

**ENVIRONMENTAL HEALTH  
SUPPORTING COMMUNITIES**

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| <b>To:</b>         | Rav Curry, David Fowler   |
| <b>From:</b>       | Paul Adams (Acting Contaminated Land Officer)   |
| <b>Date:</b>       | 20.01.22  |
| <b>Address:</b>    | Land at Southern Car Park, Royal Free Hospital, Pond St., London, NW3 2QG   |
| <b>Proposal:</b>   | Erection of a Maggie's Centre   |
| <b>Reference:</b>  | 2021.4810.P (original appl ref 2019/4937/P 22.1.21)   |
| <b>Key Points:</b> | Recommend discharge of Parts A and B of Condition 9 for this phase of the development. Remedial Strategy requested. |

**ENVIRONMENTAL HEALTH OBERVATIONS**

**PART 1 - Introduction**

A request for comment has been received for the above proposed development with regard to the discharge of land contamination condition 9. The condition states:

9 Land Contamination

Prior to the commencement of work for each section of the development or stage in the development as may be agreed in writing by the Local Planning Authority (LPA) a scheme including the following components to address the risk associated with site contamination shall be submitted to and approved in writing by the LPA.

- A) A preliminary risk assessment which identifies all previous uses, potential contaminants associated with those uses (including asbestos, landfill gas, ground water contaminants); a conceptual model of the site indicating sources, pathways and receptors; and potentially unacceptable risks arising from contamination at the site.
- B) A site investigation scheme based on (a) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site;
- C) The results of the investigation and detailed risk assessment referred to in (b) and, based on these, in the event that remediation measures are identified necessary, a remediation strategy giving full details of the remediation measures required and how they are to be undertaken;
- D) A verification report demonstrating the works set out in the remediation strategy have been undertaken.

Any investigation and risk assessment must be undertaken in accordance with the requirements of the Environment Agency's Model Procedures for the Management of Contamination (CLR11). In the event that additional significant contamination is found at any time when carrying out the approved development it must be reported immediately to the LPA.

For the avoidance of doubt, this condition can be discharged on a section by section basis.

Reason: To ensure the risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors, in accordance with policy A1 of the London Borough of Camden Local Plan 2017.

## **PART 2 – Comments**

The following report has been submitted and reviewed (NB: only the land contamination aspects of the report have been reviewed):

*Geo-environmental Site Assessment. Ref: 1920319 R01 (00). RSK, July 2020.*

The report presents a preliminary risk assessment which is considered compliant with published guidance. We are in broad agreement with the conclusions.

The site investigation comprised a single cable percussion borehole for geotechnical purposes, 5 windowless sampler boreholes with monitoring instruments installed and 8 hand pits for the inspection of existing building foundations. Given the perceived low to moderate risks to receptors identified within the preliminary risk assessment, this scope is considered acceptable. However, we note that only 4 samples of Made Ground were taken for geo-chemical analysis. This is considered very low given the 'abundant anthropogenic inclusions' found within the Made Ground forming the slope. We would have expected at least twice as many samples to have been taken and analysed to provide greater confidence that the geo-chemical conditions have been adequately characterised.

No visual or olfactory evidence of contamination was found and no groundwater was encountered. Groundwater was measured in standpipes during return monitoring visits at depths in the region of 2.7-3.7m bgl.

The data has been assessed against a public open space – parks land use. We question the justification for selecting these criteria and whether they are sufficiently conservative. POS - parks assumes no tracked back dust into buildings. In a hospital setting we would suggest that site users could theoretically bring dust into hospital buildings having walked on soft landscaped areas prior to entering the building. POS – residential does include the tracked back dust exposure pathway and hence, may have been a more appropriate screen in this particular instance. We have undertaken a review of the laboratory data and note just one, marginal exceedance of the POS – residential criteria for lead. Given that no significant exceedances of what would have been our preferred assessment criteria were evident, we are willing to accept the conclusions made by the authors.

We are satisfied that the report has adequately demonstrated no unacceptable risks from ground gases.

We note the recommendations for barrier pipe for water supply lines and for imported topsoil as some potentially phytotoxic concentrations of heavy metals were detected in the Made Ground samples.

### **Part 3 - Conclusion**

We consider that the report is sufficient to permit the discharge of Parts A and B of the Condition ***for this phase of development works***. We would advise however that our comments on the number of samples taken and the adopted assessment criteria are communicated to the applicant.

In light of the recommendations made for barrier pipe and clean cover, we request that a Remediation Strategy is produced and submitted for our review (in accordance with Part C). Given the relative simplicity of the work required, this could take the form of a simple letter outlining what will be undertaken (in line with the latest development designs as the report is dated July 2020) and how the works will be verified (Part D). We would expect to see a discovery strategy for undiscovered contamination to be included within this document.

Sincerely,

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