



**ENVIRONMENTAL HEALTH  
SUPPORTING COMMUNITIES**

<b>To:</b>	
<b>From:</b>	Paul Adams LBC Contaminated Land Team
<b>Date:</b>	23.06.2021
<b>Address:</b>	The O2 Centre, 255 Finchley Road, London, NW3 6LU
<b>Proposal:</b>	New proposed housing and commercial development → request for comment on EIA Scoping Report
<b>Reference:</b>	2021/2770/P
<b>Key Points:</b>	Broad agreement with proposals subject to points raised

**ENVIRONMENTAL HEALTH OBSERVATIONS**

**PART 1 - Introduction**

The following documents were reviewed in preparation for the comments below:

Introduction & Section 6.5 'Ground Conditions and Land Contamination' of:  
*Scoping Report for Environmental Impact Assessment - O2 Finchley Road.*  
*Plowman & Craven Ref: 43284, dated May 2021.*

The proposal comprises a residential-led redevelopment of a c. 5.7 ha parcel of land encompassing the O2 centre, Homebase, car park and warehousing units currently occupied by car dealerships and a builder's depot. Up to 2,000 homes and 200,000 square feet of non-residential floorspace is proposed. Due to the scale of the redevelopment, the project will require an Environmental Impact Assessment (EIA).

The site is located in Finchley and bounded by Blackburn Road to the north and south, by Finchley Road to the east and by Billy Fury Way to the west.

Section 6.5 indicates that the ground conditions assessment will be produced by Pell Frischman. The baseline conditions presented are based on a Phase I Desk Study produced by Pell Frischman in March 2021 (report not provided for review at this stage).

The geology is reportedly mapped as being underlain by London Clay of significant thickness with no overlying superficial deposits (but an unknown thickness of overlying made ground). There are no surface water features within 1 km, no groundwater abstractions within 500m and the site is not located within a groundwater source protection zone.

Historical land uses with the potential to have caused contamination reportedly comprised extensive areas of railway sidings and cuttings, coal depots, car parks, a refuse transfer station and possible landfill, industrial buildings, depots, a builder's yard, a printer's and a laundry.

Current land uses with the potential to have caused contamination reportedly comprise plant rooms containing fuel storage tanks the O2 Centre, car parks and vehicle maintenance businesses (the latter with associated above ground storage tanks and drums). Interceptors were also reportedly observed during a site walkover.

The authors of the Desk Study reportedly concluded a moderate land contamination risk rating to the proposed redevelopment.

The intended structure of the EIA Chapter will reportedly comprise the findings of the Desk Study and the factual findings of the intrusive site investigation, a GRQA for human health and a land gas risk assessment. There will be no ecological or environmentally sensitive land use assessment as the Desk Study has not identified any such receptors. A controlled waters GQRA will not be included due to the low sensitivity of the site in this regard. Assessment of potential impacts at construction and operational phases will be undertaken along with mitigation measures which may require further assessment or remediation.

## **PART 2 – Comments**

We are in broad agreement with the reported findings of the Desk Study and the Conceptual Site Model. The historical land use findings are broadly consistent with an outline review of records held by LBC. We are also in broad agreement with the proposed approach for producing the Ground Conditions EIA Chapter subject to the following considerations:

- (Subject to confirmation via a detailed desk-based UXO risk assessment) Due to evidence of historical bomb damage on site, UXO supervision will be required during all intrusive site investigation works;
- It will be of the utmost importance to prove / disprove the presence of the landfill within the boundary of the former Waste Transfer Station;
- Assessment of waters should not be completely discounted. Whilst we agree that the risk to controlled waters is low; perched water could be anticipated to have accumulated on top of the London Clay. This could cause lateral migration of contamination present in the made ground (subject to the topography of the site / top of the London Clay). Heavily impacted perched water could also potentially present a vapour intrusion risk. Based on the former land uses; fairly significant, localised contamination of the made ground cannot be discounted. It will be important to prove the depth to the top of the London Clay at regular intervals across the site;
- Supplementary intrusive site investigations (targeting both existing and historical previous land uses with the potential to cause contamination) will likely be required post demolition of buildings.

Please contact the undersigned should you require any further information.

Sincerely,



Dr Paul Adams BSc PhD MEnvSc CSci  
Acting Contaminated Land Officer (CLO)  
London Borough of Camden