



Phase I Geo-Environmental Desk Study

Status Business Park

Nobel Drive
Harlington
Hayes
Middlesex
UB3 5EY

Prepared for:

MHA Heathrow Ltd
6 Bloomsbury Square
London
WC1A 2LP

EPS Project Reference:	UK16.2474
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STATUS BUSINESS PARK, HAYES

NON TECHNICAL CLIENT SUMMARY

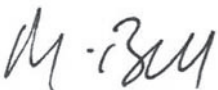
This report presents the findings of a Phase I Geo-Environmental Desk Study which was carried out to identify potential contamination from previous or current uses of the site and surrounding area and to provide an initial assessment of how the proposed development or surrounding environment might be affected.

- The site currently includes three commercial properties which are proposed to be converted to residential accommodation under permitted development. The proposals would not involve any external alteration, only conversion of internal space.
- The site is located within an area of low environmental sensitivity, primarily due to anticipated underlying clay based ground conditions. The vast majority of the site is currently building or hardstanding other than soft landscaping around the boundaries and within car parking areas.
- Historic mapping and Environment Agency (EA) records indicate that the agricultural fields immediately to the north and east of the site were used for gravel abstraction in the 1980s and subsequently backfilled under an EA Permit in the 80s and 90s with Inert waste materials.
- Although the areas to the east and north are reported to have been backfilled with inert waste, it has not been possible to fully discount potential risks from associated ground gases; a risk which could increase based on the proposed alteration of the buildings from commercial to residential use. Therefore, a landfill gas investigation has been recommended to assess risks posed to future residents and ensure the site is suitable for its proposed enduse.
- A copy of this report should be provided to the Environmental Health department of the London Borough of Hillingdon Council so that the information may be used to support planning proposals for the site.

By their very nature, the above bullet points represent a simplified summary of our work and should not be relied upon to form the basis for key decisions for the proposed development. A full picture is provided in the following report, or alternatively give us a call and we'll talk you through it.



Project Reference:	UK16.2474	
Title:	Phase I Geo-Environmental Desk Study Status Business Park, Hayes	
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Where ground investigations have been conducted, these have been limited to the level of detail required for the site in order to achieve the objectives of the investigation.

The report has been written, reviewed and authorised by the persons listed above. It has also undergone EPS' in house quality management inspection. Should you require any further assistance regarding the information provided within the report, please do not hesitate to contact us.

TABLE OF CONTENTS

1	INTRODUCTION.....	1
1.1	Background	1
1.2	Objectives.....	1
1.3	Scope of Work	1
1.4	Project Limitations and Constraints	2
2	GEO-ENVIRONMENTAL SETTING	3
2.1	Site Location and Description	3
2.2	Environmental Setting	3
2.3	Site History	5
3	ENVIRONMENTAL CONCEPTUAL MODEL & PRELIMINARY RISK ASSESSMENT	6
3.1	Source Characterisation	6
3.2	Potential Receptors	6
3.3	Potential Pathways	7
3.4	Summary of Contaminant Linkages	8
3.5	Summary of Regulatory Liaison	9
4	CONCLUSIONS & RECOMMENDATIONS	10

Figures

Figure 1	Site Location Plan
Figure 2	Current Site Layout
Figure 3	Aerial Photograph
Figure 4	Site Context – CLR11

Appendices

Appendix A	Surrounding Land Use
Appendix B	Geological Context
Appendix C	Groundwater Vulnerability Maps
Appendix D	A Selection of Historic Maps

1 INTRODUCTION

On 9th November 2016, Environmental Protection Strategies Ltd (EPS) was commissioned by MHA Heathrow Ltd to complete a Phase I Geo-Environmental Desk Study on Status Business Park, Nobel Drive, Harlington, Hayes, Middlesex, UB3 5EY ('the site'); see Figure 1.

The work was commissioned in order to fulfil pre-planning requirements for the proposed conversion of office space (B1a use) to residential (C3 use) under permitted development. It is understood that the proposals would not involve any external alteration, only conversion of internal space to residential apartments.

This report presents the findings, conclusions, and recommendations of the Phase I Desk Study undertaken for the site as instructed.

1.1 Background

A Desk Study comprises the first stage of any geo-environmental assessment, the purpose of which is to determine what potentially contaminative activities may have occurred at the property or the surrounding area which may pose an environmental or geological risk to site users, the surrounding environment or proposed development, either at present or in the future.

