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Phase I Environmental Assessment

Green Walk Garages, Ruislip, HA4 8NL

November 2023

Document Control

Document Name	Phase I Environmental Assessment
Date submitted	November 2023
Issue	For Issue
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1 Introduction

1.1 Background

Blue Signal Limited (BSL) was instructed by KpH Environmental Services Ltd (KpH) to carry out a Phase I Environmental Assessment of an area of land identified as Garages off Green Walk, Ruislip, HA4 8NL (the Site). The Site has Planning Permission (Ref 73047/APP/2023/103 dated 3rd May 2023) to replace existing residential garages with '*two 3-bedroom semi-detached dwellinghouses, landscaping and parking*'. The planning condition relating to contaminated land, as stated in the Grant of Planning Permission document is as follows:

"(i)The development hereby approved shall not commence until a scheme to deal with contamination has been submitted to and approved by the Local Planning Authority (LPA). All works which form part of any required 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. The scheme shall include the following measures unless the LPA dispenses with any such requirement specifically and in writing:

a) A desk-top study carried out by a competent person to characterise the site and provide information on the history of the site/surrounding area and to identify and evaluate all potential sources of contamination and impacts on land and water and all other identified receptors relevant to the site:

(b) A site investigation, including where relevant soil, soil gas, surface water and groundwater sampling, together with the results of analysis and risk assessment shall be carried out by a suitably qualified and accredited consultant/contractor. The report should also clearly identify all risks, limitations and recommendations for remedial measures to make the site suitable for the proposed use; and

(c) A written method statement providing details of the remediation scheme and how the completion of the remedial works will be verified shall be agreed in writing with the LPA prior to commencement along with the details of a watching brief to address undiscovered contamination.

No deviation shall be made from this scheme without the express agreement of the LPA prior to its implementation.

(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

(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. The report shall include the details of the final remediation works and their verification to show that the works have been carried out in full and in accordance with the approved methodology.

(iv) No contaminated soils or other materials shall be imported to the site. All imported soils for landscaping and/or engineering 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 factual results and interpretive reports of this testing shall be submitted to and approved in writing by the Local Planning Authority.

REASON: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems and the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with Hillingdon Local Plan: Part 2 (January 2020) Policy DMEI 12: Development of Land Affected by Contamination.

The Site location is provided as Appendix A.

1.2 Purpose of this Study

The objectives of this study are to obtain information on the historical land uses of the Site to determine if the previous uses of the Site are considered likely to have generated any environmental restrictions to redevelopment. The environmental setting will be assessed to determine the Site environmental sensitivity. It is intended to use this information to assess the potential constraints, if any, to the proposed development and to assess the need for further studies on the Site. The requirement for this study is as per the planning condition detailed in Section 1.1 above.

This report has been completed in accordance with the requirements set out in the National Planning Policy Framework (NPPF) (Ref 1) and the Agency's 'Model Procedures for the Management of Land Contamination CLR11' (Ref.2).

1.3 Proposed Site End Use

The Site will be redeveloped from an area of hardstanding and residential garages to residential end use. Part of the existing Site footprint includes a portion of land currently occupied by residential gardens.

1.4 Information Sources

The main sources of information used for this study has been a Groundsure Enviro+Geo Insight Report (Ref. 3). The report provides environmental and geological information within a maximum 2,000m radius of the Site and information is provided on the following:

- Past Land Use.
- Waste and Landfill.
- Current Industrial Land Use.
- Hydrogeology.
- Hydrology.
- River and Coastal Flooding.
- Surface Water Flooding.
- Groundwater Flooding.
- Environmental Designations.
- Visual and Cultural Designations.
- Agricultural Designations.
- Habitat Designations.
- Geology.
- Natural Ground Subsidence.
- Mining, ground workings and natural cavities.
- Radon.
- Soil Chemistry.
- Railway Infrastructure and Projects.
- Associated current and historical mapping (1866 to the present).

Reference has also been made to the Environment Agency website, Hillingdon Council Planning Portal and 'Google Earth' for additional geographical, historical and environmental information.

A site visit has not been undertaken as part of this assessment and information from the site owner has been relied upon for the current Site status.

