Planning Department



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Camden Council,

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|  |
| 23th Oct 2020 |
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Dear Sir or Madam,

**RE. Planning Application 2015/6141/P Former Public Conveniences Guilford Place London WC1N 1EA. Change of use from former public convenience (Sui Generis) to mixed A1/A3 use (retail/restaurant), and associated works.**

In regards to the above application and conditions discharge. We wish to discharge condition 4. The condition reads.

*4 At least 28 days before development commences: (a) a written programme of ground investigation for the presence of soil and groundwater contamination and landfill gas shall be submitted to and approved by the local planning authority; and (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 [if necessary] shall be submitted to and approved by the local planning authority.*

*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 prior to occupation.*

*Reason: To protect future occupiers of the development from the possible presence of ground contamination arising in connection with the previous industrial/storage use of the site in accordance with Policy A1 of the Camden Local Plan 2017.*

Guilford Place WC is a grade II listed building. The WC is underground. The wall surfaces are covered with a ceramic tile which is to be retained. The roof is a concrete and glass pavement light recently refurbished. The floor is a concrete terrazzo floor. All of these elements are to be retained as part of the listed heritage of the building. The building is set on an island at the centre of the junction of Lambs Conduit Street and Guildford Street and is surrounded by pavement or road surface which is in control of the Highways. There is no outdoor space. All works are internal and of a light nature. There are no external works which may cause disturbance to the ground.

Guilford Place WC was decommissioned by the council in the 1980’s and has remained empty since. The condition states that the use has been industrial / storage this is not the case.

BRE 211: Radon – Guidance on Protective Measures for New Buildings (2015) notes that basements are at increased risk of elevated radon regardless of geographic location due to the possible exposure from walls and floor.

Following discussions with the council’s pollution control department it has been agreed that in order to discharge this condition a radon survey should be carried out on the site.

Proposal:-

To carry out a workplace radon survey at the above site.

Radon measurement packs are available from Public Health England and available to purchase online. The pack required is the ‘Workplace Measurement Pack’ The PHE guidelines for the carrying out of radon tests in the workplace states that radon monitors placed in unoccupied buildings can give false results. It recommends that the orders for monitors are only placed once the workplace is running ‘normally’.

<https://www.ukradon.org/services/orderworkplace>.

Therefore it has been agreed with the council that this test will be carried out once the building has been occupied and is operating. Monitors will be ordered and placed in their respective locations on receipt and left in place for 3 months.

The test is designed to test the employees exposure to radon. Therefore three monitors will be ordered with one being placed in the kitchen area, the second in the washing area adjacent to the bar, with the third being placed in the open area where staff wait on customers. The monitors are to be located at head height.

The proposed timescales and schedule of works entail placing monitors only once the business has been in operation for 3 weeks to ensure that it is running ‘normally’, the test will be carried out over a three month period in accordance with PHE guidelines. Having returned the monitors to PHE and following a 4 week period where PHE will test the monitors, the client will on receipt of the results have a further week to review the results.

The overall time period will be approximately 5 months, it has therefore been agreed with the council that a period of 6 months from the building being occupied and operating is an acceptable period to return the results to the council.

Any variation in this method or the timescales is to be agreed with the council in writing.

We therefore ask for this condition to be discharged on the basis that results of a radon test for this building will be returned to the council within 6 months of occupation and operation.

Yours sincerely

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