Contaminated Land Inspection Strategy Review 2007
Document Control

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UB8 1UW

November 2007
Executive Summary

The Contaminated Land Inspection Strategy was published in July 2001. That document outlined how the London Borough of Hillingdon would carry out its statutory duties in collating and reviewing information on land, which may have contamination issues, in order to identify contaminated land in the borough, which meets the statutory definition. Members of the Cabinet approved some revisions to the implementation of the strategy in 2005.

The purpose of the strategy review is to bring the original document up to date by highlighting any changes in legislation and guidance, reporting on the progress made in implementing the strategy and identifying the work that remains to be completed. The strategy review is not a replacement document but should be read alongside the 2001 strategy and 2005 amendment. The priorities of the strategy remain the same. These are:

1. To protect human health
2. To protect controlled waters
3. To protect designated ecosystems
4. To prevent damage to property
5. To prevent any further contamination of land
6. To encourage voluntary remediation
7. To encourage reuse of brownfield land

The wording of the aims and objectives of the strategy has been simplified and streamlined in the strategy review. The aims are:

1. To fulfill the Council’s duties under the Part IIA legislation
2. To bring about environmental improvements to create a clean, attractive borough
3. To encourage voluntary remediation and the reuse of brownfield land
4. To limit the impact of contamination from Council owned land
5. To raise awareness and promote understanding of land contamination issues

The work relating to these aims remain complex. The strategy review document endeavours to provide some information on the work that has been carried out and the work that still remains to be carried out in order to meet the aims and objectives.

The strategy review focuses specifically on how the inspection strategy is being implemented by the Environmental Protection Unit (EPU), providing details on how information on sites is collected, and used to prioritise sites, carry out inspection and determine if further investigation is required. The most up to date best practice technical guidance documents available for carrying out the work are being used and are noted in this review. Details of policies relating to the determination and remediation of contaminated land will be provided in the Contaminated Land Remediation Strategy in due course.

This document also highlights the importance of working together with other sections of the Council to achieve the aims of the strategy, primarily by sharing information, and the contributions other sections of the Council make in managing land contamination matters in Hillingdon.

Reflecting the need for wider involvement in the review process, consultation on the draft strategy review document was carried out prior to publication. The list of the Council Departments and external organisations consulted as part of the review are provided in Appendix 5. Comments received in relation to the consultation are provided in Appendix 6.
Table of Contents

Document Control, Acknowledgements, Copyright  
Executive Summary  
Table of Contents  

Chapter 1 – Introduction to Part IIA & Council Policy  
1.0 Introduction  
1.1 Regulatory Context  
1.2 Definition of Contaminated Land  
1.3 Government Objectives for Implementing Part IIA  
1.4 General Local Authority Policies  
1.4.1 Hillingdon’s Community Strategy  
1.4.2 Development Control  
1.4.3 Enforcement & Hardship Policies  
1.5 Interaction of Part IIA with Other Regimes  
1.6 Progress of the Strategy  

Chapter 2 – Introduction to the Borough  
2.0 Introduction to the Borough  
2.1 Current Land Use Characteristics  
2.2 Industrial History and Potential Contamination  
2.3 Nature Conservation Areas  
2.4 Protected Property  
2.5 Protection of Controlled Waters  
2.6 General Geological and Hydrogeological Characteristics  
2.7 Local Authority Ownership of Land  

Chapter 3 – Aims, Objectives & Priorities of the Inspection Strategy  
3.0 Introduction  
3.1 To Fulfil the Council’s Duties under the Part IIA Legislation  
3.2 Bringing about environmental improvements to create a clean, attractive borough  
3.3 To encourage voluntary remediation and the reuse of brownfield land  
3.4 Limiting the impact of contamination from Council owned land  
3.5 To raise awareness and promote understanding of land contamination issues  
3.6 Priority Timescales and Milestones  
3.7 Review of the Inspection Strategy  

Chapter 4 – Prioritisation of Sites and Detailed Inspections  
4.0 Introduction  
4.1 Information Collection  
4.1.1 Information on the Sources of Potential Contamination
4.1.2 Information on Potential Pathways for Contamination
4.1.3 Information on Potential Receptors
4.2 Prioritisation using the GroundView™ SPT Tool
4.3 Carrying out Detailed Inspections – Initial Risk Assessment
4.4 Carrying out Detailed Inspections – Further Risk Assessment
4.5 Powers of Entry on to Land
4.6 Special Considerations with Respect to Site Investigations
4.6.1 Controlled Waters and Potential Special Sites
4.6.2 Nature Conservation Sites
4.6.3 Sites of Archaeological and Historical Significance
4.6.4 Contamination affecting Agricultural Land, Property and Foodstuffs
4.7 Monitoring the Progress of the Detailed Inspection Work
4.8 Funding for Part IIA Investigation
4.9 Re-Inspecting Land

Chapter 5 – Management of Land Contamination Matters
5.0 Introduction
5.1 Responsibilities of the Contaminated Land Officer
5.2 Responsibilities within Planning and Building Control
5.3 Responsibilities of the Council as Land Owner
5.4 Consulting Legal Services
5.5 Corporate Contaminated Land Strategy
5.6 The Contaminated Land Remediation Strategy

Chapter 6 – General Liaison and Communication
6.0 Introduction
6.1 Statutory Consultees
6.2 Non-statutory Consultees
6.3 Communicating with Interested Parties
6.4 Provision of Information to the Environment Agency
6.5 Risk Communication
6.6 Press and Media

Chapter 7 – Information Management
7.0 Introduction
7.1 Information and Complaints
7.2 Storage of Information
7.3 Updating and Maintenance of Information
7.4 Arrangements for Internal Access to Information
7.5 Arrangements for Public Access to Information
7.5.1 The Contaminated Land Public Register
7.5.2 Land Contamination Enquiries
7.6 Confidentiality

References/Bibliography
Appendices

Appendix 1: Acronyms and Glossary of Terms 2
Appendix 2: Interaction of Part IIA with Other Regimes 9
Appendix 3: Contaminated Land BV 216 a and b 12
Appendix 4: Contact Details of Statutory Consultees 14
Appendix 5: List of Draft Strategy Review Consultees 15
Appendix 6: Draft Strategy Review 2007 Consultation Comments 16

List of Figures

Figure 2.1: Area in Hectares of the 33 London Authorities 7
Figure 4.1: GroundView™ SPT Prioritisation Tool 27
Figure 4.2: ArcView™ GIS showing the GroundView™ Prioritisation Spatial Output 27
Figure 4.3: GroundView™ Database for Storing Site Review Information 29
Figure 5.1: Land Contamination Internal and External Consultation 36

List of Boxes

Box 1.1: Key Part IIA Guidance Documents 1
Box 1.2: Modification to Definitions and the Guidance 2
Box 1.3: Determination of Contaminated Land: Source-Pathway-Receptor Methodology 3
Box 1.4: Contaminated Land Policy, Regulation and Assessment Documents 4
Box 1.5: Supplementary Planning Guidance Documents 5
Box 2.1: Sites Protected by English Nature 12
Box 2.2: Definition of each Source Protection Zone 16
Box 2.3: Differing Geology within the London Borough of Hillingdon 18
Box 3.1: Priority Timescales for Inspection 22
Box 3.2: Milestones 23
Box 3.3: Review Questions for the Inspection Strategy 23
Box 4.1: Historical Source Data Collected in the GIS 25
Box 4.2: Potential Pathway Data Collected in the GIS 25
Box 4.3: Potential Receptor Data Collected in the GIS 26
Box 4.4: Definition of Detailed Inspection as set out in the Part IIA Guidance 29
Box 4.5: Internal and External Sources of Information relevant to Part IIA 30
Box 4.6: Criteria for taking Priority Action (based on CLR6 Priority Categories) 31
Box 4.7: Risk Assessment Guidelines for Initial and Detailed Risk Assessment 32
Box 4.8: Good Practice Guidance documents for the Investigation and Assessment of Land Contamination 33
Box 5.1: The Responsibilities of the Contaminated Land Officer under Part IIA 37
Box 5.2: The Responsibilities of the Contaminated Land Officer under Development Control 37
Box 5.3: The Responsibilities of the Contaminated Land Officer for Council Owned Land 38
Box 5.4: Responsibilities within Development Control - Planning Policy 38
List of Table

Table 1.1: Count of Sites Inspected/Remediated in Hillingdon (by January 2007) 6
Table 1.2: Achievement of Significant Milestones Identified in 2001 6
Table 4.1: BV 216 b Targets for site with sufficient detailed information 35

List of Maps

Map 2.1: Location of the London Borough of Hillingdon in relation to other London Boroughs 7
Map 2.3: Aerial Photo of Hillingdon (2002) 10
Map 2.4: Potentially Contaminative Uses Identified by 2005 11
Map 2.5: Nature Conservation Sites in the borough 12
Map 2.6: Location of Protected Property throughout the borough 13
Map 2.7: Distribution of Land used for Agriculture 14
Map 2.8: Distribution of MAFF Designated Land 14
Map 2.9: Source Protection Zones in the London Borough of Hillingdon 15
Map 2.10: Groundwater Vulnerability and Drift Deposits 16
Map 2.11: Surface water features in the borough 17
Map 2.12: The Council’s Land Assets 19
1.0 Introduction

The London Borough of Hillingdon published its Contaminated Land Inspection Strategy in July 2001, as required under Part IIA of the Environmental Protection Act 1990, to identify and remediate contaminated land in the borough. An initial review in 2005, lead to some revisions to the original strategy. This document is the second review of the strategy. Its purpose is to act as an addendum document to bring the original strategy, whose timetable extended to July 2006, up to date by:

- reviewing the progress being made with the implementation of the Strategy;
- reporting any updates and amendments to legislation, guidance and codes of practice;
- reporting on the revisions made to the implementation of the Strategy; and
- identifying the work that remains to be implemented

The details relating to the implementation of the remediation of contaminated land will be covered in a Contaminated Land Remediation Strategy in due course (see section 5.6).

1.1 Regulatory Context

Part IIA of the Environmental Protection Act 1990, inserted by Section 57 of the Environment Act 1995 places a duty on Local Authorities to deal with a substantial legacy of land throughout the United Kingdom that has been historically contaminated. The Act came into force in April 2000. Local Authorities have a duty to:

- prepare a Strategy to identify contaminated land in their area and implement it
- identify contaminated land (and special sites for the Enforcement of the Environment Agency)
- identify responsibility for the remediation of the land
- bring about the remediation of the land voluntarily or through enforcement action
- maintain a Public Register of the remediation of land
- provide the Environment Agency with local land contamination/remediation information

The statutory guidance forms an essential part of the regime and was recently updated in DEFRA Circular 1/2006 along with other guidance and regulations on the regime. The key documents pertinent to Part IIA are listed in Box 1.1. Appendix 1 provides a glossary of terms and abbreviations some of which are relevant to the implementation of Part IIA.

<table>
<thead>
<tr>
<th>Box 1.1: Key Part IIA Guidance Documents</th>
</tr>
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<tbody>
<tr>
<td><strong>Part IIA of the Environmental Protection Act 1990</strong> Inserted by Section 57 of the Environment Act 1995</td>
</tr>
<tr>
<td><strong>DEFRA Circular 01/2006 &quot;Contaminated land&quot;</strong> This Circular replaced DETR Circular 02/2000. It deals with the extended regime for the identification and remediation of contaminated land including radioactivity which came into force on 4 August 2006</td>
</tr>
<tr>
<td><strong>The Contaminated Land (England) Regulations 2006 (SI 2006/1380)</strong> These Regulations consolidate the provisions of the Contaminated Land (England) Regulations 2000 and the Contaminated Land (England) (Amendment) Regulations 2001, with further amendments. They make provision for an additional special site description of land, which is contaminated land as a result of radioactive substances. They also remove provisions relating to appeals against remediation notices to a magistrates’ court. The 2000 and 2001 regulations are revoked from 4 August 2006</td>
</tr>
<tr>
<td><strong>Local Authority Guide to the Application of Part IIA</strong> Provides a non-statutory guide for the implementation of Part IIA, aimed at local authorities</td>
</tr>
</tbody>
</table>
Since the introduction of the Part IIA regime in April 2000, there have been some modifications to the definitions and guidance, which will affect decisions made in England. The areas of change cover pollution of ‘controlled waters’, radioactively contaminated land and appeals against remediation notices and are noted in Box 1.2.


Section 86 of the Water Act 2003:

- Amended the definition of *controlled waters* set out in section 78A(9) of Part IIA of the Environmental Protection Act (EPA) 1990 by 1 October 2004. It is still in keeping with the definition in the Water Resources Act 1991, however for the purposes of Part IIA ONLY, *ground waters* no longer includes waters above the saturation zone
- Will amend the crucial definition of *contaminated land* in section 78A(2)(b) of the 1990 Act (given below) so that Part IIA will only apply where “significant” pollution of controlled waters is being caused, or there is a “significant” possibility of such pollution being caused, in due course. This is to avoid land being formally identified as *contaminated land* on the basis of very small amounts of matter entering controlled waters in due course

The Radioactive Contaminated Land (Modification and Enactments) (England) Regulations 2006:

- Extension of Part IIA of the Environmental Protection Act (EPA) 1990 to include radioactivity has "modified" the definition of *contaminated land* in respect of radioactivity from 4 August 2006. This effectively means that in a case involving radioactivity, the original statutory provision has effect with modifications, while in all other cases it has effect just as before (see definition below)
- Local Authority (LA) duty to inspect its area under Part IIA is extended in respect of radioactivity
- Radioactive substances are covered only insofar as human health is concerned. Other receptors such as ecological systems or controlled waters are not covered with respect to radioactivity
- "Radioactive" *contaminated land*, if identified, will be a *special site* (as before)

Clean Neighbourhoods and Environment Act 2005:

- For any Part IIA remediation notice served on or after 4 August 2006, appeal is to be made to the Secretary of State. Section 78L of the Environmental Protection Act 1990 has been amended accordingly. A remediation notice must tell recipients how to appeal, and so this change will directly affect the wording of any remediation notices served

1.2 Definition of Contaminated Land

Section 78A(2) of the Environmental Protection Act 1990 defines *contaminated land* for the purposes of Part IIA as:

… any land which appears to the Local Authority in whose area it is situated to be in such a condition, by reason of substances in, on or under the land, that –

(a) **Significant harm** is being caused or there is the **significant possibility** of such **harm** being caused, or

(b) Pollution of **controlled waters** is being or is likely to be, caused; …

‘and in determining whether any land appears to be such land, a local authority shall, … act in accordance with guidance issued by the Secretary of State… with respect to the manner in which that determination is made.’
Where harm is attributable to radioactivity, the definition of contaminated land has been modified by regulation 4(a) of the modification regulations [The Radioactive Contaminated Land (Modification and Enactments) (England) Regulations 2006] as:

…any land which appears to the local authority in whose area it is situated to be in such a condition, by reason of substances in, on or under the land, that –

(a) harm is being caused, or

(b) there is a significant possibility of such harm being caused.

This second definition relates to a human receptor only at present. Further modifications are still due in relation to the significance of pollution (non-radioactive) to controlled waters as indicated in Box 1.2.

Box 1.3 briefly explains the methodology for the determination of contaminated land under Part IIA.

<table>
<thead>
<tr>
<th>Box 1.3: Determination of Contaminated Land: Source-Pathway-Receptor Methodology</th>
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<tr>
<td>The concept of a source of contamination and a receptor (target) for this contamination linked by a pathway is used to identify contaminated land. A contaminant (source) is a substance which is in, on or under the land in sufficient quantities and which has the potential to cause harm or pollution to controlled waters. A receptor is a living organism, a group of living organisms, an ecological system, controlled waters or a piece of property, which is a type of receptor listed in the Part IIA guidance, and is being or could be, harmed by a contaminant. A pathway is one or more routes or means by, or through, which a receptor is being exposed to or affected by a contaminant, or could be exposed or affected.</td>
</tr>
</tbody>
</table>

For General Contamination:

<table>
<thead>
<tr>
<th>Contaminant (source):</th>
<th>Pathway:</th>
<th>Receptor:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Methane (landfills)</td>
<td>Gas ingress to Buildings</td>
<td>Buildings</td>
</tr>
<tr>
<td>Petrol (Petrol Stations)</td>
<td>Migration into Groundwater</td>
<td>Humans</td>
</tr>
<tr>
<td>Solvents (Paint Manufacturers)</td>
<td>Uptake by plants</td>
<td>Controlled waters</td>
</tr>
<tr>
<td>Lead (Rifle Range)</td>
<td>Direct contact</td>
<td>Plants/Ecosystems</td>
</tr>
</tbody>
</table>

For Radioactive Contamination:

<table>
<thead>
<tr>
<th>Contaminant (source):</th>
<th>Pathway:</th>
<th>Receptor:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Radium/Tritium (Luminising works)</td>
<td>Direct contact</td>
<td>Humans</td>
</tr>
<tr>
<td>Uranium (Mining)</td>
<td>Inhalation</td>
<td>Inhalation</td>
</tr>
<tr>
<td>Radioactive wastes (Landfill sites)</td>
<td>Proximity exposure</td>
<td>Proximity exposure</td>
</tr>
</tbody>
</table>

For a piece of land to be identified as contaminated land all of the three elements (as indicated above) must be identified in respect of that piece of land, by a site-specific risk assessment demonstrating the presence of a significant pollutant linkage or a significant possibility of such a linkage existing (i.e. significant harm is being caused or there is significant possibility of significant harm). The site-specific risk assessment should also help to determine the level of remediation required to make the site suitable for use. The remediation is designed to break all the possible significant pollutant linkages, to ensure that no harm comes to human beings or the environment.

It is the duty of the Local Authority to make the contaminated land determination based on the investigation information, and the most up to date guidance available will be followed when carrying out this work. Following determination the Local Authority will be the enforcing authority for further action under Part IIA. However, if the contaminated site is then designated as a special site, as set out in regulations 2 and 3, and schedule 1 of The Contaminated Land (England) Regulations 2006, including for radioactive contaminated land, the Environment Agency will become the enforcing authority.
1.3 Government Objectives for Implementing Part IIA

The Government’s objectives for sustainable development, continues to play a major role in shaping UK policy. This includes the clean up and reuse of contaminated land both under Part IIA and Development Control (i.e. the Planning regime), as well as the prevention of contamination occurring in future through the use of the Pollution Prevention and Control regimes. The Government’s objectives with respect to contaminated land are to:

- identify and remove unacceptable risks to human health and the environment;
- seek to bring damaged land back into beneficial use; and
- seek to ensure that the cost burdens faced by individuals, companies and society as a whole are proportionate, manageable and economically sustainable.

The Development Control process has been responsible for the majority of remediation of land affected by contamination in England. Therefore, the Government has also updated the advice provided in Planning Policy Guidance Note 23 - Planning and Pollution Control 1994 and Building Regulations Approved Document C 1994, in line with requirements for assessing land under Part IIA. Box 1.4 below lists the superseding documents and government policy and guidance on the assessment of land affected by contamination.

**Box 1.4: Contaminated Land Policy, Regulation and Assessment Documents**

- **Planning Policy Statement 23 – Planning and Pollution Control, Annex 1 (Pollution, Air and Water Quality) and Annex 2 (Development on Land Affected by Contamination)** need to be taken into account in any development plans as well as individual planning applications.
- **Approved Document C - Site Preparation and Resistance to Contaminants and Moisture 2004 Edition** has been updated in line with Building Regulations 2000.
- **Model Procedures for the Management of Land Contamination (CLR11)** is an Environment Agency published document intended as a framework to assist all those involved in the management of land, such as landowners, developers, industry, professional advisors, planners and regulators.
- **Contaminated Land Exposure Assessment (CLEA)** is a risk assessment framework for assessing human health risks. It is made up of a model and a number of guidance documents, which advise on the best approach to take, including in the absence of published CLEA Soil Guideline Values. The Environment Agency provides advice on suitable risk assessments for controlled water and ecological risk assessment as well. The [Environment Agency website](http://www.environment-agency.gov.uk) has more information.