1.5 Report Structure

The following sections of this report contain:

- a description and characterisation of the Site;
- the site history and environmental setting;
- an assessment of the potential contaminants present on the Site and environmental liabilities associated with the Site;
- a Conceptual Site Model; and
- conclusions and recommendations.

2 Site Description and Characterisation

2.1 Site Details

The Site is located in Ruislip, within the London Borough of Hillingdon, approximately 25 miles north west of Central London. Approximately 60% of the Site currently comprises 15 No. single-vehicle garages located within a residential area. The remaining 40% of the Site is currently occupied by residential gardens.

The Site covers an area of approximately 0.08 hectares and the National Grid Reference is 509714, 187276.

Land adjacent to all Site boundaries is occupied by residential houses and garden space.

The Site is generally level and is level with surrounding land.

2.2 Geology and Hydrogeology

The geological data provided in the Groundsure Report (Ref 3) identifies the Site as directly overlying ***Bedrock*** of the **Lambeth Group, comprising Clay, Silt and Sand.** There are no ***Superficial deposits*** or ***Artificial Ground deposits*** present at the Site. The Groundsure Report does not identify any BGS boreholes within 250m of the Site to confirm the geology. However, the BGS website identifies a borehole located approximately 400m south east of the Site, considered from the mapping to be located within the same geology. The borehole confirms a 'Brown London Clay' to a depth of 1.5m. An additional borehole also located within the same bedrock identifies the presence of a 'grey mottled clay' with 'minute traces of Chalk' from the ground surface to a depth of 8m, becoming a stiff clay for the full depth of the borehole that was completed at 10m depth. It is considered that the London Clay underlies the Lambeth Group. Neither log identifies shallow groundwater i.e. groundwater was no identified in the top 10m of the geological strata.

The Lambeth Group bedrock is identified as a Secondary A aquifer, capable of supporting water supplies at a local rather than strategic scale, and in some cases forming an important source of base flow to rivers. The aquifer is also classified as being of Medium Vulnerability with a combined classification of 'Productive Bedrock Aquifer'.

Soils are classified as having a leaching class of low infiltration potential indicating that there are soils present that do not easily transmit pollutants.

The Site lies within a Source Protection Zone 3 (SPZ), total catchment. There are no active licensed groundwater abstractions located within 2,000m of the Site.

2.3 Hydrology

There are no surface watercourses within 250m of the Site.

The closest river is the River Pinn that flows in a south west to north east direction approximately 850m north of the Site.

2.4 Flooding

The Groundsure report has identified a *very low flooding risk* at the Site. The details are provided in the following table:

Risk of Flooding from Rivers and Sea (RoFRaS)	None identified.
Historical Flood Events	None identified.
Flood Defences	None identified.
Areas Benefiting from Flood Defences	None identified.
Flood Storage Areas	None identified.
Flood Zone 2	None identified.
Flood Zone 3	None identified.
Surface water flooding	Negligible
Groundwater Flooding	Low

2.5 Environment Agency Website

The resources on the Environment Agency website confirm the information provided in the Groundsure report.

2.6 Natural Ground Subsidence

Natural subsidence risk on the Site is *very low*. The following ratings have been identified for the Site:

Shrink Swell Clays	Moderate
Running Sands	Very Low
Compressible deposits	Negligible
Collapsible deposits	Very Low
Landslides	Very Low
Ground dissolution of soluble rocks	Negligible

3 Site History and Environmental Setting

3.1 Introduction

The Site history was assessed using the Groundsure report (Ref. 3) including historical maps dating from 1864 to 2023. Large scale mapping (1:2,500) has been assessed along with small scale mapping (1:10,000). Google Earth was also used to determine the Site history. The history of adjacent land uses is also discussed and the information is summarised below.

3.2 General Site History

The large scale mapping has been used to assess the Site initially as it shows greater detail of both the Site and surrounding areas. The small scale mapping has been used to review the wider area and to confirm the general Site and surrounding area layout identified in the large scale mapping.

Large Scale Mapping 1865 - 2003

The **1865, 1896 and 1914** maps show the Site as open ground with no development present. Surrounding areas are occupied by open, undeveloped ground on all sides.

