

15 October 2024

Our ref: J17173/DB/c11d

Ed Laughton  
Hillingdon Council  
Planning Department  
3 North Civic Centre  
High Street  
Uxbridge, UB8 1UW

Dear Sir/Madam,

**RE: MACHINE STORE, THE OLD VINYL FACTORY SITE DEVELOPMENT, HAYES  
UPDATED REMEDIATION VALIDATION REPORT FOR CONSIDERATION WITH  
RESPECT TO PARTIAL DISCHARGE OF PLANNING CONDITION 16iii**

This letter is intended to provide information for consideration with regard to an application seeking the partial discharge of Condition 16iii of the planning consent for the Machine Store development at The Old Vinyl Factory Site (TOVF), as approved under permission ref. 59872/APP/2022/897 as amended, and is provided in accordance with our agreed standard terms, conditions and limitations.

This letter and the enclosed records relate solely to the development of the Machine Store site by Crest Nicholson that forms part of the overall TOVF development and does not cover any remediation works proposed or to be carried out by any other third parties on any other parts of the wider TOVF development site, such as the Pressing Plant and the Groove.

**Requirement for Remediation**

Condition 16 parts ia ib and ic relating the Machine Store have been discharged under approval reference 59872/APP/2018/392 on 29.03.18.

The main elements of works required under the finalised Remediation Method Statement, as approved to address condition 16 1a, 1b and 1c for the Machine Store were set out in Report Reference J17027dbc03a dated 1 February 2018, a copy of which is enclosed and the main points of which are summarised as follows;

- Provision of a 300mm thickness of clean cover system to areas of proposed managed planting;
- Validation of imported materials required to be used to form the above clean cover system;
- Inspection of formation levels to areas of managed planting as part of a check for any gross contamination / presence of asbestos fragments, with any remediation works required to remove any such contaminants carried out in agreement with the Local Authority; and
- Maintenance of a Watching Brief for contaminated land in order to ensure that should any unexpected pockets of contamination or any suspicious soils be encountered, they may be appropriately investigated, assessed and remediated as necessary in consultation with the Regulatory Authorities.

The extent of the agreed soft landscaping works to be undertaken by Crest Nicholson as part of their development of the Machine Store are indicated on the approved general arrangement plan reference 14805-APA-AB-DR-LA-2778-LA-01 rev T3, a copy of which is enclosed.

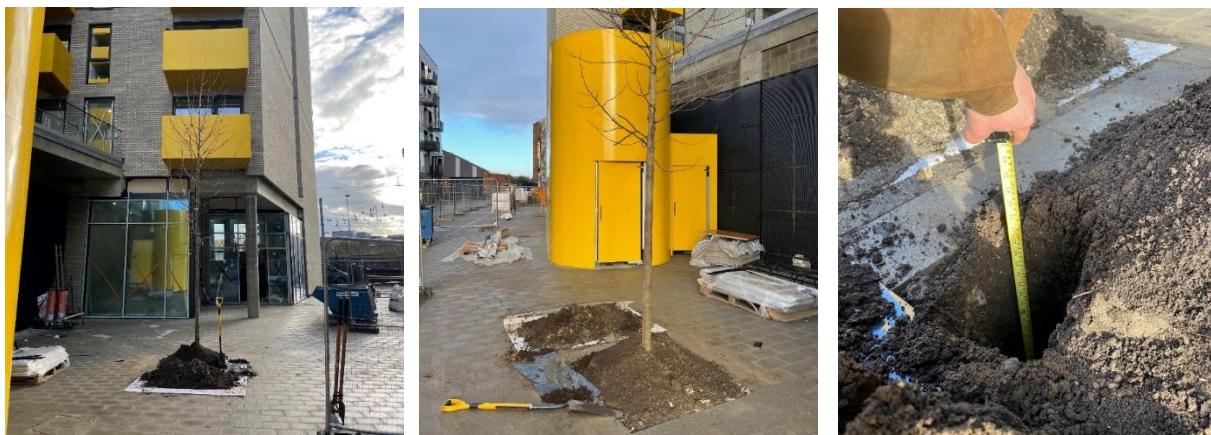
Condition 16iii attached to permission ref 59872/APP/2022/897 requires the following:

