

**ENVIRONMENTAL HEALTH
SUPPORTING COMMUNITIES**

To:	Rav Curry, David Fowler
From:	Paul Adams (Acting Contaminated Land Officer)
Date:	16.12.21
Address:	The Charlie Ratchford Centre, Belmont St, London NW1 8HF
Proposal:	Details pursuant to Condition 11 (land contamination) for redevelopment of the site with a new ten storey residential building
Reference:	2021.5877.P (original application reference 2020.5063.P)
Key Points:	Condition should not be discharged; supplementary site investigation required

ENVIRONMENTAL HEALTH OBERVATIONS

PART 1 - Introduction

A request for comment has been received for the above proposed development.

The applicant has submitted the following report which has been reviewed:

- Geo-environmental Assessment. Delta Simons. Ref: 21-0166.01 Final, 29th June 2021.

NOTE: This report also contains geotechnical interpretation. Only land-contamination aspects of the report have been reviewed with comments provided below.

PART 2 – Comments

Part A of Condition 11 required the submission of a site investigation scheme to the Local Planning Authority for our review and approval prior to any intrusive works being undertaken. Our records do not show that any such scheme was submitted for our review / approval.

The site investigation (comprising 3 cable percussion boreholes and two hand-dug trial pits) was reportedly scoped by the Env. Consultants client. The scope appears largely (if not exclusively) scoped based on the geotechnical requirements of the project. This is not an acceptable approach to investigating the risks posed by contaminated land. Locations should have been placed as a direct result of the findings of the Phase I Desk Study (namely the offsite potential sources of contamination inc. a paintworks 40m NE, an engineering works 15m N and a petrol filling station 30m S to name just three). This is exactly why we imposed Part A of the Condition.

Ten soil samples were tested for a range of potential organic compounds and heavy metals and six samples were tested for asbestos. One round of ground gas monitoring was undertaken from 3 standpipes. Made Ground was encountered to at least 1.1m (depth unproven). No visual or olfactory evidence of contamination was recorded during the intrusive works. No groundwater was encountered. Five exceedances of the adopted assessment criteria were recorded for lead, one for naphthalene and one for benzo[a]pyrene (plus some other PAHs for which benzo[a]pyrene is a surrogate marker). A single exceedance for TPH (aromatic band C16-21) was also recorded. No asbestos was detected. The ground gas monitoring round recorded a maximum concentration of carbon dioxide of 2.2% with no methane or flow detected.

Section 9.3 of the report recommends the following supplementary work:

- Investigation of the Made Ground below the existing building post demolition;
- Additional ground gas monitoring;
- Remediation and verification strategy.

We are in agreement with the above and have the following to add:

IF the 3 ground gas monitoring wells are located within the footprint of the proposed new building AND the supplementary site investigation works prove the maximum thickness of the Made Ground is, on average, less than 1.0m, then we will accept two further ground gas monitoring rounds demonstrating no detectable methane or flow and carbon dioxide <5% as proof of CS1 conditions as we agree that the risk posed by ground gas at this site from a CSM standpoint is low.

The borehole location plan appears to indicate that there were no locations excavated in the north of the site. Potential offsite sources have been identified to the north of the site. As part of the supplementary site investigation, we will expect to see locations (windowless or hand-dug pits onto the London Clay) placed at suitable locations to adequately target these offsite sources. Laboratory testing should be tailored for the contaminants of concern at each location. **IF** the applicant's consultant considers that this has already been adequately addressed or is not necessary then justification should be provided in the supplementary site investigation report for our review and comment.

Part 3 - Conclusions

In light of the above, we cannot recommend discharge of Condition 11 or any of its subsections at this stage. In order to do so we expect to see:

Part A & B: A supplementary site investigation report detailing the findings of the investigation below the current building post demolition encompassing our requirements outlined above AND a remediation strategy outlining how the remediation will be undertaken and verified.

Part C: A remediation verification report issued prior to occupation but post construction.

Sincerely,

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