The next available map is dated **1935** and shows the Site in its current layout, with all of the current residential properties to the north, south, east and west, having been constructed. There are no garages located in the central part of the Site identified on the map. The remaining mapping dated **1938, 1961, 1962, 1988-1992, 2003** indicate no change to the Site layout or immediate surroundings, all of which have remained in residential housing use. The garage buildings are not identified as structures on any of the mapping although they are understood to have been present during the mapping phase.

Small Scale Mapping 1864 - 2023

The small scale mapping covers slightly different mapping dates to that of the large scale mapping. A review of these maps has provided confirmation of the Site and surrounding land uses provided in the large scale mapping. There was clearly a very rapid construction period in the 1930's as the Site and surrounding areas were occupied by residential houses with gardens from the early 1930s.

Google Earth

Reference was made to the Google Earth internet resource which was interrogated to see aerial photographs of the Site from **1945 (unclear), 1985 (unclear), 1999, 2002**, **2003**, **2005**, **2006, 2010, 2011, 2012, 2013, 2014, 2015, 2017, 2018, 2019, 2020, 2021 and 2022**. The aerial maps again confirm the layout of the Site and surrounding land use as residential with gardens, and also confirm the presence of the garages on the Site, clearly visible since at least 1999.

3.3 Current Site Status

The part of the Site occupied by the hardstanding and garages is currently disused and vacant. The garages, of prefabricated concrete with metal roll-over doors, are generally in a poor state of repair. The garden areas are currently separated from the garage area by

fencing that will be removed to incorporate the garden space into the Site proposed for the new build houses. The houses associated with the gardens are currently occupied.

3.4 Asbestos on Site

The presence of asbestos within the garage structures is not known at this stage. There is also the potential for asbestos to be present on the roofs of the shed structures located within the garden areas, of which there are two.

3.5 Groundsure Enviro Insight Report Data Review

The data provided in the Groundsure report enables a full understanding of the general environmental setting of the Site which, with the physical setting (geology, hydrogeology etc.) enables an environmental site sensitivity to be determined. The data is presented below and a discussion provided in section 3.9 below.

Category	Detail
Historical Industrial Uses within 500m	
Historical Industrial Land Uses within 500m	**None identified on the Site or within 50m of the Site. The industrial uses identified within 500m of the Site relate to railway sidings located over 160m to the south of the Site.**
Historical Tanks within 500m	None identified.
Historical Energy Features within 500m	**None located within 50m of the Site. 12 identified 50 – 500m from the Site and all relate to electricity substations.**
Historical Petrol stations	None identified.
Historical garages	**None identified on Site or within 50m of the Site. 8 No. identified 50 – 500m from the Site. None relate to petrol filling stations.**
Historical military Land	None identified.
Waste and Landfill within 500m	
Active or recent landfill	None identified.
Historical Landfill	None identified.
Historical landfill (LA/mapping records)	None identified.
Historical landfill (EA/NRW records)	None identified.
Historical waste sites	None identified.
Licensed waste sites	None identified.

Waste Exemptions	**9 identified over 250m from the Site. The majority relate to 'storage of waste in a secure place'.**
Current Industrial Land Use within 500m	
Recent industrial land uses	**None located within 50m of the Site. Seven identified including a clothing company, 3 No. electricity substations, computer repairs company, mobile phone repair company and a second hand car showroom.**
Current or recent petrol stations	None identified.
Electricity cables	None identified.
Gas pipelines	None identified.
Sites determined as Contaminated Land	None identified.
Control of Major Accident Hazards (COMAH)	None identified.
Regulated explosive sites	None identified.
Hazardous substance storage/usage	None identified.
Historical licensed industrial activities (IPC)	None identified.
Licensed industrial activities (Part A(1))	None identified.
Licensed pollutant release (Part A(2)/B)	**None within 400m of the Site. One identified 292m west, relating to a dry cleaners.**
Radioactive Substance Authorisations	None identified.
Licensed Discharges to controlled waters	None identified.
Pollutant release to surface waters (Red List)	None identified.
Pollutant release to public sewer	None identified.
List 1 Dangerous Substances	None identified.
List 2 Dangerous Substances	None identified.
Pollution Incidents (EA/NRW)	**None related to the Site. One incident identified that occurred in March 2003 related to lubricating oils 429m south east. Minor impact to water and land and no impact to air.**
Pollution inventory substances	None identified.