*"All works which form part of the remediation scheme shall be completed and a verification report submitted to the Council's Environmental Protection Unit before any part of the development is occupied or brought into use unless the LPA dispenses with any such requirement specifically and in writing."*

### **Remediation Works Carried out**

Within the Machine Store site boundary, other than first floor level raised planted containers, the only in ground soft landscaping comprises a single tree located within a tree planting pit within an area of hard landscaping.

In accordance with the landscape architect's specification, this tree is located within a tree pit that has been excavated to a depth of 1.00 m below ground level to help establish the semi-mature planted tree and to help support its long term growth and development. Photographs of the planted tree are provided below.



Unfortunately, it was not possible to inspect the formation level prior to the placement of the tree and the imported topsoil, although the depth of the imported topsoil has been checked using hand digging tools which have confirmed a depth to 1.10m below ground level.

A sample of the topsoil has been recovered from the exploratory hole and was tested at an MCerts and UKAS accredited soils testing laboratory, and the results of the testing are enclosed. The results of these analyses indicate that acceptable concentrations of a wide range of potential chemicals of concern have been identified when assessed with respect to a Residential Without Plant Uptake End Use, which is considered to be an appropriate assessment criterion with respect to the proposed end use of the development.

It is important to note that whilst a positive identification of asbestos fibres has been identified within the topsoil sample, quantification indicates that this is only a trace concentration and is therefore considered acceptable at this site.

### **Watching Brief for Contaminated Land**

We confirm that a watching brief for contaminated or suspicious soils has been maintained throughout the ground works phase of the development of the Machine Store and that no such soils have been encountered, such that Wilson Bailey have not been asked to attend site to carry out any further investigations, assessments or remediation works.

### Conclusions

The placed depth of topsoil observed in the trial pit is substantially in excess of the original requirement agreed as part of the Remediation Strategy for The Machine Store development and the results of the soil testing indicate that the soil complies with the requirements of the acceptance criteria.

On the basis of the works carried out it is therefore considered that an appropriate level of protection has been provided to ensure the safety of end users and site maintenance workers and ensure the healthy growth and development of plants.

This report should be submitted to the Local Authority Environmental Health Officer for review and consideration with respect to the requirements of Condition 16iii of the planning permission for the Machine Store.

We trust that this letter provides sufficient information to allow condition 16iii to be partially discharged for the Machine Store, noting that the Groove and Pressing Plant remediation is to be undertaken by others, although please do not hesitate to contact me should you have any questions or queries.

Yours faithfully  
Wilson Bailey Partnership

Dominic Brightman  
BSc MSc DIC FGS CGeol ARSM

Encs.

- Report Reference J17027dbc03a dated 1 February 2018 (submitted previously)
- 14805-APA-AB-DR-LA-2778-LA-01 rev T3 (not submitted previously)
- MCerts and UKAS accredited soils test results (submitted previously)

1 February 2018

Your ref:

Planning ref:

Our ref: J17027dbc03a

**RE: OLD MACHINE STORE SITE, VINYL WORKS DEVELOPMENT, HAYES  
REMEDIATION PROPOSALS AND DISCUSSION**

Further to your instruction you have asked us to provide a review and discussion of the Remediation Method Statement prepared by Merebrook on behalf of the vendor of the site (report reference RMS-19579G-16-271 Rev A dated August 2016).

From our review we can confirm that the proposed details of the consented development that have been considered as part of the remediation proposals are appropriate for the final scheme that is to be implemented such that the fundamental basis of the remediation strategy remains valid.

