

26 August 2015



Planning ref: 2015/2026/P
Our ref J14367/ML/1

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Dear Anna

Re: 44 GLOUCESTER AVENUE, LONDON NW1 8JD

We have now reviewed the comments made within the planning objection made by Mr Richard Simpson on behalf of the Primrose Hill Conservation Area Advisory Committee, dated 03/07/2015, and have responded below.

The objection provides information on the history of the site that is noted to have not been included in our Desk Study and Basement Impact Assessment Report (ref J14367, dated 31 January 2015). The information from Mr Simpson indicates that the site was occupied by a factory and associated stores for the production of batteries and instruments, which was operated by the Electric Telegraph Company. The information also suggests that the company moved to the site in the 1850s and a review of the information source has found the plan below, which confirms that the site was operated by the Electric Telegraph Company.

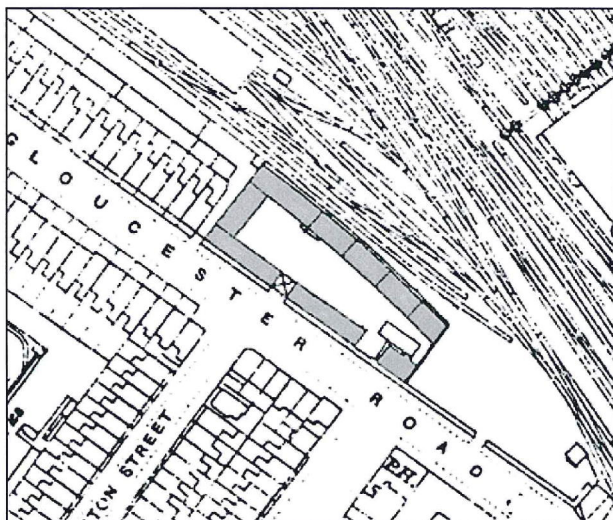


Figure 1. The Electric Telegraph Factory at 44 Gloucester Avenue, dated 1868.

This information does not contradict the desk study information within Section 2.2 of our report where we state that Gloucester Avenue had been constructed by 1859 and the earliest Ordnance Survey map studied, dated 1875, confirms the site layout as that shown in the plan above.

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Whilst the use of the site as a factory is noted, annotation shown on a 1927 historical insurance plan indicates that the site was simply used as 'Postal Telegraph Stores' and does not indicate factory use. It is therefore reasonable to conclude that factory operations had been terminated prior to 1927, with the site being taken over by a furniture company, Druce & Co Ltd, for use as a furniture warehouse between 1942 and 1948. Even though from historical evidence it would be logical to assume that factory workings ceased close to 100 years ago, within our Preliminary Contamination Risk Assessment in Section 2.6, we state that although the site is not considered to have had a *particularly* contaminative history, 'there is the potential that small-scale industrial work may have taken place on the site and the site neighboured a large railway goods depot up until the 1980s. The desk study information has therefore not indicated sources of particular contaminants, but there is considered to be the potential for localised contamination to be present within any made ground below the site'.

The desk study forms only the first stage of identifying the risk of contamination. During the course of the intrusive investigation, a site walkover was carried out by a qualified engineer from GEA, during which no sources of contamination were identified on the site. Further still the investigation comprised three deep boreholes and a series of 11 trial pits across the site, which allowed the inspection of the underlying made ground and natural soil. No olfactory or visual evidence of significant contamination was identified in either the made ground or natural soil, although eight samples of the made ground were recovered and sent to an analytical laboratory for a suite of contamination testing.

The results of the contamination testing only revealed elevated concentrations of lead. As discussed in Section 8.9 of our report, the elevated concentrations are likely to be attributable to fragments of extraneous material within the made ground, such as ash and coal. As the site has been developed since the 1850s, the made ground on the site is over 100 years old and therefore any soluble or volatile contamination would not still be present. The lead should therefore not be in a soluble form and does not pose a risk to neighbouring sites. Furthermore, as it is proposed to excavate and construct basements below areas that do not currently have basements, which will remove made ground from the site and in doing so remove ongoing potential sources of contamination.

As concluded within our report, there is not considered to be a risk to off-site receptors and, provided that the site remains covered in hardstanding, there is not considered to be a risk to future end users. If areas of soft landscaping form part of the final proposals then clean topsoil will need to be imported, but the requirement for this will be reviewed once the exact proposals have been finalised. In any case there will still not be a risk to off-site receptors.

I trust that the above satisfies your current requirements however should you need anything further then do not hesitate to contact us.

Yours sincerely
GEOTECHNICAL & ENVIRONMENTAL ASSOCIATES



Matt Legg