Pollution inventory waste transfers	None identified.
Pollution inventory radioactive waste	None identified.
Environmental Designations within 2000m	
Sites of Special Scientific Interest (SSSI)	**1 SSSI identified as Ruislip Woods 1,163m north west.**
Conserved wetland sites (Ramsar sites)	None identified.
Special Areas of Conservation (SAC)	None identified.
Special Protection Areas (SPA)	None identified.
National Nature Reserves (NNR)	**1 NNR identified as Ruislip Woods 1,163m north west.**
Local Nature Reserves (LNR)	**1 LNR identified as Ruislip 873m north east.**
Designated Ancient Woodland	**1 identified, identified as Park Wood located 1,163m north west. Ancient and Semi-natural Woodland.**
Biosphere Reserves	None identified.
Forest Parks	None identified.
Marine Conservation Zones	None identified.
Green Belt	**6 identified.**
Proposed Ramsar sites	None identified.
Possible Special Areas of Conservation (pSAC)	None identified.
Potential Special Protection Areas (pSPA)	None identified.
Nitrate Sensitive Areas	None identified.
Nitrate Vulnerable Zones	None identified.
SSSI Impact Risk Zones	**One identified on Site. Certain developments require consultation. Does not apply to residential property development.**
SSSI Units	**Two identified 1,163 north west, Ruislip Woods.**
Visual and Cultural Designations within 250m	
World Heritage Sites	None identified.

Area of Outstanding Natural Beauty	None identified.
National Parks	None identified.
Listed Buildings	None identified.
Conservation Areas	**Site is located within a Conservation Area.**
Scheduled Ancient Monuments	None identified.
Registered Parks and Gardens	None identified.
Agricultural Designations within 250m	
Agricultural Land Classification	Urban land.
Open Access Land	None identified.
Tree Felling Licences	None identified.
Environmental Stewardship Schemes	None identified.
Countryside Stewardship Schemes	None identified.
Habitat Designations	
Priority Habitat Inventory	None identified.
Habitat Networks	None identified.
Open Mosaic Habitat	None identified.
Limestone Pavement Orders	None identified.
Mining Ground workings and Natural Cavities within 500m	
BritPits	None identified.
Surface ground workings	None identified.
Underground workings	None identified.
Underground mining extents	None identified.
Historical Mineral Planning Areas	None identified.
Underground mining extents	None identified.
Non-coal mining	**Potential for historical Chalk mining on Site.**
JPB mining areas	None identified.
Coal Authority Non-coal mining	None identified.

Researched Mining	None identified.
Mining Record Office Plans	None identified.
BGS Mine Plans	None identified.
Coal Mining	None identified.
Brine areas	None identified.
Gypsum areas	None identified.
Tin mining	None identified.
Clay mining	None identified.
Ground Cavities and Sinkholes	
Natural Cavities	None identified.
Mining Cavities	None identified.
Reported Recent Incidents	None identified.
Historical Incidents	None identified.

3.6 Radon

The Site lies in an area where less than 1% of properties are affected by Radon. No Radon Protection Measures are required for properties in the area.

3.7 Railway Infrastructure and Projects

The Metropolitan and Piccadilly underground lines run east-west 166m south. The lines are at ground surface at this location.

There are no railway tunnels or underground railways within 250m of the Site.

There are no recorded historical or proposed railway infrastructure projects (Crossrail, HS2) at the Site or within 250m of the Site.

3.8 Assessment of Site Environmental Sensitivity

From the data gathered on the Site history, 60% of the Site appears to have been occupied by a residential car parking area with single vehicle garages since the construction of the housing estate in the early 1930s, although the exact date of construction is unconfirmed from historical sources. The Site does not appear to have been used for any commercial use, although it is likely that minor car repairs and vehicle maintenance may have been undertaken by residents in this area. There do not appear to be any underground storage tanks or above ground tanks holding bulk fuels or oils. The historical mapping and imagery (aerial photography) does not indicated any significant ground staining from spills or leaks. The garden areas are grassed and this land use has not changed.

The Site has not been used for any form of light or heavy industry and there are no industrial sites in the vicinity.