1.4 General Local Authority Policies

The Contaminated Land Inspection Strategy fits within the wider framework of other key Council policies and strategies to make the borough and its environs clean and more attractive. The Contaminated Land Inspection Strategy aims to protect the environment and the people of Hillingdon from risks associated with contamination. The main council policies and strategies are described below.

1.4.1 Hillingdon’s Community Strategy 2005-2015

This document sets out the short-, medium-, and long-term goals for the development of the London Borough of Hillingdon, based on what the diverse community in Hillingdon want for the borough. They are based on the following themes:

- **A borough of learning and culture**
  Where residents can develop their skills, broaden their knowledge and embrace new leisure pursuits.
- **A safe borough**
  Where crime and the fear of crime is falling, policing is visible and our community is safer.
- **A clean and attractive borough**
Where the environment is protected, transport links improved and our heritage preserved.

- **A borough with improving health, housing and social care**
  Where first class health and social care and decent, affordable housing are available to all.

- **A prosperous borough**
  Where enterprise is encouraged, businesses supported and new jobs created for local people.

- **A borough where opportunities are open to all**
  Where communities are closer and stronger, local people are listened to and excellent services are provided for all.

- **A borough where children and young people are healthy, safe and supported**
  Where our young people are valued, properly educated and given the opportunity to thrive.

### 1.4.2 Development Control

Land contamination has been a material planning consideration since 1974. Hillingdon’s Unitary Development Plan (UDP) 1998 and the up coming Local Development Framework (LDF) both have policies which will be used in the remediation and development of contaminated land along side the Part IIA process. The Environmental Protection Unit (EPU), responsible for carrying out the Part IIA work within the Council have co-written Supplementary Planning Guidance documents to the UDP on land contamination and planning obligations to assist developers. Box 1.5 lists the relevant documents.

**Box 1.5: Supplementary Planning Guidance Documents**

- **Supplementary Planning Guidance Document on Land Contamination** provides guidance on the information required to satisfy a contaminated land condition on a planning application
- **Supplementary Planning Guidance Document – Planning Obligations, Planning Obligations Strategy on Land Contamination, Recycling and Waste Management and Flooding** amongst other things provides advice on when planning agreements will be required in relation to land contamination

The documents listed in Box 1.5 will be updated in line with the LDF requirements in due course. The LDF is also required to take the implications of *climate change* into consideration in relation to future developments. This could potentially affect the choices of remediation options under Part IIA and Planning.

### 1.4.3 Enforcement and Hardship Policies

The general Environmental Protection Unit (EPU) enforcement policy, alongside the guidance in DEFRA Circular 1/2006 will be used to undertake enforcement action under Part IIA. The development of any specific *enforcement* and *hardship* policies will be outlined in the Contaminated Land Remediation Strategy in due course (see section 5.6).

### 1.5 Interaction of Part IIA with Other Regimes

Part IIA can be used to bring about the remediation of historically contaminated sites that meet the definition of *contaminated land* given above, based on its current use. However, there are instances where other legislation may take precedence. The following legislation and regulations can also be used to address contamination issues in the instances where Part IIA may not apply:

- Town & Country Planning Act 1990
- Building Regulations 2000
- Water Resources Act 1991
- Pollution Prevention and Control Act 1999
- Waste Management Licensing (Part II of the Environmental Protection Act 1990)
- Radioactive Substances Act 1993
- Statutory Nuisance (Part III of the Environmental Protection Act 1990)
Environmental Liability (not yet in force in England)

A summary of when these and other legislation may apply is given in Appendix 2.

1.6 Progress of the Strategy

As noted above progress has been made both under Part IIA and Development Control, which plays a prominent role in cleaning up contaminated land in the borough. Table 1.1 below summarises a count of the identification, inspection and remediation work carried out up to January 2007 under Part IIA and Development Control.

Table 1.1: Count of Sites Inspected/Remediated in Hillingdon (by January 2007)

<table>
<thead>
<tr>
<th>Description</th>
<th>No. of Sites</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sites identified under Part IIA as potentially contaminated by 2005</td>
<td>5421</td>
</tr>
<tr>
<td>Sites Prioritised under Part IIA in 2005</td>
<td>680</td>
</tr>
<tr>
<td>Sites Inspected under Part IIA</td>
<td>70</td>
</tr>
<tr>
<td>Site Reviews Completed under Part IIA</td>
<td>41</td>
</tr>
<tr>
<td>Sites Investigated under Part IIA</td>
<td>1</td>
</tr>
<tr>
<td>Sites Remediated under Part IIA</td>
<td>0</td>
</tr>
<tr>
<td>Sites Investigated under Development Control</td>
<td>31</td>
</tr>
<tr>
<td>Sites Remediated under Development Control</td>
<td>19</td>
</tr>
</tbody>
</table>

The original strategy document noted a number of milestones in the implementation of the inspection strategy. Table 1.2 provides an update on these milestones.

Table 1.2: Achievement of Significant Milestones identified in 2001

<table>
<thead>
<tr>
<th>Milestone</th>
<th>Date Achieved</th>
<th>Status</th>
</tr>
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<tbody>
<tr>
<td>The publication of the strategy</td>
<td>July 2001</td>
<td>Met</td>
</tr>
<tr>
<td>The establishment of efficient liaison and information exchange procedures internally and externally with other organisations</td>
<td>Mid 2002; Jan 2004; Feb 2007</td>
<td>Met &amp; Ongoing</td>
</tr>
<tr>
<td>The implementation of an efficient data storage system for contaminated land information</td>
<td>June 2003; Jan 2004</td>
<td>Met &amp; Ongoing</td>
</tr>
<tr>
<td>The first internal yearly review of the progress of the strategy</td>
<td>July 2002</td>
<td>Met</td>
</tr>
<tr>
<td>The first yearly reports to the Environment Agency regarding contaminated land in Hillingdon for their national report</td>
<td>Mid 2002</td>
<td>Met</td>
</tr>
<tr>
<td>Completion of the initial inspection work as detailed in the timetable i.e. the Council’s land, and each of the four areas of the borough</td>
<td>This approach was amended Aug 2005</td>
<td>Pending</td>
</tr>
<tr>
<td>Review and the prioritisation of sites in the borough for detailed inspection work</td>
<td>Nov 2004, Dec 2005</td>
<td>Met &amp; Ongoing</td>
</tr>
<tr>
<td>Reaching the 5 Year target (this is dependent on resources and the amount of urgent contaminated land work necessary under part IIA)</td>
<td>Dec 2005</td>
<td>Met &amp; Ongoing</td>
</tr>
<tr>
<td>The establishment of suitable risk assessment models to be used by the Council and/or its consultants in the detailed inspection work</td>
<td>March 2002; Jan 2004</td>
<td>Met &amp; Ongoing</td>
</tr>
<tr>
<td>The setting of targets for the completion of the detailed inspection of suspected contaminated land</td>
<td>Jan 2007</td>
<td>Met &amp; Ongoing</td>
</tr>
<tr>
<td>Completion of detailed assessments and the setting of a timetable to achieve the remediation of the contaminated land found</td>
<td>Pending</td>
<td>Pending</td>
</tr>
<tr>
<td>Full development of the Council’s enforcement and hardship policies</td>
<td>Pending</td>
<td>Pending</td>
</tr>
</tbody>
</table>
Chapter 2: Characteristics of the London Borough of Hillingdon

2.0 Introduction to the Borough

The London Borough of Hillingdon was formed in 1965 when the borough of Uxbridge and the Urban Districts of Hayes and Harlington, Yiewsley and West Drayton and Ruislip-Northwood were amalgamated. It is the second largest borough in London in terms of its area covering 11,571 hectares (see Figure 2.1). It is some 11 miles from north to south and 4 miles east to west, located on the western edge of London (See Map 2.1).

Hillingdon is made up of 22 wards, with a population exceeding 243,000 individuals based on the 2001 census. The borough is set to grow over the next ten years, with estimates suggesting that the population will have swelled to around 260,000 by 2015. This has
potential implications for changes in land use in the borough, including an increase in the use of land that may be affected by contamination.

2.1 Current Land use Characteristics

The London Borough of Hillingdon arguably has the greatest diversity of land use, compared to other London boroughs. The large variety of environs both modern and ancient include busy town centres, industrial and business areas, residential areas, land set aside for agriculture, nature conservation and recreation. The most prominent feature south of the M4 is the largest single industrial/commercial unit in the borough - Heathrow Airport covering approximately 1200 hectares of land.

The population density within Hillingdon varies greatly in part reflecting the diverse land use. Map 2.2 taken from ‘Hillingdon Profile – A snapshot of the borough and its people 2004-2005’ illustrates the population densities within the borough by super output areas. The population density of Hillingdon is over 21 people per hectare (pph). However, this population density varies from 4.3pph in Heathrow Villages and 4.7pph in Harefield to 55.3pph in Barnhill and 55.8pph in Cavendish.
About 44% of the borough, some 4860 hectares makes up the largest Green Belt in London. The areas within the Green Belt are undeveloped open land, farmland, land developed for leisure activities (e.g. Northwood Golf Course, Colne Valley Park, Minet Country Park) or nature conservation areas (e.g. Frays Island Nature Reserve, Ruislip Woods). In addition there are a further 36 hectares of Metropolitan Open Land, containing features or landscape of historic, recreational, nature conservation or scientific value. Some of these areas have also had former contaminative uses such as mineral extraction and landfilling or may have been affected by pollution incidents.

Industry in the borough is mainly limited to some 420 hectares making up ‘employment generating land’, known as Industrial and Business Areas (IBAs), a majority of which is located in the Hayes/West Drayton corridor, and in smaller pockets along the Grand Union Canal and the railway. Industries falling outside of these areas are mainly gravel works and landfill sites.

2.2 Industrial History and Potential Contamination

Hillingdon’s history has been largely agrarian and remained so well into the early 20th century, including amongst other things a large number of orchards, nurseries and market gardens. Small areas of industry occurred by the river and in town centres such as Uxbridge (early industry often related to agriculture), and along major transport routes such as the canals and railways, after they first appeared in the late 18th and late 19th/early 20th century, respectively. Some of the larger industries to move into the area included the manufacturing of chemicals and paints (Astor Stag, Trinite), records and recording equipment (Gramophone & Typewriter Co./HMV/EMI), metal products manufacturing (Steel Barrel Works, Power Plant Gears) and asbestos products manufacturing (Cape Boards, Bell’s United Asbestos Company). A few still remain today.

The 1st and 2nd World Wars also contributed to the development of an existing interest in aviation in the borough, which included the testing of aircraft at what became Northolt Aerodrome (now RAF Northolt), which officially opened in 1915 and the Great West Aerodrome, which opened in 1930 and became the site of Heathrow RAF Station during World War II. Both these sites still dominate the borough today as can be seen from the aerial photo Map 2.3. There were further RAF bases at Eastcote, Uxbridge, West Ruislip, South Ruislip and West Drayton. Some of these bases still remain in use today with significant areas of land in the borough having been or remaining the property of the Ministry of Defence. Military vehicles, radar equipment, and munitions were also manufactured and tested in the borough as part of the War effort. The most notable of which were the manufacture of aeroplanes by Fairey Aviation Company in Hayes, the development of radar equipment by EMI in Hayes, the manufacture of the Oerlikon anti-aircraft Guns at ‘the Sheds’ in Ruislip, and munitions manufacturing in Hayes and Yeading.

In terms of land coverage, the predominant industry in Hillingdon appears to have been mineral extraction and brick making, which largely coincided with the development of residential areas in and around London in the 20th century. In Hillingdon housing for the increasing numbers of industrial workers and their families had to be built and these are located mainly to the south of the borough. The expansion of ‘Metroland’ — advertised as a rural retreat for those working in the city, made possible by good rail links, resulted in housing developments located mainly in the north of the borough. Mineral extraction has also left behind a significant legacy of excavated land most of which was later filled with domestic and other types of waste from Hillingdon and other neighbouring authorities. There are 82 recorded landfill sites in Hillingdon of which 2 are still operational, accepting inert wastes.
Map 2.3: Aerial Photo of Hillingdon (2002)
Since the implementation of the strategy began a considerable and diverse number of potentially contaminative uses have been identified in the borough using historical Ordnance Survey maps and files within the EPU as well as from other sources. The review of information from trade directories is ongoing, however most areas potentially affected by industrial sources have now been identified. Map 2.4 below shows all potentially contaminative activities identified in the borough to date. These include manufacturing industries, depots, railway land, petrol stations, and landfill sites amongst others.

![Map 2.4: Potentially Contaminative Uses identified by 2005](image)

Most of the areas identified have continued to be used for industrial purposes or are in agricultural use. However, there are a significant number that have been redeveloped for housing. These sites are of high priority and are currently under review (refer to Box 3.1 for more information on priorities).

2.3 Nature Conservation Areas

Ruislip Woods declared as a Site of Special Scientific Interest (SSSI) in 1950, were the first sites within London to be designated as a National Nature Reserve (NNR) in May 1997, and represents 10 per cent of London’s semi-natural ancient woodland. Park Wood, which makes up more than a third of Ruislip Woods in area, is the largest unbroken wood in
London. There are five other SSSI designations in Hillingdon, and together they cover an area of 500 hectares (see Box 2.1 below).

### Box 2.1: Sites Protected by English Nature

<table>
<thead>
<tr>
<th>Site Name</th>
<th>Designation</th>
<th>Area (hectares)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ruislip Woods</td>
<td>SSSI (biological)</td>
<td>305</td>
</tr>
<tr>
<td>Old Park Wood, Harefield</td>
<td>SSSI (biological)</td>
<td>17</td>
</tr>
<tr>
<td>Mid Colne Valley, Harefield</td>
<td>SSSI (biological)</td>
<td>145</td>
</tr>
<tr>
<td>Fray’s Farm Meadow, Ickenham</td>
<td>SSSI (biological)</td>
<td>25</td>
</tr>
<tr>
<td>Denham Lock Wood, Ickenham</td>
<td>SSSI (biological)</td>
<td>6</td>
</tr>
<tr>
<td>Harefield Pit</td>
<td>SSSI (geological)</td>
<td>2</td>
</tr>
<tr>
<td>Ruislip Woods</td>
<td>NNR</td>
<td>296</td>
</tr>
</tbody>
</table>

Hillingdon Council has designated four sites within the borough as Local Nature Reserves, under the National Parks and Access to the Countryside Act 1972. There are a number of other sites identified within Hillingdon for their local nature conservation value. It is the aim of the Council to protect these sites from potential contamination. Map 2.5 below shows all the nature conservation sites identified in the borough in 2005.
2.4 Protected Property

There are over 500 Listed Buildings, listed by the Department of National Heritage, including Locally Listed buildings, spread throughout the borough. Five of these are scheduled Ancient Monuments, designated by English Heritage in the early 1950s. These are the Brackenbury Farm Moated site, Moated site on the west bank of the River Pinn and Manor Farm Moat in Ickenham, the Manor farm barn in Harmondsworth, and Ruislip Motte and Bailey in Ruislip. Map 2.6 shows the identified protected properties including locally listed sites in Hillingdon.

Agricultural land, allotments and nurseries together make up a good portion of the borough. Map 2.7 shows the distribution of these sites in the borough. The Council aims to protect the best and most versatile agricultural land (MAFF designated Grades 1, 2 and 3A). Map 2.8 shows the distribution on MAFF designated land in the borough.
Map 2.7: Distribution of Land used for Agriculture

Map 2.8: Distribution of MAFF Designated Land
2.5 Protection of Controlled Waters

The north-west of the borough and a small area centrally located within the borough, are located over Source Protection Zones (SPZ) designated by the Environment Agency. They cover 7 abstraction points falling within the borough, and 2 just outside the western boundary as shown on Map 2.9 below.

The shape and size of the SPZs are based on a number of factors, which are used to develop a model of the groundwater environment on which the zones are defined. Therefore the size and shape of the zones can change. The Environment Agency provided updates of this information since the strategy was first published. The definition of each type of SPZ has been reproduced in Box 2.2 below. Potentially contaminated sites in the vicinity of source protection zones are given higher priority.

Map 2.9: Source Protection Zones in the London Borough of Hillingdon
Box 2.2: Definition of each Source Protection Zone (Source: Environment Agency Website)

<table>
<thead>
<tr>
<th>Zone</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Zone 1 (Inner Protection Zone)</td>
<td>Any pollution that can travel to the borehole within 50 days from any point within the zone is classified as being inside zone 1. This applies at and below the water table. This zone also has a minimum 50 metre protection radius around the borehole. These criteria are designed to protect against the transmission of toxic chemicals and water-borne disease.</td>
</tr>
<tr>
<td>Zone 2 (Outer Protection Zone)</td>
<td>The outer zone covers pollution that takes up to 400 days to travel to the borehole, or 25% of the total catchment area – whichever area is the biggest. This travel time is the minimum amount of time that we think pollutants need to be diluted, reduced in strength or delayed by the time they reach the borehole.</td>
</tr>
<tr>
<td>Zone 3 (Total Catchment)</td>
<td>The total catchment is the total area needed to support removal of water from the borehole, and to support any discharge from the borehole.</td>
</tr>
</tbody>
</table>

Further licensed abstraction points within the borough are prioritised using 250 metre buffers and groundwater vulnerability information as shown in Map 2.10 below.
The London Borough of Hillingdon has 20 per cent of all the standing water in Greater London, and an important network of rivers and canals. Therefore surface water quality is also an important issue for Hillingdon. Contamination of these waters has implications on water abstraction, the conservation of existing ecosystems, and their amenity value. These waters and particularly the seven main rivers that flow through the borough: the Colne, Fray’s, Pinn, Wraysbury, Duke of Northumberland, Crane and Yeading brook, and their tributaries and associated ditches also need to be considered for their potential to accumulate and/or transport contaminants to other areas. Map 2.11 shows surface water features in the borough and licensed surface water abstraction points.

2.6 General Geological and Hydrogeological Characteristics

Most of the north London area consists of clayey surface soils. The solid geology of the area forms part of the north-western limb of the London Basin syncline consisting predominantly of a chalk outcrop, which dips gently in a south-easterly direction towards the Thames, with some cover of tertiary strata as well as superficial glacial deposits (See Box 2.3). Groundwater flow follows the dip in the chalk aquifer in a southeasterly direction, and continues to flow in the chalk as it extends under the London clay. The Upper Chalk is a major aquifer in the area, with groundwater flow occurring mainly through fissures in the chalk, making it particularly vulnerable to groundwater pollution in areas where there are no glacial or drift deposits or where these have been removed.
As the rivers flow towards the Thames, the deposits thicken and terrace gravels become increasingly evident. The different geological stratum and deposits are roughly outlined in Box 2.3. Some of these deposits are in hydraulic continuity (i.e. directly linked) with the chalk, which underlies them, making it vulnerable to groundwater pollution. The London Clay, Brick earth and other deposits however, helps to protect the aquifer from surface pollution, resulting from human activities.

