

Appendix C - EA Correspondence

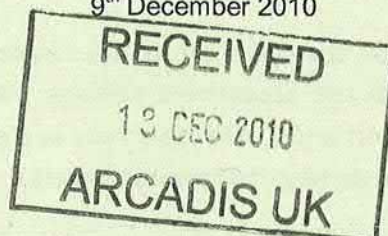


Alastair Dunster
Arcadis
2 Craven Court
Willie Snaith Road
Newmarket
CB8 7FA

Our ref: CL/3830

Your ref:

Date: 9th December 2010



Dear Alastair

Re: Sanofi Aventis, Rainham Road South, Dagenham

Thank you for the reports relating to the above site. The Environment Agency has now reviewed the following reports:

- Site Wide Investigation Report (ARCADIS Ref: 928871027_01, November 2009)
- Site Wide Detailed Qualitative Risk Assessment (ARCADIS Ref: 928872004, March 2010)
- D44 Landfilled Material Remediation Options Appraisal (ARCADIS Ref: 928871812, July 2010)

Site Wide Investigation Report (ARCADIS Ref: 928871027_01, November 2009)

From the information submitted the EA is satisfied that site investigation works relating to this phase of works have been able to characterise areas of impact on the site. Due to the size of the site and the complexity of different contaminants existing at the site it is agreed that the zoning of the site to better identify areas of impact is appropriate.

Section 8 of the report presents a conceptual model for the site. Controlled waters receptors have been accurately detailed in section 8.2.1. With regard to the vulnerability of the source protection zone and the chalk aquifer it is agreed that a level of protection is given to this by London Clay. Please could you confirm the thickness of the London Clay beneath the site to further evidence its protective properties?

With regard to the unnamed pond and lagoon the sensitivity of these receptors will depend to an extent on whether they are lined. It is understood that the lagoon is isolated from the groundwater system as it is encompassed by London Clay. Is the unnamed pond considered to be in hydraulic continuity with the surrounding groundwater system?



Site Wide Detailed Qualitative Risk Assessment (ARCADIS Ref: 928872004, March 2010)

The EA supports the approach of modelling SSAC's with the assumption that the permeable reactive barrier (PRB) is no longer present. This is something that will have to be considered within future validation works also. There will likely be a requirement for validation works to be carried out once the PRB has been removed to ensure this doesn't lead to increased off site migration or potential impact to surrounding watercourses.

It is agreed that for a site of this nature, with multiple contaminant sources, CONSIM v2.5 is an appropriate risk assessment package. We support the use of site data wherever possible in risk assessments and it is felt that there is a good level of site data from site investigation work that has assisted in deriving the remedial targets.

It is encouraging to see that section 7.2 of the report mentions that sensitivity analysis has been carried out as part of the works. Where ground is heterogeneous, as suggested by the wide range of permeability results gathered during site work, then sensitivity analysis is especially important. Additionally, the half lives assumed for compounds where no text data is available are considered reasonable.

While the aim of remediation should be to achieve these remedial targets, in consideration of the overall sensitivity of the site to controlled waters it is considered that a pragmatic approach would be beneficial in this instance. Treatability studies should hopefully indicate what concentration ranges are achievable from the selected remediation techniques. However, where remedial targets are very low then evidence showing betterment of groundwater quality may be considered suitable where it can be demonstrated that the risk posed has been reduced to an acceptable level, for example to the River Beam or Wantz Brook.

D44 Landfilled Material Remediation Options Appraisal (ARCADIS Ref: 928871812, July 2010)

The D44 Landfill area has been recognised as one of the most severely impacted areas of the site with regard to contamination. The EA is satisfied that the landfill area has been adequately characterised with regard to waste types found within the landfill and distribution and thicknesses of different materials.

The EA supports the proposed remediation method incorporating soil washing, chemical oxidation and stabilisation. With regard to stabilisation, have treatability studies been carried out to ascertain the length of time that treated materials will remain in a stable form? Factors such as change of pH can cause releases of previously stabilised compounds. The type of contaminant to be stabilised and how this reacts with the surrounding environment should be considered.