During the intervening period between the original limited scope Merebrook Ground Investigation / Geo-Environmental Assessment (report reference GEA-19579G-16-230 dated August 2016) and the provision of the above Remediation Method Statement, we confirm that we have attended site and carried out additional ground investigation works including additional boreholes and soil sampling together with exploratory works to determine the nature and extent of the underground ducts that are mentioned in the initial Merebrook Works. The findings of these sit works are summarised in our report reference (J17027dbc02 dated September 2017).

In summary the additional ground investigation works have confirmed that the near surface ground underlying the existing building slab to be free from elevated concentrations of a wide range of potential soil contaminants, which broadly corresponds with the findings of the previous Merebrook work, although the greater level of coverage now provided allows a more robust assessment to be made of the absence of ground contamination. The findings of the additional works with regards to the ducts is also of significance in that these can now be discounted as a potential source of ground contamination and concern.

On this basis, we can confirm that in the light of the additional ground investigation information and the details of the finalised development scheme that is to be implemented, it is considered that the following main elements of works are required under this Remediation Method Statement;

- Provision of a 300mm thickness of clean cover system to areas of proposed managed planting;
- Validation of imported materials required to be used to form the above clean cover system;
- Inspection of formation levels to areas of managed planting as part of a check for any gross contamination / presence of asbestos fragments, with any remediation works required to remove any such contaminants carried out in agreement with the Local Authority; and
- Maintenance of a Watching Brief for contaminated land in order to ensure that should any unexpected pockets of contamination or any suspicious soils be encountered, they may be appropriately investigated, assessed and remediated as necessary in consultation with the Regulatory Authorities.

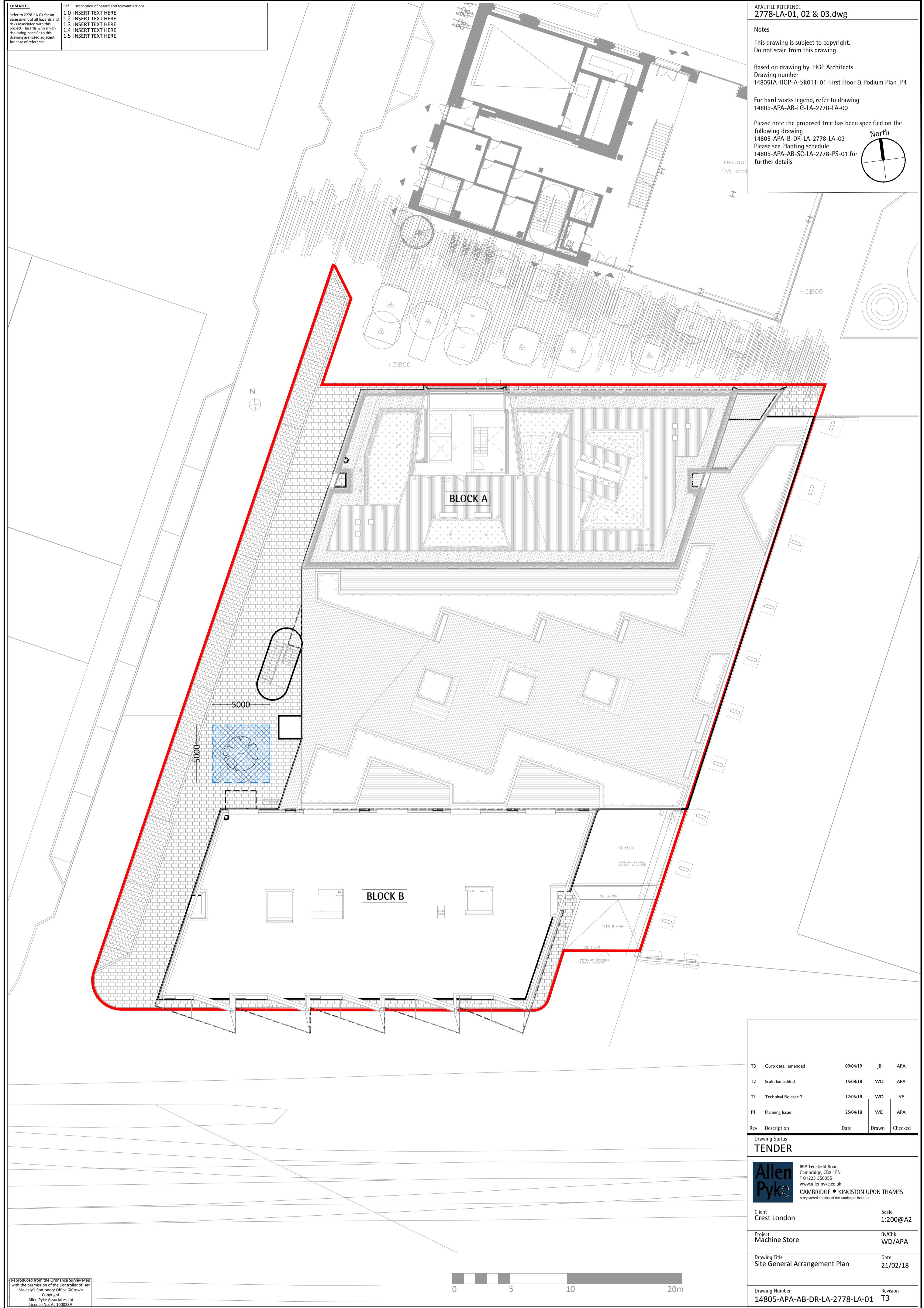
As discussed, we would be pleased to assist you with this project through the management of the above remediation actions and the collation of records required as part of the preparation of a Verification Report summarised as follows;

