

Our Ref: 07.09.2026 25/007c
Application Ref: 17942/APP/2024/2874

Hillingdon Council
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FAO: Christos Chrysanthou

7th September 2026



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RE: Discharge of Condition 8 – Imported Materials Management Approach for Middlesex Stadium

Dear Christos,

I write on behalf of our client, Chris Foreman, in relation to Condition 8 of planning permission reference 17942/APP/2024/2874 for the development at Middlesex Stadium.

I am writing further to your correspondence dated 25 August 2026 regarding the discharge of Condition 8. In your response, you advised that the submitted Materials Report V1 does not provide sufficient information to enable the Local Planning Authority to discharge the condition, as the report sets out the framework for assessing imported materials rather than providing the specific donor site information required by the condition.

I acknowledge the Council's position and understand that the Local Planning Authority requires the information specified within Condition 8, namely the donor site, material volumes, material history and chemical testing data for the imported soils before the condition can be discharged.

- The donor site for the imported materials.
- The precise volume of materials proposed for import.
- The previous use and current status of the materials.
- The results of chemical testing.

As outlined within the submitted Materials Report V1, the proposed development requires approximately 60,163m³ of imported materials to facilitate the construction of the approved football pitches. At the time the report was prepared, no donor sites had been identified, and it remains impracticable to identify all future donor sites in advance due to the nature of the construction industry and the way surplus soils become available from development projects. Donor sites are typically secured through competitive tendering processes and are often only available for reuse within relatively short timescales.

To address the Council's concerns whilst maintaining compliance with the CL:AIRE Definition of Waste: Development Industry Code of Practice (DoWCoP), I propose the following approach:

1. A Materials Management Plan (MMP) and supporting MMP Report will be prepared for the receiver site and the first identified donor site.
2. The donor site will be assessed in accordance with the CL:AIRE DoWCoP process, including review of site history, material provenance, proposed volumes and chemical testing data.
3. The MMP documentation will be independently reviewed by a Qualified Person and submitted to CL:AIRE for declaration.
4. Upon receipt of the CL:AIRE Declaration, the following information will be submitted to the Local Planning Authority for review:
 - Donor site details.
 - Material volumes.
 - Material history and site background information.
 - Chemical testing results.

5. This process will then be repeated for each subsequent donor site proposed for importation to Middlesex Stadium.

I believe this approach satisfies the objectives of Condition 8 whilst recognising the practical constraints associated with sourcing suitable donor sites.

Given the commercial and programme-driven nature of donor site availability, materials frequently require prompt movement once a donor site has been approved under the DoWCoP process. Delays can result in materials becoming unavailable and being directed elsewhere or, potentially, to disposal.

Accordingly, we respectfully propose that, following submission of the donor site information detailed above, the Local Planning Authority be afforded a period of three working days to review the information and raise any concerns. In the absence of any response within that period, the importation of materials will proceed in accordance with the approved CL:AIRE Declaration and supporting documentation.

We would also welcome clarification regarding the assessment criteria that the Council intends to apply when reviewing donor site analytical data. Specifically, we request confirmation of the contaminant assessment criteria, soil quality standards, or other benchmark values against which the analytical results will be assessed. Agreement of these criteria at the outset would assist all parties and ensure that donor site assessments are undertaken consistently and transparently.

We trust this proposal provides a practical mechanism for satisfying the requirements of Condition 8 whilst ensuring that the Local Planning Authority retains oversight of all imported materials proposed for use at Middlesex Stadium.

Should you wish to discuss the proposed approach, we welcome the opportunity to arrange a meeting or telephone call at your convenience.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'H. Downing'.

Hayley Downing
Client Services Coordinator