

# RE: Planning Application Consultation for 19/0646/FUL / LBRUT Environmental Health Contaminated Land / Ms Joanne Simpson / Greggs, Gould Road, Twickenham, TW2 6RT

08 April 2019 15:18

<b>Subject</b>	<b>RE: Planning Application Consultation for 19/0646/FUL / LBRUT Environmental Health Contaminated Land / Ms Joanne Simpson / Greggs, Gould Road, Twickenham, TW2 6RT</b>
<b>From</b>	Simon Makoni
<b>To</b>	Simpson, Joanne
<b>Cc</b>	Econsult
<b>Sent</b>	02 April 2019 12:07

Dear Joanne

Thank you for consulting me on the above application. Please find my comments below. I have updated my comments into Uniform. Please let me know if you have any queries at all.

*I can confirm I have reviewed the application. A Phase 1 Environmental Assessment (Ref. 4609-1; February 2019) and a Phase 2 Geoenvironmental Investigation (Ref. 4609-2; February 2019) both by AP Geotechnics were submitted in support of the application.*

*Combined review of OS Historical maps in our search and in the submitted Phase 1 indicates that the site was undeveloped from c. 1865 until c. 1920 when the site was developed with multiple unspecified buildings which were labelled as a Bakery and Distribution Depot for Greggs c. 1960.*

*Potentially contaminative onsite uses identified in our search and in the submitted Phase 1 include the former Bakery and associated Tanks and Distribution Depot. Potentially contaminative offsite uses identified in our search and in the submitted Phase 1 include Railway Line, Sewage Works, Fever Hospital, Gravel Pit, Laundry, Works and Printing Works. The site currently comprises the derelict Bakery with associated Tanks (above ground and underground), machinery and commercial offices. Furthermore, a medium risk associated with UXOs was identified.*

*The submitted Phase 1 report considers that previous activities on or in the immediate vicinity of the site constitute a low to medium risk of significant or widespread contamination. Therefore, an intrusive investigation was recommended.*

*Intrusive investigation was undertaken by AP Geotechnics in August 2017 which comprised 5no. cable percussion boreholes (BH1 – BH5) to a maximum depth of 20 mbgl and 18no. window sampler boreholes (WS1 – WS18) to sample near surface soils. Standpipes were installed in BH1, BH2, BH5, WS13, WS16 and WS17 in order to allow for monitoring of soil gas concentrations and groundwater levels. 14no. soil samples from 14no. borehole locations were sent for chemical analysis.*

*Made Ground was identified to a maximum depth of 1.7 mbgl in WS2. Groundwater was encountered at depths ranging from 2.4 to 4.2 mbgl in WS13 and BH2 respectively during the site investigation. However, during monitoring, groundwater was generally encountered at approximately 3 mbgl. Elevated concentrations of Lead (max. 1350 mg/kg in WS4), speciated TPH (max. 5910 mg/kg in WS17) and Aromatic carbon bands >C12 – C16 and >16 – C21 (max. 1020 and 1360 mg/kg respectively) were identified. Various elevated PAHs were identified in multiple*

*locations. No Asbestos was identified in any of the 15no. soil samples analysed. Various elevated concentrations of contaminants were also identified in the groundwater samples. It should be noted that the original laboratory certificates of the soil and groundwater analyses were not submitted.*

*It appears that 3no. rounds of ground gas monitoring have been undertaken. However, 4no. dates of the monitoring rounds as stated in Appendix C of the submitted report are the 24/08/2017, 05/09/2017, 19/09/2017 and again on the 05/09/2017. It should be noted that the results are the same for both rounds on the 05/09/2017. The submitted report states that conclusions will be made once all 6no. monitoring rounds have been completed.*

*The submitted Phase 2 report concludes that the subsoil currently onsite is unsuitable for the proposed residential end use. Therefore, it is considered that clean imported soils will be required. Furthermore, the report states that further investigation in the vicinity of WS2 is required following the removal of the tanks.*

*Given the history of the site and surrounding area, I recommend that the Standard Contaminated Land Condition DV29F is attached to any planning permission granted. I consider the submitted Phase 1 Desk Study report to be satisfactory and therefore, I can recommend the discharge of part 1a of the condition. Given that further ground gas monitoring and investigation after removal of the tanks is to take place, I do not recommend the discharge of any other parts at this time. Furthermore, I would require the original laboratory certificates of the soils analyses to be submitted.*

Please do not hesitate to contact me should you have any further queries.

Kind regards,

Kelley Swana

Pp Simon Makoni

Email: [Simon.Makoni@richmond.gov.uk](mailto:Simon.Makoni@richmond.gov.uk)

Tel: 07900 464 945

-----Original Message-----

From: [econsult@richmond.gov.uk](mailto:econsult@richmond.gov.uk) [<mailto:econsult@richmond.gov.uk>]

Sent: 19 March 2019 11:49

To: Simon Makoni

Cc: Econsult

Subject: Planning Application Consultation for 19/0646/FUL / LBRUT Environmental Health Contaminated Land / Ms Joanne Simpson / Greggs, Gould Road, Twickenham, TW2 6RT

FAO: LBRUT Environmental Health Contaminated Land

Officer: Ms Joanne Simpson

Site: Greggs, Gould Road, Twickenham, TW2 6RT

Please see the attached consultation document seeking your views on a planning application we have received. I would be grateful if you could submit any observations, quoting reference 19/0646/FUL no later than 2 April 2019. If we do not hear from you by that date we shall assume that you have no comments.

Details of the application can be found online at

[http://www2.richmond.gov.uk/PlanData2/planning\\_caseno.aspx?strCaseNo=19/0646/FUL](http://www2.richmond.gov.uk/PlanData2/planning_caseno.aspx?strCaseNo=19/0646/FUL)