

6th April 2020

Mark Chan

Planner

London Borough of Camden

5 Pancras Square

London

N1C 4AG

19 Maltings Place
169 Tower Bridge Road
London SE1 3JB
Telephone
020 7089 2121
Facsimile
020 7089 2120
info@tibbalds.co.uk
www.tibbalds.co.uk

Dear Mark

Panther House, 38 Mount Pleasant, The Brain Yard, 156-164 Grays Inn Road, London WC1X Application 2015/6955/P.

Submission of application to discharge conditions 16 (part), 22, 23 and 26.

Redevelopment of the site following partial demolition of Panther House and Brain Yard buildings, partial demolition of 160-164 Gray's Inn Road and demolition of 156 Gray's Inn Road. Proposals would result in part 4 storey, part 7 storey (plus plant and basement) buildings at Panther House and Brain Yard for predominantly employment (B1) uses (including 1450sq.m of subsidised workspaces) and a new 7 storey (plus plant and basement) building at 156-164 Gray's Inn Road behind the retained facade of 160-164 Gray's Inn Road to provide flexible retail/restaurant (A1/3) uses at ground and basement levels with 15 self-contained residential units (C3) (including 3 Intermediate Rent flats) at the upper levels. Associated landscaping, plant and public realm works.

On behalf of our client, Panther House Developments Ltd we submit the necessary information to discharge the four relevant pre-commencement conditions (16 (part), 22/23 and 26) attached to the above consent.

This submission follows on from our recent s96A application, which seeks to amend the wording of a number of pre-commencement conditions in order to change the 'trigger' points and hence delay the timing of these submissions to more appropriate points in the implementation process (application 2020/1368P).

As you are aware the submission of the Section 96A and now this submission relate to the Applicant's wish to secure the lawful implementation of the extant

Principal

Andy Karski
BA(Hons) MSc(Econ) FRTPi

Directors

Jane Dann
BA MA(UD) DipArch MRTPI

Jennifer Ross
BA(Hons) MRTPI

Sue Rowlands
BA(Hons) DipArch
MA(UD) RIBA MRTPI

Hilary Satchwell
BA(Hons) DipArch RIBA

Associate

Katja Stille
BA(Hons) DipArch MA(UD)

Registered Company
Tibbalds Planning and
Urban Design Limited

Registered in England
Company number 4877097

consent in advance of the expiry date of 1st November 2020 and is submitted in line with the agreed PPA.

In pursuit of the discharge of these four conditions we submit the following:

Condition 16: Piling (partial discharge), which states that no piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

In pursuit of the (partial) discharge of this condition we submit:

- Method Statement prepared by GSS Piling Ltd.
- 20147-PD01 Bearing Pile Design Rev. C2, which provides the construction brief for the installation of a single pile required to support the proposed foundation forming part of the extant consent scheme, prepared by Geostructural Solutions Ltd
- COSHH Risk Assessment prepared by GSS
- A piling high risk task briefing prepared by GSS

We confirm that the submission of this information is sufficient to secure the partial discharge of condition 16 in relation to the proposed implementation pile.

Condition 22: Scheme of assessment consisting of site reconnaissance, conceptual model, risk assessment and proposed schedule of investigation, requires the Applicant to submit at least 28 days before the development commences, a written detailed scheme of assessment consisting of site reconnaissance, conceptual model, risk assessment and proposed schedule of investigation.

The condition states that the scheme of assessment must be sufficient to assess the scale and nature of potential contamination risks on the site and include details of the number of sample points, the sampling methodology and the type and quantity of analyses proposed. The scheme of assessment must be approved by the Local Planning Authority and the documentation submitted must comply with the standards of the Environment Agency's Model Procedures for the Management of Contamination (CLR11).

In pursuit of the discharge of this condition we submit:

- **Ground Investigation Report** prepared by GEA (March 2020), which describes the findings of a desk study and review of site investigation.

Based on the findings of the report the report confirms that:

- Excavations for the proposed basement structures will require temporary support to maintain stability and to prevent any excessive ground movements.
- Groundwater inflows are expected to be encountered in the basement excavations and protection measures will be required.
- The existing foundations will need to be underpinned prior to construction of the proposed basement or will need to be supported by new retaining walls.

The report also confirms that no visual or olfactory evidence of contamination was noted during the fieldwork by Site Analytical Services Ltd and that the testing of soils did not identify the presence of elevated concentrations of contaminants and as a result the report confirms that it is not envisaged that any remediation work will be required.

- **Remediation Method Statement** prepared by GEA (March 2020).

The report confirms that the site investigation and risk assessment have not identified potential risks to commercial end users such that remedial measures are unlikely to be required due to the relatively low sensitivity of the receptors, the low concentrations of contaminants identified across the site and the fact the site is to be completely covered with hardstanding.

The report also confirms that in parallel with the sinking of the single implementation pile that additional samples will be obtained for subsequent contamination tests.

The report also advises that it would be prudent to inform site workers of the potential for contamination and maintain a watching brief. If any suspicious soils or suspected asbestos-containing materials are encountered, the report recommends that provision should be made for the inspection of the suspect soils by the geoenvironmental engineer, with a view to determining the requirement for additional remedial works.

Condition 23: Site investigations undertaken in accordance with the

approved scheme of assessment. The condition requires- prior to development commencing- a site investigation to be undertaken in accordance with the approved scheme of assessment and the written results provided to the Local Planning Authority for their approval.

The condition confirms that laboratory results must be provided as numeric values in a formatted electronic spread sheet.

The condition goes on to state that a remediation scheme shall be agreed in writing with the Local Planning Authority prior to development commencing and the scheme as approved be implemented before any part of the development hereby permitted is occupied.

Based on the site investigation work undertaken in relation to condition 22 it is not envisaged that there will be a need for any remediation work and hence the information submitted in relation to condition 22 is sufficient to also deal with the discharge of this condition 23.

Condition 26: Written Scheme of Investigation (WSI) – archaeology states that no demolition or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the Local Planning Authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works.

If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest the condition requires a stage 2 WSI to be submitted to and approved. The condition also states that for land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include:

A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works.

B. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.

In pursuit of the discharge of this condition we submit the WSI prepared by MOLA.

We also confirm that in order to speed up the process of consideration and discharge that MOLA has already sent this WSI to Historic England.

The submission of the above information completes the second phase of submissions in relation to securing the implementation of the extant consent and their discharge will ensure the discharge of all relevant pre-commencement conditions.

The application is submitted via the planning portal and in addition to this cover letter and the aforementioned reports includes the requisite planning fee.

We hope the above is sufficient to enable registration. If, however you require any further information please do not hesitate to contact me.

Yours sincerely



For Tibbalds Planning and Urban Design

Jennifer Ross
Founding Director and Consultant

jennifer.ross@tibbalds.co.uk

Direct dial: 020 7089 2131

enc

cc

Paul Cook Dukelease
Crispin Gandy Argo Real Estate Management
Josh McEvoy Radcliffes