with uncontaminated materials (Costa-Pierce and Weinstein, 2002, Martin et al.,

242 2019) and practices and technology uptake can vary, driven by nuances in national dredging  
 243 policy and the communication difficulties associated with coupling sediment supply to suitable,  
 244 local receptor sites (Ausden et al. 2018).  
 245



246  
 247  
 248 **Figure 1: Superfund Sites Located in Areas that May Be Impacted by Flooding, Storm**  
 249 **Surge, Wildfires, or Sea Level Rise (top). Bottom graph shows (from top) percentage of**  
 250 **sites impacted by Sea, Lake and Overland Surges by Hurricanes (SLOSH) of category 4**  
 251 **or 5, and category 1, and those expected to be inundated by a sea-level rise of 3, 1 and 0**  
 252 **ft (source: US GAO, 2019).**

253  
 254  
 255 **3. Low input approaches – their benefits, and towards an integrated management**  
 256 **approach.**

257  
 258 A variety of integrated, low input remediation / restoration approaches are possible for coastal  
 259 brownfields which may offer some advantages over contemporary approaches. In broad terms  
 260 remediation<sup>2</sup> describes the mitigation of risks from brownfields. For a risk to be present, a

<sup>2</sup> Specifically, managing the risks to receptors so that there is no longer a risk of unacceptable harm. This may be via some form of intervention at the level of source, pathway or receptor

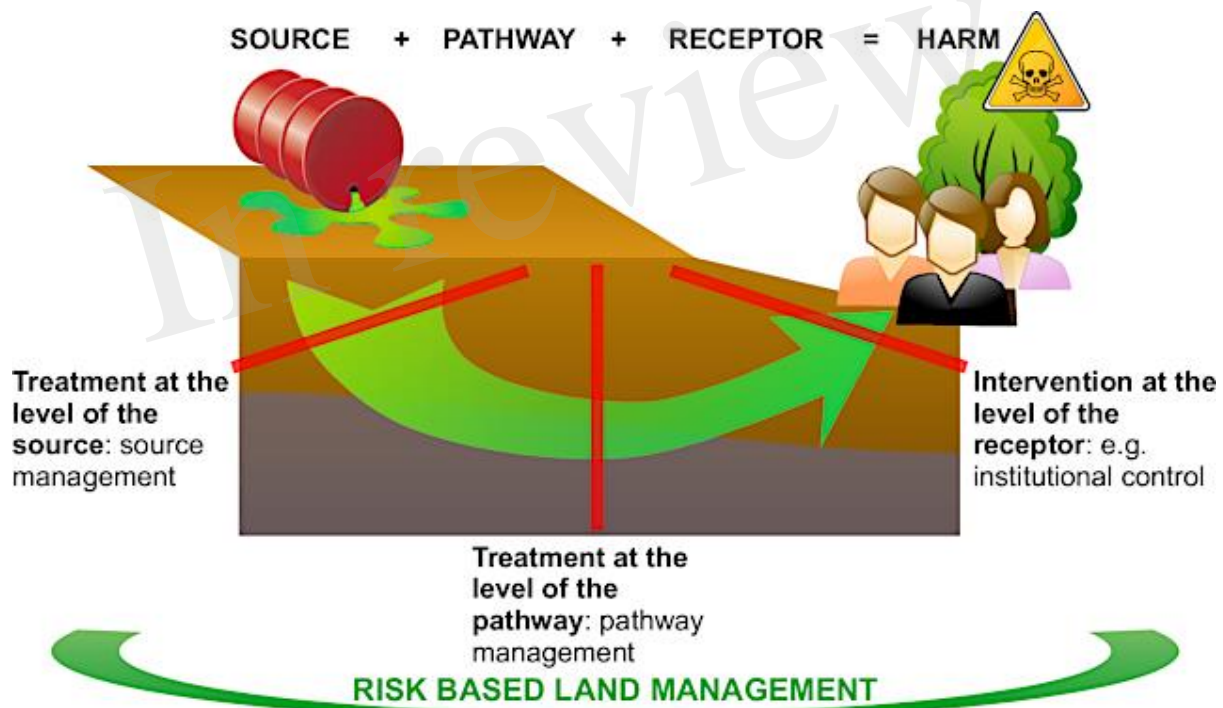


261 source (of hazardous substance or property), a receptor (that could be affected adversely by the  
262 contamination) and a pathway (linking the source to the receptor) must be present, as shown in  
263 Figure 2 (Tack and Bardos 2020).

264  
265 A receptor might be a human, an ecologically sensitive site, surface or underground water  
266 resources, or a building. Moreover, risks to the ecosystem ‘goods or services’ provided by the  
267 wider environment<sup>3</sup> may become an increasingly important receptor to consider in many  
268 scenarios. A risk management intervention can take place at any point in the S-P-R linkage  
269 provided that it breaks the linkage, which might be by removing the source, intercepting the  
270 pathway, or modifying the receptor behaviour or location. A range of risk management /  
271 remediation options are available at different points across any particular linkage<sup>4</sup>. This risk-  
272 based approach to contaminated sites is termed Risk Based Land Management – RBLM  
273 (Vegter et al., 2002)

274  
275 Remediation is not intrinsically sustainable. Poorly planned projects can have serious negative  
276 impacts, and so (ideally) risk management should also therefore meet sustainable development  
277 principles. Together this constitutes sustainable risk based contaminated land management,  
278 SRBLM (NICOLE/COMMON FORUM 2013).

