
From: Zoe Smythe [REDACTED]
Sent: 08 June 2020 15:08
To: Limbrick, Richard
Cc: Dean Jordan
Subject: 18 Vine Hill RE: Land Contamination

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Afternoon Richard,

I hope you are well.

I understand you have taken over from Seonaid Carr on 18 Vine Hill. She had sent the comments below on the land contamination condition. Please see our response below;

Radon Gas

With regards to the risk from Radon gas, a basement isn't being proposed so this seems an unlikely risk; the Grey water harvesting tank is being encased in concrete below the ground floor slab but this is not accessible.

Waste Disposal

All hazardous material will be removed from site by a licenced contractor and taken to a licensed tip. The Ground Investigation reports have identified hotspots of hazardous materials. There will be a watching brief for other areas to be tested as they are excavated and dealt with accordingly. There will be a validation statement issued showing the amounts and destinations of contaminated materials.

Protection of Buried Services

All underground potable water pipes will be installed in barrier pipe. This is a requirement of Thames Water Utilities and is demonstrated to them before they will connect any services.

Protection of Site Workers (PPE)

We, HG Construction Ltd, have copies of the Ground Investigation reports and are used to dealing with these types of conditions ie hazardous materials. Copies of our Waste Management Policy and Environmental Policy are attached All the appropriate PPE will be worn by site groundwork operatives.

Watching Brief

A watching brief will be maintained during excavation. There is an allowance for further testing as excavated materials are stockpiled.

A validation statement will be produced on completion of the works.

Please let us know if you require anything further.

Kind Regards,

Zoe Smythe
Assistant Planner



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From: Carr, Seonaid <Seonaid.Carr@camden.gov.uk>

Sent: 28 May 2020 09:51

To: Dean Jordan <dean.jordan@dp9.co.uk>

Subject: Land Contamination

Hi Dean,

Please find below the comments from our Land Contamination officer,

The ground investigation and BIA report mentioned above states the proposed development includes:

- the demolition of the existing rear annex and garages at 18 Vine Hill,
- erection of an eight - storey building comprising a hotel (Class C1) with ground floor restaurant/café facilities (Class A3/A4) and residential dwellings (Class C3);
- the refurbishment of 18 Vine Hill building and erection of a three - storey extension to provide improved and additional office (Class B1) floor space;
- hard landscaping works and other associated works.
- The new hotel and residential building will be separate to the existing building located within the footprint of the existing carpark.
- A slight regrading of ground level of approximately 0.5 m is also proposed.

The title of the ground investigation report suggests the development includes a basement, which raises possible radon gas implications. A review of the "Excavation Method Statement" clarifies the scope of regarding works is limited to reducing the slab at ground floor level by approx. 800 – 500mmbgl (by definition a basement is the part of building which is partly or entirely below ground level) The BIA informs excavation is relatively small i.e. for a grey water harvesting tank.

It was noted the ground investigation report did not include the risk from radon gas.

In terms of the basement and the risk from radon gas, reference is made to Building Research Establishment BRE 211: Radon – Guidance on Protective Measures for New Buildings (2015). This document notes that all basements are at increased risk of elevated levels of radon regardless of geographic location, because more walls are in contact with the ground as well as the floor, and reduced natural ventilation below ground level increases the risk of elevated radon levels. In addition, the Management of Health and Safety at Work Regulations (1999) require the assessment of health and safety risks and both the Health and Safety Executive (HSE) and Public Health England (PHE) state that this should include the measurement of radon for occupied below ground workplaces (occupied for more than 1 hour per week/52 hours of the year), *irrespective of whether a site is situated in a radon affected area*. This is the responsibility of the Employer. For residential developments Public Health England advise that consideration should be given to testing for radon if the basement includes a room that is used regularly.

It seems likely that a basement used for grey water harvesting is outside the HSE & PHE criteria for assessment. It might be prudent to seek confirmation from the applicant on the basement usage to clarify this point.

Additionally, Approved Document C of the Building Regs 2013 relates to radon. Based on the applicants response it may be worth seeking confirmation from colleagues in Building Control on whether further assessment is required to determine if radon gas protection measures are necessary.

In conclusion the Ground Investigation Report states the site will be covered by either hard standing or new buildings, which effectively severs pollution pathways from buried contaminants and no remedial works will be required. The following four points were identified as requiring control measures (i.e. remedial measures):

- Waste disposal
- Protection of buried services
- Protection of site workers
- Watching brief

The contamination results reported confirm that the Made Ground (MG) formation is contaminated with asbestos fibres. This has human health implications for site workers and site neighbours during excavation works. It was also mentioned that the MG contains TPH & PAH at concentrations with implications for buried plastic potable water supply piping.

Waste Disposal

In terms of asbestos contaminated soils requiring off-site disposal the ground investigation report recommended the Council and or the HSE be consulted for confirmation on suitable waste disposal sites. In response to this comment, any waste material for offsite disposal must be handled by a licenced contractor in accordance with the Waste Duty of Care Code of Practice (November 2018). A licenced contractor will advise accordingly. A validation statement should confirm the volume of asbestos contaminated soil removed for off-site disposal, and evidence the disposal site(s).

Protection of Buried Services

It was reported that the MG contains TPH & PAH at concentrations with implications for buried plastic potable water pipes. The UKWIR project steering group decided that barrier pipes provide sufficient protection for the supply of drinking water in all brownfield land conditions. However, this approach needs to be agreed with the local water company. This should be demonstrated.

Protection of Site Workers (PPE)

Under the Construction (Design and Management) (CDM) Regulations 2015 the main contractor will be responsible for site Health and Safety. It is recommended that a copy of the Ground Investigation Report is provided to the contractor. This should help manage site contamination risks through the provision of PPE, appropriate site infrastructure, education of the workforce and site inductions. Adherence to these measures will minimise the risk of exposure to potentially contaminated soils, dust and groundwater. Therefore, further comment on PPE is not considered necessary.

Watching Brief

It was recommended that a watching brief be maintained during site groundworks and if any suspicious soils encountered that they are inspected by a geo-environmental engineer, further assessment undertaken and reported to the LPA.

It is recommend that a validation/verification statement be submitted to the LPA for approval. A validation or verification statement is required by CLR11 and once this has been approved Condition 16 is effectively discharged. It should confirm the status of each of the applicable points above and demonstrate that each has been

addressed. The statement should also confirm the site is suitable for the approved development in terms of the contaminated land regime in England.

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