- Results of laboratory testing to substantiate the quality and chemical acceptability of imported soils used to form the clean cover system;
- Confirmation of the placement of these soils to the required 300mm depth below finished ground level;
- Inspection of formation levels to proposed areas of managed planting in order to check for gross contamination and potential presence of asbestos, with details of any remediation works deemed necessary in agreement with the Local Authority;
- Confirmation of the geo-environmental watching brief being maintained and details of any works required as part of these works;
- Photographic records of key stages of work;
- Details of waste disposal of soils removed to form the proposed basement and the reduced level formation to areas of managed planting; and
- Records of any materials reuse on site.

We trust that this letter provides sufficient information although please do not hesitate to contact me should you have any queries or questions.

Yours sincerely  
Wilson Bailey Partnership

Dominic Brightman  
BSc MSc DIC FGS CGeol ARSM



Dominic Brightman  
Wilson Bailey Geotechnical & Environmental Ltd  
Northdown Farmhouse  
Donhead St Mary  
Wiltshire  
SP7 9DD

**Derwentside Environmental Testing Services Ltd**  
Unit 1  
Rose Lane Industrial Estate  
Rose Lane  
Lenham Heath  
Kent  
ME17 2JN  
**t:** 01622 850410

### **DETS Report No: 22-01456**

**Site Reference:** Old Vinyl Works Development, Hayes

**Project / Job Ref:** DB

**Order No:** None Supplied

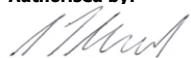
**Sample Receipt Date:** 11/02/2022

**Sample Scheduled Date:** 15/02/2022

**Report Issue Number:** 1

**Reporting Date:** 18/02/2022

**Authorised by:**



Dave Ashworth  
Technical Manager

Dates of laboratory activities for each tested analyte are available upon request.

Opinions and interpretations are outside the laboratory's scope of ISO 17025 accreditation. This certificate is issued in accordance with the accreditation requirements of the United Kingdom Accreditation Service. The results reported herein relate only to the material supplied to the laboratory. This certificate shall not be reproduced except in full, without the prior written approval of the laboratory.