Environmental information for the Site and surrounding area indicates that it is in an area of **moderate environmental sensitivity** given the underlying Secondary A aquifer and the presence of an SPZ 3, although there is no shallow groundwater underlying the Site and there are no potable groundwater abstractions within 2,000m of the Site.

Given the long history of use of the Site as a residential parking area (60%) and gardens (40%), it is considered that the potential for contaminants to be present on the Site is **low to moderate**.

4 Conceptual Site Model

4.1 Introduction

In accordance with current published guidelines (Refs 1 and 2) and best practice, a conceptual site model (CSM) has been developed for the Site. This is a key component of the preliminary risk assessment. The CSM identifies potential sources of contamination and assesses potentially unacceptable risks to identified receptors through the concept of a source-pathway-receptor linkage.

4.2 Conceptual Site Model

The sources, pathways and receptors identified at the Site are discussed below:

Sources

60% of the Site has been occupied by a hard surfaced vehicle parking and garage area associated with the surrounding residential properties since the early 1930s, prior to which the Site was occupied by open ground. The Site use has remained unchanged since the early 1930s.

While the Site does not appear to have been used for commercial purposes, there is the potential for minor vehicle maintenance and repair activities to have been undertaken in the area (oil changes etc). The garages are also small for modern cars and it is likely that the garages are used for residential storage purposes. Other than this domestic use, there is no current ongoing contamination source associated with the Site.

Pathways

The geology of the underlying ground is understood to be a Sandy Silty Clay Bedrock, with no superficial deposits. The Bedrock is identified as a Secondary A aquifer with a low vulnerability likely due to the high percentage of Clay deposits in the Bedrock. Clay has a very low permeability and does not readily permit contamination migration. The Site is also located within an SPZ 3, although there are no groundwater abstractions located within 2km of the Site. Groundwater is also understood to be absent at shallow depth. Given the potential variability of Sand, Silt, Clay and Chalk (identified in borehole logs) that is present in the Bedrock, there remains a (low) potential for the presence of a contaminant pathway to exist.

Receptors

The sensitive receptors at the Site are considered to be the Secondary A aquifer underlying the Site, the SPZ, residents of the residential gardens adjacent to the Site, construction workers during the redevelopment phase and the future Site residents.

4.3 Discussion of Conceptual Site Model

The Site was a greenfield site prior to construction of the residential properties and garage area in the 1930s and is located in a predominantly residential area that is considered to be a non-contaminative use.

The parking of vehicles in the Site, along with any repairs and maintenance activities undertaken by residents may have impacted the shallow ground. Although 100% of the garage and parking area has asphalt hardstanding, the integrity of this may have

deteriorated over the years. However, any oils or fuel spills and leaks that may have been released into the ground are considered to have limited migration potential due to the underlying geology and are considered unlikely to have migrated significantly due to the absence of shallow groundwater and the absence of a hydraulic link to the nearest watercourse (located over 850m to the north). It is therefore considered that any spills or leak of oil or fuels would remain within the shallow soil within the Site and attenuation over time would reduce the impact on the shallow soils. The potential for any contamination to have migrated off Site (into adjacent garden areas) is considered to be very low. The healthy status of vegetation (from aerial photos and anecdotal evidence), including trees, shrubs and grass, with no canopy loss or dieback, indicates that detrimental impacts to ecological receptors are not occurring.

In summary, there is potential for minor contamination at the Site due to small vehicle leaks, and repair and maintenance activities by residents. The mobility of hydrocarbon contaminants is reduced due to the presence of hardstanding, absence of shallow groundwater and the low permeability nature of the underlying geology. Further, no ground or groundwater pollution incidents have been recorded on the Site or near the Site from either anecdotal information or official records.

Although there is no longer any ongoing contamination source at the Site and limited potential for migration of any hydrocarbons into the underlying aquifer or closest watercourse (850m to the north), there remains the potential for hydrocarbons to have historically entered the ground and thereby have impacted the ground. Therefore, a plausible source-pathway-receptor scenario is considered likely to be present at the Site.