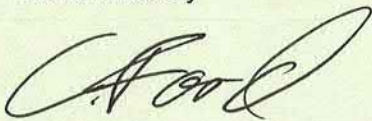
Section 4.1 of the report mentions that the effect of the PRB has not been considered. While this is in line with the general approach of the site investigation works, assuming the PRB is no longer present, would it be worth attempting to quantify or predict the potential impacts of removing the PRB? Any residual

contaminant plume remaining in groundwater could expand following removal and pose an off site risk.

With regard to groundwater remediation it is understood that this will be addressed in a future remediation options appraisal.

If you have any further questions please don't hesitate to contact me on the number below.

Yours sincerely



Chris Ford
Technical Officer

Direct dial 01707 632472

Direct fax 01707 632499

Direct e-mail chris.ford@environment-agency.gov.uk

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Alastair Dunster
Arcadis
2 Craven Court
Willie Snaith Road
Newmarket
CB8 7FA

Our ref: CL/3830
Your ref:
Date: 6th December 2012

Dear Alastair

Re: Sanofi Aventis, Rainham Road South, Dagenham – D44 Landfill Validation report

Thank you for the D44 Landfill Validation report. The Environment Agency (EA) has now reviewed the report and would like to make the following comments.

Based on the information submitted I am satisfied that the verification data provides the necessary lines of evidence to show that the remediation criteria have been achieved. Therefore we have no further requirements with regard to remedial works in the D44 landfill area of the Sanofi Aventis site.

If you have any further questions please don't hesitate to contact me on the number below.

Yours sincerely

A handwritten signature in blue ink, appearing to read "Chris Ford".

Chris Ford
Technical Specialist

Direct dial 01707 632472
Direct fax 01707 632499
Direct e-mail chris.ford@environment-agency.gov.uk

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Alastair Dunster
Arcadis
2 Craven Court
Willie Snaith Road
Newmarket
CB8 7FA

Our ref: CL/3830
Your ref:
Date: 7 June 2012

Dear Alastair

Re: Sanofi Aventis, Rainham Road South, Dagenham – Remediation Priority Areas, Remediation Implementation Plan and Validation Plan

Thank you for the above reports for the Sanofi Aventis site. The Environment Agency (EA) has now reviewed the following reports and I would like to make the following comments.

Remediation Priority Areas, Remediation Implementation Plan

The Remediation Implementation Plan (RIP) has gone into a good level of detail for each of the three Remediation Priority Areas (RPA). It is understood that the following remediation treatment trains will be implemented for each RPA:

RPA 1:

- Groundwater pumping
- Soil flushing
- In situ chemical oxidation
- Soil vapour extraction

RPA 2:

- Groundwater pumping
- In situ chemical oxidation

RPA 3:

- Excavation and disposal
- In situ chemical oxidation

I have no objections to the proposed remediation technologies for treatment of impacted soils and groundwater. Ground conditions have been well characterized which has enabled accurate assessment of dosing quantities for treatments such as in situ chemical oxidation. Where DNAPL is encountered this should be removed and disposed of to an appropriately permitted facility. With regard to RPA 3 and excavation and disposal of impacted soils are there any treatment technologies of the soil that could be used to enable re-use at the site?

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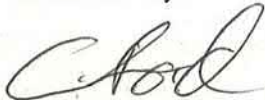
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Remediation Priority Areas Validation Plan

I have no objections to the proposed Validation Plan. With regard to groundwater monitoring at the validation stage please could you confirm whether the 12 months monitoring will take place monthly or quarterly? Section 6.1 of the report states that sampling will be carried out quarterly but then the table below refers to monthly sampling.

If you have any further questions please don't hesitate to contact me on the number below.