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<b>Soil Analysis Certificate</b>					
<b>DETS Report No: 22-01456</b>		<b>Date Sampled</b>	None Supplied		
<b>Wilson Bailey Geotechnical &amp; Environmental Ltd</b>		<b>Time Sampled</b>	None Supplied		
<b>Site Reference: Old Vinyl Works Development, Hayes</b>		<b>TP / BH No</b>	TS1		
<b>Project / Job Ref: DB</b>		<b>Additional Refs</b>	None Supplied		
<b>Order No: None Supplied</b>		<b>Depth (m)</b>	GL - 1.00		
<b>Reporting Date: 18/02/2022</b>		<b>DETS Sample No</b>	586365		

<b>Determinand</b>	<b>Unit</b>	<b>RL</b>	<b>Accreditation</b>				
Asbestos Screen <sup>(S)</sup>	N/a	N/a	<b>ISO17025</b>	Detected			
Sample Matrix <sup>(S)</sup>	Material Type	N/a	NONE	Chrysotile present as fibre bundles			
Asbestos Type <sup>(S)</sup>	PLM Result	N/a	<b>ISO17025</b>	Chrysotile			
Asbestos Quantification <sup>(S)</sup>	%	< 0.001	<b>ISO17025</b>	< 0.001			
pH	pH Units	N/a	<b>MCERTS</b>	8.0			
TOC (Total Organic Carbon)	%	< 0.1	<b>MCERTS</b>	1.9			
Arsenic (As)	mg/kg	< 2	<b>MCERTS</b>	9			
W/S Boron	mg/kg	< 1	NONE	1.3			
Cadmium (Cd)	mg/kg	< 0.2	<b>MCERTS</b>	< 0.2			
Chromium (Cr)	mg/kg	< 2	<b>MCERTS</b>	13			
Chromium (hexavalent)	mg/kg	< 2	NONE	< 2			
Copper (Cu)	mg/kg	< 4	<b>MCERTS</b>	18			
Lead (Pb)	mg/kg	< 3	<b>MCERTS</b>	51			
Mercury (Hg)	mg/kg	< 1	<b>MCERTS</b>	< 1			
Nickel (Ni)	mg/kg	< 3	<b>MCERTS</b>	11			
Selenium (Se)	mg/kg	< 2	<b>MCERTS</b>	< 3			
Zinc (Zn)	mg/kg	< 3	<b>MCERTS</b>	58			
Total Phenols (monohydric)	mg/kg	< 2	NONE	< 2			

Analytical results are expressed on a dry weight basis where samples are assisted-dried at less than 30°C. The Method Description page describes if the test is performed on the dried or as-received portion  
Subcontracted analysis (S)



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**Soil Analysis Certificate - Speciated PAHs**

DETS Report No: 22-01456	Date Sampled	None Supplied				
Wilson Bailey Geotechnical & Environmental L	Time Sampled	None Supplied				
Site Reference: Old Vinyl Works Development, Hayes	TP / BH No	TS1				
Project / Job Ref: DB	Additional Refs	None Supplied				
Order No: None Supplied	Depth (m)	GL - 1.00				
Reporting Date: 18/02/2022	DETS Sample No	586365				

Determinand	Unit	RL	Accreditation			
Naphthalene	mg/kg	< 0.1	MCERTS	< 0.1		
Acenaphthylene	mg/kg	< 0.1	MCERTS	< 0.1		
Acenaphthene	mg/kg	< 0.1	MCERTS	< 0.1		
Fluorene	mg/kg	< 0.1	MCERTS	< 0.1		
Phenanthrene	mg/kg	< 0.1	MCERTS	0.19		
Anthracene	mg/kg	< 0.1	MCERTS	< 0.1		
Fluoranthene	mg/kg	< 0.1	MCERTS	0.48		
Pyrene	mg/kg	< 0.1	MCERTS	0.43		
Benzo(a)anthracene	mg/kg	< 0.1	MCERTS	0.18		
Chrysene	mg/kg	< 0.1	MCERTS	0.18		
Benzo(b)fluoranthene	mg/kg	< 0.1	MCERTS	0.23		
Benzo(k)fluoranthene	mg/kg	< 0.1	MCERTS	< 0.1		
Benzo(a)pyrene	mg/kg	< 0.1	MCERTS	0.16		
Indeno(1,2,3-cd)pyrene	mg/kg	< 0.1	MCERTS	< 0.1		
Dibenz(a,h)anthracene	mg/kg	< 0.1	MCERTS	< 0.1		
Benzo(ghi)perylene	mg/kg	< 0.1	MCERTS	< 0.1		
Total EPA-16 PAHs	mg/kg	< 1.6	MCERTS	1.9		