279



280  
281  
282 **Figure 2: Risk Management along a Contaminant (S-P-R) Linkage (Tack and Bardos,**  
283 **2020)**

284  
285 Restoration describes improving and extending the functionality of land so it can serve a wider  
286 range of purposes, which can encompass remediation, but also measures to improve soil and  
287 water quality, ecological management, and establishment of new higher value (including more  
288 sustainable) land uses. These land uses may be for buildings or other infrastructure where the

<sup>3</sup> e.g. as described by the World Health Organisation: <https://www.who.int/globalchange/ecosystems/en>

<sup>4</sup> e.g. as described by *Land contamination: risk management*, <https://www.gov.uk/guidance/land-contamination-how-to-manage-the-risks>

289 soil is sealed (“hard” re-uses), or land use dependent on the soil function such as for parkland  
290 or where the soil is otherwise unsealed such as for photovoltaic arrays (“soft re-uses”). In the  
291 context of coastal brownfields soft re-uses may be particularly important as they can offer a  
292 range of ancillary services, for example flood management capacity, carbon sequestration and  
293 storage, and/or public amenity in areas where buildings and infrastructure are either no longer  
294 feasible or considered at risk. The processes of remediation, restoration and ongoing  
295 management may all be included in an overarching strategy that yields multiple benefits from  
296 the brownfield management process (Bardos *et al.* 2016), creating a greater overall value from  
297 the land re-use, a wider partnership of interested parties able to support the brownfield  
298 regeneration and greater resilience to future threats, such as climate change mitigated impacts  
299 (e.g. Maco *et al.*, 2018).

300  
301 Low input remediation measures, so called “gentle” remediation approaches or options, may  
302 be particularly advantageous given their passive nature and relatively low cost base. “Gentle”  
303 remediation options, or GRO, are defined as “risk management strategies or technologies that  
304 result in a net gain (or at least no gross reduction) in soil function as well as achieving effective  
305 risk management” (Cundy *et al.*, 2013). They include a range of plant (phyto-), fungi (myco-),  
306 and/or bacteria-based approaches (Cundy *et al.*, 2016, Table 1), with or without chemical  
307 additives or soil amendments, which reduce contaminant transfer to local receptors by  
308 extraction, transformation, or degradation of contaminants, or by *in-situ* stabilisation. “Gentle”  
309 remediation options are closely aligned with the concept of “nature-based solutions” for the  
310 longer-term restoration of land. Indeed, approaches such as bioremediation and  
311 phytoremediation are increasingly being used as a low input approach to coastal brownfield  
312 land remediation (Hassan *et al.* 2019; O’Connor *et al.* 2019). Phytoremediation is particularly  
313 effective where hyperaccumulator plants are used, e.g. those that have the capability of  
314 assimilating high levels of metals such as Au, Ag, Cd, Se, Ta, Cu, Co, Cr, Ni, Pb, U, As, Mn  
315 and Zn (Mahar *et al.*, 2016) including coastal plant species such as *Phragmites australis*,  
316 *Deschampsia cespitosa*, *Festuca rubra*, *Juncus maritimus*, *Spartina alterniflora*, *Distichlis*  
317 *spicata*, and *Ruppia maritima* (Peer *et al.*, 2005). In addition, where metal-excluding plants are  
318 used (with or without soil amendments), phytostabilisation shows promise as a low-cost  
319 method for contaminated dredged sediment management (e.g. Bert *et al.*, 2008, Bert *et al.*,  
320 2009). Bioremediation utilises microbial activity to decrease available contaminants within  
321 degraded systems. This method is particularly effective for groundwater treatment although  
322 this is dependent on appropriate geochemical conditions, available nutrients and the abundance  
323 of microorganisms (Sam and Zabbey 2018), and does not provide the same landscape and  
324 visual amenity, nor ecosystem service benefits available from other nature-based solutions  
325 (Song *et al.* 2019). Phytoremediation can offer a range of benefits to coastal brownfield site  
326 remediation including lower energy input, higher material efficiency and resilience from global  
327 environmental change as well as providing a range of ecosystem service benefits such as flood  
328 protection, estuarine filtering of environmental pollutants, habitat and nursery for marine  
329 animals, and carbon sequestration and storage amongst others (Blanco-Canqui 2016; Burges *et al.*  
330 2017, 2018). In spite of these benefits, nature based solutions are often only used where  
331 there is a cost benefit to implementation rather than taking into account the wider socio-  
332 economic and environmental benefits (Song *et al.* 2019).

333  
334

Gentle Remediation Option (GRO)	Definition
Phytoextraction	The removal of metal(loid)s or organics from soils by accumulating them in the harvestable biomass of plants. When aided by use of soil amendments, this is termed <i>aided phytoextraction</i> .
Phytodegradation / phytotransformation	The use of plants (and associated microorganisms such as rhizosphere bacteria) to uptake, store and degrade organic contaminants.
Rhizodegradation	The use of plant roots and rhizosphere microorganisms to degrade organic contaminants.
Rhizofiltration	The removal of contaminants from aqueous sources by plant roots and associated microorganisms.
Phytostabilisation	Reduction in the bioavailability of contaminants by immobilisation in root systems and / or living or dead biomass in the rhizosphere soil – creating a milieu which enables the growth of a vegetation cover. When aided by use of soil amendments, this is termed <i>aided phytostabilisation</i> .
Phytovolatilisation	Use of plants to remove contaminants from the growth matrix, transform them and disperse them (or their degradation products) into the atmosphere.
Phytoexclusion	The implementation of a stable vegetation cover using excluder plants which do not accumulate contaminants in the harvestable plant biomass. Can be combined with <i>in situ</i> immobilisation (below).
<i>In situ</i> immobilisation	Reduction in the bioavailability of contaminants by immobilising or binding them to the soil matrix through the incorporation into the soil of organic or inorganic compounds, singly or in combination, to prevent the excessive uptake of essential elements and non-essential contaminants into the food chain.
Bioremediation	Generic term applied to a range of remediation and risk management technologies which utilise soil microbial organisms to degrade, stabilise or reduce the bioavailability of contaminants.
Mycoremediation	A form of bioremediation in which fungi-based methods are used to degrade, stabilise or reduce the bioavailability of contaminants.