Yours sincerely



Chris Ford
Technical Specialist

Direct dial 01707 632472

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Direct e-mail chris.ford@environment-agency.gov.uk

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Alastair Dunster
Arcadis
2 Craven Court
Willie Snaith Road
Newmarket
CB8 7FA

Our ref: CL/3830
Your ref:
Date: 10 May 2012

Dear Alastair

Re: Sanofi Aventis, Rainham Road South, Dagenham

Thank you for the reports relating to the above site. The Environment Agency (EA) has now reviewed the following reports:

- Sediment and Surface Water Sampling of Boyers Pond, November 2011; reference: 928874702_02
- Quantitative Risk Assessment for Boyers Pond, March 2012; reference: 928874902_02.

I agree from the data collected as part of the Sediment and Sampling report that groundwater stored within the gravels is in hydraulic continuity with Boyers Pond. This is evidenced by contaminants found in groundwater upgradient of the permeable reactive barrier (PRB) and contaminants found within sediment samples from Boyers Pond alongside groundwater and surface water elevations. The sediment and surface water results collected as part of the assessment indicate that current impacts to Boyers Pond are limited.

The Quantitative Risk Assessment has taken a suitable approach to assessing possible impacts of removing the PRB on the surrounding hydrogeological system. I would agree that from looking at the contaminant concentrations through the sediment profile at different depths that low rates of biodegradation are likely. I do however feel that following removal of the PRB a contingency plan should be in place in the event that surface water and/ or downgradient groundwater show a marked increase in contaminant concentrations.

With regard to the decommissioning of the PRB would this be a phased schedule of works to enable surface and groundwater monitoring at different stages of decommissioning, e.g closure/removal of some gates and the effects of the changes to downgradient groundwater flow towards Boyers Pond?

I feel that following removal of the PRB there would need to be a period of post removal groundwater monitoring upgradient and downgradient of the PRB. This would include looking at groundwater elevations to assess any changes caused by the PRB removal and whether this has any effect on

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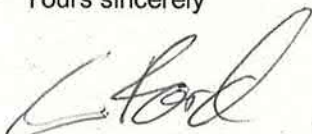
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groundwater flow direction as well as chemical analysis to assess any qualitative changes to groundwater.

If you have any further questions please don't hesitate to contact me on the number below.

Yours sincerely

A handwritten signature in black ink, appearing to read 'C. Ford', written in a cursive style.

Chris Ford
Technical Specialist

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Direct fax 01707 632499

Direct e-mail chris.ford@environment-agency.gov.uk

Alastair Dunster
Arcadis
2 Craven Court
Willie Snaith Road
Newmarket
CB8 7FA

Our ref: CL/3830
Your ref:
Date: 26th October 2012

Dear Alastair

Re: Sanofi Aventis, Rainham Road South, Dagenham

Thank you for the reports relating to the above site. The Environment Agency (EA) has now reviewed the following reports:

- Site Wide Remediation Implementation Plan, April 2012, reference: 928875401_01
- Site Wide Remediation Areas Validation Plan, May 2012, reference: 928875402_02

Site Wide Remediation Plan

The Environment Agency has no objections to the proposed remediation plan for the site. This is understood to be a treatment train approach, allowing for a degree of flexibility such as altering treatment efficiency at certain stages along the process. The use of pilot testing to confirm the suitability of the selected remediation techniques on identified contaminants of concern also gives extra confidence in the selected techniques. The report comments on the variability of ground conditions at the site as a possible limitation due to the large range of hydraulic conductivities measured. It is however expected that the flexibility in the treatment train approach will be able to mitigate this to some extent, for example changing pumping rates to reflect any change in ground conditions.

The performance criteria detailed in section 3.2 is acceptable. This is specific to groundwater where a reduction of 70% will be required for all contaminants of concern when compared to the baseline starting concentrations. It is acknowledged that some of the remedial targets derived for controlled waters may not be practically achievable, particularly where remedial targets are below laboratory limits of detection.

Site Wide Remediation Areas Validation Plan

It is understood that groundwater verification monitoring will take place over 12 months with sampling carried out on a quarterly basis. This monitoring will not commence until the effects of the sodium persulphate injections have ended.

