

The Development Control Manager
London Borough of Camden
Development Control Planning Services
Town Hall
Argyle Street
London
WC1H 8ND

FAO Mr Michael Cassidy

27 April 2015

Our Reference: 13/800
BY PLANNING PORTAL PP-04036326

Dear Sir/Madam,

**THE TOWN AND COUNTRY PLANNING ACT 1990, AS AMENDED
277A GRAY'S INN ROAD, LONDON WC1X 8QF
APPROVAL OF DETAILS APPLICATION – CONDITION 9 GROUND CONTAMINATION**

We write on behalf of our client, Regal GI Limited, to request that the London Borough of Camden discharge Condition 9 (Ground Contamination), which is attached to the consent for comprehensive redevelopment of 277a Gray's Inn Road, London WC1X 8QF (ref. 2014/4267/P), approved on 10 October 2014.

The development comprises:

“Demolition of existing building and comprehensive mixed-use redevelopment of the site to provide 60 residential units (including 14 affordable flats) comprising: 56 units arranged around the new open space (seven x 2 storey houses plus lower-ground floor, 49 x flats in 3, 7 and 8 storey blocks plus lower-ground floor) and 4 flats in a 4 storey plus lower-ground building on St Chads Street, with ancillary basement gym; with offices at ground and lower-ground floor, café/gallery (Class A1/Class A3) at ground floor, together with cycle parking, access, landscaping, boundary treatments and associated works.”

This application seeks to discharge Condition 9 to allow the construction programme to progress unhindered. The discharge of this condition has previously been discussed with Environmental Health Officer, Ms Anona Arthur.

The developer and the Council have entered into a Post Approval Agreement for the discharge of planning conditions, relating the original consent. As such we anticipate that a decision, subject to consultation, will be made on or shortly after 23rd day of validation.

a. Condition 9a – Programme of Ground Investigation

Condition 9a states:

“At least 28 days before development commences (other than site clearance & preparation, relocation of services, utilities and public infrastructure, but prior to removal of any soil from the site):

- a) *A written programme of ground investigation for the presence of soil and ground water contamination and landfill gas, shall be submitted to and approved by the local planning authority in writing;...*

Terragen Environmental Ltd have prepared a Phase 2a Site Investigation and Generic Quantitative Risk Assessment (GQRA) report, which accompanies this application. This report provides a written programme of ground investigation for the presence of soil and ground water contamination and landfill gas.

The report recommends that due to widespread presence of Asbestos Containing Materials (ACM), that a Risk Management Strategy (RMS) should be compiled and employed at the site during the development to ensure that risks to groundwork operatives and offsite humans are suitably mitigated and the SPL broken. The presence of ACM is not unexpected given the fabric of the former warehouse. Elevated concentrations of lead and zinc in the made ground were also identified across the site, which will also be removed as part of the basement excavation.

Subsequently a RMS, also written by Terragen Environmental Ltd, was prepared to mitigate the only remaining significant pollutant linkage '*ACM in the rubble dominated made ground to be removed as part of the basement excavation*'.

Both the Phase 2a site investigation and GQRA, and RMS, will guide the investigations on site under Condition 9b and recommend a watching brief to mitigate the risk of any previously unidentified contaminants.

b. Condition 9b – Ground Investigation Report

Condition 9b states:

“At least 28 days before development commences (other than site clearance & preparation, relocation of services, utilities and public infrastructure, but prior to removal of any soil from the site):

(b) following the approval detailed in paragraph (a), an investigation shall be carried out in accordance with the approved programme and the results and a written scheme of remediation measures shall be submitted to and approved by the local planning authority in writing.

The remediation measures shall be implemented strictly in accordance with the approved scheme and a written report detailing the remediation shall be submitted to and approved by the local planning authority in writing prior to occupation.

Pursuant to this Condition, a Ground Investigation Report, prepared by Soil Consultants, outlines the investigation undertaken (in line with the Phase 2a Site Investigation and GQRA, and RMS), which included cable percussive boreholes, gas and ground-water monitoring and geotechnical laboratory testing. The report then provides a summary of the ground conditions encountered, and provides foundation design recommendations.

c. The Application Package

The application has been submitted via the Planning Portal and comprises:

- Completed application form for the approval of details reserved by condition;
- Cover letter, prepared by Icen Projects Limited;
- Risk Management Strategy, prepared by Terragen Environmental Consultants Limited (dated February 2015);

- Phase 2a Site Investigation and GQRA, prepared by Terragen Environmental Consultants Limited (dated February 2015); and
- Ground Investigation Report, prepared by Soil Consultants.

We have paid the requisite fee of £97.00 via the Planning Portal. We would be grateful if you can issue a receipt.

We trust that the information provided is sufficient to enable the council to validate and discharge Condition 9, and look forward to receiving confirmation of this at the earliest opportunity.

In the meantime, please contact Rebecca Dewey on 020 3725 3849 (rdewey@iceniprojects.com) or Kieron Hodgson on 020 3435 4218 (khodgson@iceniprojects.com), of this office in the first instance should you have any questions

Yours faithfully,



Rebecca Dewey
Senior Planner

Copy

Mr G Whyte
Ms A Arthur

Regal GI Limited
Camden Council