5 Conclusions and Recommendations

5.1 Conclusions

The results of the study allow the following conclusions to be presented:

- The Site has been occupied by a residential parking area with single car garages since development of the Site in the early 1930s. The surrounding area is predominantly residential and has not been subject to any historical industrial uses.
- The Site is located in an area of moderate environmental sensitivity with respect to groundwater as it is located over a Secondary (A) aquifer and is located within an SPZ 3. The aquifer is not abstracted from within a 2km radius of the Site.
- The historic use of the Site as a garage area used for car parking and minor maintenance and repair indicates that there is low to moderate potential for localised ground contamination to have occurred from Site activities.
- The presence of hardstanding, the low permeability nature of the underlying geology and hydrogeology suggests that potential for migration of any contamination is low.
- There is considered to be a plausible source-pathway-receptor scenario associated with the Site.

The development of the Site for the proposed use is considered to meet the Government's objectives for contaminated land as set out in The Environmental Protection Act 1990: Part 2A, Contaminated Land Statutory Guidance (April 2012) (Ref.4) which states that the overarching objectives of the Government's policy on contaminated land and the Part 2A regime are:

- to identify and remove unacceptable risks to human health and the environment;
- to seek to ensure that contaminated land is made suitable for its current use; and
- to ensure that the burdens faced by individuals, companies and society as a whole are proportionate, manageable and compatible with the principals of sustainable development.

5.2 Recommendations

Based on the conclusions drawn on the available information, the potential for some form of hydrocarbon presence in the underlying soils cannot be ruled out. If the Site was to remain in its current use, no further investigations would have been required. However, given the proposed sensitive end-use of residential premises with garden areas, a site investigation is considered necessary to assess the ground quality.

The building footprints and hardstanding proposed as part of the redevelopment essentially encapsulates any potential contamination that may be present in shallow soils. Therefore, the Site investigation should focus on areas that are to have soft landscaping such as garden areas where there is potential for future human contact with underlying soils.

A site investigation is therefore recommended to include the following:

- Shallow soil testing, to a maximum depth of 0.6m, from the garden areas of the proposed residential housing formerly occupied by the garage area. Plot 2 is the garden area where these samples should be taken from; Plot 2 is identified on Figure 1 below with a feint red outline indicating the existing Site layout.

- Up to four soil samples should be tested for a range of contaminants including, but not limited to: Total Petroleum Hydrocarbons (TPH) with carbon banding, BTEX, Volatile Organic Compounds (VOCs), Metals (CLEA Suite) and MTBE. Asbestos screening should also be included.

- An additional soil test from the existing garden areas, Plot 1 shown on Figure 1, should be taken for comparison.

Given that the Site was constructed on a greenfield site directly on the silty clayey bedrock, there is considered to be no requirement for gas monitoring at the Site. Shallow groundwater is also understood to be absent and therefore groundwater sampling is not anticipated. If perched groundwater is identified, a sample should be taken and tested as per the above suite (excluding asbestos).

Figure 1. Proposed Development Showing Plots 1 and 2 Overlying Existing Site Layout

The Phase II report should provide the findings of the site investigation and a quantitative risk assessment based on the findings. If necessary, a remediation strategy should be provided in the report depending on the findings of the Phase II investigation.

5.3 Planning Issues

The findings from this report should be provided to Hillingdon Borough Council.

5.4 Redevelopment Issues

Redevelopment will include the removal of the garages and the existing asphalt surfacing and considerable earth moving will form part of the Site preparation works. Should the developer propose the removal of existing soils within the proposed garden areas formerly occupied by the garages to a depth of 0.6m, this removal would act as a remedial activity. The excavated garden areas would then require a membrane and clean imported soil. Removal of a depth of 0.6m in impacted garden areas would remove the potential for residents to come into contact with potentially contaminated soils and therefore remove the 'source'.

Given the small area proposed as garden use that was formerly occupied by the garages and hardstanding in Plot 2 (approximately 136m^2 as identified on Figure 1), removal of the soils to a depth of 0.6m is considered to be feasible as part of the Site preparation groundworks, particularly as the surfacing requires removal. Testing of the soils removed would be required prior to disposal to confirm the disposal location.

Should this option be chosen by the developer, a written Method Statement for these remedial works should be submitted to Hillingdon Borough Council for approval. Validation reports would be required for any remediation undertaken on Site.