The method used in this investigation to assess the environmental risk posed is based on the concept of 'contaminant linkage', which considers the following three factors:

Source	The location from which an environmentally hazardous / contaminative substance is, (or was,) derived.
Receptor	An environmentally sensitive object or condition e.g. person, property, controlled water, or ecological system, which may be present now or in future.
Pathway	A route or mechanism via which a source could come into contact with a receptor to cause significant harm.

If all three factors are identified, there is the potential for a 'contaminant linkage' to be active, which could result in significant harm being caused to the environment or human health.

1.2 Objectives

The purpose of this desk study is to evaluate the potential contaminant linkages which may be active at the site in its current condition, or could become active in future, and to determine if any action is required to investigate them further or to break them.

1.3 Scope of Work

The objectives were achieved by carrying out the following activities:

- a) Examining the site history - late 1800s to present day, through collection of historical maps of the area, records held by relevant local authorities, the Environment Agency and review of other information databases.

- b) Characterising the site's environmental and geological sensitivity through examination of existing geological, hydrogeological, topographical, and historical maps and aerial photographs of the area.
- c) Identifying Potential Areas of Concern (PAOCs) through a combination of historical map and data review.
- d) Consideration of any future plans for the site and the effects any proposed changes may have on contaminant linkages over time.
- e) Development of a site conceptual model and Preliminary Risk Assessment to determine the potential risks posed by the site and make recommendations for any further work that may be required and to ensure suitability for use and safe development in accordance with the *Model Procedures for the Management of Land Contamination* - Contaminated Land Report 11 and the *National Planning Policy Framework (2012)*.

1.4 Project Limitations and Constraints

The purpose of this report is to present the findings of a Phase I Geo-Environmental Desk Study conducted at the location(s) specified. When examining the data collected from the investigations made during the assessment, EPS makes the following statements:

This report does not include specific investigation for the presence of either Potential Asbestos Containing Material (PACM) or Japanese Knotweed at the subject site. No site visit has been undertaken within the scope of this Phase 1 Geo-Environmental Desk Study. There is always potential for different conditions to those identified as a result of the inspection of available maps and records to be encountered during a site inspection. Should areas of concern be identified during any site visit, EPS should be contacted and will advise on additional requirements.

2 GEO-ENVIRONMENTAL SETTING

The following section provides a summary of the information collected in relation to the site location and history.

2.1 Site Location and Description

Detail	Description
Location	The site is located on the south eastern outskirts of Harlington, approximately 150m to the north of Heathrow Airport, in Middlesex.
Grid Reference	NGR 509100 177000
Topographic Elevation	Approximately 24 metres above ordnance datum (m AOD).
Topographic Gradient	The site and surrounding area is generally flat.
Description of Site	The site currently comprises three commercial office buildings, with associated car parking, two electricity substations and Nobel Drive, which provides access to the site buildings as well as other commercial and residential properties that are located within Status Business Park. Access to Nobel Drive is from Bath Road (A4), which passes along the southern site boundary. Soft landscaping, which is primarily planted with grass, shrubs and trees is present along the northern, eastern and southern boundaries of the site and around the borders of the parking areas.
Surrounding Land Use	The surrounding area comprises a mixture of agricultural, residential and commercial land use. Residential properties and agricultural land are located to the north of the site. Agricultural land is also located immediately to the east. The south of the site is bound by Bath Road (A4), with car hire premises and an electricity substation beyond. Other commercial premises, office buildings and hotels are located within the business park and to the west of the site. Heathrow Airport is located approximately 150m to the south of the site.

A plan showing the site location is provided as Figure 1, the current site layout is detailed on Figure 2 and an aerial photograph is included as Figure 3. Relevant extracts of a Landmark Envirocheck report are included as Appendix A.

2.2 Environmental Setting

Detail	Description
Geology	Geological maps of the area show the site to lie directly on Langley Silt Member (Clay and Silt), overlying London Clay Formation (Clay, Silt and Sand). Maps also indicate that land immediately to the north and east of the site is classified as infilled ground. Information on the site's geological context is included as Appendix B.