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**Table 1: Examples of Gentle Remediation Options. Adapted and updated from Cundy et al., (2016).**

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Potential low input approaches to the redevelopment of coastal brownfield sites include conversion of brownfield land to coastal wetland, parkland or forest providing resilience to pressures from global environmental change (Sarkis et al., 2016; Song et al., 2019; Zhu et al., 2017). These options all provide strong aesthetic value improvement to sites (Hartig et al. 2012), as well as habitat creation (or replacement) for plants, mammals, birds and invertebrates (Harrison and Davies, 2002; Sellers et al. 2006; Woods 2012, Latham et al. 2016), increased infiltration or flood storage capacity and resultant decrease in flood risk (EPA, 2014), and low life cycle environmental footprints. They also provide a meeting/socialising space, which improves well-being, particularly important in crowded urban areas such as are found in Asia, N. America and Europe (Faivre et al., 2017). Forest planting schemes at coastal brownfield sites can help reduce noise, improve air quality and reduce heat island effects (Solecki et al. 2005; Tan et al. 2016). Importantly, given the adoption of ambitious zero net carbon targets by a number of urban areas (<https://news.trust.org/packages/zero-carbon-cities/>), there is

353 significant potential for planted sites to provide a very visible contribution to integrated carbon  
354 reduction strategies, via carbon storage and sequestration, although the degree of carbon  
355 offsetting generated will depend on planting type and density, stand area, etc (e.g. Zhao et al.,  
356 2010, Tang et al., 2016, Wilkes et al, 2018). Conversion of brownfield sites to forest, coastal  
357 wetland or parkland can also have wider societal benefits improving the longer-term liveability  
358 and environmental quality for local communities (Mitchell et al. 2015). This can also strongly  
359 interface with “bluefields” strategies, around the linking or integration of abandoned or  
360 underutilised sites along rivers or other waterfronts, as part of urban waterfront regeneration  
361 initiatives (e.g. Pinch and Munt, 2002; Tolnai, 2018).

362  
363 In addition, the EU has set a target of at least 20% of energy from renewable sources by 2020,  
364 with a consequent requirement for an increase in biomass fuels. The State of California has  
365 committed to procuring 50% of energy from renewables by 2050, while the State of New  
366 York’s Climate Action Plan includes a goal of 100% Renewable energy by 2050. To support  
367 these targets, coastal brownfield sites can be repurposed for biomass production utilising plant  
368 species such as: *Salix* spp; *Phalaris arundinacea*; *Panicum virgatum*; *Miscanthus giganteus*;  
369 rapid growth species with a tolerance for high levels of soil contamination and a  
370 tolerance/preference for wet soils (Lord et al. 2008; Lord 2015). The autecological  
371 requirements of these species make them ideal for coastal brownfield site plantation. These  
372 species can also provide phytoremediation through removal of some soil contaminants (e.g.  
373 Zn, Cd, and Cu) (Lord et al., 2008). Infrastructure linked to coastal brownfield sites (e.g. roads,  
374 grid connections), as well as proximity to consumers and appropriate zoning make these sites  
375 ideal for potential repurposing as brightfield sites (sites for renewable energy generation)  
376 (Converse 2007), addressing three major global challenges: climate change; urban  
377 revitalisation; and contaminated land remediation (Adelaja et al. 2010).

#### 378 379 **4. Potential synergies, and maximising benefits.**

380  
381 As we discuss above, there are a range of synergies potentially offered by the application of  
382 low input remediation or restoration approaches for soft end-use, which utilise coastal  
383 brownfields and/or contaminated dredged materials within an integrated overall coastal  
384 management approach. A number of current and historical examples have gone part-way  
385 towards realising this synergetic management approach. These include:

- 386 • Beneficial use of dredging materials and construction wastes for habitat recreation and  
387 other benefits, SE England and the Thames estuary, UK. Increasingly, dredged  
388 materials from maintenance and capital dredging, but also sediments from engineered  
389 tunnelling have been used for coastal and brownfield restoration in the Thames Estuary  
390 and south east England. For example, 6 million tonnes of excavation material from  
391 London’s Crossrail project has been re-used and recycled to create 670 ha of coastal  
392 wetland habitat at Wallasea Island, Blackwater Estuary, Essex, UK, and to raise the  
393 land by 1.5 m as an adaptation to sea level rise (Dixon et al., 2008; Cross 2017).
- 394 • Restoration of a former landfill site for ecological and community benefit, Mersey  
395 estuary, UK. Port Sunlight River Park is a 28-hectare community park space near  
396 Birkenhead in the Wirral, Merseyside, U.K. located on a capped and covered former  
397 coastal landfill site. After closure to new waste in 2006, the site was leased to the Land  
398 Trust (a UK charity) and following a £3.4 million investment was repurposed as a  
399 riverside park in 2013 (opening to the public in 2014). The River Park is managed  
400 through a partnership with a local non-profit organisation, Autism Together (a charity  
401 providing services and support to people with autism and their families), who manage  
402 the park on a day-to-day basis and lead local community engagement in park activities,

403 as well as providing work opportunities for local community members affected by  
404 autism. The completed park provides visitors with waterfront access (with views over  
405 the Liverpool city skyline), a variety of walks (and other leisure and recreation  
406 opportunities) and access to nature. A section of wetland in the north of the site, linking  
407 to the adjacent River Mersey mud flats, provides important habitat for water birds.  
408 Based on a qualitative sustainability assessment, Li et al, (2019) show that the  
409 establishment of the Port Sunlight River Park has clear sustainability advantages (using  
410 a range of environmental, economic and social indicators) over a baseline of having left  
411 the site under its previous management regime.