6 References

1. National Planning Policy Framework, Department for Communities and Local Government, March 2012.

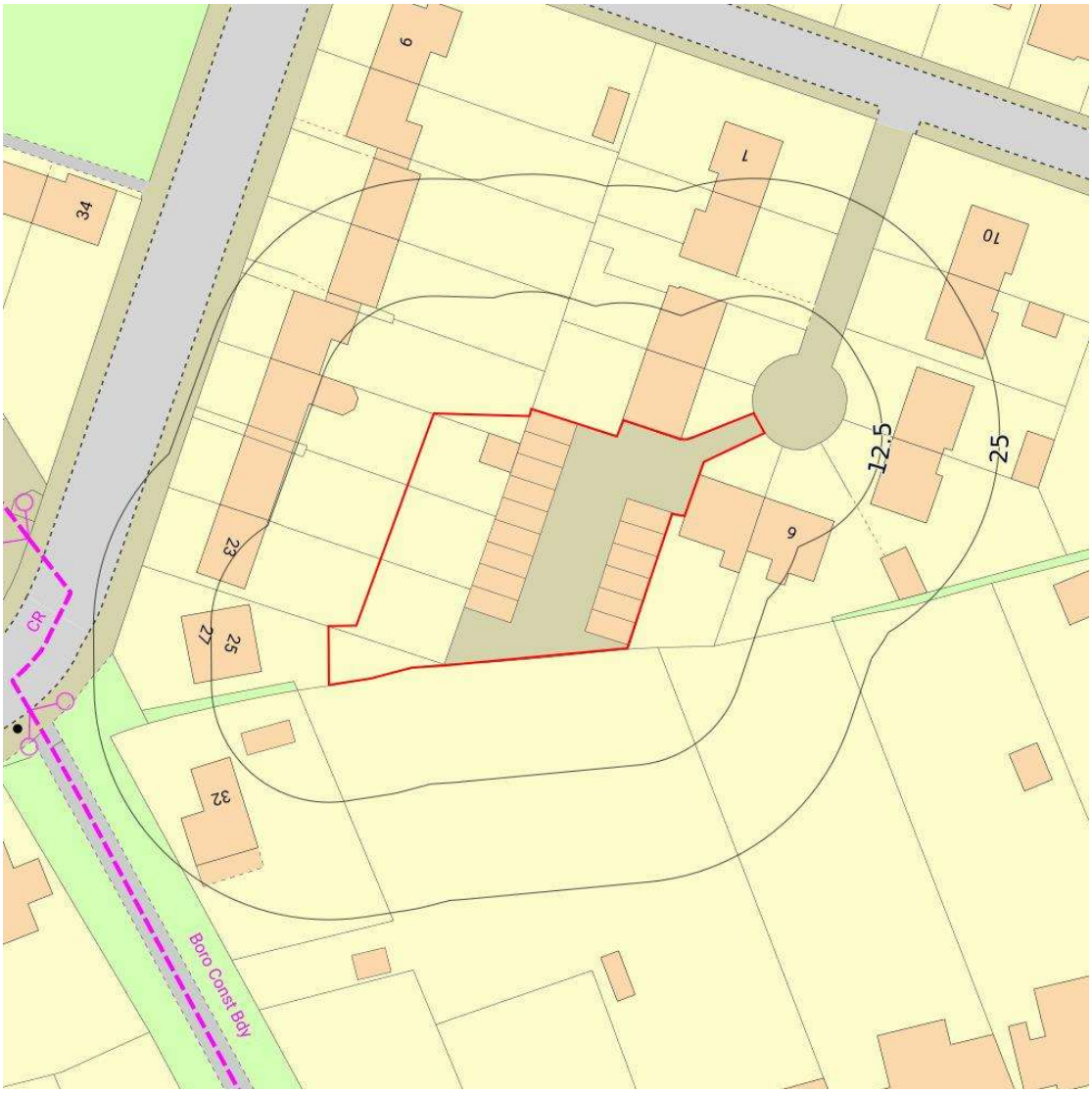
2. Model Procedures for the Management of Contaminated Land, CLR 11, Environment Agency and DEFRA, 2004.

3. Groundsure Enviro+Geo Insight Report, Ref: GS-IVT-JMA-X2H-1T2, 27 October 2023.

4. Environmental Protection Act 1990: Part 2A. Contaminated Land Statutory Guidance. April 2012.

APPENDIX A

SITE LOCATION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