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London Borough of Hillingdon Council,
High Street,
Uxbridge,
UB8 1UW

For the attention of Mr S Snape

27th November 2020

BY EMAIL

REF: TL1306PCRL1.0

Dear Simon,

LAND OFF HAREFIELD ROAD (UNITS 1&2), UXBRIDGE – PLANNING CONDITIONS RESPONSE

I write in response to your comments regarding planning reference 16299/APP/2020/331 for development on land referred to as land off Harefield Road (Units 1 & 2), Uxbridge, UB8 1JS.

Further to a review of your comments, we consider that the existing ground investigation report is sufficient to support the planning application. We have previously provided our client with proposals for supplementary works and subsequent production of a Remediation Strategy and Verification Reports that would be required to discharge the relevant planning conditions, that concur with the proposed conditions outlined, and would ourselves propose the following course of action:

Table 1.1 Planning Condition Responses

Condition	Response
(i) The development shall not commence until a detailed scheme to deal with contamination has been submitted to and approved by the LPA. All works which form part of the remediation scheme shall be completed before any part of the development is occupied or brought into use unless the Local Planning Authority dispenses with any such requirement specifically and in writing.	A Supplementary Ground Investigation and subsequent Remediation Method Statement will be produced for the site to include the following: 1. Post demolition supplementary site investigation, inclusive of areas beneath the existing footprint delineation of hotspots. 2. Review of the conceptual site model to identify any residual risks associated with the site; 3. Ground gas monitoring and vapour testing to further clarify the presence of VOCs; 4. Groundwater monitoring and testing to refine the possible presence of TPH-CWG and update the risk to controlled waters; 5. Proposed mitigation and remediation measures to ensure the safe redevelopment of the site.

(ii) If during remedial or development works contamination not addressed in the submitted remediation scheme is identified an addendum to the remediation scheme shall be agreed with the LPA prior to implementation; and	A contingency for previously unknown areas of contamination will be detailed in a remediation strategy and communication thereof with the LPA.
(iii) Upon completion of the approved remedial works, this condition will not be discharged until a comprehensive verification report has been submitted to and approved by the LPA.	A verification report will be produced documenting all remediation works and mitigation measures, such as clean cover in soft landscaped areas and volatile resistant membrane, have been completed in accordance with the agreed remediation strategy.
(iv) No contaminated soils or other materials shall be imported to the site. All imported soils for landscaping purposes shall be clean and free of contamination. Before any part of the development is occupied, all imported soils shall be independently tested for chemical contamination, and the results of this testing shall be submitted and approved in writing by the Local Planning Authority. All soils used for gardens and/or landscaping purposes shall be clean and free of contamination	All imported soils shall be independently tested for chemical contamination All soils used for gardens and/or landscaping purposes shall be clean and free of contamination. The verification criteria, including generic acceptance criteria and frequency of testing, shall be included within the agreed Remediation Strategy.

As outlined above, we consider that the existing ground investigation report is sufficient to support the planning application and see no reason for the application to be refused based on potential contamination issues. Your reasons for potential refusal outlined below can be dealt with through the proposed planning conditions. Please find below our responses to your comments under section 2.

Table 1.2 Objection Reasoning Comments

Reason	Tier Comments
The applicant has failed to indicate the means of addressing hotspots where areas of elevated concentrations of contaminants are shown to be present.	Hotspots will be delineated during the supplementary investigation works and/or remediation and verification works.
The applicant has failed to provide suitable details of how possible gas and/or identified VOC will be addressed during the construction phase of this development.	Additional works in the form of ground gas/VOC monitoring in addition to soil vapour sampling and testing will provide further clarity to requirement for vapour protection membrane. We have highlighted the potential need for a volatile resistant gas membrane to protect against indoor inhalation.
The applicant has failed to identify methods to establish if / where underground tanks are still present at the site.	The historic OS plans do not identify any tanks within the site. There is a historic circular feature in the northern area of the site that Groundsure has identified as a tank but is more likely to be a garden/water feature. The Remediation Strategy will outline that the site will be inspected following the site clearance works for evidence of any underground storage tanks. The LPA will be informed if any evidence of USTs is encountered during the construction works.

The previous uses of the proposed development site also present a high risk of contamination from hydrocarbons (e.g. as identified by oil sheen on water) that could be mobilised to pollute controlled waters. Controlled waters are particularly sensitive in this location because the proposed development site is located upon a Principal Aquifer	The majority of the recorded TPHCWG (including BTEX) concentrations were below the laboratory limits of detection within the groundwater monitoring undertaken by Tier Environmental. However, the presence of a sheen is noted on the REC logs for BH101 and further investigation of this is proposed as part of the supplementary ground investigation works. It should also be noted that BH101 is located adjacent to the western site boundary and could indicate an off-site source of the hydrocarbons.

We hope the above also addresses the observations you have made regarding a supplementary geo-environmental investigation, the possibility for presence of tank features on site and how the presence of VOC's will be monitored.

If you have any queries regarding any of the above, please do not hesitate to contact us.

Yours sincerely,



Stuart Milne MSc, BSc FGS

Geoenvironmental Engineer

Tier Environmental Ltd