With regard to laboratory accreditation not being available for some contaminants will this be mitigated to some extent by an increased frequency of duplicate or blank sampling, compared to contaminants where MCERTS or UKAS accreditation is available?

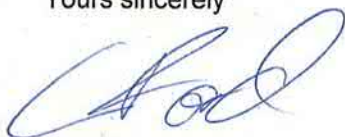
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Considering the scope of remedial works proposed and the overall site sensitivity with respect to controlled waters I am in agreement with the proposed validation plan. As mentioned previously the success of the remediation will be assessed based on a 70% reduction of contaminants of concern with evidence of a stable or reducing plume also assisting in demonstrating the efficacy of the remedial works.

If you have any further questions please don't hesitate to contact me on the number below.

Yours sincerely



Chris Ford
Technical Specialist

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Direct fax 01707 632499

Direct e-mail chris.ford@environment-agency.gov.uk

Mr Chris Ford – Technical Officer
Environment Agency
Apollo Court
2 Bishops Square Business Park
St Albans Road West
Hatfield
Hertfordshire
AL10 9EX

For the Attention of Mr Chris Ford

Dear Chris,

Thank you for your letter of the 7th of June regarding our proposed works and reports for the Remediation Priority Areas at the Sanofi Dagenham Facility. Please find below our responses to your comments.

RPA - Remediation Implementation Plan

With respect to your query regarding re-using material excavated in RPA3, the remediation strategy comprises a treatment train approach to achieve a pragmatic solution that balances implementation costs and liability reduction. Based on the results of the RPA3 remediation pilot trials the following remediation technologies were selected to manage the risks posed by contamination in RPA3:

- Excavation and off-site disposal of impacted soils
- *In Situ* Chemical Oxidation

It is proposed that some material will be re-used - the estimated excavation mass is approximately 1,990 tonnes, of which, 660 tonnes of material are expected to be suitable for re-use on-site and 1,330 tonnes would require disposal off-site.

ARCADIS are committed to minimising the amount of material that is disposed of off-site. Whilst treatment technologies are available which could enable further re-use the following justification is made in favour of off-site disposal for the most impacted material:

- the works are to be carried out within the operational footprint of the site and there would not be an appropriate area to carry out the works without disrupting site operations via significant movements of soils
- the contaminant mass means that ex-situ bioremediation methods would not be effective in a timely enough manner and ex-situ chemical oxidation would not be cost effective as it would require a high mass of oxidant to be mixed with the soils to reduce the contaminant mass;
- the volume of material requiring treatment is relatively small and would entail disproportionate costs to remediate on-site.

RPA – Validation Plan

We can confirm that the 12 months groundwater monitoring will be undertaken on a quarterly basis. The Validation plan has been updated to ensure this is now clear (Section 6.1), a copy of which is included on the enclosed CD.

ARCADIS

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Date:
18th July 2012

Contact:
Alastair Dunster

Telephone:
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Email:
Alastair.Dunster@arcadis-uk.com

Mobile:
07730 814922

Our Ref:
92887.4507

I trust the above information address yours comments. If you have any further questions or need further clarification please don't hesitate to contact me.

Yours sincerely



Alastair Dunster BSc, MSc, MRSC
Account Principal

Appendix D - Planning Approval 16/00926/CDN

TOWN AND COUNTRY PLANNING ACT 1990

**TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE)
(ENGLAND) ORDER 2015**

To: Sanofi
c/o Savills
33 Margaret Street
London W1G 0JD
FAO: Miss C Mason

APPLICATION NO:

16/00926/CDN

PROPOSAL:

Application for approval of details reserved by conditions 9 (verification report) and 10 (remediation scheme carried out) in respect of planning permission 15/00951/OUT (Areas 3, 4a and 4b).