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**Soil Analysis Certificate - TPH CWG Banded**

DETS Report No: 22-01456	Date Sampled	None Supplied					
Wilson Bailey Geotechnical & Environmental L	Time Sampled	None Supplied					
Site Reference: Old Vinyl Works Development, Hayes	TP / BH No	TS1					
Project / Job Ref: DB	Additional Refs	None Supplied					
Order No: None Supplied	Depth (m)	GL - 1.00					
Reporting Date: 18/02/2022	DETS Sample No	586365					

Determinand	Unit	RL	Accreditation				
Aliphatic >C5 - C6	mg/kg	< 0.01	NONE	< 0.01			
Aliphatic >C6 - C8	mg/kg	< 0.05	NONE	< 0.05			
Aliphatic >C8 - C10	mg/kg	< 2	MCERTS	< 2			
Aliphatic >C10 - C12	mg/kg	< 2	MCERTS	< 2			
Aliphatic >C12 - C16	mg/kg	< 3	MCERTS	< 3			
Aliphatic >C16 - C21	mg/kg	< 3	MCERTS	< 3			
Aliphatic >C21 - C34	mg/kg	< 10	MCERTS	< 10			
Aliphatic (C5 - C34)	mg/kg	< 21	NONE	< 21			
Aromatic >C5 - C7	mg/kg	< 0.01	NONE	< 0.01			
Aromatic >C7 - C8	mg/kg	< 0.05	NONE	< 0.05			
Aromatic >C8 - C10	mg/kg	< 2	MCERTS	< 2			
Aromatic >C10 - C12	mg/kg	< 2	MCERTS	< 2			
Aromatic >C12 - C16	mg/kg	< 2	MCERTS	< 2			
Aromatic >C16 - C21	mg/kg	< 3	MCERTS	< 3			
Aromatic >C21 - C35	mg/kg	< 10	MCERTS	< 10			
Aromatic (C5 - C35)	mg/kg	< 21	NONE	< 21			
Total >C5 - C35	mg/kg	< 42	NONE	< 42			



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**Soil Analysis Certificate - BTEX / MTBE**

DETS Report No: 22-01456	Date Sampled	None Supplied				
Wilson Bailey Geotechnical & Environmental L	Time Sampled	None Supplied				
Site Reference: Old Vinyl Works Development, Hayes	TP / BH No	TS1				
Project / Job Ref: DB	Additional Refs	None Supplied				
Order No: None Supplied	Depth (m)	GL - 1.00				
Reporting Date: 18/02/2022	DETS Sample No	586365				

Determinand	Unit	RL	Accreditation			
Benzene	ug/kg	< 2	MCERTS	< 2		
Toluene	ug/kg	< 5	MCERTS	< 5		
Ethylbenzene	ug/kg	< 2	MCERTS	< 2		
p & m-xylene	ug/kg	< 2	MCERTS	< 2		
o-xylene	ug/kg	< 2	MCERTS	< 2		
MTBE	ug/kg	< 5	MCERTS	< 5		



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**Soil Analysis Certificate - Sample Descriptions**

