

**ENVIRONMENTAL HEALTH
SUPPORTING COMMUNITIES**

To:	Rav Curry, Patrick Marfleet, David Fowler, Nadine James
From:	Paul Adams (Acting Contaminated Land Officer)
Date:	04.11.21
Address:	15-17 Tavistock Place, London, WC1H 9SH
Proposal:	Details pursuant to Condition 11b (remediation) granted under 2017/5914/P dated 27/06/18 for the erection of a 1-3 storey medical research laboratory and education facility. [Original planning application ref: 2015/3406/P dated 27/01/17]
Reference:	2021.4693.P
Key Points:	Revision to report required before discharge can be recommended

ENVIRONMENTAL HEALTH OBERVATIONS

PART 1 - Introduction

A request for comment has been received for matters relating to the discharge of Condition 11b of planning permission reference 2017/5914/P.

The following report has been provided by the applicant:

- Remediation Completion Report. GEA (for 8Build Ltd). Ref: J13113F Issue 1 (Final), dated 20th August 2021.

PART 2 – Comments

Following internal communication, we now have confirmation that Condition 11 Part A was discharged on 19th February 2019. Thus, the Remediation Completion Report has now been reviewed.

We consider that the report is missing some important information as follows:

- A verification or completion report should provide a concise summary of the key elements of the project to date. This should include all relevant contaminated land-related planning conditions, when they were discharged and the purpose of the report (i.e. to enable discharge Condition 11b);
- More detail is requested in Section 3.2 regarding the detection of a significant concentration (6,100 ug/l) of total petroleum hydrocarbons in groundwater in 2013. Specifically, what were the concentrations during subsequent monitoring rounds and was offsite migration considered (this

could, in theory, present an offsite indoor vapour inhalation risk to adjacent properties);

- The summary of the remediation method statement (Section 4.0) makes no reference to asbestos. Yet, the decision notice advising of the discharge of Condition 11a (appended to this communication) states ‘...shows that asbestos is present on site and thus a set of specific remediation measures for the site has been prepared to mitigate the risk identified.’ An explanation for this is requested;
- Section 5.0 (Verification) does not provide some of the information we would expect to see. We would expect to see a concise summary regarding total volumes of waste removed from the site (dates, classifications, destinations, confirmation of licensed haulier etc...). Although the appendix contains much of this detail, a summary is necessary in the main report body. This provides a clearer picture to the reader and provides confidence that industry procedures have been adhered to;
- Section 5.0 makes reference to the removal of a previously undiscovered tank. It was reportedly an empty diesel tank. There are no photographs of the base and sides of the excavation post tank removal and no verification laboratory samples were reportedly taken (not even PID headspace readings). Justification is required for this. Based on our understanding of the project it will have been because the surrounding soils were due to be removed as part of the basement excavation. If this is the case we would expect further details i.e. how far below the base of the tank were the soils removed and what total volume of soil were removed to form the basement. The Environ report dated 2009 in the appendix referring to the removal of another tank demonstrates how tank removal and verification work should be reported;
- A discussion of groundwater conditions during the basement excavation would also be useful in providing confidence that there are no residual groundwater contamination issues and/or indoor vapour inhalation issues; was groundwater encountered, was there any visual or olfactory evidence of contamination, was it tested, was it removed;
- Once the basement excavation was complete were the slab-level soils natural or Made Ground, was there any residual visual or olfactory evidence of contamination;
- A verification report should refer back to the original Conceptual Site Model (CSM) and explain how the remediation has broken the source-pathway-receptor linkages and thus removed any unacceptable risks (the conclusions (Section 6.0) touch on this regarding the ground floor slab but need to be more explicit;
- The appendix appears to contain laboratory test certificates and environmental monitoring data from earlier in the process i.e. during the site investigation(s). This document is not the place for such data. Only verification-specific testing should be included in this document i.e. that required by the RMS.

We request that these comments are related to the applicant who should, in turn, provide them to their environmental consultant. We ask that the revised and updated report is provided for our review. If acceptable, this will enable us to recommend the discharge of Condition 11b.

Sincerely,

Dr Paul Adams (Acting Contaminated Land Officer, LB Camden).

Application ref: 2018/5509/P
Contact: Charles Thuaire
Tel: 020 7974 5867
Date: 19 February 2019

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Dear Sir/Madam

DECISION

Town and Country Planning Act 1990 (as amended)

Approval of Details Granted

Address:

**15-17 Tavistock Place
London WC1H 9SH**

Proposal:

Details required by condition 11a (site investigation and proposed remediation measures) of planning permission ref 2017/5914/P dated 27.6.18 for Variation of condition 2 (approved plans) of planning permission ref 2015/3406/P dated 27/01/2017 (for Demolition of existing shed buildings and erection of a 1-3 storey medical research laboratory and higher education facility with basement accommodation and associated plant on roof).

Drawing Nos: Remediation Proposals Report dated October 2018 ref J13113D by GEA

The Council has considered your application and decided to grant permission.

Informative(s):

1 Reasons for granting approval-

The submitted ground contamination report shows that asbestos is present on the site and thus a set of specific remediation measures for the site has been prepared to mitigate the risks identified. These are considered acceptable by the Council's Environmental Health officer in order to protect future occupiers of the development from any ground contamination.

The full impact of the proposed development has already been assessed.

As such, the proposed development is in general accordance with policies G1, D1 and A1 of the Camden Local Plan 2017.

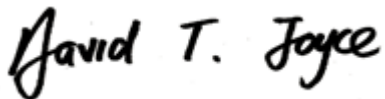
- 2 You are reminded that conditions 3abcd (design and materials), 6 (PV cells), 7 (green roof), 8 (SUDS), 9 (landscaping), 11b (contaminated land remediation verification report), 12 (bird & bat boxes), 13 (lighting strategy), 15 (roof plant) and 17 (archaeology) of planning permission ref 2017/5914/P dated 27/06/2018 are outstanding and require details to be submitted and approved.

In dealing with the application, the Council has sought to work with the applicant in a positive and proactive way in accordance with paragraph 38 of the National Planning Policy Framework 2018.

You can find advice about your rights of appeal at:

<http://www.planningportal.gov.uk/planning/appeals/guidance/guidancecontent>

Yours faithfully

A handwritten signature in black ink that reads "David T. Joyce". The signature is written in a cursive, slightly slanted style.

David Joyce
Director of Regeneration and Planning