**Box 2.3: Differing Geology within the London Borough of Hillingdon**

<table>
<thead>
<tr>
<th>Geology</th>
<th>Areas</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reading Beds</td>
<td>Northwood, Ruislip, Ruislip Manor, Ruislip Common, Eastcote Village, Ickemham, New Years Green, edge of Harefield</td>
</tr>
<tr>
<td>London Clay</td>
<td>Northwood, Ruislip, Ruislip Common, Ruislip Gardens, Northolt, North Hillingdon, Yeading, Pield Heath, Uxbridge</td>
</tr>
<tr>
<td>Brickearth</td>
<td>Cowley, Cowley Peachy, Harmondsworth, Harlington, Hayes, Uxbridge, Harefield, a strip through: Ickenham, Hillingdon, Ruislip, Eastcote</td>
</tr>
<tr>
<td>Alluvium</td>
<td>Along the River Colne on the western edge of the Borough</td>
</tr>
<tr>
<td>Taplow Gravel</td>
<td>Heathrow Airport, Perry Oaks, West Drayton, Hayes</td>
</tr>
<tr>
<td>Boyne Hill Gravel</td>
<td>Hillingdon Heath, Colham Green, Hayes End, Wood End Green, Hayes End</td>
</tr>
<tr>
<td>Glacial Gravel over London Clay</td>
<td>Hillingdon</td>
</tr>
<tr>
<td>Glacial Gravel over Reading Beds</td>
<td>Hill End, Harefield</td>
</tr>
<tr>
<td>Glacial Gravel</td>
<td>Haste Hill, Northwood, Uxbridge, Hillingdon</td>
</tr>
<tr>
<td>Upper Chalk</td>
<td>From South Harefield, along and up to the north western edge of the Borough</td>
</tr>
<tr>
<td>Terrace Gravel</td>
<td>Uxbridge</td>
</tr>
<tr>
<td>Pebble Gravel over London Clay</td>
<td>Very small area in Northwood</td>
</tr>
</tbody>
</table>

**2.7 Local Authority Ownership of Land**

The Council has extensive land holdings, generally freehold land owned by the Council, accounting for nearly a third of the borough area. The management of the land is split between a number of Council departments and directorates. The Council’s Corporate Property section manages the Council’s property assets covering about 2500 hectares (see Map 2.12 below).

Potential contamination of Council owned land appears to have arisen as a result of the operation of landfill sites within the borough, the Council inheriting or purchasing land which has had a potentially contaminative former use such as sewage works, engineering works or railway land, or potential contamination resulting from Council land being developed and used for industrial purposes.
The Council's land holdings could also be potential receptors for contamination. These land holdings include housing developments, allotments, numerous nature reserves, farms, school playing fields and public parks throughout the borough. Of the 680 potentially contaminated sites identified in the 2005 prioritisation list, about 180 sites affect Council owned land.
Chapter 3: Aims, Objectives & Priorities of the Inspection Strategy

3.0 Introduction

The main aims, objectives and priorities set out in the 2001 strategy still stand, with the exception of those relating to the area-by-area inspections, and the review of Council-owned land and controlled waters as a priority. The revisions made to the strategy approach are outlined in an addendum document ‘Amendments made to the Contaminated Land Inspection Strategy 2001’ (August 2005) and are provided in greater detail throughout this document.

The course of implementing the contaminated land inspection strategy has helped to better integrate the aims, objectives and priorities of the strategy put forward originally, and to develop a better understanding of the likely timescales involved. The simplified aims, objectives and priorities are given below. The background to the stated aims, objectives and priorities are provided in chapters 1 and 2. The details of Hillingdon’s approach to progressing the inspection strategy are provided in chapters 4 to 7. Aspects covering the remediation of contaminated land will be covered in more detail in the Contaminated Land Remediation Strategy in due course (see Section 5.6).

3.1 Aim 1: To fulfil the Council’s duties under the Part IIA legislation

Objective: to implement the contaminated land inspection strategy in Hillingdon with due regard for the requirements under the Part IIA legislation and following the most up to date good practice guidance, bearing in mind the following priorities.

Priorities (based on B.9. of the statutory guidance DEFRA Circular 1/2006 Contaminated Land):

- To be rational, ordered and efficient;
- To be proportionate to the seriousness of any actual or potential risk;
- To seek to ensure that the most pressing and serious problems are located first;
- To ensure that resources are concentrated on investigating in areas where the Authority is most likely to identify contaminated land; and
- To ensure that the Local Authority efficiently identifies requirements for the detailed inspection of particular areas of land

3.2 Aim 2: Bringing about environmental improvements to create a clean, attractive borough

Objective: to identify land in the borough where contamination is most likely to present unacceptable environmental risks and bring about its remediation, bearing in mind the following priorities.

Priorities:

1. To protect human health
2. To protect controlled waters
3. To protect designated ecosystems
4. To prevent damage to property
5. To prevent any further contamination of land
3.3 **Aim 3: To encourage voluntary remediation and the reuse of brownfield land**

**Objective:** to ensure that for the redevelopment of contaminated sites in Hillingdon, the development control process deals effectively with land contamination and Part IIA powers are used if necessary to assist with the actions on contamination through the development control process.

**Priorities:**
- To integrate the requirements of Part IIA with planning policy guidance
- To provide information to enable developers to act in accordance with government planning policy guidance
- To advise on the development of internal planning policies and guidance documents
- To ensure existing wildlife and green space interests on land affected by contamination are considered where viable

3.4 **Aim 4: Limiting the impact of contamination from Council owned land**

**Objective:** to inspect the Council’s existing, previous and proposed land holdings thereby addressing any contamination and liability issues with current, intended or previous land ownership.

**Priorities:**
- To carry out objective assessments of the Council’s landholdings alongside all other sites based on priority
- To provide advice to Corporate Property and managing/occupying Departments on the investigation and remediation of Council land
- To provide advice to Corporate Property and managing/occupying Departments on limiting the Council’s liabilities due to contamination issues

3.5 **Aim 5: To raise awareness and promote understanding of land contamination issues**

**Objective:** to ensure that Councillors and Departments of the Council, landowners and residents are made aware of land contamination issues, the statutory requirements of Part IIA and its potential in Hillingdon for achieving improvement in the quality of land in the borough.

**Priorities:**
- To consult widely amongst stakeholders on the reviews of the Contaminated Land Inspection Strategy
- To adopt a transparent approach to the implementation of the strategy
- To develop effective procedures for communication, liaison and information exchange within the Council and with external agencies, land owners and residents
3.6 Priority Timescales and Milestones

The timescales and milestones are identified in Boxes 3.1 and 3.2, respectively. The timescales are estimated based on the 2005 draft prioritisation list, where the human health receptor is being reviewed as a priority whilst giving due consideration to other receptor groups. Further information about the prioritisation work is included in chapter 4. It should be noted that the prioritisation work may have to be carried out again in the event of a substantial number of new potentially contaminated sites being identified, or where there are changes to the existing information or criteria used to carry out this work. Where a few new sites are identified, these will be integrated into the existing list using the appropriate prioritisation criteria. This also applies to sites that are identified as a result of a complaint, unless it is identified as an urgent site, in which case it will be dealt with as a priority. This may potentially affect the timescales and milestones identified below.

**Box 3.1: Priority Timescales for Inspection (based on Human Health Risk)**

<table>
<thead>
<tr>
<th>SPT Category</th>
<th>Description</th>
<th>Inspection Completion Target</th>
</tr>
</thead>
<tbody>
<tr>
<td>SPT 1A</td>
<td>Allotments, Residential with Gardens on site (source score 33-25)</td>
<td>Completed</td>
</tr>
<tr>
<td>SPT 1B</td>
<td>Allotments, Residential with Gardens on site (source score 24-10) AND/OR Landfill within 50 m of buildings</td>
<td>June 2008</td>
</tr>
<tr>
<td>SPT 1C</td>
<td>Allotments, Residential with Gardens on site (source score 9-5) AND/OR Landfill within 250 m of buildings</td>
<td>Jan 2009</td>
</tr>
<tr>
<td>SPT 1D</td>
<td>Schools/Nurseries (Playing fields), Residential without Gardens on site (source score 33-25) AND/OR Current day Petrol Stations within 50 m of buildings</td>
<td>Jan 2010</td>
</tr>
<tr>
<td>SPT 2A</td>
<td>Allotments, Residential with Gardens on site (source score 4-1)</td>
<td>June 2010</td>
</tr>
<tr>
<td>SPT 2B</td>
<td>Schools/Nurseries (Playing fields), Residential without Gardens on site (source score 24-10)</td>
<td>Jan 2011</td>
</tr>
<tr>
<td>SPT 2C</td>
<td>Schools/Nurseries (Playing fields), Residential without Gardens on site (source score 9-5)</td>
<td>June 2011</td>
</tr>
<tr>
<td>SPT 2D</td>
<td>Amenity (Parks, recreation), nursery (plant), Industrial/Commercial on site (source score 33-25)</td>
<td>June 2012</td>
</tr>
<tr>
<td>SPT 3A</td>
<td>Schools/Nurseries (Playing fields), Residential without Gardens (source score 4-1)</td>
<td>June 2012</td>
</tr>
<tr>
<td>SPT 3B</td>
<td>Amenity (Parks, recreation), nursery (plant), Industrial/Commercial on site (source score 24-10)</td>
<td>June 2013</td>
</tr>
<tr>
<td>SPT 3C</td>
<td>Amenity (Parks, recreation), nursery (plant), Industrial/Commercial on site (source score 9-5)</td>
<td>Jan 2014</td>
</tr>
<tr>
<td>SPT 3D</td>
<td>Agriculture, open space, vacant land on site (source score 33-25)</td>
<td>Apr 2014</td>
</tr>
<tr>
<td>SPT 4A</td>
<td>Amenity (Parks, recreation), nursery (plant), Industrial/Commercial on site (source score 4-1) AND/OR Current day Petrol Stations</td>
<td>Oct 2014</td>
</tr>
<tr>
<td>SPT 4B</td>
<td>Agriculture, open space, vacant land on site (source score 24-10)</td>
<td>Jan 2015</td>
</tr>
<tr>
<td>SPT 4C</td>
<td>Agriculture, open space, vacant land on site (source score 9-5)</td>
<td>June 2015</td>
</tr>
<tr>
<td>SPT 4D</td>
<td>Agriculture, open space, vacant land on site (source score 4-1) OR Current day Industrial Estate</td>
<td>June 2015</td>
</tr>
</tbody>
</table>

*SPT (Source-Pathway-Target) Category* – these are provided in the table in descending order of priority (i.e. 1A is the highest priority). The category is based on the current use of the site and the total source score (which is truncated – see chapter 4) as indicated under ‘description’.
Box 3.2: Milestones

- The publication of the strategy review;
- The ongoing establishment of efficient liaison and information exchange procedures internally and with external agencies;
- The ongoing establishment of suitable risk assessment models to be used by the Council and/or its consultants in the detailed inspection work;
- Reaching the inspection target for each SPT category identified in the priority timescales (this is dependent on resources and the amount of other contaminated land work necessary under part IIA, Planning etc.);
- The setting of targets for the completion of the detailed intrusive inspection of suspected contaminated land;
- Completion of detailed assessments and the setting of a timetable to achieve the remediation of the contaminated land found;
- The full development of the Council’s enforcement and hardship policies for contaminated land (to be included in the Contaminated Land Remediation Strategy (see section 5.6));
- The development of the Part IIA Communication Strategy (including risk) if required;
- The development of the Corporate Contaminated Land Strategy if required; and
- Working to meet the Council’s internal BVPI targets for inspecting potentially contaminated sites (refer to Section 4.7).

3.7 Review of the Inspection Strategy

The progress made in implementing the strategy will be reviewed from time to time, primarily on the basis set out throughout this document but specifically on the basis of the priority timescales and milestones. It is anticipated that unplanned work will also be included in any review. Questions that are likely to be asked as part of future reviews are included in Box 3.3 below.

Box 3.3: Review Questions for the Inspection Strategy

- Is the inspection work on target?
- Has there been sufficient work to inspect Council land and threat to controlled waters?
- Have any urgent sites been identified and have they been adequately dealt with?
- Has available information or approach to prioritisation changed significantly enough to reprioritise and produce a new prioritisation list?
- How does any new technical advice, guidance or new legislation or requirements affect the Council’s approach?
- Are BVPI targets being met? (refer to section 4.7)
- Have any sites been timetabled for intrusive investigation/remediation?

Adjustments to the approach in carrying out the strategy work are anticipated in light of new information being discovered through the course of its implementation. Internal reviews will be carried out to monitor progress and any changes to the approach, as necessary. Council members will be kept informed of any progress made in remediating contaminated land in the borough, both under Part IIA and planning, in an annual bulletin.

A formal strategy review will be carried out in 2015, unless one is required sooner, where for example, significant changes to the strategy is required or significant progress is made in implementing the strategy.
4.0 Introduction

More than 5000 potentially contaminative uses have been identified in the borough to date, far more than anticipated in 2001. These have been reduced to approximately 680 ‘sites’ identified in the 2005 version of the prioritised inspection list. The following explains the work carried out in order to create and prioritise the inspection list, so the most pressing sites in the borough are reviewed and inspected first, and detailed review carried out to assist in determining if there are significant pollutant linkages that require remediation. This work is carried out in stages in the following order:

1. Information collection identifying potentially contaminated sites, possible pathways and the receptors that may be affected by them
2. Creation of an inspection list of the potentially contaminated sites put into priority order (i.e. the prioritisation list)
3. Detailed inspection of the sites I – Site reconnaissance visits and desk top study of available information (CLR 11 Preliminary/Generic Risk Assessment)
4. Detailed inspection of the sites II – limited sampling and/or intrusive investigation (CLR 11 Generic and Detailed Quantitative Risk Assessment)

It should be noted that Part II A work is iterative by nature as available information on sites may change. The first three stages of the work will be carried out for all sites identified in the prioritisation list, and will be repeated as necessary should new information come to light. However, any detailed inspection involving intrusive investigation will be carried out only for those sites, where contamination is most likely to present a risk and further information is needed to determine significant pollutant linkage(s) and associated unacceptable risks.

4.1 Information Collection

The majority of the information collection work involving data capture of source, pathway and receptor information using Geographical Information Systems (GIS) is complete. This data is used to prioritise sites within the borough. The collected data is updated as appropriate and checked periodically for accuracy. The collection of information from trade directories is ongoing. A database of metadata for the collected GIS information has also been created as part of the QA/QC process to manage the information.

4.1.1 Information on the Sources of Potential Contamination

Ordnance Survey (OS) historical maps were the primary source of information used to identify areas of potential contamination. Information available within EPU files were also included, as well as data provided by the Environment Agency where appropriate. Box 4.1 below lists most of the collected data, some of which were used in the prioritisation work. (Also see Map 2.4 in Chapter 2.)

4.1.2 Information on Potential Pathways for Contamination

Some information on possible pathways has been gathered including digitised aerial photos, which can be used to identify soft landscaping and areas of hard standing; drift geology polygons, drains and so on. Some of the relevant information collected is presented in Box 4.2 below. However, at the prioritisation stage it is assumed pathways exist, with the pathway information being considered more closely at the desk top study stage (detailed inspection).
Box 4.1: Historical Source Data collected in the GIS

<table>
<thead>
<tr>
<th>GIS Polygon Data</th>
<th>Data Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>Landfills</td>
<td>Planning (Mineral maps)</td>
</tr>
<tr>
<td>Draft_landfill_250K</td>
<td>Environment Agency CD-ROM</td>
</tr>
<tr>
<td>Potent_contaminative_sites_e1</td>
<td>Pre-War OS Maps Epoch 1 (1846-1901)</td>
</tr>
<tr>
<td>Pitsandpoundsepech1</td>
<td>Pre-War OS Maps Epoch 2 (1888-1915)</td>
</tr>
<tr>
<td>Historical_Water_e2</td>
<td>Pre-War OS Maps Epoch 3 (1900-1949)</td>
</tr>
<tr>
<td>Potent_contaminative_sites_e3</td>
<td>Pre-War OS Maps Epoch 4 (1922-1969)</td>
</tr>
<tr>
<td>Historical_Water_e3</td>
<td>1st Edition 1:2500 OS Maps (1960-1973)</td>
</tr>
<tr>
<td>Pitsandpoundsepech3</td>
<td>1st Revision 1:2500 OS Maps (1968-1991)</td>
</tr>
<tr>
<td>Potent_contaminative_sites_mod_other</td>
<td>OS Lines and EPU Files</td>
</tr>
<tr>
<td>Petrolst (Petrol Stations)</td>
<td>Part B Authorised Processes Files</td>
</tr>
</tbody>
</table>

Box 4.2: Potential Pathway Data collected in the GIS

<table>
<thead>
<tr>
<th>GIS Polygon Data</th>
<th>Data Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>Historical_Water_e1</td>
<td>Pre-War OS Maps Epoch 1 (1846-1901)</td>
</tr>
<tr>
<td>Historical_Water_e2</td>
<td>Pre-War OS Maps Epoch 2 (1888-1915)</td>
</tr>
<tr>
<td>Historical_Water_e3</td>
<td>Pre-War OS Maps Epoch 3 (1900-1949)</td>
</tr>
<tr>
<td>Historical_Water_e4</td>
<td>Pre-War OS Maps Epoch 4 (1922-1969)</td>
</tr>
<tr>
<td>Clip_tq_class_mod</td>
<td>NRA Groundwater Vulnerability data</td>
</tr>
<tr>
<td>Clip_tq_drift</td>
<td>NRA Drift Data</td>
</tr>
<tr>
<td>Clip_surface_water_draft</td>
<td>OS Master Map surface water data</td>
</tr>
</tbody>
</table>

4.1.3 Information on Potential Receptors

The statutory guidance identifies specific sensitive receptors to be protected from harm that would have to be considered within the prioritisation process (refer to Table A in DEFRA Circular 1/2006 Contaminated Land). The appropriate information on land uses related to the receptors have been collected into the GIS and are listed within Box 4.3 below. This information is updated periodically as land use changes in the borough or if there are changes in the model outputs as with Source Protection Zones (see Box 2.2). It should also be noted that surface and ground waters are both pathways and receptors.
### Box 4.3: Potential Receptor Data collected in the GIS

<table>
<thead>
<tr>
<th>Receptor</th>
<th>GIS Data</th>
<th>Data Type</th>
<th>Data Source</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Human beings:</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Allotments</td>
<td>Agrihorticulture</td>
<td>Polygon</td>
<td>OS data; Aerial Photos; Property</td>
</tr>
<tr>
<td>Residential with Gardens</td>
<td>Buffer_houses_with_gardens</td>
<td>Polygon</td>
<td>OS data; Aerial Photos</td>
</tr>
<tr>
<td>Residential without Gardens</td>
<td>Res_without_gardens</td>
<td>Polygon</td>
<td>OS data; Aerial Photos</td>
</tr>
<tr>
<td>Schools/Nurseries/Playgroups (Hospitals/Surgeries)</td>
<td>Education_Health</td>
<td>Polygon</td>
<td>Education; OS data</td>
</tr>
<tr>
<td>Recreation/Parks/Playingfields</td>
<td>PPP</td>
<td>Polygon</td>
<td>Leisure; Aerial Photos</td>
</tr>
<tr>
<td>Commercial/Industrial</td>
<td>Buffer_of_Current_industrial</td>
<td>Polygon</td>
<td>Planning; OS data; Aerial Photos</td>
</tr>
<tr>
<td><strong>Ecological systems, or living organisms within protected location:</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>SSSIs</td>
<td>Nature_Conservation_Sites</td>
<td>Polygon</td>
<td>English Nature</td>
</tr>
<tr>
<td>National Nature Reserve</td>
<td>Nature_Conservation_Sites</td>
<td>Polygon</td>
<td>English Nature</td>
</tr>
<tr>
<td>Local Nature Reserves</td>
<td>Nature_Conservation_Sites</td>
<td>Polygon</td>
<td>Planning</td>
</tr>
<tr>
<td>Other Nature Reserves</td>
<td>Nature_Conservation_Sites</td>
<td>Polygon</td>
<td>Planning</td>
</tr>
<tr>
<td><strong>Property in the form of buildings:</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ancient Monuments; Listed Buildings; Locally Listed Buildings</td>
<td>Heritage</td>
<td>Polygon</td>
<td>English Heritage; Planning</td>
</tr>
<tr>
<td>Buildings</td>
<td>Buildings</td>
<td>Polygon</td>
<td>OS Master Map</td>
</tr>
<tr>
<td><strong>Property in other forms (crops, livestock, home grown produce, owned/domesticated animals, wild animals subject to shooting or fishing rights):</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Agricultural land</td>
<td>Agrihorticulture</td>
<td>Polygon</td>
<td>OS data; Aerial Photos; Property</td>
</tr>
<tr>
<td>Allotments and gardens</td>
<td>Buffer_houses_with_gardens</td>
<td>Polygon</td>
<td>OS data; Aerial Photos; Property</td>
</tr>
<tr>
<td>Other open spaces, rivers, lakes etc.</td>
<td>PPP</td>
<td>Polygon</td>
<td>Leisure; Aerial Photos</td>
</tr>
<tr>
<td><strong>Controlled waters:</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Surface water</td>
<td>Clip_Surface_water_draft</td>
<td>Polygon</td>
<td>OS Master Map</td>
</tr>
<tr>
<td>Drinking water abstraction</td>
<td>Source_Protection_Locations</td>
<td>Point</td>
<td>Environment Agency</td>
</tr>
<tr>
<td>Source Protection Zones</td>
<td>Clip_source_protection_zones</td>
<td>Polygon</td>
<td>Environment Agency</td>
</tr>
<tr>
<td>Major Aquifers</td>
<td>Clip_tq_class_mod</td>
<td>Polygon</td>
<td>NRA Groundwater vulnerability Data</td>
</tr>
<tr>
<td></td>
<td>Groundwater_abs_2005</td>
<td>Polygon</td>
<td>Environment Agency</td>
</tr>
</tbody>
</table>
4.2 Prioritisation using the GroundView™ Site Prioritisation Tool

The GroundView™ database was licensed from AEA Technology plc to assist with the Part IIA work in 2004. It includes a prioritisation tool that can use the GIS information gathered in the first stage of the prioritisation work on the potentially contaminated sites and receptors (listed in Box 4.1 and 4.3) to calculate a total score for the sites based on scores assigned to the different land uses. Figure 4.1 below shows part of the site prioritisation tool. The output of the prioritisation run is in the form of spatial data as shown in Figure 4.2 and as a list of sites in a Microsoft Excel spreadsheet with associated scores.