ADDRESS:

Former Sanofi Aventis Site
Rainham Road South
Dagenham
Essex

In accordance with the powers exercised by them as Local Planning Authority, the Council of the London Borough of Barking and Dagenham, having considered your application to carry out the above development, do hereby give notice of their decision to **APPROVE THE FOLLOWING DETAILS** for the said development:

1) The following details submitted in respect of conditions 9 and 10 of planning permission 15/00951/OUT (Areas 3, 4a and 4b) are considered to accord with policy BR5 of the Borough Wide Development Policies DPD and are hereby approved.

- Arcadis Report Back Plot A dated April 2016
- Arcadis Report Back Plot B dated April 2016
- Letter from Arcadis EC Harris reference 2572312726

Dated 17th October 2016
Development Management
Regeneration & Economic
Development
Room 104 Barking Town Hall
1, Town Square
Barking IG11 7LU



.....
Strategic Director of Growth & Homes

IMPORTANT - ATTENTION IS DRAWN TO THE NOTES OVERLEAF

NOTES

Appeals to the Secretary of State

- If you are aggrieved by the decision of your local planning authority to refuse permission for the proposed development or to grant it subject to conditions, then you can appeal to the Secretary of State under section 78 of the Town and Country Planning Act 1990.
- If you want to appeal against your local planning authority's decision then you must do so within 6 months of the date of this notice.
- Appeals must be made using a form which you can get from the Secretary of State at Temple Quay House, 2 The Square, Temple Quay, Bristol BS1 6PN (Tel: 0303 444 5000) or online at <https://acp.planninginspectorate.gov.uk>.
- The Secretary of State can allow a longer period for giving notice of an appeal but will not normally be prepared to use this power unless there are special circumstances which excuse the delay in giving notice of appeal.
- The Secretary of State need not consider an appeal if it seems to the Secretary of State that the local planning authority could not have granted planning permission for the proposed development or could not have granted it without the conditions they imposed, having regard to the statutory requirements, to the provisions of any development order and to any directions given under a development order.

PURCHASE NOTICES

If either the local planning authority or the Secretary of State refuses permission to develop land or grants it subject to conditions, the owner may claim that he can neither put the land to a reasonably beneficial use in its present state nor can render the land capable of a reasonable beneficial use by carrying out any development which has been or would be permitted.

In these circumstances, the owner may serve a purchase notice on the Council. His notice will require the Council to purchase his interest in the land in accordance with the provisions of Part IV of the Town and Country Planning Act 1990.

NOTES

- (1) The attention of developers is drawn to the fact that any failure to adhere to the details of the approved plans, or failure to comply with conditions attached to a planning permission, constitutes a contravention of the provisions of the Town and Country Planning Acts in respect of which enforcement action may be taken.
- (2) The decision overleaf is for planning permission only, but it may be necessary for your plans to be passed under BUILDING REGULATIONS (unless this has already been done). Nor does this consent relieve the applicant of any duties or obligations to obtain the necessary consent of any other interested party under Common Law or any other Statute other than the Town and Country Planning Acts.

Appendix E - Planning Permission 16/01017/FUL

Application No. 16/01017/FUL

**TOWN AND COUNTRY PLANNING ACT 1990
TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT
PROCEDURE) (England) ORDER 2015**

To: Sanofi
c/o Savills
33 Margaret Street
London W1G 0JD
FAO: Miss C Mason

In pursuance of the powers exercised by them as Local Planning Authority, the Council of the London Borough of Barking and Dagenham, having considered your application to carry out the following development:-

Decommissioning of permeable reactive barrier on southern edge of site (in phases).

At Sanofi Aventis Rainham Road South Dagenham Essex

In accordance with the drawing(s) accompanying the said application, do hereby give notice of their decision to **GRANT PERMISSION** for the said development, subject to the following condition(s):-

1) No development should take place until a long-term monitoring and maintenance plan in respect of contamination including a timetable of monitoring and submission of reports to the Local Planning Authority, shall be submitted to and approved in writing by the Local Planning Authority. Reports as specified in the approved plan, including details of any necessary contingency action arising from the monitoring, shall be submitted to and approved in writing by the Local Planning Authority. Any necessary contingency measures shall be carried out in accordance with the details in the approved reports. On completion of the monitoring specified in the plan a final report demonstrating that the decommissioning and staged removal of the Permeable Reactive Barrier has been satisfactorily achieved shall be submitted to and approved in writing by the Local Planning Authority.