Detail	Description																
British Geological Survey (BGS)	A historic borehole log was acquired from the British Geological Survey (BGS) for a location within 75m east of the site and at similar topographic elevation. The borehole log reports ground conditions comprising made ground consisting of sandy clay, gravel, fragments of concrete, wood, brick, slag, newspaper, hardboard cloth, plastic, ceramic tile, vegetation and wire flex, proven to a depth of 4.1m below ground level (bgl). The made ground is reported to overlie a stiff, silty, laminated clay, proven to a depth of 5.0m bgl. A copy of the historic borehole log is included within Appendix B.																
Geological Hazards	<table> <tr> <th>Hazard</th><th>On Site Risk</th></tr> <tr> <td>Coal Mining</td><td>Might not be affected / No Hazard</td></tr> <tr> <td>Collapsible Ground</td><td>Very Low</td></tr> <tr> <td>Compressible Ground</td><td>Moderate</td></tr> <tr> <td>Ground Dissolution</td><td>No Hazard</td></tr> <tr> <td>Running Sand</td><td>No Hazard</td></tr> <tr> <td>Landslide</td><td>Very Low</td></tr> <tr> <td>Shrinking / Swelling Clay</td><td>Very Low</td></tr> </table>	Hazard	On Site Risk	Coal Mining	Might not be affected / No Hazard	Collapsible Ground	Very Low	Compressible Ground	Moderate	Ground Dissolution	No Hazard	Running Sand	No Hazard	Landslide	Very Low	Shrinking / Swelling Clay	Very Low
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Radon	The BGS and Health Protection Agency (HPA) report entitled ' <i>Indicative Atlas of Radon in England and Wales</i> ' (November 2007) shows the site to lie within a 1km grid section where the percentage of homes above the radon action level is between 0% and 1%. The joint Building Research Establishment Ltd (BRE) report entitled: ' <i>Radon: Guidance on Protective Measures for New Buildings - 2007</i> ' reports that the site does not lie within an area where basic radon protection methods will need to be employed.																
Hydrogeology	Groundwater vulnerability maps for the area show that the underlying geology is classified as Unproductive Strata. The site does not lie within a Source Protection Zone for local groundwater abstraction. Groundwater vulnerability maps are included as Appendix C.																
Hydrology	Frogs Ditch, which is a tributary of the River Crane, flows in a westerly direction, approximately 625m to the north east of the site. Review of the EA flood zone map for the area indicates that the site lies within flood zone 1, which is defined within Table 1 of technical guidance to the National Planning Policy Framework (NPPF) as the area with the lowest potential risk of flooding from fluvial or tidal sources. It should be noted that the EA maps do not take into account flooding from other potential sources of flood water, such as from poor drainage, or groundwater.																
Landfill & Waste	The EA database indicates that the agricultural land located immediately to the north of the site is a historical landfill site, which last received inert waste (authorised waste was construction and demolition waste) in 1985. The records indicate that gas control measures have been taken at some point. The Envirocheck report indicates that the input rate was very large (greater than or equal to 250,000 tonnes per year). The land immediately to the east of the site, also currently used as agricultural land, is indicated, on the EA database, as a closed authorised landfill that accepted non-biodegradable wastes.																

Detail	Description
Licensed Industrial Activity	The Envirocheck report has one record of a trade listing, located within 100m of the site. The listing is for engineering services, but is currently inactive. There are a number of trade listings located within a 500m radius of the site for a variety of uses including car breakers, waste disposal, petrol filling stations and upholstery cleaners. The majority of the listings are currently inactive. The nearest active trade listing to the site is located 460m to the north west of the site and is for garage services.
Pollution Incidents	The EA database lists a number of pollution incidents to controlled waters that have occurred in the general vicinity of the site, although none within approximately 100m. The incidents appear to be primarily associated with discharges to the River Crane, approximately 770m to the east.
Sensitive Land Use	The site is not listed as being within a Nitrate Vulnerable Zone.

2.3 Site History

A summary of historical map data from 1874 to 2006 is provided below and copies of relevant historic maps and any others examined during the investigation are included in this report as Appendix F.

- The site was undeveloped and used as an orchard until construction of a sports ground in the western area of the site, in 1932. Bath Road is in existence to the south of the site and a gravel pit is located approximately 250m to the south east of the site.
- In 1938, the sports ground was used as a greyhound stadium.
- In 1948, the eastern end of the site was developed with a school and playing fields. Heathrow Airport was developed, approximately 150m to the south of the site.
- The hotel, located 60m to the west of the site was developed, in 1961.
- In 1972, the current bowling alley, located within the Status Business Park, was developed, and maps from that year show tanks located along its northern boundary. The electricity substation located beyond Bath Road, to the south of the site, was present.
- By 1987 the site resembled its current layout with three commercial buildings, two electricity substations, car parking areas and an access road. The remainder of the business park, including the residential properties, also resembled the present day layout. A gravel pit is shown to be located adjacent to the east of the site.
- The tanks previously located adjacent to the bowling alley, were replaced with an electricity substation by 1992. The gravel pit, adjacent to the east of the site is still shown to be present.