**DETS Report No: 22-01456**

**Wilson Bailey Geotechnical & Environmental Ltd**

**Site Reference: Old Vinyl Works Development, Hayes**

**Project / Job Ref: DB**

**Order No: None Supplied**

**Reporting Date: 18/02/2022**

<b>DETS Sample No</b>	<b>TP / BH No</b>	<b>Additional Refs</b>	<b>Depth (m)</b>	<b>Moisture Content (%)</b>	<b>Sample Matrix Description</b>
^ 586365	TS1	None Supplied	GL - 1.00	14.6	Brown sandy clay with stones and concrete

*Moisture content is part of procedure E003 & is not an accredited test*

Insufficient Sample <sup>U/S</sup>

Unsuitable Sample <sup>U/S</sup>

^ no sampling date provided; unable to confirm if samples are within acceptable holding times



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**Soil Analysis Certificate - Methodology & Miscellaneous Information**

DETS Report No: 22-01456

Wilson Bailey Geotechnical & Environmental Ltd

Site Reference: Old Vinyl Works Development, Hayes

Project / Job Ref: DB

Order No: None Supplied

Reporting Date: 18/02/2022

Matrix	Analysed On	Determinand	Brief Method Description	Method No
Soil	D	Boron - Water Soluble	Determination of water soluble boron in soil by 2:1 hot water extract followed by ICP-OES	E012
Soil	AR	BTEX	Determination of BTEX by headspace GC-MS	E001
Soil	D	Cations	Determination of cations in soil by aqua-regia digestion followed by ICP-OES	E002
Soil	D	Chloride - Water Soluble (2:1)	Determination of chloride by extraction with water & analysed by ion chromatography	E009
Soil	AR	Chromium - Hexavalent	Determination of hexavalent chromium in soil by extraction in water then by acidification, addition of 1,5 diphenylcarbazide followed by colorimetry	E016
Soil	AR	Cyanide - Complex	Determination of complex cyanide by distillation followed by colorimetry	E015
Soil	AR	Cyanide - Free	Determination of free cyanide by distillation followed by colorimetry	E015
Soil	AR	Cyanide - Total	Determination of total cyanide by distillation followed by colorimetry	E015
Soil	D	Cyclohexane Extractable Matter (CEM)	Gravimetrically determined through extraction with cyclohexane	E011
Soil	AR	Diesel Range Organics (C10 - C24)	Determination of hexane/acetone extractable hydrocarbons by GC-FID	E004
Soil	AR	Electrical Conductivity	Determination of electrical conductivity by addition of saturated calcium sulphate followed by electrometric measurement	E022
Soil	AR	Electrical Conductivity	Determination of electrical conductivity by addition of water followed by electrometric measurement	E023
Soil	D	Elemental Sulphur	Determination of elemental sulphur by solvent extraction followed by GC-MS	E020
Soil	AR	EPH (C10 - C40)	Determination of acetone/hexane extractable hydrocarbons by GC-FID	E004
Soil	AR	EPH Product ID	Determination of acetone/hexane extractable hydrocarbons by GC-FID	E004
Soil	AR	EPH TEXAS (C6-C8, C8-C10, C10-C12, C12-C16, C16-C21, C21-C40)	Determination of acetone/hexane extractable hydrocarbons by GC-FID for C8 to C40. C6 to C8 by headspace GC-MS	E004
Soil	D	Fluoride - Water Soluble	Determination of Fluoride by extraction with water & analysed by ion chromatography	E009
Soil	D	Fraction Organic Carbon (FOC)	Determination of TOC by combustion analyser.	E027
Soil	D	Organic Matter (SOM)	Determination of TOC by combustion analyser.	E027
Soil	D	TOC (Total Organic Carbon)	Determination of TOC by combustion analyser.	E027
Soil	AR	Exchangeable Ammonium	Determination of ammonium by discrete analyser.	E029
Soil	D	FOC (Fraction Organic Carbon)	Determination of fraction of organic carbon by oxidising with potassium dichromate followed by titration with iron (II) sulphate	E010