Reason:

A long-term monitoring and maintenance plan is required prior to the commencement of the development to protect groundwater from pollution and/or further deterioration in accordance with Policies BR4 and BR5 of the Borough Wide Development Policies Development Plan Document.

2) If during decommissioning of the Permeable Reactive Barrier, contamination not previously identified is found to be present at the site then no further works (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until the developer has submitted a remediation strategy to the Local Planning Authority

detailing how this unsuspected contamination shall be dealt with and obtained written approval from the Local Planning Authority. The remediation strategy shall be implemented as approved.

Reason:

To protect groundwater in accordance with Policies BR4 and BR5 of the Borough Wide Development Policies Development Plan Document.

APPROACH TO DECISION-TAKING:

The council has adopted the approach detailed in paragraphs 186 and 187 of the National Planning Policy Framework in dealing with this application.

**Dated 14th October 2016
Development Management
Regeneration & Economic Development
Room 104 Barking Town Hall
1, Town Square
Barking IG11 7LU**



.....
Strategic Director – Growth & Homes

IMPORTANT - ATTENTION IS DRAWN TO THE NOTES OVERLEAF

NOTES

Appeals to the Secretary of State

- If you are aggrieved by the decision of your local planning authority to refuse permission for the proposed development or to grant it subject to conditions, then you can appeal to the Secretary of State under section 78 of the Town and Country Planning Act 1990.
- If you want to appeal against your local planning authority's decision then you must do so within 6 months of the date of this notice (except in the case of applications subject to an Enforcement Notice where appeals must be lodged within 28 DAYS).
- Appeals must be made using a form which you can get from the Secretary of State at Temple Quay House, 2 The Square, Temple Quay, Bristol BS1 6PN (Tel: 0303 444 5000) or online at <https://acp.planninginspectorate.gov.uk>.
- The Secretary of State can allow a longer period for giving notice of an appeal but will not normally be prepared to use this power unless there are special circumstances which excuse the delay in giving notice of appeal.
- The Secretary of State need not consider an appeal if it seems to the Secretary of State that the local planning authority could not have granted planning permission for the proposed development or could not have granted it without the conditions they imposed, having regard to the statutory requirements, to the provisions of any development order and to any directions given under a development order.

PURCHASE NOTICES

If either the local planning authority or the Secretary of State refuses permission to develop land or grants it subject to conditions, the owner may claim that he can neither put the land to a reasonably beneficial use in its present state nor can render the land capable of a reasonable beneficial use by carrying out any development which has been or would be permitted.

In these circumstances, the owner may serve a purchase notice on the Council. His notice will require the Council to purchase his interest in the land in accordance with the provisions of Part IV of the Town and Country Planning Act 1990.

NOTES

(1) The attention of developers is drawn to the fact that any failure to adhere to the details of the approved plans, or failure to comply with conditions attached to a planning permission, constitutes a contravention of the provisions of the Town and Country Planning Acts in respect of which enforcement action may be taken.

(2) The decision overleaf is for planning permission only, but it may be necessary for your plans to be passed under BUILDING REGULATIONS (unless this has already been done). Nor does this consent relieve the applicant of any duties or obligations to obtain the necessary consent of any other interested party under Common Law or any other Statute other than the Town and Country Planning Acts.

Miss Nelupa Malik
London Borough of Barking & Dagenham

Our ref: NE/2017/126784/03-L01
Your ref: 17/00537/CDN

Nelupa.malik@lbbd.gov.uk

Date: 10 November 2017

Dear Miss Malik

Application for approval of details reserved by condition 1 (monitoring and maintenance plan) in respect of planning permission 16/01017/FUL.