3 ENVIRONMENTAL CONCEPTUAL MODEL & PRELIMINARY RISK ASSESSMENT

The following section provides a review of the contaminant linkages that may be active at the site through examination of the potential sources that may be present as a result of historic and / or current site activities and where potential interaction between these sources and the identified human / environmental receptors may occur.

3.1 Source Characterisation

The following potential contaminant sources have been identified at the site and in the surrounding area:

Potential Source	Source Description	Principal Contaminants of Concern
Current & Historic Site Use	In-fill material of unknown origin (Made Ground) used to level areas beneath existing / historic buildings and hardstanding. Presence of electricity substations.	PAH, Metals, ACM, PCBs
Historic Site Use	No potentially contaminative land uses identified.	None
Current and Historic Surrounding Land Use	Current / historic use of land for landfill adjacent to northern and eastern site boundaries. Former tanks and current electricity substation present adjacent to bowling alley.	CH ₄ , CO ₂ , TPH, PAH, Metals, PCBs

Notes:

PAH	Polycyclic Aromatic Hydrocarbons	ACM	Asbestos Containing Materials
CH ₄	Methane	CO ₂	Carbon Dioxide
TPH	Total Petroleum Hydrocarbons	SVOC	Semi-Volatile Organic Compounds
VOC	Volatile Organic Compounds	PCBs	Polychlorinated Biphenyls

3.2 Potential Receptors

A framework for the assessment of risks arising from the presence of contamination in soils has been produced by the Environment Agency and the Department for the Environment, Food and Rural Affairs (DEFRA) and is presented with the report: 'Using Science to Create A Better Place: Updated Technical Background to the CLEA Model – Science Report SC050021/SR3'. This guidance document defines a series of standard land-uses, which form a basis for the development of an Environmental Conceptual Model.

The development proposals are for the conversion of the internal space of the current buildings into a number of residential properties, with no external alteration. This proposed future land use, as defined within Science Report SC050021/SR3, has been considered as residential (without home grown produce).

In view of the environmental setting, current and potential future land use of the site and historical use of surrounding sites, the potential receptors for any contaminant impact are discussed below:

Receptor	Site Specific Description
Human	Future site users, site workers involved in the site redevelopment, and those working and living in the surrounding area have the potential to be at risk from exposure to potential contaminants of concern (CoCs).
Groundwater	The site is reported to be underlain by Langley Silt Member (Clay and Silt) overlying London Clay Formation (Clay, Silt and Sand), which are defined by the EA as Unproductive Strata (i.e. has negligible resource value and is not sensitive), the site does not lie within a SPZ for any nearby groundwater abstraction. Therefore underlying groundwater has not been considered as a potential receptor to site derived contaminants.
Surface Water	The nearest surface watercourse is Frogs Ditch, which is a tributary of the River Crane, flowing in a westerly direction, approximately 625m to the north east of the site. Given the distance to the surface water feature, it has not been considered as a potential receptor to site derived contamination.
Flora and Fauna	The proposed development does not include the provision of any new or alteration of any existing soft landscaped areas, with all existing external areas believed to be being retained in their current format.
Buildings & Infrastructure	The existing building and its infrastructure is to be retained with only internal conversion of office space to residential dwellings.

3.3 Potential Pathways

Where contaminants may be present in soil, there are a number of potential pathways that enable human receptors to come into contact with or be exposed to them. The most direct pathways, considered under current UK legislation, can be summarised as follows:

- Direct ingestion of contaminated soil
- Ingestion of household dust
- Ingestion of contaminated vegetables
- Ingestion of soil attached to vegetables
- Dermal contact with contaminated soil
- Dermal contact with household dust
- Inhalation of fugitive soil dust
- Inhalation of fugitive household dust
- Inhalation of vapours outdoors
- Inhalation of vapours indoors

Clearly, not all of these potential pathways apply for every standard land-use; the simplest example for exclusions being a commercial / industrial site which is covered by concrete hardstanding. The concrete precludes the direct exposure of humans working at the site to any contaminated soils.

However in addition to direct exposure pathways, a number of physical transport mechanisms / pathways may also exist at a site that allow remote or less accessible contaminants in soil or groundwater to reach human or environmental receptors both at a site and beyond the site boundary. These include the following:

- Downward and lateral movement of contaminants in soil either by gravity or through being 'leached' by percolating rainwater.
- Lateral migration of contaminants dissolved in groundwater.
- Direct seepage or leaching of contaminants from soil into subsurface drains or supply pipework.
- Volatilisation of contaminants from groundwater or unsaturated soils into buildings or outdoor air.

Through examination of the standard land use and environmental setting at each site, the presence of pathways and transport mechanisms described above must be considered when assessing whether a contaminant linkage may plausibly be active, and therefore be included in the conceptual site model.

