



City Temple  
Holborn Viaduct  
London  
EC1A 2DE

**By Post and Email/Portal**

Hannah Walker  
Design and Conservation Officer  
Planning and Built Environment  
Camden Council  
Town Hall Extension  
Argyle Street  
London  
WC1H 8NJ

13<sup>th</sup> December 2013

Dear Hannah,

**2-6 SOUTHAMPTON ROW, LONDON EC1**

**PLANNING (LISTED BUILDINGS AND CONSERVATION AREAS) ACT 1990**

**Details Pursuant to Condition 17 of Permissions 2012/5591/L (Alterations in connection with the reduction in hotel room numbers and alterations to the design of the Chapel, circulation areas and services, to create an 84 bed hotel [Class C1])**


Further to our recent meeting on site, I write to submit further information by way of a formal application (details pursuant to a condition), on behalf of Havza Ltd, regarding the proposed treatment of the asbestos found in the circulation areas at 2 Southampton Row.

It is our belief that the removal of the asbestos, and any related fabric alterations, can be addressed under Condition 17 of the 2012 Listed Building Consent (2012/5591/L). We would however appreciate your confirmation at your earliest convenience that this is acceptable and hopeful encouragement for early registration of the application.

Full details of the locations of asbestos and the proposed treatment are provided below. The following documents are however also enclosed as supporting information:

- Asbestos Bulk Analysis Report, by Lab UK Limited
- McLaren Construction: Refurbishment Survey, by De-Risk UK
- Drawing GA\_EX00\_ASBO - Existing Ground Floor Plan: Existing Extent of Asbestos
- Drawing GA\_EX01\_ASBO - Existing First Floor Plan: Existing Extent of Asbestos
- Drawing GA\_EX02\_ASBO - Existing Second Floor Plan: Existing Extent of Asbestos



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- Drawing GA\_EX03\_ASBO - Existing Third Floor Plan: Existing Extent of Asbestos
  - Drawing GA\_EX04\_ASBO - Existing Fourth Floor Plan: Existing Extent of Asbestos
  - 2 x Sample Photographs of the Artex (Asbestos) coating in-situ
  - Photograph of Asbestos Test Chamber, Ground Floor Corridor, 2 Southampton Row
  - Drawing 586 (SK)164 - Sample Wall Elevation (GF Ornate Niche), showing proposed approach to removal of contaminated wall plaster

### **Extent of Asbestos Contamination**

Full details of the extent of asbestos contamination at 2 Southampton Row is provided in the enclosed reports by Lab UK Limited, De-Risk UK and in Drawings GA\_EX00\_ASBO-GA\_EX04\_ASBO.

In summary though, asbestos contamination has been found on all walls in the main stairwell, as well as on the majority of the walls in the corridor circulation areas at ground to fourth floor (excluding mezzanine). In the ground floor entrance corridor, a number of profiled decorative features have also unfortunately been contaminated: including a large pedimented stone niche; and deep plaster cornices.

The asbestos contamination at 2 Southampton Row is in the form of a textured Artex wall coating, apparently applied in the mid-20<sup>th</sup> century (please see 2 x enclosed photographs showing sample areas of wall with the coating in-situ). This coating contains Chrysotile asbestos, a form of asbestos which is highly dangerous if broken or converted into an airborne form. The removal of this asbestos in order to secure appropriate Health and Safety conditions for those using the building, both during the extensive construction works and the later hotel operational stage, is therefore essential.

### **Testing**

Advice has been sought from two independent asbestos specialists on the extent of asbestos contamination resulting from the Artex coating. Samples of the affected wall material have also been sent to independent laboratories for testing.

Test results show that the asbestos contamination is primarily contained within the Artex coating layer. However, due to direct contact, cross-contamination has also occurred to the wall/decorative plasterwork beneath in those locations where the Artex coating has been applied.


Having tested further, it has been concluded by the laboratories that the level of cross-contamination found in the samples is significantly higher than the acceptable level for fabric retention, meaning that the plaster beneath the Artex coating must also be regarded as contaminated.

No contamination is anticipated to fabric not subject to the Artex coating.

### **Proposed Approach to Asbestos Removal**

A range of different asbestos removal approaches have been reviewed by the design team, construction team and plasterwork specialists over the past two weeks, in order to try to identify a method which appropriately balances the





important needs of public health & safety, with minimising as far as possible harmful fabric loss to the interior of this listed building.

