

Space House

Environmental Health Officer Comments

Introduction

1. This note has been prepared by Gerald Eve LLP on behalf of the applicant in response to the comments received from Camden's Environmental Health Officer, dated 5 June 2019, in respect of the pending planning application (ref: 2019/2773/P) at Space House, 1 Kemble Street and 43-59 Kingsway, London, WC2B 6TE.

Suggested condition	Applicant Response
<p>Asbestos</p> <p>The developer must either submit evidence that site buildings were built post 2000 or provide an intrusive pre-demolition and refurbishment asbestos survey in accordance with HSG264 supported by an appropriate mitigation scheme to control risks to future occupiers. The scheme must be written by a suitably qualified person and submitted to the Local Planning Authority (LPA) for approval before commencement. The scheme as submitted shall demonstrably identify potential sources of asbestos contamination and detail removal or mitigation appropriate for the proposed end use. Detailed working methods are not required but the scheme of mitigation shall be independently verified to the satisfaction of the LPA prior to occupation.</p> <p>Reason To protect future occupiers of the development from the possible contamination arising in connection with the buildings on the site in accordance with policies A1 (Managing impact of development), C1 (Health) and CC5 (Waste) of the London Borough of Camden Local Plan 2017.</p>	<p>The applicant will be issuing a report to Camden setting out the proposed methodology and mitigation measures to be conducted at the site.</p>
<p>Site/Land Contamination</p> <p>Prior to the commencement of work for each section of the development or such other date, or stage in the development as may be agreed in writing by the Local Planning Authority (LPA) a scheme including the following</p>	<p>Pell Frischman have undertaken a contamination risk assessment, therefore the desk study reference in condition 2(a) of the document (highlighted below) should be replaced by</p>

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components to address the risk associated with site contamination shall be submitted to and approved in writing by the LPA.

- A) A ground investigation based on the Phase 1 Desk Study (Ref: 401213-2) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site;
- B) The results of the investigation and detailed risk assessment referred to in (A) and, based on these, in the event that remediation measures are identified necessary a remediation strategy shall be submitted giving full details of the remediation measures required and how they are to be undertaken;
- C) A verification report providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (b) are complete.

Each section of the development shall be carried out strictly in accordance with the relevant risk assessment, site investigation, remediation strategy and verification plan so approved, and no change therefrom shall take place without prior written consent from the LPA.

Any investigation and risk assessment must be undertaken in accordance with the requirements of the Environment Agency's Model Procedures for the Management of Contamination (CLR11). In the event that additional significant contamination is found at any time when carrying out the approved development it must be reported in writing immediately to the LPA.

For the avoidance of doubt, this condition can be discharged on a section by section basis or in full.

Reason: To ensure the risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors, in accordance with policies G1, D1, A1, and DM1 of the London Borough of Camden Local Plan 2017.

"Geotechnical & Geo-Environmental Desk Study" (Ref: 101478-PF-ZZ-XX-RP-C-0001). Pell Frischmann's desk study has been reviewed and this response for clarity.

The applicant requests clarification as to what the sections of development the condition refers to are.

Commented [AG1]: The applicant's study. Please update to refer to Pell Frischmann report.

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<p>Fixed Plant</p> <p>Before the use commences, the total noise level from fixed plant associated with the application site, when at a point 1m external to sensitive facades shall be at least 10 dB(A) less than the existing background measurement (LA90), expressed in dB(A), when all plant/equipment (or any part of it) is in operation unless the plant/equipment hereby permitted will have a noise that is distinguishable, discrete continuous note (whine, hiss, screech, hum) and/or if there are distinct impulses(bangs, clicks, clatters, thumps), then the noise levels from the plant/equipment at any sensitive façade shall be at least 15 dB(A) below background noise level.</p> <p>Reason: To safeguard the amenities of the [adjoining] premises [and the area generally] in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.</p>	<p>HannTucker are liaising directly with Camden's EHO to understand exactly what is required and against which British Standard.</p>
<p>Fixed Plant Anti-Vibration</p> <p>Before the use commences, all plant and machinery installed and or operated (including new kitchen extract and supply fans, air conditioning condensers, other supply and extract fans, ASHPs, refrigeration condensers along with associated ductwork, pipework and ancillaries) installed and/or operated in connection with the carrying out of this permission shall be installed with suitable acoustic isolation to prevent the transmission of noise and/or vibration to other parts of the building.</p> <p>Reason: To safeguard the amenities of the [adjoining] premises [and the area generally] in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.</p>	<p>HannTucker are liaising directly with Camden's EHO to understand exactly what is required and against which British Standard.</p>
<p>Deliveries</p> <p>Deliveries <u>for the Class B1 and B1/Event (sui generis) uses</u> may not arrive, depart or be loaded or unloaded outside the following times: 08.00hrs and 18.00hrs Mondays to Fridays and 08.00hrs and 13.00 hrs on Saturday. And at no time Sundays and Bank Holidays.</p>	<p>The restriction on servicing to between 08:00 and 18:00 is overly onerous for the A1/A3 uses for which retailers will need to get servicing in before 08:00 in order to cater for breakfast customers, and this has been assumed as taking place from 06:00-07:00 in the submitted DSP, prepared by</p>

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<p>Reason: To safeguard the amenities of the [adjoining] premises [and the area generally] in accordance with the requirements of policies A1, A4 and TC4 (if in town centre) of the London Borough of Camden Local Plan 2017.</p>	<p>Caneparo Associates. The requirement for early servicing for the A3 use in particular also stems from restaurants taking fresh deliveries from markets and transporting them directly to the site, with much of this done during the early morning period.</p> <p>The suggested restriction in servicing hours would also result in the need for increased delivery activity during the period (08:00 – 09:00), which coincides with the main arrival time for pedestrians accessing the proposed office and other buildings in the surrounding area. The proposed servicing strategy seeks to prevent servicing during this period to prioritise movement by pedestrians and avoid potential conflict between reversing vehicles and pedestrians.</p> <p>A restriction of 07:00 – 18:00 for this location would provide greater flexibility to avoid the above issues and is considered more appropriate.</p>
<p>Artificial Lighting</p>	<p>The applicant requests confirmation of what is considered a 'light sensitive receptor' location.</p>

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Before occupation the developer shall demonstrate to the Local Planning Authority that any artificial lighting in connection to this application shall not increase the pre-existing illuminance at light sensitive receptor locations when the light is operating.	The proposed development will increase lighting levels at ground floor level to improve security as the existing lighting at the site is very minimal and insufficient.
<p>Pest Control</p> <p>Either</p> <p>Full details shall be submitted to the Local Planning Authority regarding the design and location of void access points to gain access to the void areas for the pest control treatment purposes.</p> <p>Or</p> <p>The developer shall ensure that identifiable adequate facilities points to gain access to the void of the fabric of the building areas are provided for pest control treatment purposes.</p>	Accepted.