3.4 Summary of Contaminant Linkages

Considering the site use and environmental setting, the plausible contaminant linkages that have been identified through the Desk Study work are summarised in the following table.

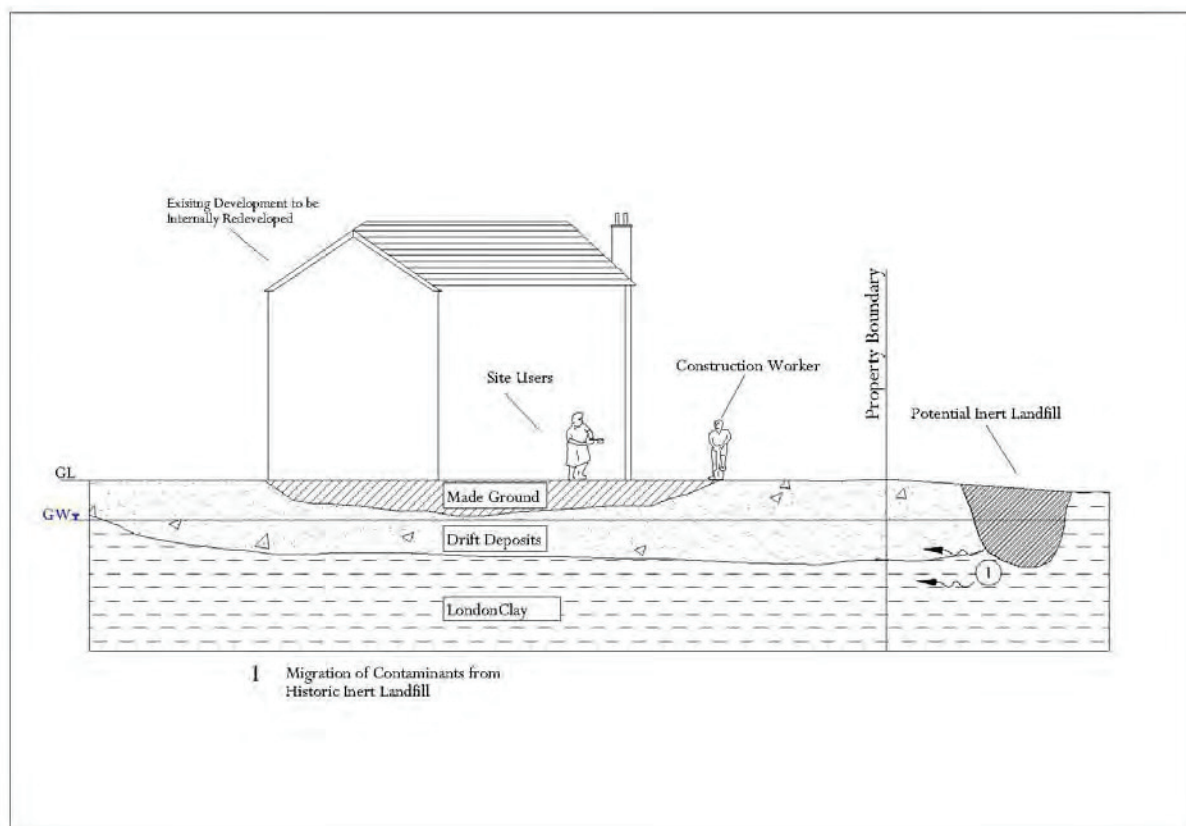
Source	Pathway	Receptor
Off-site Infilled Land	On-site migration of ground gases	Future site residents

The following comments are made with respect to contaminant linkages which have been considered through development of the conceptual model, but have not been concluded as 'plausible' – i.e. through which an unacceptable risk of harm to people or the environment is a significant possibility:

- The existing buildings will be retained with no external alteration. Given the nature and location of the soft landscaping which is present, the proposals are not considered likely to result in any significant change in how those areas are used or the intensity at which site users would use them. On this basis, the proposals would not result in any significant increase in environmental risk and physical interaction with near surface materials in those areas could not plausibly result in unacceptable risk levels and thereby a contaminant linkage becoming active.
- PCBs were identified as possible contaminants of concern associated with the presence of electricity substations on and near the site. However, PCBs do not easily volatilise and therefore are unlikely to present an unacceptable risk from volatilisation to indoor air in potentially unacceptable levels. The potential for ingestion or dermal contact with soil is considered to be low due to the widespread presence of hardstanding at the site. This source is not considered to pose an unacceptable risk to the proposed development.
- The historical presence of tanks adjacent to the nearby bowling alley has been identified as a potential source of contaminants. The tanks have not been present since 1992 and given that they are located over 100m from the nearest building to be redeveloped for residential use, they are considered unlikely to present an unacceptable risk to the proposed development.
- Adjacent land has historically and more recently been used for light industrial purposes, which has led to the inclusion of both environmentally mobile and volatile contaminants of concern, however on-site migration would likely be restricted by the clay based ground conditions.