Figure 4.1: GroundView™ SPT Prioritisation Tool

Figure 4.2: ArcView™ GIS showing the GroundView™ Prioritisation Spatial Output
This prioritisation method allows scores to be assigned to multiple sites, covering large areas of the borough in one prioritisation run. The rationale behind the prioritisation of the sites follows that set out in Box 1.3 and the general priority actions of the Council (paragraph 3.2) taking into account the priority groups covered by the Strategy. The prioritisation work was carried out with the following in mind:

- Prioritising for the receptor groups separately: Human Health; Groundwater, Surface water (collectively Controlled Waters); Nature Conservation; Property (Buildings) in this priority order
- Taking into consideration multiple potentially contaminating uses at the same site
- Giving equal weighting to sources of potential contamination and receptors (i.e. truncating equally between sources, pathways and receptors)
- Carrying out the prioritisation at a suitable scale so the output information is meaningful (as Hillingdon covers a large area this means running the prioritisation up to 19 times for each receptor group using 250 grid squares)
- Assuming a pathway exists by using the whole borough as a pathway, and on this basis, using the summation of scores

There are two PCs in use with the required GroundView™ software. The prioritisation work is carried out alongside other work and therefore can take between 8 to 15 weeks to complete. The information generated by the GroundView™ site prioritisation tool has been collated for the whole borough for the different receptor groups as spatial data layers in ArcView™ and as a comprehensive, prioritised inspection list, using Access database tables and queries. This list was further modified so it could be used to manage the strategy inspection work. The advantage of having the editable prioritisation list as an Access query is the ability to organise the prioritisation list so that it can be easily managed, and information that is not required at any one time can be left out of the view, so the list does not appear to be overwhelming or complicated.

This list has been further ordered, to compensate for any disproportionate or erroneous scores, on the basis of the vulnerability of the different uses within the receptor groups, by being assigned an **SPT category**. There are 16 categories for each receptor group based on vulnerability/importance and the source score. The prioritisation list has been ordered on the basis of the human health SPT category and then the total maximum score, although the other receptor categories and scores can be used to order the list where it may be appropriate. Box 3.1 contains the complete human health categories.

### 4.3 Carrying out Detailed Inspections – Initial Risk Assessment

Box 4.4 contains the definition of detailed inspection given in B.20 of the DEFRA Circular 1/2006 guidance document. The purpose of the detailed inspection work is to establish if there are any **significant pollutant linkages**, which are dependent on the nature of the site and its current use, and to determine based on available information if the site meets the statutory definition of **contaminated land**.
Box 4.4: The definition of ‘detailed inspection’ as set out in the Part IIA guidance (DEFRA Circular 1/2006 paragraph B.20)

Detailed inspection may include any or all of the following:

(a) the collation and assessment of documentary information, or other information from other bodies. In relation to harm so far as attributable to radioactivity, the local authority should have regard to any advice provided by the Environment Agency on the manner in which to carry out such an inspection;

(b) a visit to the particular area for the purposes of visual inspection and, in some cases, limited sampling (for example of surface deposits) or survey (for example using handheld radiation meters). In relation to harm so far as attributable to radioactivity, the local authority should have regard to any advice provided by the Environment Agency on the manner in which to carry out such an inspection; or

(c) intrusive investigation of the land (for example by exploratory excavations). In relation to harm so far as attributable to radioactivity, the local authority should always seek to make arrangements with the Environment Agency for the Agency to carry out such an inspection.

Starting with the top priority sites (SPT category 1A for human health), information available at the Council is collected into the GroundView™ database as part of the desk top study. Figure 4.3 shows the main page of the database, with the various fields and tabs that can be filled in.

![GroundView Database](image)

Figure 4.3: GroundView™ Database for storing site review information

The desk study includes a review of information available in the GIS, electronic and paper files within the Environmental Protection Unit (EPU), development control files and other available information. A lot of the EPU files have already been scanned and therefore can be attached directly to database. Sites that were remediated prior to the introduction of Part IIA are also being reviewed. Where information is lacking locally, or where there are gaps in information, external organisation that may have this information will be contacted. Box 4.5
below lists some sources where information on contamination and/or remediation may be available for review.

**Box 4.5: Internal and External Sources of Information Relevant to Part IIA**

<table>
<thead>
<tr>
<th>Source</th>
<th>Types of Information</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Internal</strong></td>
<td>Environmental Protection Unit (EPU) files</td>
</tr>
<tr>
<td><strong>Internal</strong></td>
<td>Planning and Building Control</td>
</tr>
<tr>
<td><strong>Internal</strong></td>
<td>Corporate Property Engineering Consultancy/Architects Highways</td>
</tr>
<tr>
<td><strong>Internal</strong></td>
<td>Local Heritage Centre (Uxbridge Library)</td>
</tr>
<tr>
<td><strong>External</strong></td>
<td>Environment Agency</td>
</tr>
<tr>
<td><strong>External</strong></td>
<td>London Fire and Emergency Planning Authority (Petroleum Inspectorate)</td>
</tr>
<tr>
<td><strong>External</strong></td>
<td>Developers</td>
</tr>
<tr>
<td><strong>External</strong></td>
<td>Ministry of Defence (Defence Estates) Other Major Landowners</td>
</tr>
<tr>
<td><strong>External</strong></td>
<td>Neighbouring Local Authorities</td>
</tr>
</tbody>
</table>

Site reconnaissance visits have been conducted after information is collected from internal sources whenever possible, in order to identify possible problem areas, prior to visually assessing the sites for signs of contamination, possible pathways and any additional, previously unidentified receptors. Photographs have been taken to record their current condition. Other relevant information such as weather conditions have also been noted when putting together information on the site visits into the database. Visual inspections of sites have not always been complete, as access to private garden areas have been limited, however, considerable areas of land on a site can still be assessed.

Where ground investigation information is available (usually for sites that have been remediated under Development Control prior to Part IIA), current UK guidance on land contamination has been used where it is available to determine if the contaminant levels are significant. Contaminated Land Exposure Assessment (CLEA) guidance is being used where
appropriate as screening criteria. More information about useful risk assessment criteria is given in a Box 4.7. Where further information is still required as a decision on the suitability of the site cannot be made or for added assurance, information from external historical archives and organisations including potential polluters and developers will be sought.

At the end of the initial review a report of the desk top study can be created using the GroundView™ database, based on the information collected, reviewed and any conclusions reached. The reviewed site is then categorised into Priority Action (PA) Groups as defined in Box 4.6 below, and the information will be used to update the prioritisation list. Any PA1 sites will then be put forward for limited sampling or intrusive investigation, followed by any PA2 sites.

### Box 4.6: Criteria for taking Priority Action (based on CLR6 Priority Categories)

<table>
<thead>
<tr>
<th>Priority Action Group</th>
<th>Description of the Site Conditions</th>
</tr>
</thead>
</table>
| **PA1**               | ▶ Site probably or certainly not suitable for present use and environmental setting  
                        | ▶ Contaminants probably or certainly present and very likely to have an unacceptable impact on key receptors/targets  
                        | ▶ Urgent assessment action needed in the short-term |
| **PA2**               | ▶ Site may not be suitable for present use and environmental setting  
                        | ▶ Contaminants probably or certainly present and very likely to have an unacceptable impact on key receptors/targets  
                        | ▶ Assessment action needed in the medium-term |
| **PA3**               | ▶ Site considered suitable for present use and environmental setting  
                        | ▶ Contaminants may be present but unlikely to have an unacceptable impact on key receptors/targets  
                        | ▶ Assessment action unlikely to be needed whilst site remains in present use or otherwise undisturbed |
| **PA4**               | ▶ Site considered suitable for present use and environmental setting  
                        | ▶ Contaminants unlikely to be present so unlikely to have an unacceptable impact on key receptors/targets  
                        | ▶ No assessment action needed while site remains in present use or undisturbed |

### 4.4 Carrying out Detailed Inspections – Further Risk Assessment

Other than for any urgent sites identified, detailed intrusive site investigations will only be carried out for sites identified at the end of the initial risk assessment process whereby:

▶ the site is identified as probably or certainly NOT or may NOT be suitable for its current use (i.e. sites that fall into priority action group PA1 or PA2 as set out in Box 4.6); AND

▶ there is insufficient information to make a determination of contaminated land under Part IIA and sufficient information cannot be obtained voluntarily.

Initially, where there is no or very limited chemical analysis of soil, water data etc. available for the site, it is likely limited site investigation work will be undertaken by the Council, using a suitably accredited laboratory. Some basic risk screening will be carried out by the Council using available generic assessment criteria (see Box 4.7 below).
Box 4.7: Risk Assessment Guidelines for Initial and Detailed Human Health Risk Assessment

**Contaminated Land Exposure Assessment (CLEA)**
The official UK guidance for carrying risk assessment work in published in CLR reports 7-10 along with the accompanying TOX and SGV reports for specific contaminants, and this advice will be followed as far as practicable. Where CLEA SGVs and TOX are not available the principles of CLEA and the most appropriate and up to date TOX data will be used with similar risk assessment models such as:

- Scotland and Northern Ireland Forum for Environmental Research (SNIFFER)
- Risk-Based Corrective Action (RBCA)
- RISC-Human (Netherlands)

The CLEA guidance is currently under review and further advice on its use is anticipated (refer to CLAN 6/06 Soil Guideline Values: The Way Forward).

**NOTE:** since the strategy was published in July 2001, the most commonly used guidelines for soil contamination issued by the Interdepartmental Committee on the Redevelopment of Contaminated Land (ICRCL) document ICRCL 59/83 (2nd Edition July 1987) was withdrawn by DEFRA in December 2002 (refer to CLAN 1/02 withdrawal of ICRCL Guidance Note 59/83 (2nd Edition)).

Based on the outcome of these results or where more information is initially available indicating the presence of contamination, further detailed site investigation work will be carried out using suitably qualified consultants, acting on behalf of the Council to establish the presence/absence of any significant pollutant linkages and assess if the site presents an unacceptable risk as ‘harm is being caused’ or there is ‘a significant possibility of significant harm’. This work will be carried out using up to date guidance and codes of practice such as those listed in Box 4.7 and 4.8, including the framework document CLR 11 as far as practicable. It is anticipated that this work will fully estimate and evaluate the risk to receptor(s) from the contamination and will be carried out in the following Phases:

- **Phase 1 – Desk top Study** (historical review of site use, site walkover survey, possibly some limited sampling/monitoring of soil/water/gas to identify if there are contamination issues on site, much as above)

- **Phase 2 – Detailed Site Investigation** (where further sampling information is required to determine extent of contamination and in order to carry out detailed risk assessment work)

- **Phase 3 – Remediation/Verification** (where an unacceptable risk is identified, remedial works will be carried out to minimise the risk, if it is found to be necessary. These works will also require verification to show the risk has been adequately addressed)

The risk assessments will be carried out using the site investigation information with the following objectives:

- **Hazard Identification** – involves the establishment of contaminant sources;
- **Hazard Assessment** – involves analysing the potential for unacceptable risks (i.e. what pathways and receptors could be present, what pollutant linkages could result and what the effects could be);
- **Risk Estimation** – predicting the magnitude and probability of possible consequences (what degree of harm or pollution may result to what receptors and how likely it is) that may arise as a result of a hazard; and
- **Risk Evaluation** – determining whether a risk is unacceptable

Where human health risks are identified, specialist advice will also be sought from the Health Protection Agency (HPA). Further information about special considerations with respect to site investigations is given below (paragraph 4.6).
Box 4.8: Good Practice Guidance documents for the Investigation and Assessment of Land Contamination

- Harris, M R, Herbert, S M, Smith, M A (1995-1996); Remedial Treatment for Contaminated Land (referred to as Volumes I to XII), special publications 101-112, CIRIA
- DEFRA/EA (March 2002); Assessment of Risks to Human Health from Land Contamination: An overview of the Development of Soil Guideline Values and Related Research, CLR 7 DEFRA/EA (March 2002); Priority Contaminants for the Assessment of Land, CLR 8 DEFRA/EA (March 2002); Contaminants in soils: Collation of Toxicological Data and Intake Values for Humans, CLR9 DEFRA/EA (March 2002); Contaminated Land Exposure Assessment Model (CLEA): Technical Basis and Algorithms, CLR 10 DEFRA/EA (March 2002); Related “Tox” (Toxicity) and “SGV” (Soil Guideline Value) series. Each ‘Tox’ or ‘SGV’ report considers a specific contaminant. The ‘Tox’ reports assess the risks to human health from contaminants in the soil and present key data and expert opinions on the toxicology and intake of contaminants. The SGV reports describe Soil Guideline Values, generic criteria for assessing the risks to human health from chronic exposure to soil contamination for contaminants, all available on-line at: http://www.environment-agency.gov.uk/subjects/landquality/113813/672771/?version=1&lang= e
- Assessing risks posed by hazardous ground gases to buildings (C659); CIRIA; 2006; ISBN: 0-86017-654-1
- Environment Agency (1999); Methodology for the Derivation of Remedial Targets for Soil and Groundwater to Protect Water Resources, R&D Publication 20
- CLR 13-15 documents on Radioactively Contaminated Land Exposure Assessment (RCLEA), DEFRA website (Draft, interim)

4.5 Powers of Entry on to Land

If entry onto a piece of land appears to be necessary for carrying out detailed site inspection work, and the owners consent is not forthcoming, the Council has statutory powers of entry to carry out the inspection works. These powers are under Section 108 of the Environment Act 1995 and the Council may authorise a person to carry out these investigations as part of its inspection of land duties.

Before the Council carries out an inspection of land using its statutory powers of entry the Council will have to be satisfied that on the basis of the information already obtained that:

- there is a reasonable possibility that a pollutant linkage exists on the land; and
- it is likely that a contaminant is present; and
- given the current use of the land a receptor is actually present or likely to be present.

4.6 Special Considerations with respect to Site Investigations

Site investigations may need to be carried out for other receptors, other than human health as identified in the guidance. Specialist advice will be sought with regards to this work and any risk assessment carried out in relation to it.
4.6.1 Controlled Waters and Potential Special Sites
For the assessment of risks to controlled waters by the Council advice will be sought from the Environment Agency and that risk assessments will be carried out on a site-specific basis. It is anticipated that some of the sites where controlled waters are an issue will be special sites under Regulation 3 of the Contaminated Land (England) Regulations 2006 and any site assessment details by the Council will be formally passed to the Environment Agency.

4.6.2 Nature Conservation Sites
The Council needs to consider harm or interference from potentially contaminated land to protected ecosystems when it carries out its inspection work. This work will be very site specific and in addition to using the expertise within the Council other experts will be consulted. These experts are likely to be Local conservation and Wildlife Groups, Natural England (for nationally designated sites), and the London Ecological Unit. The Council owns many of the nature reserves in the borough and as such will be responsible for these receptors as a landowner. It is anticipated that ecological consultants or similar would be used when assessing ecological effects and advice from these experts and the Environment Agency will be sought with regard to ecological risk assessments.

4.6.3 Sites of Archaeological and Historical Significance
Before carrying out any site investigations and assessing risk to sites of archaeological and historical significance English Heritage will be consulted for their specific advice. Their input will also be required to determine if there is sufficient information to indicate a site is contaminated land under Part IIA.

4.6.4 Land Contamination affecting Agricultural Land, Property and Foodstuffs
There may be instances where land contamination may potentially be affecting crops, vegetables, livestock etc. The advice of the Food Standards Agency (FSA) and the Health Protection Agency (HPA) will be sought as appropriate to determine the possibility of health effects to foodstuffs, crops, livestock and human health implications.

4.7 Monitoring the Progress of the Detailed Inspection Work
BV 216 a and b are contaminated land performance indicators introduced in ‘Best Value Performance Indicators (BVPI): 2005/06’. They came into effect on April 1st 2005 and are there to help determine the progress made by Local Authorities in:

- identifying sites of potential concern; and
- acquiring information about these sites so that a decision can be made about whether the sites require remediation.

They are intended to be local indicators to see how an individual Local Authority is progressing with the work, and includes work carried out under Development Control.

BV 216 a relates to the total number of ‘sites of potential concern’. It is there to help identify how much information on potentially contaminated land has been collected by the Local Authority, that still remains to be reviewed, where a decision has not been reached at the beginning of the BVPI reporting year. BV 216 b relates to the number of sites for which sufficient detailed information is available to decide whether remediation of the land is necessary, as a percentage of all ‘sites of potential concern’ (i.e. BV 216 a) at the end of the BVPI reporting year. The more detailed definition of BV 216 a and b is included in Appendix 3.
The indicators are not intended to measure progress in terms of remedial works carried out by the Local Authority (i.e. it relates to detailed inspections only) or to drive the Part IIA work. The information collection/review work for the sites measured by BV 216 b are to be carried out on the basis of the priorities derived under Part IIA and not on the basis of sites with sufficient information to make a decision, so as to get a ‘good result’. Hillingdon's figures for 2004/5 were a=478 and b=3.35%. Table 4.1 below notes the BV 216 b proposed internal targets up to 2008/9. The internal target for 2006/7 has been met.

