

ENVIRONMENTAL HEALTH SUPPORTING COMMUNITIES

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| To: | Josh Lawlor, Planning Officer, Development Management, 5 Pancras Square N1C |
| From: | <i>Nick Priddle BSc (Hons) MSc AIEMA, MIOA (Technical Officer Contaminated Land & Noise)</i> |
| Date: | 18/3/20 |
| Address: | <i>Central Somers Town Covering Land At Polygon Road Open Space, Edith Neville Primary School 174 Ossulston Street and London Purchase Street Open Space NW1 1EE</i> |
| Proposal: | Details for condition 55 (Land Contamination) granted under ref. 2015/2704/P Details for condition 61 (Site Investigation and Remediation Scheme Submission) granted under reference 2015/2704/P |
| Reference: | 2019/6367/P & 2019/6362/P |
| Key Points: | Further information required. |

ENVIRONMENTAL HEALTH OBSERVATIONS

PART 1

The following have been reviewed in preparation for the comments below:

- Ground Investigation and Generic Quantitative Risk Assessment for Brill Place Somers Town by WSP dated March 2020.

Condition 55

55 Land contamination - Plot 7

At least 28 days before the development of Plot 7 hereby permitted commences a written detailed scheme of assessment consisting of site reconnaissance, conceptual model, risk assessment and proposed schedule of investigation must be submitted to the planning authority. The scheme of assessment must be sufficient to assess the scale and nature of potential contamination risks on the site and shall 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 LPA and the documentation submitted must comply with the standards of the Environment Agency's Model Procedures for the Management of Contamination (CLR11).

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 CS5 of the London Borough of Camden Local Development Framework Core Strategy and policy DP26 of the London Borough of Camden Local Development Framework Development Policies.

Condition 61

61 Site investigation and submission of a remediation scheme for land contamination - Plot 7

Before the development of Plot 7 commences, a site investigation shall be undertaken in accordance with the approved scheme of assessment and the written results provided to the planning authority for their approval. Laboratory results must be provided as numeric values in a formatted electronic spread sheet. Before development of this plot commences a remediation scheme shall be agreed in writing with the planning authority and the scheme as approved shall be implemented before any part of the development hereby permitted is occupied.

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 CS5 of the London Borough of Camden Local Development Framework Core Strategy and policy DP26 of the London Borough of Camden Local Development Framework Development Policies.

Summary

The proposed development comprises a 22-storey residential tower and single storey basement which extends some 5m bgl. The area surrounded the tower comprises soft landscaping forming part of the wider Brill Place park.

I am in general agreement with the contamination risk assessments undertaken by WSP to discharge the two conditions above. However, I have recently discovered BRE guidance on reducing the risk from radon gas due to basement constructions. I therefore question why radon gas wasn't included in the site risk assessments; basis:

BRE 211: Radon – Guidance on Protective Measures for New Buildings (2015) 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.

As the proposed development includes construction of a basement, consideration should be given to the incorporation of radon protection measures or site specific assessment to determine whether protective measures are actually required.

I considered the risks from radon should be included in a revised Ground Investigation and GQRA and this submitted to the LPA for approval before further site development.