The following diagram provides an illustration of the plausible contaminant linkages which have been identified:

Status Park – Illustrative Conceptual Site Model



3.5 Summary of Regulatory Liaison

As part of the desk study process, EPS carried out an initial consultation with the Environmental Protection Unit at the London Borough of Hillingdon to gather further information on, primarily, the adjacent former landfill sites and the risks they may pose through on-site gas migration.

Mr Mick Brough provided additional information in his email of the 18th November 2016, which indicated that the two former landfills of concern are known as 'Cranford Lane South (East and West Areas)' which were reportedly landfilled in around the 1980's. Mr Brough also highlighted former landfills sites to the south of Bath Road and a smaller site to the north west along Nobel Drive. Although the large Cranford sites were licensed to accept only inert construction wastes, Mr Brough advised that the proximity of the sites and the proposed change of use to a more sensitive enduse would require some gas investigation.

Through this regulatory liaison, it was also indicated that the gas investigation could be undertaken in response to a conditional prior notification which is reflected in the following Conclusions and Recommendations.

4 CONCLUSIONS & RECOMMENDATIONS

It has not been possible through this Phase I Desk Study process to discount the potential for a plausible contaminant linkage to become active as a result of the presence of former landfill sites in the immediate vicinity of the site, and the proposed future use of the site for residential purposes. Risks from migrating landfill gases are influenced by the building type and usage, hence why the change of use prior notification relevant to this site introduces a plausible contaminant linkage which warrants further investigation.

It is therefore recommended that, initially, the identified plausible contaminant linkage should be further investigated by means of exploratory intrusive investigation. The investigation will need to allow the installation of gas-monitoring standpipes along the boundaries of the site with the former landfill sites (primarily the eastern and northern boundaries), with a subsequent gas monitoring program undertaken to assess concentrations and flow rates of any landfill gases migrating onto the site over a range of barometric pressures. This assessment will determine whether any risks are present which require remedial action through ground gas protection measures. It is anticipated that the monitoring program would need to be carried out over a six-month period, with monitoring visits approximately every fortnight.

Given the close proximity of several large landfill sites it is considered likely that, at the minimum, a requirement for basic ground gas protection to be retrofitted into the buildings undergoing a change of use will be identified. However, the findings of the proposed gas monitoring program could be initially reviewed after six weeks to inform whether more substantial protection measures are likely to be required or if a sub-floor membrane (applied retrospectively) is likely to be sufficient. At this point, following further liaison with the London Borough of Hillingdon it may be possible to provisionally agree the broad nature of protection measures and therefore allow commencement of groundworks, prior to the detailed design being confirmed through the remaining monitoring period. It should be noted that if this approach was adopted with the agreement of the Council, the project risk associated with any further monitoring identifying a need for more substantial measures (such as active or maintained systems), would rest with the applicant/developer.