<table>
<thead>
<tr>
<th>BV Reporting Year</th>
<th>BV 216 b Target (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>2006/7</td>
<td>8</td>
</tr>
<tr>
<td>2007/8</td>
<td>10</td>
</tr>
<tr>
<td>2008/9</td>
<td>12</td>
</tr>
</tbody>
</table>

### 4.8 Funding for Part IIA Investigations

There is no external DEFRA funding available to the Council for initial Part IIA inspections (see Box 4.4 a and b) to identify if a piece of land may be contaminated. The Government provides revenue support for Local authorities for their Part IIA work but this is not ring fenced for this purpose. The Council will endeavour to identify appropriate internal funds to carry out the initial intrusive investigation work to meet its Part IIA duties.

Where sufficient information has been gathered which indicates land contamination may be a potential risk the Council can apply for capital funding from DEFRA for detailed intrusive investigations (see Box 4.4 c) to determine if the site meets the definition of **Contaminated Land**. If a funding application to DEFRA is unsuccessful then in the case of Council land the responsibility for funding will generally fall to Corporate Property or the Council Department managing the land.

Where the Council carries out investigation on private land, either funded by the Council or DEFRA, to determine whether it meets the definition of **Contaminated Land**, the Council has no powers to recover any of the costs it incurs under Part IIA. This however does not apply to costs incurred in carrying out remediation (clean up) works on private land or Council land where the **appropriate person** can be identified. Details of this will be outlined further in the Contaminated Land Remediation Strategy in due course.

### 4.9 Re-inspecting Land

The priority timescales for inspecting sites is indicated in Box 3.1 for the sites identified in the 2005 prioritisation run. There may be instances where some of these sites will need to be re-inspected. Triggers for re-inspection may include:

- Responding to new information about unusual/abnormal site conditions including possible effects of **climate change**; site investigation information; localised health effects from statutory bodies, owners or occupiers of land, the public or other interested parties;
- Changes in land use at or near the site with the introduction of new receptors; and/or
- Unplanned events such as spills, accidents, flooding etc.

In the instance that Part IIA is not the appropriate legislation to deal with the issues identified as a result of the re-inspection, it is anticipated the most appropriate legislation such as some of those indicated in **Appendix 2** will be used to deal with any issues that may arise.
5.0 Introduction

The deputy Director of Environment & Consumer Protection bears the overall responsibility for the production and implementation of the contaminated land inspection strategy, through the proper allocation of resources, and liaison with Council Members, the Director of Environment & Consumer Protection and other Heads of Service. The Cabinet bears the responsibility for the adoption of the contaminated land inspection strategy and any subsequent amendments to it. The Council will need to consider the allocation of resources for the purposes of the contaminated land regime, in particular, where it is considered that the Council may be the appropriate person in relation to a site, which requires remedial works to be undertaken.

The Environmental Protection Unit (EPU), within Environment & Consumer Protection took the lead role in producing, updating and implementing the contaminated land inspection strategy. However, land contamination has potential implications for all sections of the Council and for anyone, developing, owning or intending to purchase property in the borough.

Some of the procedures specific to Part IIA had to be developed whereas others involved improving or reinforcing existing systems of consultation and communication with different sections of the Council and external agencies. The original strategy document had an illustration of the main internal and external agencies acting as consultees to the strategy. Figure 5.1 is an expanded version focusing on consultation between interested parties when it comes to potential land contamination matters.

Some of the roles of officers and sections within the Council with regard to land contamination matters are given below.
5.1 Responsibilities of the Contaminated Land Officer

The role of the Contaminated Land Officers have been sufficiently characterised and are summarised in the Boxes 5.1 to 5.3 below, under responsibilities to different sections of the Council, as well as under different pieces of legislation.

**Box 5.1: The Responsibilities of the Contaminated Land Officer Under Part IIA**

- Implementing the Contaminated Land Inspection Strategy
- Information collation of past land uses and contamination issues and its management (i.e. GIS source, pathway, receptor data and database of land quality information across the borough)
- Upon request, the provision of Part IIA strategy information to internal consultees, and to external consultees where appropriate under the Environmental Information Regulations 2004
- Prioritisation of sites for detailed inspection
- Identification of land with a potential to be contaminated land, including Council owned land
- Applying for SCE (R) bids for Council owned land or land to be remediated by the Council that has the potential to be contaminated land
- Organising and co-ordinating detailed inspections/risk assessment and remediation of land especially Council owned sites and orphan sites that have the potential to be contaminated land
- Bringing potential contaminated land and potential Special Sites to the attention of the Environment Agency, and the land owner/occupier when appropriate
- Preparing a record of determination and serving remediation notices and statements (after Legal consultation) to clean up the land and including this information on the Public Register
- Providing information on the Public Register to the Land Charges section to pass on information about contamination as part of the standard land search form CON29
- Reporting to relevant Chief Officers, Overview Panels, cabinet etc. on land contamination matters

**Box 5.2: The Responsibilities of the Contaminated Land Officer Under Development Control and Building Control**

- To assist in reviewing and amending planning policies with regards to development on land affected by contamination, such as with the Local Development Framework (LDF). This includes:
  - the development of the Land Contamination Supplementary Planning Document (the original Supplementary Planning Guidance on Land Contamination for developers and their consultants was published in 2004)
  - the development of the Supplementary Planning Document for Planning Obligations in relation to Land Contamination (the original Supplementary Planning Guidance on Planning Obligations - Land Contamination, Recycling and Waste Management and Flooding was published in 2003)
  - review and update standard contaminated land conditions for use by the Planning Officers to clean up land
- To provide GIS information on potentially contaminative land uses in the borough. Also provide further information from EPU files where available as and when requested, to Planning and Building Control
- The development of procedures for when land contamination consultation is required, detailing the actions required at each stage of the planning/building control process in respect of dealing with sites that are potentially/actually contaminated
- To participate in informal pre-application discussions if required
- To assess planning consultations and liaise with EPU district officers/Planning officers to place appropriate conditions onto planning permissions
- To liaise with developers and their consultants, and assist planners to ensure that the site investigations, risk assessments, remediation plans and verification reports provided demonstrate that the land can be developed to an appropriate standard and are sufficient to satisfy the contaminated land condition
- To provide advice as and when required
**Box 5.3: The Responsibilities of the Contaminated Land Officer for Council Owned Land**

- The development of procedures for when land contamination consultation is required with respect to land currently or historically owned by the Council that are potentially/actually contaminated
- To carry out a review/detailed inspection of Council owned land to determine if it is likely to meet the definition of *contaminated land*
- To provide GIS information on potentially contaminative land uses in the borough. Also provide further information from EPU files where available as and when requested, for example in relation to maintenance contracts
- Applying for SCE (R) bids for Council owned land to be investigated/remediated by the Council that has the potential to be *contaminated land*
- Advice on the procurement of suitable consultants for contaminated land investigations
- To provide advice to departments as and when required regarding site specific investigations
- To assist in the co-ordination contaminated land site investigations where appropriate
- To assist in the development of a Corporate Contaminated Land Strategy to manage the Council's liabilities, if required
- To provide advice and support to Corporate Property and Legal services as required

**5.2 Responsibilities within Development Control and Building Control**

As stated previously in the document, land contamination issues have become integrated into government planning policy and the building regulations to ensure new developments do not meet the definition of *contaminated land* under Part IIA. Therefore, Development Control and Building Control officers play a key role in ensuring EPU are made aware of any existing land contamination issues, as well as ensuring that appropriate remedial measures to clean up the land are implemented, along with Contaminated Land Officers. Some of the identified roles and responsibilities are note below in Boxes 5.4 to 5.6.

**Box 5.4: Responsibilities within Development Control – Planning Policy**

- To review and amend if necessary the current policies for development on land affected by contamination as part of the Local Development Framework group of documents including relevant Supplementary Planning Documents
- Use the information collated as part of the inspection process on previous land uses, where appropriate, to assist in the decision-making processes during planning policy formation
- To review and develop suitable standard conditions with the Contaminated Land Officer to deal with land contamination through the development control process

**Box 5.5: Responsibilities within Development Control – Development**

- The development of procedures for when land contamination consultation is required, detailing the actions required at each stage of the planning process in respect of dealing with sites that are potentially/actually contaminated
- To consult with the Contaminated Land Officer on planning applications for land that may be affected by contamination and condition accordingly
- To make the developer and their consultants aware of Hillingdon’s policies, guidance documents and requirements in relation to land contamination
- To forward desk top studies, site investigation reports, remediation schemes and verification reports to the Contaminated Land Officer
- To request outstanding work/information from Developers
- To confirm when the contaminated land condition has been discharged
Box 5.6: Responsibilities within Building Control

- To ensure that any work to protect the building footprint against contamination is consistent with the most up to date guidance issued under the Building Regulations
- To consult with the Contaminated Land Officer on information available within the Environmental Protection Unit on sites with the potential to be on contaminated land, or within 250 metres of a landfill site or where there are potential ground gas issues
- To inform the Environmental Protection Unit when a site has a requirement for protection measures against contamination within the building footprint
- The development of procedures for when land contamination consultation is required, detailing the actions required at each stage of the building control process in respect of dealing with sites that are potentially/actually contaminated

5.3 Responsibilities of the Council as Landowner

The Council owns a great deal of land in the borough, much of which is managed by a number of different departments and directorates. Corporate Property has overall responsibility for strategic management of the Council’s land assets. The nature of the land use managed by the various groups and sections within the Council are included in Box 5.7.

Box 5.7: Land use managed by different Sections of the Council

<table>
<thead>
<tr>
<th>Group/Section</th>
<th>Land use</th>
</tr>
</thead>
<tbody>
<tr>
<td>Education</td>
<td>Educational facilities; Youth and Leisure Facilities</td>
</tr>
<tr>
<td>Property</td>
<td>Allotments; Agricultural land; Open Spaces and Leisure Facilities; Council Offices, Depots, Commercial premises and Community Facilities</td>
</tr>
<tr>
<td>Housing</td>
<td>Council Housing/Residential Stock, Residential Care Homes, Day Centres, Commercial Premises, Leisure Facilities, Open spaces</td>
</tr>
<tr>
<td>Environment</td>
<td>Parks and Open Spaces, Libraries, Car Parks, Cemeteries, Community Centres, Leisure Facilities</td>
</tr>
<tr>
<td>Social Services</td>
<td>Community Care, Residential Care, Council Offices</td>
</tr>
</tbody>
</table>

Approximately 180 potentially contaminated Council owned sites have been identified to date and these are being reviewed by the EPU based on priority order along with all other sites in the borough. If a site belonging to the Council is identified as requiring more detailed inspection, the investigation and any necessary remedial work will be carried out by the service responsible for the land, with the advice of the EPU.

All sections of the Council responsible for Council land holdings take land contamination into account in managing liabilities in relation to:

- health and safety implications of land owned by the Council
- development of Council owned land
- land purchases and acquisitions (including s.106)
- asset management
- marketing of Council owned land
- leasing of Council property/land
- termination/surrender of leases/tenancy agreements

The first three points are addressed in part under Part IIA and Development Control. Managers of Council land consult and pass information on any known contamination issues to the EPU and seek advice from the appropriate sections of the Council, such as Legal Services, in relation to identifying and managing the Council’s liabilities. This also applies to the remaining points on land transactions and the leasing of property, and the sharing of information with potential purchasers and lessees. Box 5.8 below summarises what could be considered in relation to land contamination in this regard.
Box 5.8: Management of Council Assets and Liabilities in relation to Land Contamination

### Land Purchases & Acquisitions

Determining the full site history (including neighbouring land where relevant) and determining potential liabilities prior to the purchase or acquisition of land, including as part of a planning agreement (**s.106**) by:
- Carry out a search of available historical records
- Carrying out a review of information held by other departments such as EPU and Planning
- Information from the vendor including previous site use and any site investigation/remediation information
- Where contamination is thought to be an issue secure the services of suitable consultants to undertake appropriate site investigation
- Give due consideration to the long term cost implications of the land based on collected information
- Seek advice on determining future liability implications from EPU and Legal Services

### Marketing and Selling of Land

Where Council owned land is sold, it is important to pass on all relevant information on land contamination that might affect the value of the site or its future development. This includes:
- Available information on site history
- Previous studies carried out for the site
- Geotechnical and contamination site investigation reports
- Site layout plans indicating location of fuel tanks, soakaways etc.
- Providing an opportunity for the purchaser to carry out their own site investigation
- Using available information on contamination and remediation costs when valuing land
- Using available information to limit liability where possible

### Granting New Leases

Information pertaining to the current condition of the land is useful in establishing a baseline of site conditions. If a site has a previous use it is advisable to:
- Establish the location of where potentially contaminating uses have taken place (i.e. storage tanks)
- Provide available site investigation information for the site (consider background soil test data where there is no hardstanding)
- Pass on any new information, where action may have to be taken by the tenant/leasee
- Place appropriate conditions on the lease/tenancy agreement to ensure the relevant environmental legislation are complied with, an effort is made to minimise potential for future contamination and that spills/leaks are adequately cleaned up
- Request information/plans detailing the location of fuel/chemical storage areas and related services, where this should change

### Termination or Surrender of Leases/Tenancy Agreements

Prior to the termination of a lease or tenancy agreement, before the lessee/tenant moves out, it is important to obtain as much information about the site condition as possible. This should include:
- Information on the location of potentially contaminating uses, including detailed plans
- Records of any spills/leaks and how these were dealt with
- Where contamination is suspected site investigation data indicating the state of the land
- Where contamination is identified, remediation to return the site to its former condition or adequate financial compensation in order the Council can undertake necessary remedial works.
5.4 Consulting Legal Services

Legal Services provide advice and guidance for the enforcement side of the Council’s varied duties as well as providing legal advice in relation to Council business. They will be consulted in relation to the legal aspects of land contamination and land transactions.

5.5 Corporate Contaminated Land Strategy

The Council generally has good procedures in place for carrying out internal consultation on land contamination matters. However, the Council does not have a written procedure detailing specific responsibilities, like some of those identified above, or detailing how liabilities due to land contamination will be managed. It is intended this strategy review will be the first step towards determining if a comprehensive corporate strategy is required.

5.6 The Contaminated Land Remediation Strategy

The Contaminated Land Inspection Strategy review only covers the inspection aspects of the Part IIA work in any detail. It is intended the aspects covering the remediation of contaminated land, once it has been determined as such, will be covered by the Contaminated Land Remediation Strategy in due course. A brief description of what needs to be considered within the remediation strategy is presented in Box 5.9 below.

<table>
<thead>
<tr>
<th>Box 5.9: Brief outline of the Contaminated Land Remediation Strategy</th>
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<tbody>
<tr>
<td>▶ Summary of determining ‘contaminated land’</td>
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<tr>
<td>▶ Establishing ‘appropriate person(s)’</td>
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<tr>
<td>▶ Identifying ‘appropriate remediation’</td>
</tr>
<tr>
<td>▶ Taking enforcement action (remediation notice)</td>
</tr>
<tr>
<td>▶ Carrying out remediation work(s)</td>
</tr>
<tr>
<td>▶ Apportioning liability</td>
</tr>
<tr>
<td>▶ Cost recovery/hardship</td>
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<tr>
<td>▶ Council owned land</td>
</tr>
<tr>
<td>▶ Public Register</td>
</tr>
</tbody>
</table>
Chapter 6: General Liaison and Communication

6.0 Introduction

Much of the work proposed in the strategy is collaborative and requires effective liaison and communication both within the Council as well as with external bodies as broadly indicated by Figure 5.1 on internal and external consultation. The original strategy identified a number of external statutory consultees who may need to be contacted with regard to the land contamination matters that fall within their jurisdiction or expertise. Non-statutory consultees who may need to be contacted were also generally identified.

6.1 Statutory Consultees

Since 2001 due to reorganisation there have been some slight change to the original statutory consultees identified and further bodies that may be able to assist with the work have also been identified. The agencies identified in Box 6.1 are the relevant statutory consultees for Hillingdon based on the advice of the statutory guidance (DEFRA Circular 01/2006). These agencies will be consulted or kept informed of any relevant updates, reviews or revisions to the strategy.

<table>
<thead>
<tr>
<th>Box 6.1: Statutory Consultees for the Contaminated Land Inspection Strategy</th>
</tr>
</thead>
<tbody>
<tr>
<td>Environment Agency</td>
</tr>
<tr>
<td>Natural England (English Nature were the original statutory Consultee, now part of NE)</td>
</tr>
<tr>
<td>English Heritage</td>
</tr>
<tr>
<td>English Partnerships (soon to be part of Communities England)</td>
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<tr>
<td>Food Standards Agency</td>
</tr>
</tbody>
</table>

The Council will liaise with the above agencies where appropriate during the implementation of the strategy in relation to specific site issues, as early as practicable. In particular the advice of the Environment Agency will be sought with regards to controlled waters and potential special sites. Appendix 4 has the most up to date contact details for the statutory consultees.

6.2 Non-statutory Consultees

The Environmental Protection Unit (EPU) will contact relevant land owners, developers and stakeholders where they may be able to provide information about potential land contamination issues, background information and details of any site investigation and remediation work carried out as part of our detailed inspection work. Major land owners and developers in the borough as well as a number of other stakeholders including neighbouring boroughs were consulted and informed of the contaminated land inspection strategy in 2001. A complete list of consultees contacted as part of the strategy review is provided in Appendix 5, and details of the consultation responses and how they were incorporated into this document are provided in Appendix 6.

Since 2001, the Health Protection Agency (HPA) has been appointed with the task of providing specialist expertise and health advice on a number of issues to the relevant Primary Care Trust (PCT) responsible for the protection their population’s health. The advice of the Health Protection Unit (HPU) for the west London area will be sought as soon as practicable where land contamination may be an issue, and advice on health implications is required.
6.3 Communicating with Interested Parties

The Environmental Protection Unit (EPU) will be the main contact point within the Council on contaminated land issues and as such will liaise with all of the involved parties where it is required as early as possible throughout the inspection, site investigation and remediation stages. This will be regardless of whether or not there is a formal designation of contaminated land.

Where it is deemed necessary for a site inspection to be made, the reasons and need for the inspection will be provided to the owners and occupiers of the land and they will be kept informed at all stages of the process and be advised of the outcome of any intrusive investigation, and subsequent decision. (See 6.5 on Risk Communication.)

The Council’s approach to its regulatory duties for contaminated land, as indicated previously, will be to seek voluntary action before taking enforcement action. Officers within the EPU will write to developers or landowners for information about the condition of the land where this may be available in order to determine if the land is suitable for use.

6.4 Provision of Information to the Environment Agency

The Council has a statutory duty to provide information about potential contaminated land and potential special sites under Part IIA to the Environment Agency. This will be done on an informal basis at the earliest opportunity. The three standard forms provided by the Agency will be used to provide information on when a site is determined to be contaminated land, when remediation action is taken for a site and to provide an annual summary of local authority regulatory activity. Any other information will be provided when requested.

6.5 Risk Communication

Risk communication plays an integral part of the contaminated land inspection strategy. Box 6.2 includes a list of some of the possible concerns that those affected by land contamination, such as residents, may have which could also potentially act as barriers to prevent the effective communication of any risks. This list is by no means exhaustive. Box 6.3 states the general aims of the communication strategy in relation to risk in order to overcome these barriers. The most up to date advice available on risk communication will be adopted to assist with communication.

