

Camden Goods Yard – Response to EHO Comments 4 February 2021 re Discharge of Condition 62b

4 March 2021

OVERVIEW

The note responds to EHO comments dated 02.02.21 in relation to the discharge of planning condition 62b: Contaminated land: HR2 Site Investigation and Remediation Scheme.

1. Further investigation

“Further investigation of the area under the existing supermarket building, particularly targeting the area of the existing sub-station – is required for this assessment to be complete”

St George Response

Further to pre-app discussion on 11.02.21 we have agreed that two further boreholes will be undertaken by Geo-Environmental in close proximity to the substation and under the store. These will be undertaken week commencing 05.04.21 once the substation has been de-commissioned.

St George will then present the updated borehole results to the Council for review to satisfy this EHO request.

2. Remediation scheme

“This document does not contain any remediation scheme. A remediation scheme should include both:

- a. “A remediation strategy giving full details of the remediation measures required and how they are to be undertaken;”

St George Response

The site has been the subject to various phases of third party investigations which have been provided for reviewed an overview of which are presented in Section 2.2 followed by a Phase I Desktop Study and Phase II intrusive investigation works undertaken and reported within the Ground Investigation Report by Geo-Environmental (GE19032-GIRv1.0-OCT20, October 2020).

In addition, a Radon Gas assessment including both a BGS/ Public Health England Radon Report and a BGS GeoReport has been undertaken by Geo-Environmental and reported within Letter Report ref GE19032/GERADON01/020221, February 2021.

A remedial strategy and verification plan has been produced to reflect the findings from all phases of the assessments undertaken on this site. Based on the findings of the investigations it is considered that remediation works would be required with respect to ground gas.

We enclose a Remediation Strategy & Verification Plan (RSVP) for review by the EHO which sets out the proposed remedial works to be undertaken on the CGY main site to support its development for a mixed commercial and residential usage.

To date sufficient testing has been undertaken to support the fact that no further formal remedial works will be needed with the exception of ground gas. No other contamination has been identified within the Main Site. This is summarised in Section 6.5 of the submitted October 2020 Ground Investigation report submitted which states that remediation of contaminated soils to protect the end user is not required:

The statistical analysis indicated that the null hypothesis could be rejected with greater than 95% confidence for all determinants tested. It is therefore considered that given the development proposals, together with the test results, no specific remedial works are required in this respect.

In addition to the above testing, VOC, SVOC and PCB tests were undertaken on samples of the Made Ground and no significantly elevated concentrations were recorded.

- b. "A verification plan providing details of the data that has been collected in order to demonstrate that the works set out in the remediation strategy are complete and identifying any requirements for the longer monitoring of pollution linkages, maintenance and arrangements for contingency action.

Both documents should be drafted in line with LCRM guidance and signed off by the LPA."

St George Response

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We request confirmation from the EHO that that the ground gas RSVP is satisfactory and that if no further contamination is identified within the main site in the two boreholes to be undertaken in April, that this condition can be discharged.