- 412 • “Designing with water” to improve storm and climate change resiliency, Boston, MA,  
413 USA. Boston, Massachusetts, has been aggressively researching options to protect the  
414 city post-Hurricane Sandy as part of its “Designing with Water” efforts (Aiken et al.,  
415 2014, Sutton-Grier et al., 2015). In 2015, Boston ran an international competition for  
416 design solutions imagining a more resilient, more sustainable, and more beautiful  
417 Boston prepared for both sea level rise and climate change up to the end of the 21st  
418 century (Sutton-Grier et al., 2015). This utilised different examples of hybrid  
419 approaches to make urban areas more resilient to climate change and storms, including  
420 Dutch “Living with Water” strategies, where planners design to accommodate flood  
421 waters in urban settings and build floating communities for flood control and  
422 socioeconomic prosperity. Successful projects were expected to help build resilience to  
423 disturbances to existing built infrastructure and to social and community networks, and  
424 do “double duty” in terms of providing flood protection in times of need whilst also  
425 providing other uses and benefits (such as recreational opportunities) when protection  
426 is not needed (Sutton-Grier et al., 2015). Outputs were used to inform revisions to  
427 building plans and zoning codes, and influence the city’s ‘Imagine Boston 2030’  
428 strategy, Boston's first citywide plan in 50 years.
- 429 • Renewable energy on coastal brownfields for local energy generation and community  
430 benefit, San Francisco Bay, USA. A recently completed renewable energy project in  
431 the San Francisco Bay Area, the Marin Clean Energy (MCE) Solar One partnership,  
432 highlights the benefits of synergetic management approaches to coastal brownfields.  
433 Sixty acres of a remediated brownfield site were leased (by the site owners Chevron)  
434 to the Partnership for \$1 per year. This land was then repurposed for solar power  
435 generation. At 10.5 megawatts capacity, the site is expected to eliminate 3,234Mt of  
436 carbon dioxide emissions per year, the equivalent to taking more than 680 cars off the  
437 road annually. As well as leveraging significant inward investment (almost two million  
438 dollars were spent on project materials purchased or rented locally), the MCE Solar  
439 One Partnership provided additional community benefits by partnering with  
440 RichmondBUILD, who are a public–private partnership focusing on training  
441 community members from low income households for skilled construction, hazardous  
442 waste removal, and renewable energy jobs. The project also includes an innovative  
443 procurement approach called “community choice energy,” in which citizens and  
444 businesses are offered an alternative to the standard energy utility for purchasing their  
445 electricity. As a result, homes and businesses benefit from a low-carbon electricity  
446 option that costs 2 to 5% less than traditional Bay Area utility rates  
447 ([https://www.mcecleanenergy.org/news/press-releases/mce-solar-one-thinking-](https://www.mcecleanenergy.org/news/press-releases/mce-solar-one-thinking-globally-building-locally/)  
448 [globally-building-locally/](https://www.mcecleanenergy.org/news/press-releases/mce-solar-one-thinking-globally-building-locally/)).
- 449 • Park Spoor Nord, Antwerp, Belgium. Antwerp, a major and diverse port city on the  
450 Scheldt estuary in Belgium, in common with many port cities contains a significant  
451 legacy of underused industrial and harbour space, as well as high density residential  
452 areas and limited public green space. Regeneration in the Spoor Nord area of the city

453 has focused on attracting investment in residential and commercial land, and generating  
454 public support for on-going regeneration. Based on local residents' feedback, green and  
455 open areas, space and light were identified as the main priorities of the regeneration  
456 process. To facilitate this, the City of Antwerp supported the restoration of a 24 ha  
457 former railway complex as an urban landscape park, integrating residential areas, a  
458 Sports centre, and green open space (parkland), to bring green public space into the  
459 densely populated Spoor Nord area, and act as a catalyst for new development and  
460 inward investment. This example is one of several considered within the EU Seventh  
461 Framework Programme project TIMBRE (<http://www.timbre-project.eu/>), which  
462 focused on the regeneration of large and complex contaminated "megasites" in Europe.  
463 To support this, the project developed a web-based tool (the Timbre Brownfield  
464 Prioritization Tool) which integrates sustainability assessment and multiple-criteria  
465 decision analysis (MCDA) to facilitate assessment and prioritisation of a portfolio of  
466 sites on the basis of the probability of successful and sustainable regeneration (Bartke  
467 et al, 2016).

468

469 One of the key issues in applying such approaches at a specific site or regional level, and  
470 realising as full a range of benefits as possible, is identifying the synergies or conflicts between  
471 interventions, in terms of maximising the benefits (services) from coastal brownfield  
472 restoration and dredged sediment re-use, and how this might encompass wider opportunities  
473 for better coastal management. In addition, in order to gain support for soft re-use, it is also  
474 important to not just illustrate sustainability in the redevelopment process, but also understand  
475 how it can create value for stakeholders. Here, we present an approach and framework for  
476 assessing and comparing **different scenarios for coastal brownfield regeneration to soft re-**  
477 **use and other end-points, to support planning and options appraisal to realise maximum**  
478 **benefit and value.** We use as the basis for this a "sustainability linkages" approach, based on  
479 sustainability assessment criteria produced by the UK Sustainable Remediation Forum (SuRF-  
480 UK) (CL:AIRE 2011, Li et al., 2019).

481

## 482 5. The "Sustainability linkages" approach

483

### 484 5.1 Context

485 Land Contamination practitioners are familiar with the source-pathway-receptor, or  
486 contaminant linkage, paradigm for providing a structure for assessing risks, evaluating them  
487 and planning a risk management response. An analogous thought process can be applied to  
488 consider the various individual considerations of a sustainability assessment, to produce a  
489 series of *sustainability linkages*. A *sustainability linkage* describes the connection between a  
490 driver (a pressure or a change), something that might be affected (i.e. a receptor) and the  
491 mechanism by which a pressure or change affects a receptor, see Figure 3. Analogous to the  
492 source-pathway-receptor model, a sustainability effect only takes place when there is also a  
493 receptor that might be affected and a mechanism ("pathway") by which this affect can happen.  
494 Li *et al.* (2019) show how individual *sustainability linkages* can be collated following site  
495 stakeholder consultation to provide a conceptual site model for sustainability for a brownfields  
496 project, using the example of a coastal legacy landfill site (the Port Sunlight River Park example  
497 discussed in section 4 above) regenerated for soft re-use as community parkland and coastal  
498 wetland. We discuss this example and the wider applicability of the sustainability linkages  
499 approach further here, within the context of the integrated management of post-industrial  
500 coasts.

501

502 The Port Sunlight Riverside Park sustainability assessment is based on UK guidance produced  
 503 by the Sustainable Remediation Forum UK, an independent cross-sectoral project managed by  
 504 the UK contaminated land information forum CL:AIRE ([www.claire.co.uk/surfuk](http://www.claire.co.uk/surfuk)). This  
 505 guidance offers a range of possible indicators / criteria that can be used in sustainability  
 506 assessments for brownfields organised across 15 headline categories, summarised in Table 2,  
 507 and has been recently updated (CL:AIRE 2020). Sustainability assessments are highly site and  
 508 project specific, so the conceptual model developed for the Port Sunlight Riverside Park is  
 509 unique to its context.