<table>
<thead>
<tr>
<th>Box 6.2: Concerns about Risks associated with Land Contamination and barriers to the effective communication of Risk</th>
</tr>
</thead>
<tbody>
<tr>
<td>Issues that may arise as a result of land contamination are:</td>
</tr>
<tr>
<td>o Concerns about short-term or long-term health implications</td>
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<tr>
<td>o Concerns about economic impacts such as potential blight to property values or damage to property</td>
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<tr>
<td>o Concerns about the possible intrusiveness of contaminated land investigations and remediation on daily lives</td>
</tr>
<tr>
<td>o Concerns about being charged for the clean up of contaminated land</td>
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<tr>
<td>o Unfamiliarity with the issues causing concern</td>
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<tr>
<td>o Lack of control within the issues causing concern such as unknown timeframes for determination and/or remediation</td>
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<tr>
<td>o ‘Social amplification of risks’ as a result of media coverage for example where risks have not been adequately characterised or explained in detail causing concern</td>
</tr>
<tr>
<td>o Nearby events causing concern due to proximity</td>
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<tr>
<td>o ‘the dread factor’ - a lack of understanding of the issues can lead to stress which may make further explanation more difficult</td>
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</tbody>
</table>
Box 6.3: Aims of the Communication Strategy in relation to Risk

- Raise awareness and understanding of the contaminated land issue without causing undue alarm
- Improve the understanding of the inspection, risk assessment and remediation process including explaining any unfamiliar technical terminology
- Enable effective participation or representation from all interested parties affected by contamination as early as possible
- Listen to the opinions of the local community and deal sensitively with any concerns
- Minimise the risk to any community believed to be at risk from a particular site by limiting exposure to the contamination by restricting access, the use of notices, leaflets etc.
- Provide opportunities for feedback from all interested parties affected by any investigation
- Support any party to effectively implement any risk management decision

The Council will proactively communicate the complex matters related to land contamination to those affected by it as early as practicable, in a clear and concise manner as possible. The advice of the Council’s Communications Team will be sought as early as possible when carrying out this work. The most appropriate method of communication for those affected by land contamination at any given time will be used which may include:

- Letters informing the landowners and occupiers of the potential/actual contamination issues and any investigation/remediation required
- Leaflets providing further information or clarification on what it involves
- Meetings/Forums including experts who can provide impartial advice
- Provision of information/updates via the Council's Website or letter
- Specific contact telephone/fax number, address or e-mail address for any queries or concerns

Opportunities for feedback will be provided to all those affected by contamination and will be taken into consideration where appropriate in the complex decision making process. Any decision will not be based on technical information alone, but may also have to take into consideration financial, legal, social and commercial implications, as well as what could potentially be conflicting view points from different stakeholders.

6.6 Press and Media

Representatives from the press and media who may wish to discuss land contamination issues may contact the Council’s Corporate Communications Unit using the contact details in Box 6.4 below.

Box 6.4: Corporate Communications Unit Contact Details

| Address          | 3E/07 Civic Centre  
|                 | High Street  
|                 | Uxbridge  
|                 | UB8 1UW  
| Telephone Number | 01895 250534  
|                 | 01895 250111 - urgent media enquiries outside hours (before 08.45, after 17.45, Monday to Friday)  
| Fax Number       | 01895 277233  
| E-mail Address   | corporatecommunications@hillingdon.gov.uk  

44
7.0 Introduction
Considerable amounts of information relating to land contamination matters have been gathered throughout the Part IIA process of identification, prioritisation and detailed site inspection from a variety of sources (this has been explained in greater detail in Chapters 2 and 4). This process is ongoing. It is important that all relevant information is assessed, safeguarded, and passed on where it is appropriate to those requiring the information. The Environment Protection Unit (EPU) sometimes also receives information from the public and other stakeholders on land contamination matters. This information will be dealt with according to internal EPU procedures.

7.1 Information and Complaints
The EPU receives information and complaints regarding potentially contaminated land in the borough from members of the public, landowners, other sections of the Council and external agencies from time to time, including anonymously supplied and anecdotal information. Details of these complaints are logged in EPU’s job management system (PROACTIVE) for follow up by an appropriate officer, who will endeavour to keep the complainant updated where the contact details are available. Where the Environment Agency is the appropriate regulator, the complainant will be directed to them or the complaint passed on as appropriate.

Some of the information and complaints received through the day to day function of the EPU may be relevant to the Part IIA inspection work. There may be instances where based on the information provided an immediate site inspection visit may be required or the site may be given a higher priority for inspection. Otherwise, the review of any complaint site will follow the process indicated in previous chapters. The determination of contaminated land will not be made on the basis of a complaint without robust scientific evidence.

7.2 Storage of Information
Information within the Council is available electronically and in paper files. EPU are endeavouring to scan as much of the available paper files as possible. The following lists electronic sources of information available within the Environmental Protection Unit (EPU):

- Source/Pathway/Receptor and other related GIS Information
- Metadata Database (QA/QC information relating to collected GIS datasets)
- GroundView™ Database (site information review work under Part IIA and Planning)
- Site Inspection Database
- Directory Database (as part of Source identification using historical Trade directories)
- Petroleum Records Database (based on Part Bs and information from LFEPA)
- i-Document management systems (scanned EPU records including site reports, Register information, includes some Planning/Building Control Information)
- Draft Part IIA Prioritisation List 2005
- Pro-Active (EPU complaints/job management system)
7.3 Updating and Maintenance of Information

The responsibility of ensuring the information noted above is up to date and adequately maintained lies with the Contaminated Land Officers. This work is either ongoing or will be carried out as and when it arises. Data entry has been set up with requirements for indicating when the data was updated, with i-Document management system incorporating an automatic audit trail.

7.4 Arrangement for Internal Access to Information

Access to available information (including electronic) within EPU is restricted to the Contaminated Land Officers only in most instances, or to EPU officers. Other sections of the Council such as Planning and Corporate Property make enquiries about specific sites from time to time. EPU will check the appropriate database(s) for the relevant information and will pass it on as requested, where it is available.

Information on former land uses identified in the borough that may have been potentially contaminative has been made available to some sections of the Council on the GIS Map browser to indicate when consultation with EPU may be necessary.

Where a site is determined to be contaminated land, the relevant Register information will be forwarded to the Local Land Charges section to enable them to answer CON29 enquiries.

7.5 Arrangement for Public Access to Information

The Hillingdon website has been updated to include relevant information on land contamination matters, and endeavours to answer questions that may be raised by members of the public, developers and landowners in relation to Part IIA and Planning, and provides relevant contact details. For more information go to:

http://www.hillingdon.gov.uk/index.jsp?articleid=8676

7.5.1 The Contaminated Land Public Register

The contaminated land public register contains the required information indicated in Section 78R of the Environment Protection Act 1990 for sites that have been designated contaminated land or a special site under Part IIA. It is intended to act as a full and permanent record of all the regulatory action taken by the enforcing authority in relation to the remediation of the land, to include information about the condition of the land. The register will include:

- Remediation notices
- Appeals against remediation notices
- Remediation declarations
- Remediation statements
- Appeals against charging notices
- Designation of special sites
- Notification of claimed remediation
- Convictions for offences under Section 78M of the Act
- Guidance issued under Section 78V(1) of the Act
- Other matters prescribed by Regulations
A summary table of the Public **Register** is available on the Council website as well as details of how to get access to further information in relation to sites on the register at the Civic Centre (also see Box 7.1 below for EPU contact details). For more information go to: 
http://www.hillingdon.gov.uk/index.jsp?articleid=8677

7.5.2 Land Contamination Enquiries
An online enquiry form has also been created specifically for land contamination enquires. These enquires may be made as part of property transactions, redevelopment or due diligence exercise, where land contamination may be an issue but the site has not been identified as **contaminated land** in the Public Register. Enquiries can still be made by letter or fax (see Box 7.1 for contact details), and there is a fee involved. Any information provided in response to specific enquiries made to the EPU will be provided under the Environmental Information Regulations 2004. For information on this service go to: 
http://www.hillingdon.gov.uk/index.jsp?articleid=5901

Other sections of the Council, such as Planning, Building Control or Local Land Charges may have the relevant information that is required. In these instances these sections of the Council should be contacted directly. Specific contact information for the Council is available on the Hillingdon website. The general contact details for EPU are in Box 7.1 below.

<table>
<thead>
<tr>
<th>Box 7.1: Environmental Protection Unit (EPU) Contact Details</th>
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<tbody>
<tr>
<td><strong>Address</strong></td>
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<tr>
<td></td>
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<tr>
<td><strong>Telephone Number</strong></td>
</tr>
<tr>
<td><strong>Fax Number</strong></td>
</tr>
<tr>
<td><strong>E-mail Address</strong></td>
</tr>
<tr>
<td><strong>Website Address</strong></td>
</tr>
</tbody>
</table>

7.6 Confidentiality
It should be noted that a **remediation notice** or **statement** requires clear identification of the land that is being identified as **contaminated land** and in the case of a notice the person, persons or company on whom the notice is served. This is publicly available information.

It is the policy of the EPU that the names and addresses of all complainants remain confidential. If a person is asked to give evidence to support actions taken under Part IIA, in instances where an appeal is made against a remediation notice, the disclosure of this information may be required by the Courts.

Information on land contamination provided by third parties is likely to fall within the definition of **Environmental Information**. Generally, where information is requested from the EPU in relation to land contamination matters it will be provided on the basis of the Environmental Information Regulations 2004. The Council will respect any requests for confidentiality, which must be made in writing, from those who provide the information, provided that the request is reasonable and complies with the requirements of the Regulations. All restricted information will be noted as such within the information management system.
References/Bibliography

Legislation and Guidance

1. Part IIA of the Environmental Protection Act 1990 inserted by section 57 and the Environment Act 1995; HMSO.
2. The Contaminated Land (England) Regulations 2006; HMSO.
3. DEFRA Circular 1/2006 Contaminated Land (October 2006); HMSO.
4. Contaminated Land Inspection strategies, Technical Advice for Local Authorities, DETR and EA (May 2001); HMSO.
5. CLR Published Research Reports 1-15 including CLEA (See DEFRA and EA website)
6. Contaminated Land Advice Notes (CLAN) (See DEFRA website)
   - CLAN 1/02 withdrawal of ICRCL Guidance Note 59/83 (2nd Edition)
   - CLAN 2/06 Best Value Performance Indicators: Contaminated Land – BV216A and 216B
   - CLAN 5/06 Extension of Part 2A to Radioactivity (revised edition)
   - CLAN 6/06 Soil Guideline Values: The Way Forward
8. Radioactive Contaminated Land briefing notes (See EA website)
11. Best Value Performance Indicators 2005/06; Office of the Deputy Prime Minister; ODPM Publications; London (February 2005)
12. Local Environment Agency Plans (LEAP plans) for the Colne (Consultation, Second Draft) and North London (Environmental Overview).

London Borough of Hillingdon Documents

1. Contaminated Land Inspection Strategy (July 2001)
2. Amendments to the Contaminated Land Inspection Strategy (August 2005)
3. Hillingdon Unitary Development Plan; LBH Planning and Transportation Services; Adopted September 1998.
4. Local Development Framework (LDF) under development (See Hillingdon website)

Other Sources of Information

1. The contaminated land inspection strategies and reviews of Leeds City Council; London Borough of Camden; Vale of Glamorgan Council; Fareham Borough Council
4. ESRI’s ArcGIS Desk Top Help, ESRI® ArcMap™ 9.1
<table>
<thead>
<tr>
<th>Appendix</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Appendix 1: Acronyms and Glossary of Terms</td>
<td>2</td>
</tr>
<tr>
<td>Appendix 2: Interaction of Part IIA with Other Regimes</td>
<td>9</td>
</tr>
<tr>
<td>Appendix 3: Contaminated Land BV 216 a and b</td>
<td>12</td>
</tr>
<tr>
<td>Appendix 4: Contact Details of Statutory Consultees</td>
<td>14</td>
</tr>
<tr>
<td>Appendix 5: List of Draft Strategy Review Consultees</td>
<td>15</td>
</tr>
<tr>
<td>Appendix 6: Draft Strategy Review 2007 Consultation Comments</td>
<td>16</td>
</tr>
</tbody>
</table>
Appendix 1: Acronyms and Glossary of Terms

The following terms are primarily based on the definitions provided in DEFRA Circular 1/2006 and Model Procedures for the Management of Land Contamination (CLR 11).

Abstraction
Removal of water from surface water or groundwater, usually by pumping.

Agency
Refer to the Environment Agency.

Ancient Monuments (Scheduled)
These are sites of national importance where the provisions of the Ancient Monuments and Archaeological Areas Act 1979 apply (as amended by The National Heritage Act 1983).

Appropriate person
Defined in section 78A(9) as: “any person who is an appropriate person, determined in accordance with section 78F..., to bear responsibility for any thing which is to be done by way of remediation in any particular case.” This term can apply to the polluter of the site, the land owner and/or occupier of the site.

ArcView
See GIS.

Aquifer
Underground water source – water bearing rock. Designated Major, Minor or Non-aquifer, refer to more detailed definitions below.

Borehole
A hole for the abstraction of groundwater usually by pumping. Also used to refer to means enabling soil sampling, and groundwater and gas monitoring.

Brownfield sites
These include vacant land or premises, underused or underdeveloped land, outdated or derelict premises, land which is likely to be redeveloped in the next 5 to 10 years and previously developed sites in the Green Belt. A fraction of Brownfield sites are likely to be contaminated by previous use.

CLEA
Refer to Contaminated Land Exposure Assessment.

Climate change
Climate change in IPCC (Intergovernmental Panel on Climate Change) usage refers to any change in climate over time, whether due to natural variability or as a result of human activity.

Contaminated land
Refer to paragraph 1.2 in chapter 1 of this strategy document.

Contaminated Land Exposure Assessment (CLEA)
UK Model and technical guidance provided for carrying out human health risk assessment work to assist in determining if a site is contaminated land under Part IIA. Refer to CLEA guidance on the Environment Agency website for further information. Also see RCLEA.

Contaminant
A substance which is in, on or under the land and which has the potential to cause harm or cause pollution to controlled waters.

Controlled Waters
Defined in section 78A(9) by reference to Part 3 (section 104) of the Water Resources Act 1991; this embraces territorial and coastal waters, inland fresh waters, and ground waters. Section 78A(9) was
amended by section 86 of the Water Act 2003 so that for Part IIA purposes “ground waters” does not include waters contained in underground strata but above the saturation zone as described in paragraph 2.9 of Annex 2 and Box 1.2 in chapter 1.

**Data**
Items of information.

**Dataset**
Refers specifically to digitised GIS information. A feature dataset in a geodatabase. Any geographic data, such as a coverage, shapefile, raster or feature class, in a geodatabase. Shapefiles can be points, polygons or lines.

**Desk Study**
Interpretation of historical, archival and current information to establish where previous activities were located, and where areas or zones that contain distinct and different types of contamination may be expected to occur, and to understand the environmental setting of the site in terms of pathways and receptors.

**Detailed Inspection**
As defined in paragraph B.20 in the guidance, reproduced in Box 4.4 in chapter 4.

**Detailed Quantitative Risk Assessment**
Risk assessment carried out using detailed site-specific information to estimate risk or to develop site-specific assessment criteria.

**Detailed Site Investigation**
Main stage of intrusive site investigation, which may involve the collection and analysis of soil, surface water, groundwater, soil gas and other media as a means of further informing the conceptual model and the risk assessment. This investigation may be undertaken in a single or a number of successive stages.

**Drift Deposits**
Term used to include all unconsolidated superficial deposits (e.g. fluviological, alluvium etc.) overlying solid rock.

**EA**
Refer to the Environment Agency.

**Enforcing Authority**
Defined in section 78A(9) as: (a) in relation to a special site, the Environment Agency; (b) in relation to contaminated land other than a special site, the local authority in whose area the land is situated.

**Environment Agency (EA)**
Leading public body for protecting and improving the environment in England and Wales. Have specific remit over enforcing legislation including in relation to controlled waters and waste management. For more information go to www.environment-agency.gov.uk

**Environmental Protection Unit (EPU)**

**Environmental Information**
As defined in Environmental Information Regulations 2004 (based on Article 2(1) of the Environmental Information Directive) is wide and covers elements of the environment, such as land, water, biological organisms etc, but also measures and activities which may affect these, including economic analysis of such measures and activities.

**EPU**
Refer to Environmental Protection Unit.
Food Standards Agency (FSA)
The Food Standards Agency is an independent Government department set up by an Act of Parliament in 2000 to protect the public's health and consumer interests in relation to food. For more information refer to [http://www.food.gov.uk/](http://www.food.gov.uk/)

FSA
Refer to Food Standards Agency.

Generic Quantitative Risk Assessment
Risk assessment carried out using generic assumptions to estimate risk or to develop generic assessment criteria.

Geographical Information System (GIS)
Geographical Information System is a general reference to software packages capable of showing both graphical information (digital maps) and associated attribute information (from a database). Typical GIS functionality includes data entry, spatial and textual querying, data analysis and the production of hard copy maps. ArcView provided by ESRI (UK) Ltd is one such system.

GIS
Refer to Geographical Information System.

Groundwater
Water in the saturation zone, where all pore space in the sediment and rock are completely filled with water. For the purposes of Part IIA, it no longer refers to water above the saturation zone.

Hardship
A factor underlying any cost recovery decision made by an enforcing authority under section 78P(2). See paragraphs 10.8 to 10.10 of Annex 2 of the DEFRA Contaminated Land Circular 1/2006 for a discussion of the interpretation of this term.

Harm
Defined in section 78A(4) as: “harm to the health of living organisms or other interference with the ecological systems of which they form part and, in the case of man, includes harm to his property.” OR with respect to radioactive contamination defined in section 78A(4)(as modified) as: “lasting exposure to any person being resulting from the after effects of a radiological emergency, past practice or past work activity”. Harm is described further in Table A, Annex 3 of the DEFRA Contaminated Land Circular 1/2006.

Health Protection Agency (HPA)
The Agency’s is a non-departmental public body whose role is to provide an integrated approach to protecting UK public health through the provision of support and advice to the NHS, local authorities, emergency services, other Arms Length Bodies, the Department of Health and the Devolved Administrations. For more information refer to [http://www.hpa.org.uk/](http://www.hpa.org.uk/)

Health Protection Unit (HPU)
Refers to the local unit (area office) of the Health Protection Agency.

HPA
Refer to Health Protection Agency.

HPU
Refer to Health Protection Unit.

Major aquifer
These are highly permeable formations usually with a known or probable presence of significant fracturing. They may be highly productive and able to support large abstractions for public supply and other purposes.
Metadata
Data about data. For GIS data, metadata usually means data that is designed to help a prospective user find GIS data and determine whether it will serve a particular purpose. Metadata consists of information about the data to help with this as well as indicate the quality and reliability of the information in question.

Minor aquifer
These can be fractured or potentially fractured rocks, which do not have a high primary permeability, or other formations of variable permeability. Although these aquifers will seldom produce large quantities of water for abstractions, they are important both for local supplies and in supplying base flow for rivers. In certain local circumstances minor aquifers can be highly vulnerable to pollution.

National Nature Reserve (NNR)
Areas declared by statutory nature conservation agencies such as English Nature (now a part of Natural England) under section 19 of the National Parks and Access to the Countryside Act 1949, or section 35 of the Wildlife and Countryside Act 1981.

Non-aquifer
These are formations with negligible permeability that are generally regarded as not containing groundwater in exploitable quantities. However, groundwater flow through such rocks, although imperceptible, does take place, and needs to be considered when assessing the risk associated with very slowly degrading pollutants.