#### *Flat Walls*

As Chrysotile asbestos is dangerous where the fabric surface is broken, its removal from areas highly likely to be subject to any such treatment during the construction or hotel operational stages has been identified as the key priority for public Health and Safety. This may include works such permitted new openings being cut, services re-run, sockets fitted, lights installed, picture hooks inserted etc.

On this basis, it is therefore proposed that all contaminated flat wall areas - within both the main stairwell and the affected circulation areas - be stripped back to the brick, then appropriately re-rendered. It is proposed that the replacement plaster be lime-based throughout, in order to reflect the clay/lime/sand mix currently found on the affected walls.

Where plaster skirtings are in place (as in the stairwell), it is anticipated that these will be retained intact and in-situ, as they have not been coated with the contaminated Artex. A further 'protective' 50mm border of wall plaster will be retained above the skirting and chemically sealed, to limit opportunities for air-born asbestos contamination. The new lime plaster wall finish will then simply be run to join this retained border, ensuring that the depth of the new render matches the original.

Adopting this approach on the flat wall areas will provide assurity that all contaminated Artex coatings and wall plaster have been entirely removed from these key areas likely to be subject to sawing, drilling, punching or patch repair works, allowing such works to be carried out in the future without hindrance or danger.

The small plaster border retained above skirtings will be included on the risk register for the building, recognising that it will remain asbestos contaminated. However, as this part of the wall fabric is unlikely to be broken in the future, the practical Health and Safety risks associated with retaining this small area of fabric are minimal.

#### *Moulded Features*

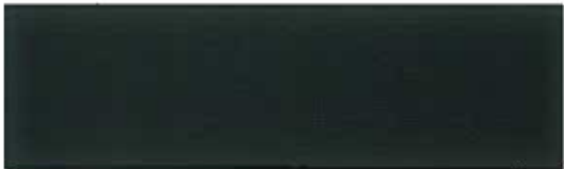
In addition to the flat wall areas, a small number of moulded decorative features have also unfortunately had the contaminated Artex coating applied: deep plaster cornice and a large stone niche in the ground floor corridor; and four simple moulded wall panels in the first floor corridor.

Recognising that these features are more significant, and moreover that they are less likely to be altered once the hotel is operational, we do therefore propose to try to retain these features in situ and treat them differently to the flat wall areas.

Proposed Treatment (a sample illustration of how this method will be applied can be seen in the enclosed Drawing 586(SK)164):

1. Contaminated wall plaster around the moulded features to be cut away, leaving only a 50mm border of wall plaster, which is to be chemically sealed to limit opportunities for future air-born asbestos contamination;
2. All moulded features to be photographically recorded and measured as a best practice measure (unfortunately castings are not helpful in this case, as the deep textured Artex coating will affect the moulding profiles);



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3. A controlled chemical chamber environment will then be established around the features (see enclosed photograph) and a chemical agent 'Extex' carefully applied to mouldings in controlled stages. Extex strips away Artex coatings and will also be used to clean the exposed surface of the plaster/stone beneath;
  4. Should any damage occur to the mouldings during cleaning, this is to be repaired using records taken and using lime/gypsum or gypsum/cement plasters, to match the existing. Though it is hoped that the need for repairs will be minimal, given that chemical stripping will be undertaken gradually, the chemical treatment does always carry the risk of causing some damage, depending on the percentage of lime used for the mouldings beneath;
  5. All moulded features to be carefully sealed and painted, under controlled conditions, to limit opportunities for future air-born asbestos contamination.

This approach will allow original decorative mouldings to be preserved within the building, albeit they will remain asbestos contaminated. As these features are however unlikely to be altered in the future, the practical Health and Safety risks associated with retaining such contaminated fabric is minimal. The affected moulded features will be included on the risk register for the building, to note that they remain asbestos contaminated.

I hope that this letter and the enclosed reports are of assistance in explaining how we propose to address the asbestos contamination in the main stairwell and circulation areas at 2 Southampton Row. We hope it is appreciable that we have tried to find a solution which balances Health & Safety requirements and the heritage special interest of the listed building as far as possible.

As you will know, the refurbishment works to the interior of this 'at risk' building are currently progressing apace, and therefore seek the Council's early registration of the application and your (and English Heritage if required) early consideration of this submission, in order to help minimise delays to construction work.

Should you have any further queries on this matter then please do not hesitate to contact me.

Yours sincerely,

**Philip Atkins MRTPI**  
**Senior Partner**

**Planning Resolution Partnership LLP**

cc. Richard Parrish, English Heritage