510

511 **Table 2. SuRF-UK Headline Categories for Sustainability Indicators (CL:AIRE 2011, 2020)**

512

Environmental	Social	Economic
ENV1: Emissions to air	SOC1: Human health and safety	ECON1: Direct economic costs and benefits
ENV2: Soil and ground conditions	SOC2: Ethics and equity	ECON2: Indirect economic costs and benefits
ENV3: Groundwater and surface water	SOC3: Neighbourhoods and locality	ECON3: Employment and employment capital
ENV4: Ecology	SOC4: Communities and community involvement	ECON4: Induced economic costs and benefits
ENV5: Natural resources and waste	SOC5: Uncertainty and evidence	ECON5: Project lifespan and flexibility

513

514 **5.2 Methodology**

515 The qualitative sustainability assessment was carried out in 2016. The aim of the sustainability  
 516 assessment was to understand the economic, environmental and social benefits/disbenefits of  
 517 transforming the former landfill (a brownfield site) into a public open space, managed long  
 518 term. The sustainability assessment therefore compared two intervention options:

- 519 1. Establishment of the park (i.e. the transformation from a restored landfill site to park and  
 520 long term management, including construction of roads, paths, landscaping, drainage and car  
 521 parking; but excluding existing landfill management measures); and
- 522 2. A hypothetical “no intervention” baseline, where the site continued as a managed former  
 523 landfill.

524 Full methodological details are given in Li et al., (2019) but in summary:

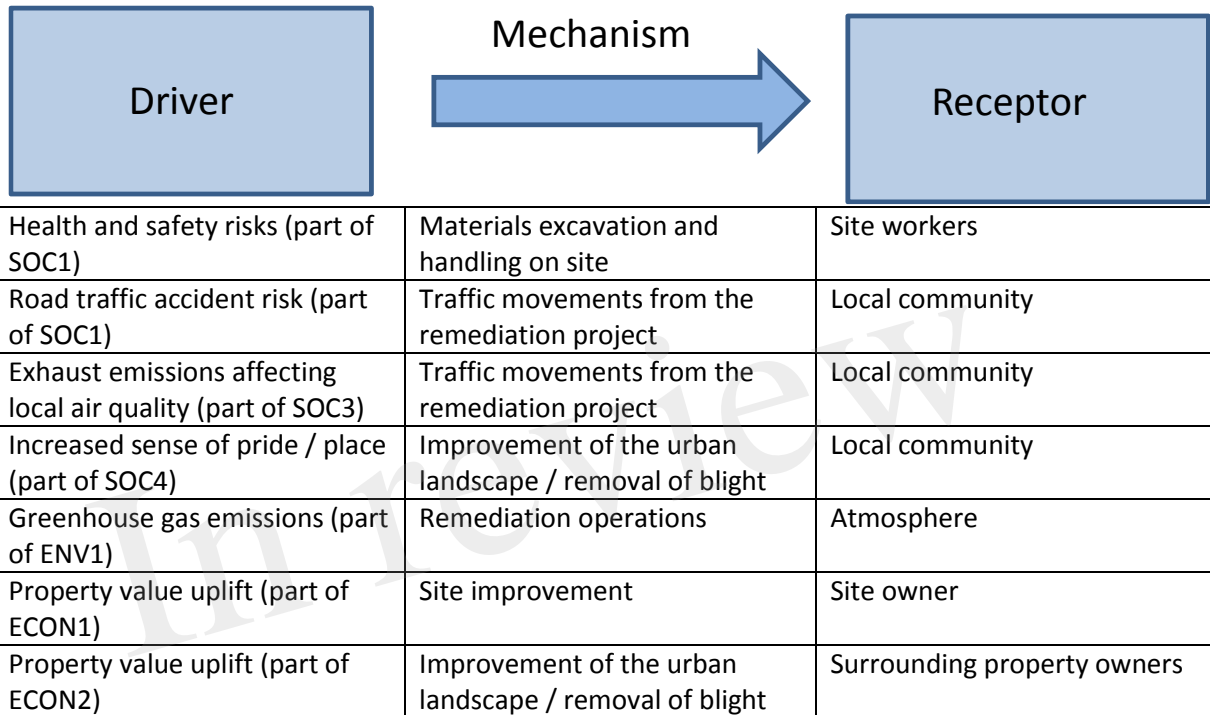
525 The sustainability assessment followed guidance issued by SuRF-UK. Identification and  
 526 analysis of individual sustainability linkages was carried out across all of the SuRF-UK  
 527 headline categories (CL:AIRE, 2011), in consultation with the Land Trust (site owner) and  
 528 Autism Together (the charity that manages the site on a day to day basis on behalf of the Land  
 529 Trust). Fifty individual specific sustainability linkages were identified and individually ranked.  
 530 These were combined into a conceptual model for the site, which can be used to rationalise the  
 531 pressures/mechanisms and receptors, show where effects are desirable or not desirable, check  
 532 for possible duplicated effects and show interconnections between effects. In the case of the  
 533 Port Sunlight River Park comparison: 30 pressures, 31 mechanisms and 6 receptors  
 534 encapsulated the 50 linkages identified (no duplicates were found).