Owner
Defined in section 78A(9) as: “a person (other than a mortgagee not in possession) who, whether in his own right or as trustee for any other person, is entitled to receive the rack rent of the land, or where the land is not let at a rack rent, would be so entitled if it were so let.”

OS
Ordnance Survey. Often refers to map data.

Part IIA
Refers to the Environmental Protection Act 1990: Part IIA.

Pathway
The route or routes, both direct and indirect by which a contaminant can reach a receptor.

PCT
Refer to Primary Care Trust.

Point
A zero-dimensional abstraction of an object; a single x,y coordinate pair that represents a geographic feature too small to be displayed as a line or area at that scale.

Polygon
A closed, two-dimensional figure with at least three sides that represents an area. It is used in GIS to describe spatial elements with a discrete area, such as parcels, political districts, areas of homogeneous land use, and soil types.

Preliminary Risk Assessment
First tier of risk assessment that develops the initial conceptual model of the site and establishes whether or not there are any potentially unacceptable risks.

Primary Care Trust (PCT)
Hillingdon Primary Care Trust (PCT) is the lead NHS organisation in the London Borough of Hillingdon. The trust is responsible for improving the health of people living in Hillingdon, developing services provided by local GPs and their teams (called primary care) and making sure that other appropriate health services are in place to meet local people's needs. For further information refer to http://www.hillingdon.nhs.uk/index.html
Prioritisation List
A list of sites that have been identified for inspection and review under Part IIA because of potential contamination issues, which has been put into some kind of priority order.

Register (Public)
The public register maintained by the enforcing authority under section 78R of particulars relating to contaminated land. More information is given in paragraph 7.5.1.

QA/QC
Refers to Quality Assurance/Quality Control measures put in place to help determine the quality of the data.

Radioactively Contaminated Land Exposure Assessment (RCLEA)
This refers to the version of CLEA that is used to determine risk to human health from radioactive contaminated land. The technical information is provided in CLR documents 13-15. Also see Contaminated Land Exposure Assessment.

Receptor
Either:
(a) a living organism, a group of living organisms, an ecological system or a piece of property which:
   (i) is in a category listed in Table A in Chapter A as a type of receptor, and
   (ii) is being, or could be, harmed, by a contaminant; or
(b) controlled waters which are being, or could be, polluted by a contaminant. Paragraph A.13; or
(c) a person subjected to lasting exposure resulting from the after-effects of a radiological emergency, past practice or past work activity (Paragraph A.13).

Remediation
Defined in section 78A(7) as:
(a) the doing of anything for the purpose of assessing the condition of -
   (i) the contaminated land in question;
   (ii) any controlled waters affected by that land; or
   (iii) any land adjoining or adjacent to that land;
(b) the doing of any works, the carrying out of any operations or the taking of any steps in relation to any such land or waters for the purpose -
   (i) of preventing or minimising, or remedying or mitigating the effects of any significant harm, or pollution of controlled waters, by reason of which the contaminated land is such land; or
   (ii) of restoring the land or waters to their former state; or
(c) the making of subsequent inspections from time to time for the purpose of keeping under review the condition of the land or waters.*

OR with respect to radioactive contamination defined in section 78A(7)(as modified) as:
(a) the doing of anything for the purpose of assessing the condition of -
   (i) the contaminated land in question; or
   (ii) any land adjoining or adjacent to that land;
(b) the doing of any works, the carrying out of any operations or the taking of any steps in relation to any such land for the purpose -
   (i) of preventing or minimising, or remedying or mitigating the effects of any harm by reason of which the contaminated land is such land; or
   (ii) of restoring the land to its former state; or
(c) the making of subsequent inspections from time to time for the purpose of keeping under review the condition of the land.

Remediation Declaration
Defined in section 78H(6). It is a document prepared and published by the enforcing authority recording remediation actions which it would have specified in a remediation notice, but which it is precluded from specifying by virtue of sections 78E(4) or (5), the reasons why it would have specified those actions and the grounds on which it is satisfied that it is precluded from specifying them in a notice.
Remediation Notice
Defined in section 78E(1) as a notice specifying what an appropriate person is to do by way of remediation and the periods within which he is required to do each of the things so specified.

Remediation Statement
Defined in section 78H(7). It is a statement prepared and published by the responsible person detailing the remediation actions, which are being, have been, or are expected to be done as well as the periods within which these things are being done.

Risk
The combination of:
(a) the probability, or frequency, of occurrence of a defined hazard (for example, exposure to a property of a substance with the potential to cause harm); and
(b) the magnitude (including the seriousness) of the consequences. Paragraph A.9.

Risk Assessment
The formal process of identifying, assessing and evaluating the health and environmental risks that may be associated with a hazard.

s.106
Refers to Section(s) 106 Planning Obligations (agreements) in Town & Country Planning Act 1990 as substituted by the Planning and Compensation Act 1991.

Significant pollutant linkage
A pollutant linkage which forms the basis for a determination that a piece of land is contaminated land. Paragraph A.20.

Site of Special Scientific Interest (SSSI)
A classification notified under the Wildlife and Countryside Act (1981 as amended). All the London sites of biodiversity interest are included within sites of Metropolitan Importance for Nature Conservation.

Source Protection Zones (SPZ)
As defined by the Environment Agency, a broad definition is provided in Box 2.2 in chapter 2.

Special site
Defined by section 78A(3) as: any contaminated land -
(a) which has been designated as such a site by virtue of section 78C(7) or 78D(6)…; and
(b) whose designation as such has not been terminated by the appropriate Agency under section 78Q(4)…
This generally refers to sites where controlled waters are affected by contamination or where there is radioactively contaminated land amongst others. The effect of the designation of any contaminated land as a special site is that the Environment Agency, rather than the local authority, becomes the enforcing authority for the land.

SPT Category
A category based on Source-Pathway-Target (i.e. Receptor) used to assist in prioritising sites for inspection. Refer to Box 3.1 for more information.

Stakeholder
Individuals or organisations with an interest in the scope, conduct and outcome of a site investigation project.

Suitable for use
The ‘suitable for use’ approach focuses on the risks caused by land contamination. The approach recognises that the risks presented by any given level of contamination will vary greatly according to the use of the land and a wide range of other factors, such as the underlying geology of the site. Risks therefore need to be assessed on a site-by-site basis. The ‘suitable for use’ approach consists of three elements:
a) ensuring that land is suitable for its current use – in other words, identifying any land where contamination is causing unacceptable risks to human health and the environment, assessed on the basis of the current use and circumstances of the land, and returning such land to a condition where such risks no longer arise (‘remediating’ the land);  
b) ensuring that land is made suitable for any new use, as official permission is given for that new use – in other words, assessing the potential risks from contamination, on the basis of the proposed future use and circumstances, before official permission is given for the development and, where necessary to avoid unacceptable risks to human health and the environment, remediating the land before the new use commences; and  
c) limiting requirements for remediation to the work necessary to prevent unacceptable risks to human health or the environment in relation to the current use or officially-permitted future use of the land - in other words, recognising that the risks from contaminated land can be satisfactorily assessed only in the context of specific uses of the land, and that any attempt to guess what might be needed at some time in the future for other uses is likely to result either in premature work (thereby risking distorting social, economic and environmental priorities) or in unnecessary work (thereby wasting resources).

Super output areas  
Super Output Areas (SOAs) were created to have a geographic boundary that was not subject to regular boundary changes over time, and were consistent in size for comparative purposes. There are currently two levels of SOAs. A third and larger group of SOAs (SOA3) is proposed. SOA1 is the lowest of the 3 levels and each SOA consists of a minimum population of 1000 people, and normally an average of 1500 people. There are 163 SOA1s in Hillingdon. SOA2 is the middle level and consists of a minimum of 5000 people with an average of 7200, and is restrained by the local authority boundaries. There are 32 SOA2s in Hillingdon.

Unacceptable Risks  
This has not been defined in the statutory guidance as such. It has been taken to mean risks associated with land that meets the statutory definition of contaminated land.
Appendix 2: Interaction of Part IIA with Other Regimes

### Development Control and Building Control

Planning Policy Statement 23 – Planning and Pollution Control, Annex 2 (Development on Land Affected by Contamination) needs to be taken into account when developing plans or conditioning planning applications to ensure land contamination is dealt with adequately for a new development, or where there is a change of use under the Town and Country Planning Act 1990. It encourages the use of risk assessments consistent with Part IIA, although remediation (clean up) requirements are broader than under Part IIA where significance of a contamination is a factor. It can also be used to guide Planning Obligation requirements where appropriate. (See Box 5.4 and Box 5.5 for requirements under planning.)

The amended Building Regulations 2000 has been used to further update Approved Document C - Site Preparation and Resistance to Contaminants and Moisture (2004 Edition), which now goes beyond the footprint of the building. Risk assessment procedures consistent with Part IIA and planning need to be carried out to characterise the risks to future site users. Following a consultation on a new building development (or where there is a material change of use), the Building Control Officer will require measures to protect the fabric of developments and their future occupants from the effects of contamination, including gas ingress, where indicated to be necessary. (See Box 5.6 for requirements under building control.)

Where the above regimes have not adequately dealt with contamination but conditions have been discharged or building approval given, Part IIA may apply.

### Water Pollution

Sections 161 to 161D of the Water Resources Act 1991 give the Environment Agency powers to take action to prevent or remedy the pollution of controlled waters (instances where land has not been historically contaminated). The EA has a policy statement titled the EA Policy and Guidance on the use of Anti-pollution Works Notices. The EA can use a works notice under Section 161A of this Act to require remedial actions to be taken (where Part IIA does not apply). The Water Resources Act powers may be particularly useful where historic pollution of groundwater has occurred but where the pollutants are entirely contained within the relevant body of groundwater or where the source site cannot be identified.

**Note:** Where controlled waters are affected as a result of contaminated land the LA will enforce remediation on the advice of the EA under Part IIA. Where contamination of controlled waters makes it a special site under Part IIA, the EA will become the enforcing authority.

### Pollution Prevention and Control (PPC)

The Pollution Prevention and Control Regulations 2000 is replacing Integrated Pollution Control (IPC) introduced under the Environmental Protection Act 1990 Part I. The regulations relate to specific authorised processes, much as before. Land contamination resulting from IPPC and LA-IPPC activities will have to be cleaned up under the regulations prior to the surrender of the permits. However, there may be instances where Part IIA may be required (e.g. if it meets the definition of contaminated land prior to the issuing of the permit or the required clean up to surrender the permit is insufficient and the definition of contaminated land is met), including for land contamination relating to LA-PPC activities which may fall under the remit of Part IIA, where voluntary remediation is not forthcoming.

### Waste Management Licensing

Where a waste management license under Part II of the Environmental Protection Act (EPA) 1990 is in force at a site, Part IIA does not normally apply. This is because the conditions of the waste management licence should deal with any pollution problem. If the pollution is from a source other than a breach of the site licence or licensed activity then action under Part IIA can be taken.

Part IIA cannot be used to effect the removal of controlled waste as there are powers under Section 59 of the EPA 1990 to effect the removal of waste.

Remediation activities on land may need a waste management licence.
Appendix 2 (continued): Interaction of Part IIA with Other Regimes

Radioactive Substances

Radioactive Substances Act 1993 is used to regulate how people keep and use radioactive materials and the accumulation and disposal (unless exemptions apply) of radioactive waste on or from premises in England and Wales. Where this license is in place, contamination relating to radioactive materials will be cleaned up under the appropriate regulations enforced by the Environment Agency.

Land regulated by the Nuclear Installations Inspectorate (NII) of the Health and Safety Executive (HSE) under Nuclear Installations Act 1965 allows the HSE to control land contaminated with radioactivity via site licence conditions. HSE regards land contaminated with radioactivity on nuclear licensed sites as an accumulation of radioactive waste and it requires licensees to manage it as such. You can find further information on the HSE’s requirements for managing land contaminated with radioactivity on nuclear licensed sites in their guidance on managing radioactive materials and radioactive wastes on nuclear sites [http://www.hse.gov.uk/nuclear/waste1.pdf]. Information can also be found in the HSE’s safety assessment principles published on their website [http://www.hse.gov.uk/nuclear/saps/contents.htm].

Where the Part IIA definition of radioactive contaminated land is met and the above legislation does not apply, the LA will carry out the detailed inspection work as stated in B.20a and B.20b prior to passing on the information to the EA where it is a potential special site.

Statutory Nuisance

These provisions are contained within Part III of the Environmental Protection Act 1990, and abatement notices can be served where nuisance arising from fumes, gases, dust, odour, smoke, an accumulation of deposits or from premises which could be prejudicial to health or a nuisance as a result of land being affected by contamination. Where the definition of contaminated land is met this would have to be dealt with under Part IIA, however nuisance provisions could still apply where the land gives rise to nuisance.

Note: Remedial works carried out under Part IIA or development control where they are found to be a nuisance or prejudicial to health may be subject to an abatement notice under statutory nuisance or a (temporary) stop notice under Planning.

Environmental Liability

Environmental Liability Directive (ELD – required to be transposed into national law by 30 April 2007) is aimed at the prevention and remedying of environmental damage - specifically, damage to habitats and species protected by EC law, damage to water resources, and land contamination, which creates a significant risk to human health being affected adversely. The proposal does not cover "traditional damage" (that is, economic loss, personal injury and property damage). The liability is to “remediate” the damaged environment. Its interaction with other existing regulations, the scope of its application (i.e. the range of activities, and the levels of liability) within the UK, have yet to be finalised. It specifically differs from Part IIA in that it does not apply to historical contamination.

Current draft regulations favoured by the government indicate that there could be no land or water liability for operators of processes outside the Annex III specified activities. The Government also favours that Annex III protected species and habitats would have strict liability applied, and fault based liability would apply to other species and habitats. This would help support Part IIA.
## Appendix 2 (continued): Interaction of Part IIA with Other Regimes

### Health and Safety

The Health and Safety at Work etc Act 1974, the Construction (Design and Management) Regulations 1994 (S.I. 1994/3140) and their associated controls are concerned with risks to the public or employees at business and other premises; risks of these kinds could arise as a result of land contamination. Liaison between Part IIA enforcing authorities and the Health and Safety Executive will help to ensure that unnecessary duplication of controls is avoided, and that the most appropriate regime is used to deal with any problems. Generally the Part IIA enforcing authority will take a longer-term view on the level of remediation, but any clean up should satisfy both authorities.

### Food Safety

Part 1 of the Food and Environment Protection Act 1985 gives ministers emergency powers to issue orders for the purpose of prohibiting specified agricultural activities in a designated area, in order to protect consumers from exposure to contaminated food. The 1985 Act provides for ministers to designate authorities for the enforcement of emergency control orders. Following the coming into force of the Food Standards Act 1999, which established the Food Standards Agency, the above powers are exercisable by the Secretary of State. Enforcing authorities under Part IIA should liaise with the Food Standards Agency about any possible use of the powers in Part 1 of the 1985 Act.

### Major Accident Hazards

The Control of Major Accident Hazards Regulations 1999 (S.I. 1999/743) (COMAH) (as amended by S.I. 2005/1088) require operators of establishments handling prescribed dangerous substances to prepare on-site emergency plans, and the local authorities to prepare off-site emergency plans. The objectives of these emergency plans include providing for the restoration and clean up of the environment following a major accident. The Health and Safety Executive are responsible for overseeing the COMAH Regulations.
Appendix 3: Contaminated Land BV 216 a and b

The following is largely reproduced from Best Value Performance Indicators: 2005/06 produced by the Office of the Deputy Prime Minister.

<table>
<thead>
<tr>
<th>BV 216a</th>
<th>Identifying Contaminated Land</th>
</tr>
</thead>
<tbody>
<tr>
<td>Description</td>
<td>Number of ‘sites of potential concern’ [within the local authority area], with respect to land contamination.</td>
</tr>
<tr>
<td>Purpose/aim</td>
<td>These two linked indicators measure progress in gathering and considering information to identify sites of potential concern with respect to land contamination, and progress in making decisions about those sites. Information gathered at a strategic level informs decisions at the level of individual sites about the need for remediation, in accordance with policy and legislation on contaminated land.</td>
</tr>
<tr>
<td>Definition</td>
<td>‘Sites of potential concern’ are particular landsites where in the view of the authority, on the basis of the history, use and other characteristics of the land, or other information, it is possible that a pollutant linkage may exist or arise and that remediation may be needed and either of the following applies: a) sufficient detailed information is not yet available to decide whether or not remediation is needed. These cases include particular land in a detailed programme of inspection drawn up by the authority in connection with Part IIA statutory guidance on inspection; and other land where, on the same basis, it is possible that a pollutant linkage exists or that one might be created as a result of development etc; or b) there is sufficient detailed information available to make a decision. ‘Sufficient detailed information’ means sufficient in terms of B18 (a) of the Part IIA statutory guidance on inspection, i.e. sufficient to decide whether or not remediation is necessary; or sufficient in terms of PPS 23, i.e. the equivalent decision required in connection with the grant of planning permission on certain land (see further guidance in BV216b). Information from any source can be taken into account, including that provided in connection with planning applications and other proposals. ‘Pollutant linkage’ is defined in the Part IIA statutory guidance. ‘Remediation’ is defined in the Part IIA statutory guidance. Do not, in order to populate the indicator, sub-divide sites artificially or depart from the priorities for inspection established under Part IIA.</td>
</tr>
<tr>
<td>Introduced</td>
<td>2005/06</td>
</tr>
<tr>
<td>Formula/ Worked e.g.</td>
<td>N = (a + b) Where: a = sites where sufficient detailed information is not yet available b = sites with sufficient detailed information available</td>
</tr>
<tr>
<td>Measurement Period</td>
<td>Current Financial Year Snapshot on 31st March</td>
</tr>
<tr>
<td>Further Guidance</td>
<td>Details of the law, policy and guidance on contaminated land can be found on the Defra contaminated land webpages at: <a href="http://www.defra.gov.uk/environment/land/contaminated/index.htm">http://www.defra.gov.uk/environment/land/contaminated/index.htm</a></td>
</tr>
<tr>
<td>Target Setting</td>
<td>Local</td>
</tr>
<tr>
<td>Scope</td>
<td>Metropolitan Authorities, London Boroughs, Unitary Authorities, District Councils, Common Council of the City of London.</td>
</tr>
</tbody>
</table>

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2 PPS 23 – Planning and Pollution Control – Annex 2 (ODPM. Nov 2004)
### Appendix 3 (continued): Contaminated Land BV 216 a and b

<table>
<thead>
<tr>
<th>BV 216b</th>
<th>Information on Contaminated Land</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Description</strong></td>
<td>Number of sites for which sufficient detailed information is available to decide whether remediation of the land is necessary, as a percentage of all 'sites of potential concern'.</td>
</tr>
<tr>
<td><strong>Purpose/aim</strong></td>
<td>These two linked indicators measure progress in gathering and considering information to identify sites of potential concern with respect to adverse effects of land contamination, and progress in making decisions about those sites. Information gathered at a strategic level informs decisions at the level of individual sites about the need for remediation, in accordance with policy and legislation on contaminated land.</td>
</tr>
</tbody>
</table>
| **Definition** | This number includes:  
- sites already given a detailed inspection under and in accordance with the Part IIA statutory guidance; and  
- sites given equivalent consideration by the authority (including in connection with a planning application, or a permission granted), on the basis of information given to or held by the authority.  