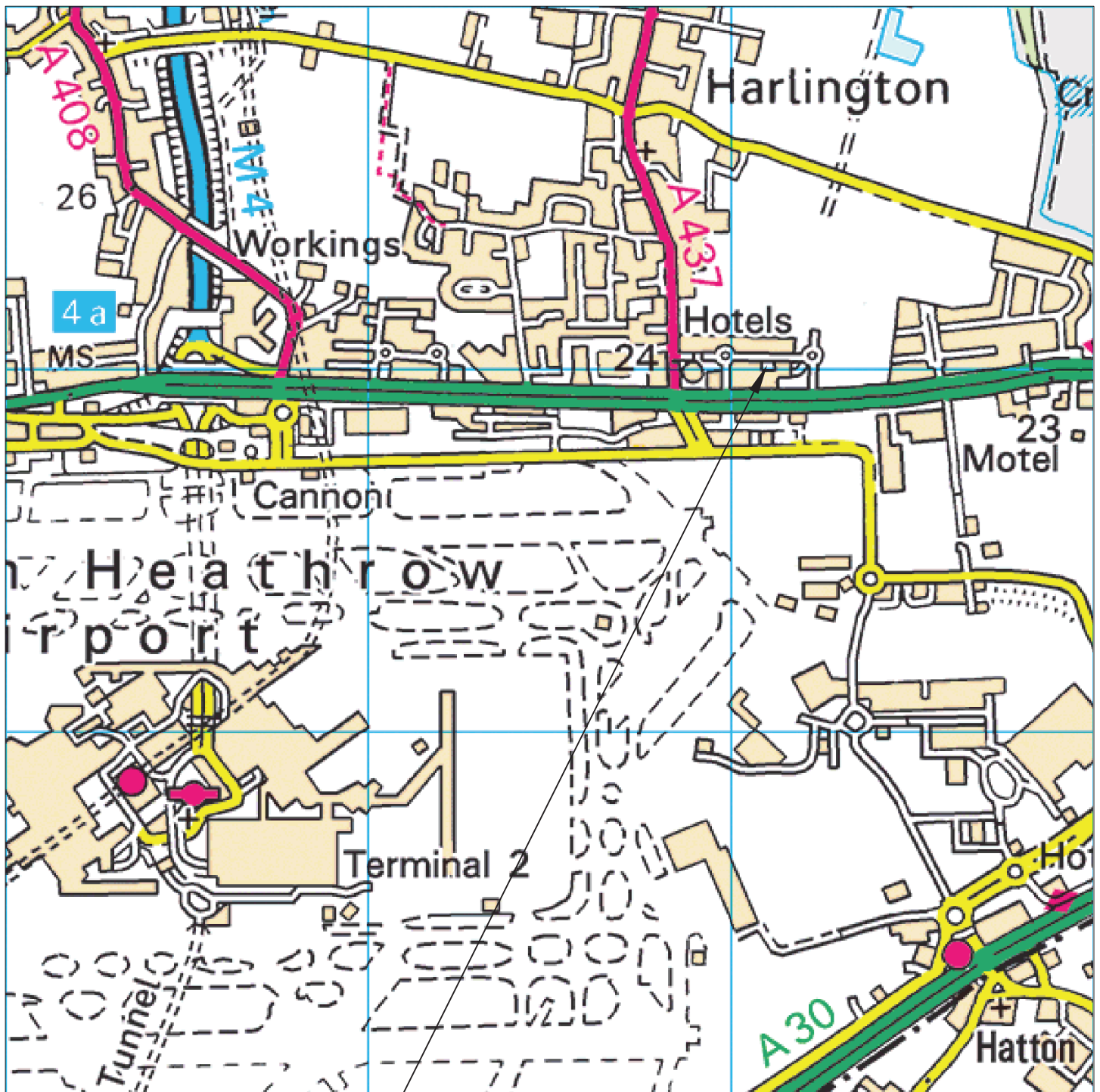
It is understood that these works can be carried out under a conditional prior notification, where the conditional need only specifically relate to the risks from landfill gases.

In accordance with the Model Procedures for Management of Land Contamination (Contaminated Land Report 11) the risks identified by this work will require further assessment in order to determine the most appropriate action for this site. A summary of the approach outlined in CLR11, marking the work already completed under the risk assessment phase, is presented as a flow diagram in Figure 4 of this report.

A proposed scope and costing for this work will be provided and EPS will discuss and agree the proposals with the local authority prior to commencement to ensure regulatory compliance.

A copy of this report should be provided to the Environmental Health department of the London Borough of Hillingdon Council so that the information may be used to support planning proposals for the site.