535

536 **5.3 Results**

537 The network diagram (conceptual model) produced for Port Sunlight River Park is shown in  
 538 Figure 4. The linkages assist in making individual cause and effect chains explicit, so that

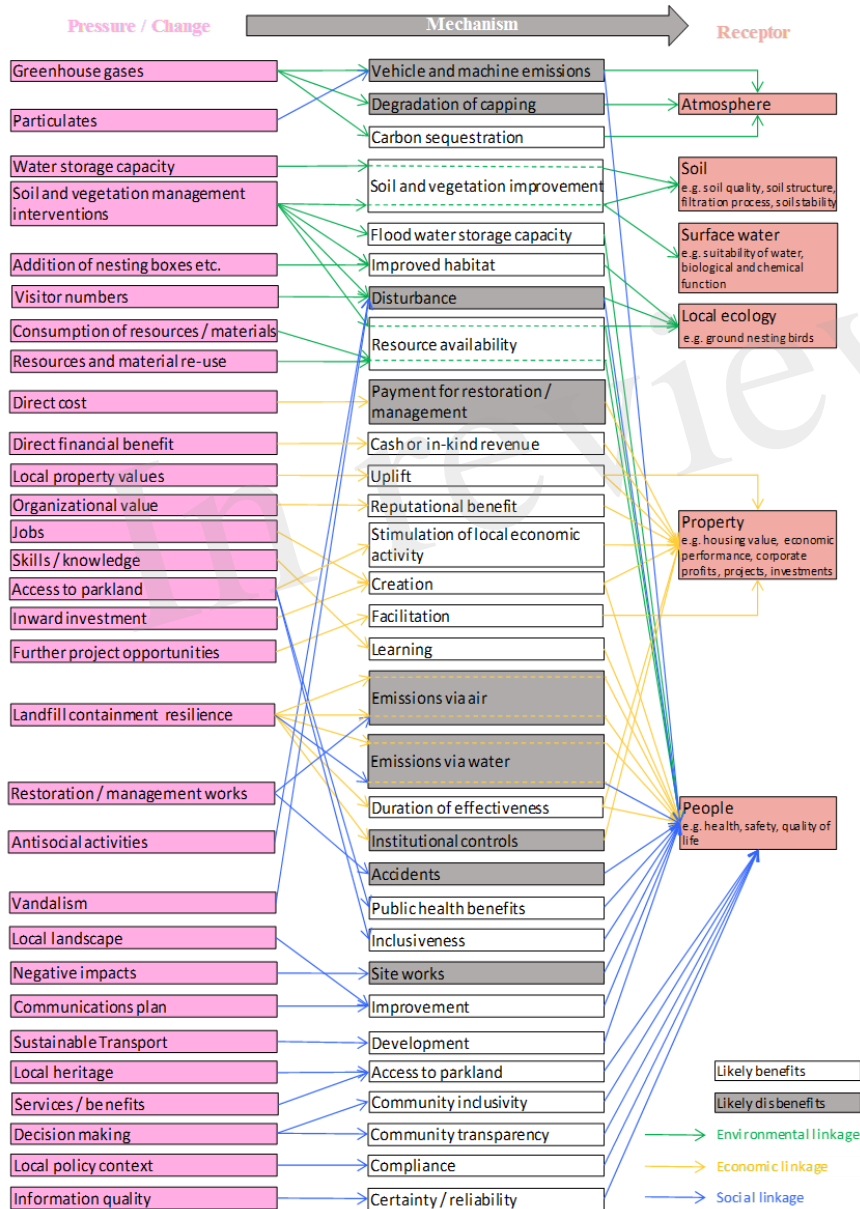
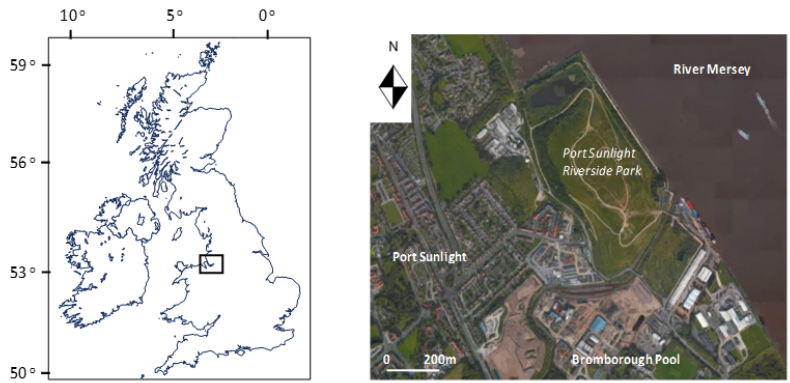
539 different management options can be more readily compared, and different linkages can be  
 540 more explicitly valued. This has the benefit of identifying and so reducing unintentional  
 541 duplications of sustainability criteria, and can also highlight synergies and conflicts for  
 542 different risk management or regeneration scenarios. For example, short-term greenhouse gas  
 543 emissions from the operation of remediation or engineering plant may be offset in the longer-  
 544 term by carbon sequestration and storage in park soils and vegetation, or “blue carbon” storage  
 545 in the wetlands at the north of the site. Specific synergies can be identified between flood water  
 546 storage capacity and improved habitat, inward investment creation and property value uplift,  
 547 and community inclusivity, access to parkland and public health benefits, amongst others.  
 548



549  
 550 **Figure 3: A Sustainability Linkage (a), and some possible examples (by no means**  
 551 **exhaustive) (b). Abbreviations in left column refer to SURF-UK Sustainability**  
 552 **Assessment Criteria (CL:AIRE 2011).**

553





554

555

556 **Figure 4: conceptual site model for sustainability (network diagram) for the Port Sunlight**  
 557 **River Park (after Li et al., 2019). Mechanisms are coloured depending on whether they**  
 558 **are considered deleterious (as grey) or beneficial (white). Linkages are shown as arrows,**  
 559 **colour-coded to environmental, economic and social elements of sustainability, using**  
 560 **green, yellow and blue respectively**

561

562 Our suggestion is that the sustainability linkages approach can be used as a planning and  
563 decisional aid to assist a more robust valuation of the wider benefits from coastal brownfield  
564 regeneration to soft re-use and other end-points, by: (1) ensuring that any cost benefit  
565 assessment is consistent with a conceptual model of sustainability, rather than being based on  
566 a different set of premises or indicators; and (2) providing a more targeted valuation approach.  
567 For the latter point (in regards to valuation) the sustainability linkages that comprise the  
568 conceptual model can be divided into three broad groups (grouped by their ease of  
569 monetisation):

- 570 • Those linked already to some form of investment cost or return – which can be valued  
571 under a direct financial model
- 572 • Linkages that can be readily and broadly agreed to be linked to wider effects that are  
573 economically tangible and so more readily valued, for example, surrounding property value  
574 uplift, and benefits to local businesses.
- 575 • Those linkages related to wider effects that at least one stakeholder considers economically  
576 intangible, or not easy to value, such as public health benefit, value of access to nature,  
577 improved visual amenity etc.