London East Business and Technical Park (Sanofi Aventis), Rainham Road South, Dagenham Essex.

We have reviewed the further information provided by the email from Alistair Dunster of Arcadis dated 29 August 2017 in response to our letter of 3 August 2017. This information relates to the removal of the Permeable Reactive Barrier (PRB) at the Former Sanofi site Dagenham.

We are now able to recommend a partial discharge of the condition for Phase 1.

Following the review of the submitted information we accept that the DQRA was run in 2010 and that Site Specific Assessment Criterion (SSACs) were agreed with the Environment Agency. We also accept that subsequently remedial targets, which are either at SSAC or at 70-90% of baseline have been achieved in areas where remedial works have been carried out and conditions discharged. We would like to highlight however, that the letter dated 9 December 2010 from Chris Ford, former EA Technical Officer, does not preclude the running of a DQRA at a later date, in fact it is suggested in the case of D44 landfilled area. Re-running the DQRA would have little purpose if SSACs were achieved in all the remedial areas, because results would be the same as if there was no PRB present.

However, as the final remedial contaminant concentrations achieved could be as high as 70% of the baseline, and in places the baseline can be hundreds of thousands to a million micrograms per litre (e.g.HBH505ERM), this still means that on site contaminant levels could be orders of magnitude in excess of water quality standards. We note that in the letter (undated) from Arcadis in response to our letter reference NE/2017/126347/01, that generally these high concentrations are observed in monitoring wells in Phase 2 and Phase 3 of the proposed PRB decommissioning plan. We need to assess the level of risk to offsite receptors such as water courses for Water Framework Directive (WFD) compliance so we cannot totally rule out that DQRA for current concentrations may need to be run.

In the case of Phase one, we note the only highly elevated concentrations are in monitoring well HBH503BAE and these are at only at 2000ug/l for total VOCs (about a 50% reduction on baseline). We have also reviewed the document '*Permeable Reactive*

Cont/d..

Barrier Decommissioning Monitoring and Maintenance Plan by Arcadis dated March 2017. In this document we note the phased removal of the PRB and the groundwater monitoring protocol. In particular Section 3.4, Stage 4 states as regulators we have a further chance to respond to see how the decommissioning is proceeding. We also note the contingency measures in Section 3.3 give additional security as the barrier would be closed if significantly elevated levels of contamination appear to be passing through the PRB following GAC removal.

Given these assurances we are willing to agree to the start of decommissioning of Phase 1 of the PRB, as it should provide useful information on the effectiveness of the remediation. It will also help to verify the existing DQRA and whether it might need to be re-run for the Phase 2 and Phase 3 decommissioning of the PRB. In the context of Condition 1

'No development should take place until a long-term monitoring and maintenance plan in respect of contamination including a timetable of monitoring and submission of reports to the Local Planning Authority, shall be submitted to and approved in writing by the Local Planning Authority. Reports as specified in the approved plan, including details of any necessary contingency action arising from the monitoring, shall be submitted to and approved in writing by the Local Planning Authority. Any necessary contingency measures shall be carried out in accordance with the details in the approved reports. On completion of the monitoring specified in the plan a final report demonstrating that the decommissioning and staged removal of the Permeable Reactive Barrier has been satisfactorily achieved shall be submitted to and approved in writing by the Local Planning Authority.'

This permission would appear to be a step in the process towards discharge or if discharge is required before works can begin on the retail unit, then we are recommending a partial discharge for Phase 1. We would like at this point in time reserve judgement on the full removal of the PRB given the levels of residual contaminants.

If you have any questions please contact me on 0203 025 5486 or email me at HNL.SustainablePlaces@environment-agency.gov.uk, quoting the reference at the beginning of this letter.

Yours sincerely

Mr Andy Goymer
Planning Advisor

Telephone: 0203 025 5486
E-mail: HNL.SustainablePlaces@environment-agency.gov.uk
Address: Environment Agency, Ergon House, Horseferry Road, London, SW1P 2AL