FIGURES



Approximate Site Location

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Title: Site Location Plan

Project: Status Business Park, Hayes,
UB3 5EY

Fig No: 1

Scale: NTS

Drawn By: TP **Approved By:** WE

Job No: UK16.2474

Dwg No: Hayes/1116/01

Date: November 2016



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Date: November 2016



— Approximate Site Boundary

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Title: Aerial Photograph

Project: Status Business Park, Hayes,
UB3 5EY

Fig No: 3

Scale: NTS

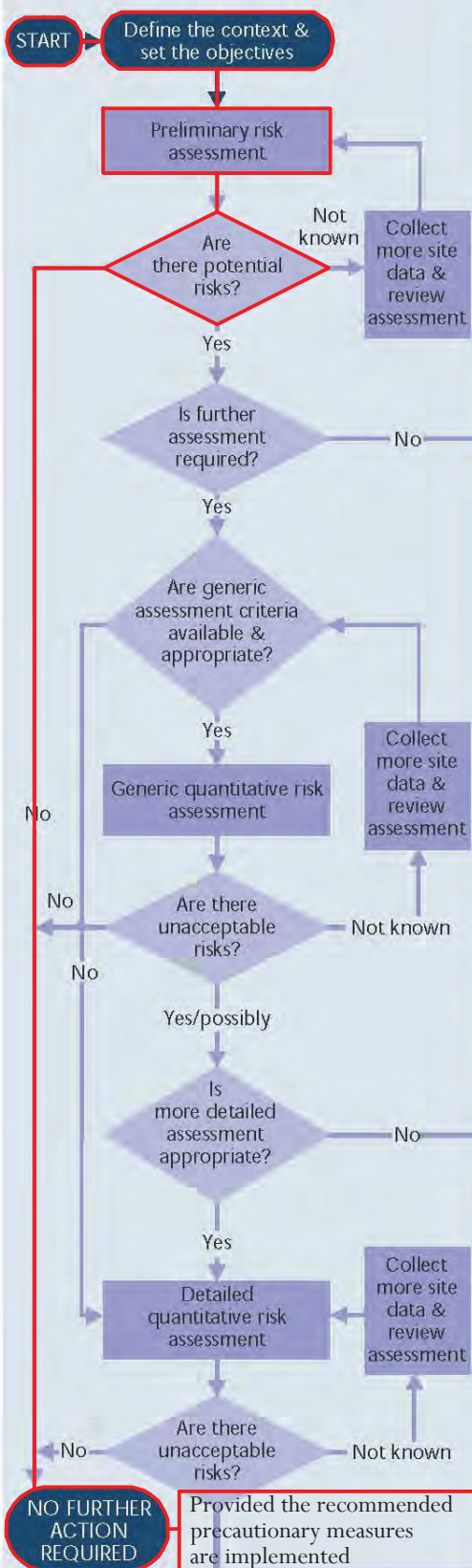
Drawn By: TP **Approved By:** WE

Job No: UK16.2474

Dwg No: Hayes/1116/03

Date: November 2016

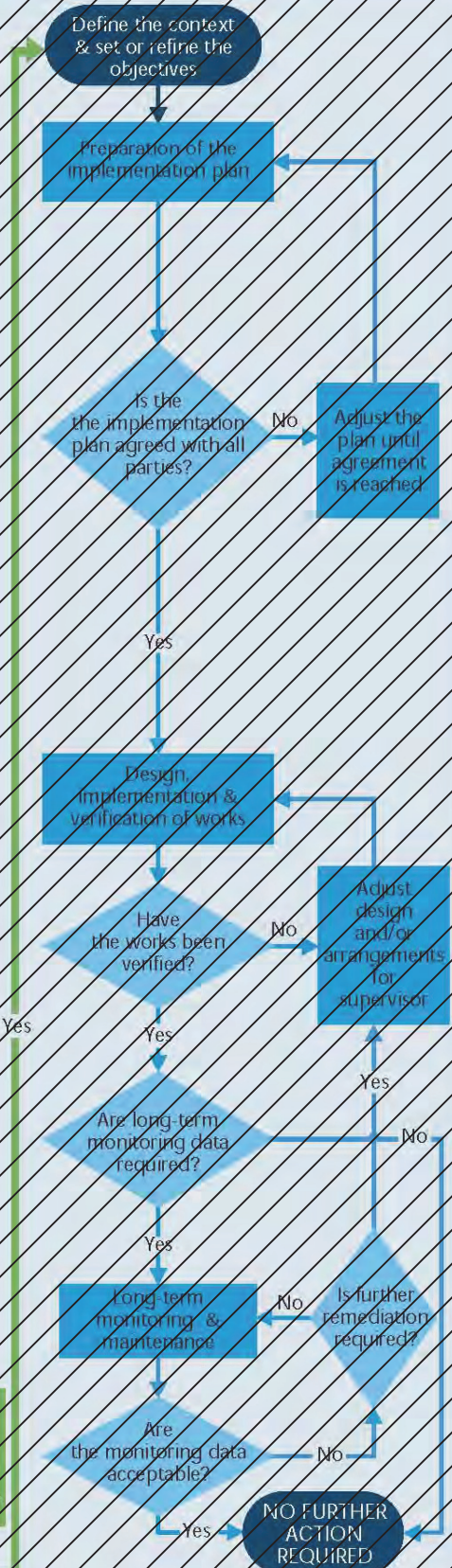
Risk Assessment



Options Appraisal



Implementation of the Remediation Strategy



Assessment Pathway for Site



Title: Site Context - CLR11

Project: Status Business Park, Hayes,
UB3 5EY

Fig No: 4

Scale: n/a

Drawn By: TP Approved By: WE

Job No: UK16.2474

Dwg No: Hayes/1116/04

Revision Date: November 2016