'Detailed inspection' is defined in the Part IIA statutory guidance on inspection  
'Sufficient detailed information' – see definition in BV216a, and further guidance below. |
| **Introduced** | 2005/06 |
| **Formula/Worked e.g.** | \[ N = \frac{b}{a} \times 100 \]  
Where:  
a = BV 216a  
b = Number of sites for which sufficient detailed information is available |
| **Measurement Period** | Current Financial Year  
Snapshot on 31st March |
| **Further Guidance** | Details of the law, policy and guidance on contaminated land can be found on the Defra contaminated land webpages at:  
| **Target Setting** | Local |
| **Scope** | Metropolitan Authorities, London Boroughs, Unitary Authorities, District Councils, Common Council of the City of London. |
## Appendix 4: Contact Details of Statutory Consultees

<table>
<thead>
<tr>
<th>Contact</th>
<th>Address</th>
<th>Telephone</th>
</tr>
</thead>
<tbody>
<tr>
<td>David Farlie, Team Leader Ground &amp; Contaminated Land Team A</td>
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<td>01707 632 499</td>
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<tr>
<td>Kyle Lischak</td>
<td>Natural England London Office 20th Floor Portland House Stag Place London SW1E 5RS</td>
<td>0207 932 5800</td>
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<tr>
<td>Michael Dunn</td>
<td>English Heritage London Region 1 Waterhouse Square 138 - 142 Holborn London EC1 2ST</td>
<td>020 7973 3000</td>
</tr>
<tr>
<td>Jeff Hennessey</td>
<td>English Partnerships (to become part of Communities England) London &amp; Thames Gateway 10th Floor 2 Harbour Exchange Harbour Exchange Square London E14 9GS</td>
<td>020 7531 2400</td>
</tr>
<tr>
<td>Kara Thomas, Ignacio Vazquez</td>
<td>Food Standards Agency Chemical Safety Division, Branch 3 Aviation House, Room 707C 125 Kingsway London WC2B 6NH</td>
<td>020 7276 8727</td>
</tr>
</tbody>
</table>
Appendix 5: List of Draft Strategy Review 2007 Consultees

<table>
<thead>
<tr>
<th>The following external Organisations were consulted on the draft strategy review:</th>
<th>The following internal departments and sections were consulted on the draft strategy review:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Environment Agency</td>
<td>Highways &amp; Green Spaces</td>
</tr>
<tr>
<td>Food Standards Agency</td>
<td>Green Spaces</td>
</tr>
<tr>
<td>English Heritage</td>
<td>Corporate Property</td>
</tr>
<tr>
<td>Natural England</td>
<td>Building Control</td>
</tr>
<tr>
<td>English Partnerships</td>
<td>Engineering Consultancy</td>
</tr>
<tr>
<td>Health Protection Agency</td>
<td>Estates &amp; Valuations</td>
</tr>
<tr>
<td>Hillingdon Primary Care Trust</td>
<td>Adult, Social Care Health &amp; Housing</td>
</tr>
<tr>
<td>National House Building Council (NHBC)</td>
<td>Hillingdon Homes</td>
</tr>
<tr>
<td>Linden Homes</td>
<td>Planning &amp; Community Services</td>
</tr>
<tr>
<td>Barratt Homes</td>
<td>Development Control</td>
</tr>
<tr>
<td>George Wimpey Homes</td>
<td>Environment &amp; Property Legal</td>
</tr>
<tr>
<td>Fairview Homes</td>
<td>Legal</td>
</tr>
<tr>
<td>British Airways Authority</td>
<td>Local Land Charges</td>
</tr>
<tr>
<td>British Airways</td>
<td>Corporate Communications Unit</td>
</tr>
<tr>
<td>Defence Estates (MoD)</td>
<td>Property Design &amp; Standards</td>
</tr>
<tr>
<td>British Waterways</td>
<td>Deputy Chief Executive Office</td>
</tr>
<tr>
<td>SEGRO (Slough Estates plc)</td>
<td>Map Research</td>
</tr>
<tr>
<td>Hillingdon Allotments Horticulture Federation</td>
<td></td>
</tr>
<tr>
<td>Notting Hill Housing Trust</td>
<td></td>
</tr>
<tr>
<td>Hillingdon Natural History Society</td>
<td></td>
</tr>
<tr>
<td>Three Valleys Water/Vivendi</td>
<td></td>
</tr>
<tr>
<td>Atkins</td>
<td></td>
</tr>
<tr>
<td>SLR Consulting</td>
<td></td>
</tr>
<tr>
<td>Temple Group</td>
<td></td>
</tr>
<tr>
<td>RH Environmental</td>
<td></td>
</tr>
<tr>
<td>Halcrow</td>
<td></td>
</tr>
<tr>
<td>AEA Energy &amp; Environment</td>
<td></td>
</tr>
<tr>
<td>London Borough of Hounslow</td>
<td></td>
</tr>
<tr>
<td>London Borough of Ealing</td>
<td></td>
</tr>
<tr>
<td>London Borough of Harrow</td>
<td></td>
</tr>
<tr>
<td>Slough Borough Council</td>
<td></td>
</tr>
<tr>
<td>South Buckinghamshire District Council</td>
<td></td>
</tr>
<tr>
<td>Spelthorne District Council</td>
<td></td>
</tr>
<tr>
<td>Chiltern District Council</td>
<td></td>
</tr>
<tr>
<td>Three Rivers District Council</td>
<td></td>
</tr>
</tbody>
</table>

The draft strategy review document was also made available on the Hillingdon website for the public to comment.
## Appendix 6: DRAFT Strategy Review 2007 Comments

<table>
<thead>
<tr>
<th>Comment</th>
<th>Required Amendment</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>AEA Tech</strong></td>
<td></td>
</tr>
<tr>
<td>• No objections to details of GroundView as shown in document on this occasion.</td>
<td>• Amend as suggested</td>
</tr>
<tr>
<td>• Section 4.2 (p.27) more accurate to state ‘GroundView software was licensed from AEA Technology plc’ rather than “purchased”.</td>
<td></td>
</tr>
<tr>
<td>• Unobtrusive acknowledgement is given to AEAT for the GroundView images in the document. Suggested ‘GroundView images reproduced with the permission of AEA Technology plc’.</td>
<td>• Include with other copyright messages on the document control page</td>
</tr>
<tr>
<td><strong>Food Standards Agency</strong></td>
<td></td>
</tr>
<tr>
<td>• No specific comments.</td>
<td>• See if references to the FSA can be put better</td>
</tr>
<tr>
<td>• General comments to consider should contaminated land issues arise. Explains remit. Attached general guidelines docs</td>
<td>• Keep guideline information provided in procedures file and incorporate into internal procedures</td>
</tr>
<tr>
<td><strong>Hillingdon Natural History Society</strong></td>
<td></td>
</tr>
<tr>
<td>• AR happy to remain contact. Direct interest due to issues at Harefield Nature reserve.</td>
<td>• No changes</td>
</tr>
<tr>
<td><strong>LBH Corporate Communications</strong></td>
<td></td>
</tr>
<tr>
<td>• Early (as possible) involvement of Corporate Communications. Will review and depending on situation decide whether it needs to be communicated to the public.</td>
<td></td>
</tr>
<tr>
<td>• Do we have to commit to a public meeting</td>
<td></td>
</tr>
<tr>
<td>• Say ‘The Council will proactively communicate the matters related to...’ instead of ‘The Council will endeavour to communicate...’ as it sounds more definite</td>
<td></td>
</tr>
<tr>
<td><strong>LBH Map Research</strong></td>
<td></td>
</tr>
<tr>
<td>• Copyright on maps are too small to read. Best approach is to update maps accordingly</td>
<td></td>
</tr>
<tr>
<td>• Also provided verbal advice on improving the appearance of maps</td>
<td></td>
</tr>
<tr>
<td>• ESRI acknowledgement (wording provided)</td>
<td></td>
</tr>
<tr>
<td>• Put the copyright message provided from OS (needs to be amended slightly) and cities revealed (including logo), on the document control page</td>
<td></td>
</tr>
<tr>
<td><strong>Defence Estates (MOD)</strong></td>
<td></td>
</tr>
<tr>
<td>• P2, para 1 ‘controlled waters’ should be defined in the text as surface and groundwaters</td>
<td>• Refers to changes in the definition of controlled waters so inappropriate to change it.</td>
</tr>
<tr>
<td>• P2 Box 1.2 title should say Water Act 2003 not 2004</td>
<td>• Amend as indicated</td>
</tr>
<tr>
<td>• Use the wording used to define ‘groundwaters’ as the definition appears to mean something different</td>
<td>• The meaning remains the same and wording is actually clearer as it is.</td>
</tr>
<tr>
<td>• WILL should be lower case</td>
<td>• Upper case deliberate to draw attention to the fact that it is not yet in force. Maybe need to make it clearer or emphasise in a different way - underline</td>
</tr>
<tr>
<td>• Paragraph on ‘significant pollution’ should come first as the amendment precedes the previous one in the Water Act 2003.</td>
<td>• This may be the case, but it is not in force so considered less important at this stage.</td>
</tr>
<tr>
<td>• Section 86 of the Water Act 2003 does not include radioactively contaminated land</td>
<td></td>
</tr>
<tr>
<td>• P2, section 1.2 ‘Secretary of state’ should be ‘Secretary of State’</td>
<td>• This is correct and needs amending. Need to refer to The Radioactive Contaminated Land (Modification and Enactments) (England) Regulations 2006</td>
</tr>
<tr>
<td>• P3, para 1 modified by regulation 4 a of the modification regulations. Wonders which regs they refer to</td>
<td>• Amend</td>
</tr>
<tr>
<td>• Paragraph on ‘significant pollution’ should come first as the amendment precedes the previous one in the Water Act 2003.</td>
<td>• The regulations was not specifically referred to in the original text in the guidance so put relevant details in [square brackets] if appropriate</td>
</tr>
<tr>
<td>• Section 86 of the Water Act 2003 does not include radioactively contaminated land</td>
<td>• Amendment not considered necessary</td>
</tr>
<tr>
<td>• P2, para 1 ‘controlled waters’ should be defined in the text as surface and groundwaters</td>
<td>• Check and amend</td>
</tr>
<tr>
<td>• P2, section 1.2 ‘Secretary of state’ should be ‘Secretary of State’</td>
<td>• Thought to be correct. Clearly causing confusion though as difference between the meaning of development control and building control does not seem to be clear (also how development control relates to planning). Clarifying</td>
</tr>
<tr>
<td>• P3, section 1.4.2, para 1 ‘UDP’ should be placed after the full worded version but before ‘1998’</td>
<td>• Text is clearly referring to the previous document and that it is no longer used. PPS23 listed in box as the pertinent document</td>
</tr>
<tr>
<td>• P5 section 1.5 ‘town and country planning act as indicated</td>
<td>• Amend</td>
</tr>
<tr>
<td>• References were made to planning rather than T&amp;CP act</td>
<td></td>
</tr>
<tr>
<td>-----------------------------</td>
<td>---------------------------------------------</td>
</tr>
<tr>
<td><strong>above</strong>. This was not previously mention in the document, so indicated above should be removed. The year 1990 of the act should be placed after it</td>
<td>previously. Take out the reference as not necessary</td>
</tr>
<tr>
<td>• P8, section 2.1, para 2 put in order of increasing population density in sentence</td>
<td>• This would read better, amend</td>
</tr>
<tr>
<td>• P11, section 2.3 SSSI needs to be written in full as it does not appear in full anywhere in the doc referring to PPS 232</td>
<td>• Write out in full in the main text</td>
</tr>
<tr>
<td>• P16 map 2.10 title, what does 2-D mean?</td>
<td>• To indicate groundwater vulnerability data used is two dimensional. Take out as image is 2-D anyway</td>
</tr>
<tr>
<td>• P17, section 2.6 Not clear what is meant by clayey soils. This statement then does not link to the next line about the solid geology. Vulnerability of underlying aquifer is biased.</td>
<td>• This text could be better written but it is not misleading as the comment would suggest (original text is thought to have come from the LEAP docs and EA were happy with this text from the original strategy</td>
</tr>
<tr>
<td>• Box 2.3 would be better displayed as a map</td>
<td>• Agree. Have produced data as shapefiles with the help of map research, however copyright implications not clear, so leave for now</td>
</tr>
<tr>
<td>• P20, section 3.1 priority 2, the ‘on’ should be ‘of’ as in B.9 in stat guidance</td>
<td>• Check and amend</td>
</tr>
<tr>
<td>• P21, section 3.3 priority 3 ‘advice’ should be ‘advise’</td>
<td>• Amend as appropriate</td>
</tr>
<tr>
<td>• P22, section 3.6, box 3.1, asks about timescales for other receptors, also to indicate what ‘SPT’ stands for</td>
<td>• Explain that other receptors are also looked at but HH is used to prioritise the inspection. Spell out SPT and what it means</td>
</tr>
<tr>
<td>• P23, SECTION 3.6, Box 3.2, last bullet point, BVPI has not been defined</td>
<td>• This also applies to the next section and box. Refer to text that defines it</td>
</tr>
<tr>
<td>• P25, section 4.1.2, box 4.1 and 4.2 would benefit from looking like 4.3</td>
<td>• Noted, but not necessary to change as source data has been provided to other sections and pathway data is not particularly robust. The relevant information are already in all tables</td>
</tr>
<tr>
<td>• P32, section 4.4, Phase 1 ‘some limited sampling’ – sampling of what materials? Is this not outside the remit of a desk top study?</td>
<td>• Clarify as suggested. Some sampling can be carried out as part of a phase 1 desk top study (definition is not that strict)</td>
</tr>
<tr>
<td>• P34, section 4.6.1 should be ‘The Contaminated Land (England) Regulations 2006’</td>
<td>• Amend</td>
</tr>
<tr>
<td>• P35, section 4.8 what criteria will be used to assess the possible affects of climate change. How will climate change affect contaminated land designation?</td>
<td>• Not considered the appropriate place to go into detail, so no change. This was in reference to consideration for re-inspection of land rather than inspection. Criteria to be used may need to be worked out as part of the climate change strategy if appropriate, how climate change will affect designation will have to be looked at on a site by site basis but the key here will be the change in significance of the contamination/new pathways</td>
</tr>
<tr>
<td>• P36, figure 5.1 questions arrow directions with the interpretation it is to do with ‘communication’ and apparently not consistent with p.42 where figure 5.1 is also referred to.</td>
<td>• Rationale behind the arrows referring to ‘consultation’ not necessarily just communication. Provide key for arrows to clarify. Where specialist advice is sought the arrow goes only one way, which isn’t to imply available information is not provided</td>
</tr>
<tr>
<td>• P38, section 5.2 confusion over building control and development control</td>
<td>• Make the distinction between the two clear. Development control refers to Planning</td>
</tr>
<tr>
<td>• P47, section 7.5.2 FOI effect contaminated land enquiries</td>
<td>• NOTE: EIR 2004 takes FOI into account. Have yet to deal with an information request regarding land contamination that cannot be considered under EIR. Information requests generally do not state the legislation the request is being made under. If regulation is stated such as FOI then it will be followed where appropriate. No change.</td>
</tr>
<tr>
<td>• P48 references/bibliography, could include other guidance docs such as those listed in Box 1.4</td>
<td>• Documents listed in the strategy are often references to guidance and is provided in sufficient detail in the document that it is not considered necessary to list them under References/Bibliography. What has been listed are documents used to assist in writing the strategy</td>
</tr>
<tr>
<td>• Appendix 3 p11, definition, PPS 232 should be PPS 23</td>
<td>• This was an error made in the ODPM BVPI publication. Not all errors were amended in the final version so if time available type up the summary amending factual (rather than policy) errors</td>
</tr>
</tbody>
</table>

**Natural England**

| • Section 3.3 aim 3 encouraging remediation/reuse of brownfield land, concern about loss of ecological value | • Loss of ecological value - need to include encouraging nature conservation as a priority as well (as indicated in original strategy) |
| • 4.6.2 referring to impacts of development or site investigation on nature conservation? | • Referring to impacts of contamination and advice on how to deal with it. This would include seeking advice on how best to investigate and remediate the site without causing further damage |
| • Box 4.3 ecological baseline should be expanded to all ‘Sites of Importance for Nature Conservation’ (SINC) in the borough | • Local nature sites have been included as directed by Statutory Guidance which does not include all SINC. Original strategy refers to considering green corridors as well although not identified as a receptor group. No change |
| • Support approach outlined in section 4.6.2 where site investigations needs to be undertaken | • Ok. Check text is clear and concise |

**PCT**

<table>
<thead>
<tr>
<th>• 2.2 Industrial history No mention of extensive asbestos industry in NW Hillingdon during latter part of 19th, early 20th century</th>
<th>• Noted in 2001 strategy. Lack of mention is due to low land coverage of use. Add to industry listed in paragraph under 2.2</th>
</tr>
</thead>
</table>

- Box 4.3 information on health facilities under Education and health, but only education facilities listed. Are nursing homes, residential care homes considered.

- Provided contact details at PCT

<table>
<thead>
<tr>
<th>HPA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Strategy seems to follow logical progression in terms of risk to human health by concentrating on prioritising where human exposure might be greatest to potential contaminants. No further comments were provided. All mention of HPA appears to have been identified.</td>
</tr>
</tbody>
</table>

- No change

<table>
<thead>
<tr>
<th>EPU changes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Make changes as indicated in this table Clarify as indicated in this table and where ever else it appears to be necessary Desirable to include brief text on the funding of the inspection work Desirable to give a brief outline of the content of the Contaminated Land Remediation Strategy (CLRS) which is referred to in the document</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Temple Group plc</th>
</tr>
</thead>
<tbody>
<tr>
<td>General positive comments, specifically refers to the importance of roles and responsibilities within different Council departments</td>
</tr>
</tbody>
</table>

- No change

<table>
<thead>
<tr>
<th>Environment Agency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Generally happy, commented of a couple of minor errors</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Corporate Property</th>
</tr>
</thead>
<tbody>
<tr>
<td>P21 para 3.4 refers to 'related departments', more accurate to refer to occupying or managing departments. P35 para 4.8 why does responsibility for funding fall to Corporate Property or the department managing or occupying the land, in the absence of DEFRA funding. P38, Box 5.3, opening para be reworded as 'The Council owns a great deal of land in the borough much of which is managed by a number of different departments and directorates. Corporate Property has overall responsibility for strategic management of the Council’s land assets.’ The last sentence to remain as drafted. P39, box 5.7 Not sure why open spaces is shown against Social Services and Environmental</td>
</tr>
</tbody>
</table>

| - Amend |
| This may be unlikely as DEFRA funding is available where it can be shown the site is likely to be or is contaminated land. EPU will provide technical information towards getting funds from other sources. EPU will have to find funding in the absence of a DEFRA grant for orphan sites, or where the site owner cannot carry out the works. For Council land, managers of the land may have to find the funds. This will also be the case for any initial investigation. |
| Amend |

| - Amend |

| - Amend |

- These are considered within the sub-division of receptor groups under human health ‘residential without gardens’ as well and have been scored based on sensitivity. There is no requirement to be explicit in the table to that degree. Table follows the format of the original strategy as far as possible and what was suggested in the DETR guidance. Hospitals and surgeries are considered under human health as well. No change. Update internal procedures with contact details, but no change to strategy document |

- Update internal procedures with contact details, but no change to strategy document
Contact Details for the Environmental Protection Unit

If you have any questions regarding contaminated land, you can contact us by post:

Peggy Law  
Environment & Consumer Protection  
Environmental Protection Unit  
Civic Centre (3S/02)  
High Street  
Uxbridge  
UB8 1UW

Or Telephone: 01895 250 155

Or e-mail: environmentalhealthepu@hillingdon.gov.uk

Find out more about contaminated land on the Hillingdon website at:  
http://www.hillingdon.gov.uk/index.jsp?articleid=8676

Language Translation

If anyone requires a translation of this Document please contact us on:

01895 250 155