Soil	D	Loss on Ignition @ 450°C	Determination of loss on ignition in soil by gravimetrically with the sample being ignited in a muffle furnace	E019
Soil	D	Magnesium - Water Soluble	Determination of water soluble magnesium by extraction with water followed by ICP-OES	E025
Soil	D	Metals	Determination of metals by aqua-regia digestion followed by ICP-OES	E002
Soil	AR	Mineral Oil (C10 - C40)	Determination of hexane/acetone extractable hydrocarbons by GC-FID fractionating with SPE cartridge	E004
Soil	AR	Moisture Content	Moisture content; determined gravimetrically	E003
Soil	D	Nitrate - Water Soluble (2:1)	Determination of nitrate by extraction with water & analysed by ion chromatography	E009
Soil	D	Organic Matter	Determination of organic matter by oxidising with potassium dichromate followed by titration with iron (II) sulphate	E010
Soil	AR	PAH - Speciated (EPA 16)	Determination of PAH compounds by extraction in acetone and hexane followed by GC-MS with the use of surrogate and internal standards	E005
Soil	AR	PCB - 7 Congeners	Determination of PCB by extraction with acetone and hexane followed by GC-MS	E008
Soil	D	Petroleum Ether Extract (PEE)	Gravimetrically determined through extraction with petroleum ether	E011
Soil	AR	pH	Determination of pH by addition of water followed by electrometric measurement	E007
Soil	AR	Phenols - Total (monohydric)	Determination of phenols by distillation followed by colorimetry	E021
Soil	D	Phosphate - Water Soluble (2:1)	Determination of phosphate by extraction with water & analysed by ion chromatography	E009
Soil	D	Sulphate (as SO4) - Total	Determination of total sulphate by extraction with 10% HCl followed by ICP-OES	E013
Soil	D	Sulphate (as SO4) - Water Soluble (2:1)	Determination of sulphate by extraction with water & analysed by ion chromatography	E009
Soil	D	Sulphate (as SO4) - Water Soluble (2:1)	Determination of water soluble sulphate by extraction with water followed by ICP-OES	E014
Soil	AR	Sulphide	Determination of sulphide by distillation followed by colorimetry	E018
Soil	D	Sulphur - Total	Determination of total sulphur by extraction with aqua-regia followed by ICP-OES	E024
Soil	AR	SVOC	Determination of semi-volatile organic compounds by extraction in acetone and hexane followed by GC-MS	E006
Soil	AR	Thiocyanate (as SCN)	Determination of thiocyanate by extraction in caustic soda followed by acidification followed by addition of ferric nitrate followed by colorimetry	E017
Soil	D	Toluene Extractable Matter (TEM)	Gravimetrically determined through extraction with toluene	E011
Soil	D	Total Organic Carbon (TOC)	Determination of organic matter by oxidising with potassium dichromate followed by titration with iron (II) sulphate	E010
Soil	AR	TPH CWG (ali: C5- C6, C6-C8, C8-C10, C10-C12, C12-C16, C16-C21, C21-C34, aro: C5-C7, C7-C8, C8-C10, C10-C12, C12-C16, C16-C21, C21-C35)	Determination of hexane/acetone extractable hydrocarbons by GC-FID fractionating with SPE cartridge for C8 to C35. C5 to C8 by headspace GC-MS	E004
Soil	AR	TPH LQM (ali: C5-C6, C6-C8, C8-C10, C10-C12, C12-C16, C16-C35, C35-C44, aro: C5-C7, C7-C8, C8-C10, C10-C12, C12-C16, C16-C21, C21-C35, C35-C44)	Determination of hexane/acetone extractable hydrocarbons by GC-FID fractionating with SPE cartridge for C8 to C44. C5 to C8 by headspace GC-MS	E004
Soil	AR	VOCs	Determination of volatile organic compounds by headspace GC-MS	E001
Soil	AR	VPH (C6-C8 & C8-C10)	Determination of hydrocarbons C6-C8 by headspace GC-MS & C8-C10 by GC-FID	E001

D Dried

AR As Received