578

579 While direct monetisation of sustainability benefits was not possible in the example given by  
580 Li et al., (2019), the conceptual site model based on sustainability linkages provides a clearer  
581 basis for understanding cause and effect for benefits and disbenefits, while also therefore  
582 providing a rationale for grouping individual effects based on their ease of valuation. This  
583 potentially provides a road map for cost-benefit assessments for different integrated coastal  
584 management approaches by (1) being able to match specific sustainability linkages to their  
585 most appropriate means of valuation, and (2) connecting the sustainability assessment and cost  
586 benefit assessment processes in a transparent (and defensible) manner. Moreover, where  
587 stakeholders have concerns about the valuation the process would be sufficiently transparent  
588 that they could precisely zero in on the points of concern and perhaps then be better able to  
589 make their own arguments.

590

## 591 **6. Concluding remarks.**

592

593 The sustainability linkages approach and framework discussed here provides a potential  
594 method for achieving a better understanding and design of combined coastal brownfields  
595 management approaches to maximise benefits and minimise risks, benchmarked against  
596 standard sustainability assessment criteria. This framework can be applied to explore the  
597 opportunities for synergy and realisation of wider environmental, economic and societal  
598 benefits between coastal protection, dredged material re-use and the management of brownfield  
599 land, as well as to support planning and options appraisal to realise maximum benefit and value  
600 from integrated coastal management strategies. The approach uses engagement with core and  
601 wider stakeholders throughout the preparation, definition and execution phases, which is  
602 critical as the effectiveness of soft re-use depends on the public's perceptions of risk and their  
603 willingness to support new uses of the sites (Levi and Kocher, 2006). There are strong synergies  
604 for these integrated soft re-use management approaches to interface with coastal flood  
605 protection and coastal habitat creation initiatives, and emerging areas such as landfill mining  
606 and resource re-use, green infrastructure approaches and city carbon neutrality targets. The  
607 unique strengths of natural infrastructure are that it can be self-maintaining, has the potential  
608 to self-repair after major damaging events, and (in the case of marsh/mangrove systems) has  
609 the ability to grow and keep pace with sea level rise (Sutton-Grier et al, 2015). Low-input  
610 approaches, appropriately designed, can generate wide environmental, economic and social

611 benefits along post-industrial coasts, and can show enhanced resilience to sea level rise and  
612 other hydroclimatic effects induced by climate change (O' Connor et al., 2019), and can  
613 leverage a number of current brownfields resilience initiatives. In the USA for example these  
614 include the ASTM guide (in development) for Resilient remedies, and the Interstate  
615 Technology and Regulatory Council- (a 50 US state-led coalition- (ITRC)) project to develop  
616 principles, practices and case studies for Resilient Sustainable Remediation. For the latter, a  
617 recent survey by the ITRC RSR team noted that brownfields provided the best opportunity  
618 for sustainable clean up and re-use of contaminated sites: the states surveyed identified the  
619 most valuable metrics as job creation and preservation and creation of open space, including  
620 parks and marshlands.

621  
622

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976

In review

977 **List of Figures:**

978

979 Figure 1: Superfund Sites Located in Areas that May Be Impacted by Flooding, Storm Surge,  
980 Wildfires, or Sea Level Rise (top). Bottom graph shows (from top) percentage of sites impacted  
981 by Sea, Lake and Overland Surges by Hurricanes (SLOSH) of category 4 or 5, and category 1,  
982 and those expected to be inundated by a sea-level rise of 3, 1 and 0 ft (source: US GAO, 2019).

983

984 Figure 2: Risk Management along a Contaminant (S-P-R) Linkage (Tack and Bardos, 2020)

985

986 Figure 3: A Sustainability Linkage (a), and some possible examples (by no means exhaustive)  
987 (b). Abbreviations in left column refer to SURF-UK Sustainability Assessment Criteria  
988 (CL:AIRE 2011).

989 Figure 4: conceptual site model for sustainability (network diagram) for the Port Sunlight River  
990 Park (after Li et al., 2019). Mechanisms are coloured depending on whether they are considered  
991 deleterious (as grey) or beneficial (white). Linkages are shown as arrows, colour-coded to  
992 environmental, economic and social elements of sustainability, using green, yellow and blue  
993 respectively.

994

995 Table 1: Examples of Gentle Remediation Options. Adapted and updated from Cundy et al.,  
996 (2016).

997

998 Table 2: SuRF-UK Headline Categories for Sustainability Indicators (CL:AIRE 2011, 2020)

In review

Figure 1.TIF

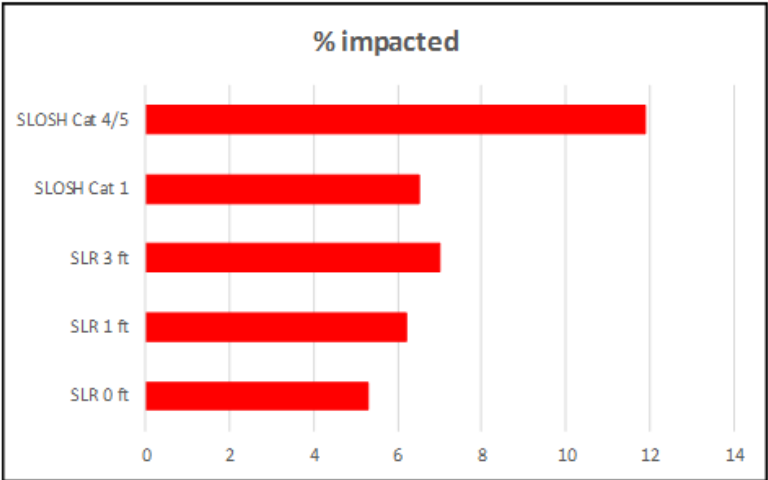
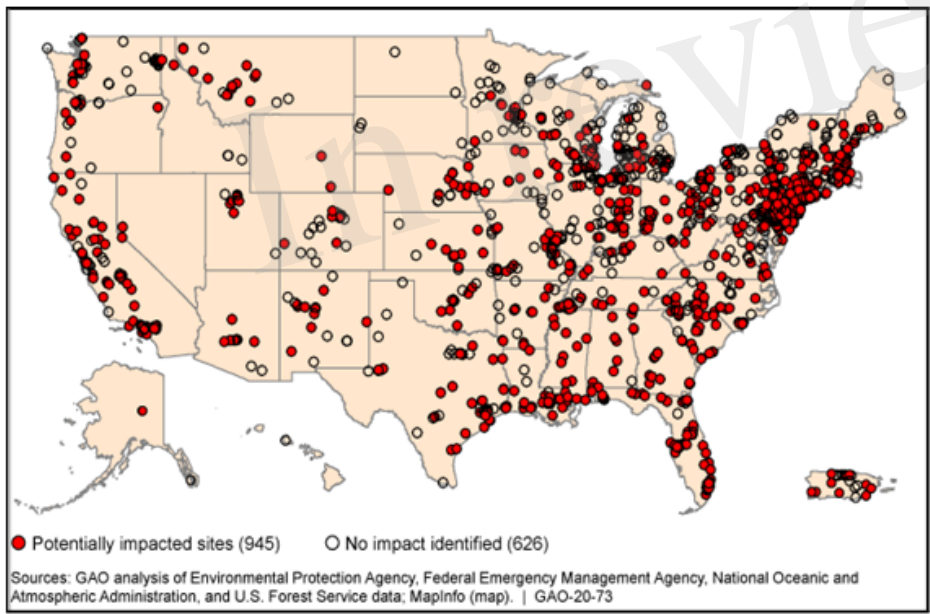
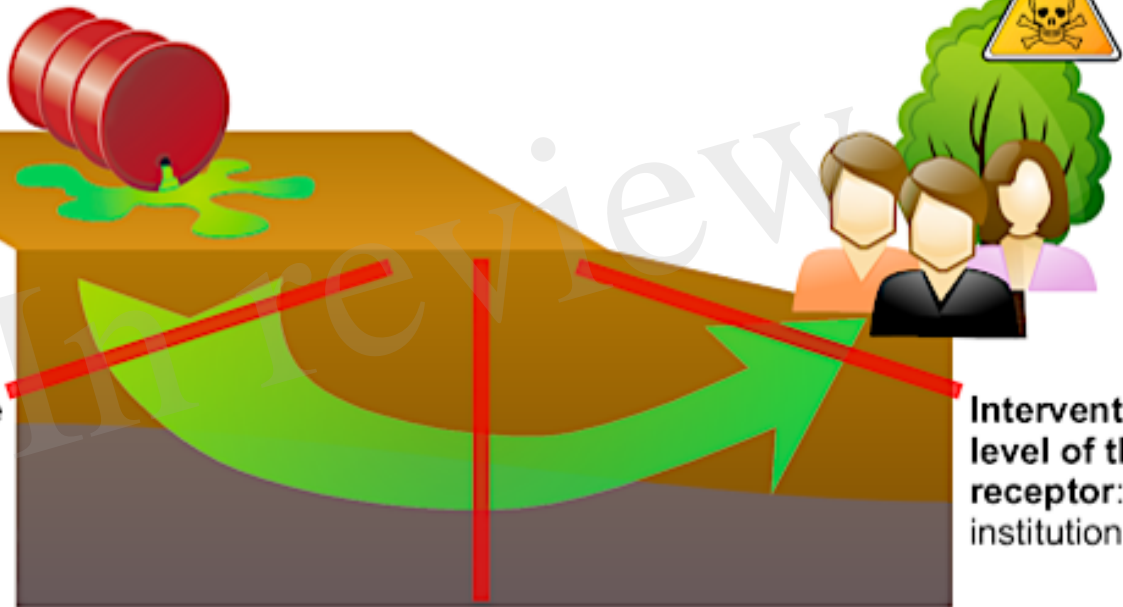


Figure 2.TIF

SOURCE + PATHWAY + RECEPTOR = HARM



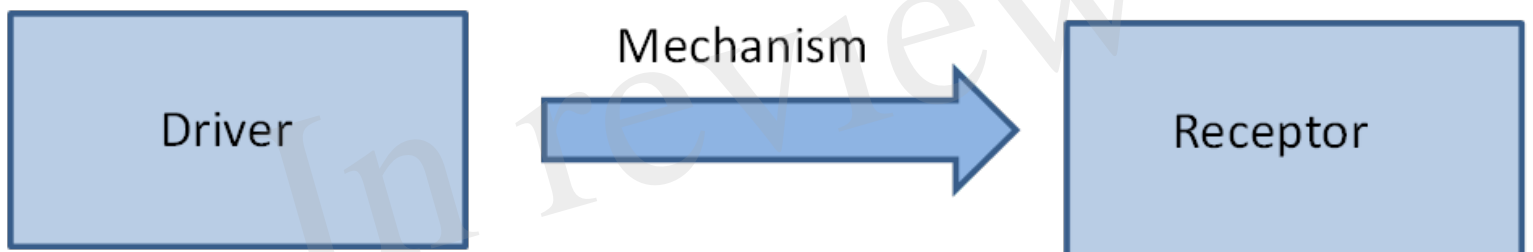
Treatment at the level of the source: source management

Intervention at the level of the receptor: e.g. institutional control

Treatment at the level of the pathway: pathway management

**RISK BASED LAND MANAGEMENT**

Figure 3.TIF



Health and safety risks (part of SOC1)	Materials excavation and handling on site	Site workers
Road traffic accident risk (part of SOC1)	Traffic movements from the remediation project	Local community
Exhaust emissions affecting local air quality (part of SOC3)	Traffic movements from the remediation project	Local community
Increased sense of pride / place (part of SOC4)	Improvement of the urban landscape / removal of blight	Local community
Greenhouse gas emissions (part of ENV1)	Remediation operations	Atmosphere
Property value uplift (part of ECON1)	Site improvement	Site owner
Property value uplift (part of ECON2)	Improvement of the urban landscape / removal of blight	Surrounding property owners

