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Development Management
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London Borough of Camden
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Via Planning Portal Ref. PP-11524532

08 September 2022

Dear Jennifer,

**ST PANCRAS HOSPITAL, 4 ST PANCRAS WAY, LONDON NW1 0PE
TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)
DISCHARGE OF CONDITION 20 PURSUANT TO PLANNING PERMISSION REF: 2020/4825/P**

On behalf of our client, Moorfields Eye Hospital NHS Foundation Trust ('Moorfields'), University College London ('UCL') Institute of Ophthalmology ('IoO') and Moorfields Eye Charity ('MEC') ('the Applicant'), we hereby apply to discharge condition 20 of planning permission 2020/4825/P, dated 5th August 2022. Permission was granted for:

“Partial redevelopment of the site, involving the demolition of seven existing buildings (Ash House, Bloomsbury Day Hospital, the Camley Centre, Jules Thorn Day Hospital, Kitchen and the Post Room & Former Mortuary) and construction of a part seven, part ten storey (plus roof plant) purpose-built eyecare, medical research and educational centre for Moorfields Eye Hospital, the UCL Institute of Ophthalmology and Moorfields Eye Charity.

New building to comprise a mixture of clinical, research and education purposes, including eye care accident and emergency department, outpatients, operating theatres, research areas, education space, cafe and retail areas, admin space and plant space.

Associated site relandscaping works including formation of patient drop off area to St Pancras way, new public realm and routes through the site, cycle parking and servicing ramp and cross over to Granary street.”

Condition 20

Condition 20 requires that:

“Prior to the commencement of the works (other than site preparation and investigation), a scheme including the following components to address the risk associated with site contamination shall be submitted to and approved in writing by the local planning authority:

a. The results of the site investigations and, based on these, if remediation measures are identified necessary, a remediation strategy giving full details of the remediation measures required and how they are to be undertaken;

b. A verification plan providing details of the data that will be 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.

Any investigation must be undertaken in accordance with the requirements of the Environment Agency's Model Procedures for the Management of Contamination (CLR11 / now LCRM). If additional significant contamination is found at any time when carrying out the approved development, it must be reported in writing 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 policies G1, D1, A1, and DM1 of the London Borough of Camden Local Plan 2017.”

In accordance with the above, the following documentation is submitted for approval:

- Remediation Specification (Ref. 13931-CRH-XX-XX-SP-LQ-0001_Rem Spec P4, dated September 2022), prepared by Campbell Reith.
- Phase 1 Geotechnical and Geo-environmental Desk Study Report (Ref. ORL-INF-XX-XX-RP-PL-260-Phase 1 Geotechnical and Geo-environmental Desk Study Report, dated October 2020), prepared by AECOM.
- Geotechnical and Geo-environmental Interpretative Report (Ref. 60588325-ACM-HGT-Z_Z_Z_Z-RP-GIR-0001, dated September 2021), prepared by AECOM.
- Radon Assessment (Ref. 13932-CRH-XX-XX-CO-LQ-0003-Radon-Assessment, dated September 2022), prepared by Campbell Reith.
- Ground Gas Assessment (Ref. 13932-CRH-XX-XX-CO-LQ-0004-Ground Gas Assessment, dated September 2022), prepared by Campbell Reith.

A summary of each report is provided below, for further details please refer to the reports in full.

Phase 1 Geotechnical and Geo-environmental Desk Study Report (Ref. ORL-INF-XX-XX-RP-PL-260-Phase 1 Geotechnical and Geo-environmental Desk Study Report, dated October 2020)

This Phase 1 Geotechnical and Geo-environmental Desk Study Report formed part of the submission package for planning permission 2020/4825/P and listed on the decision notice as an approved document. It has been re-provided as part of this submission for information purposes. The Report assesses the potential geotechnical and geo-environmental risks for the site. The report concludes that the overall geo-environmental risk of the Site is between low and moderate/low.

Geotechnical and Geo-environmental Interpretative Report (Ref. 60588325-ACM-HGT-Z_Z_Z_Z-RP-GIR-0001, dated September 2021)

A ground investigation (GI) was undertaken by Geotechnical Engineering Limited (“GEL”) in April 2021. The aim of the investigation was to obtain information on the geotechnical and geo-environmental conditions on site to inform the design

of the proposed development, the Geotechnical and Geo-environmental Interpretative Report provides a summary of the findings. The report concludes that no further remediation is required.

Remediation Specification (Ref. 13931-CRH-XX-XX-SP-LQ-0001 Rem Spec P4, dated September 2022)

The Remediation Specification Report describes the inspections and record keeping requirements for 'unforeseen contamination' during groundworks. Appendix C provides a summary of the Verification Plan.

Radon Assessment (Ref. 13932-CRH-XX-XX-CO-LQ-0003-Radon-Assessment, dated September 2022)

This Report provides a desk-based assessment of risk in relation to radon. Given the geological setting and the proposed construction at the site, the risk of radon migration into the basement is LOW. Further pre or post construction monitoring, or radon protection measures are therefore not considered to be necessary.

It is anticipated that the assessment contained within this report will negate the need for a radon-specific investigation as required by Condition 21. Considering this, we welcome the opportunity to discuss the requirements for discharging Condition 21 with the LPA.

Ground Gas Assessment (Ref. 13932-CRH-XX-XX-CO-LQ-0004-Ground Gas Assessment, dated September 2022)

This Report provides a review of the existing ground gas monitoring data contained within the Geotechnical and Geo-environmental Interpretative Report (Ref. 60588325-ACM-HGT-Z_Z_Z_Z-RP-GIR-0001, dated September 2021), to determine whether gas protection measures are required, and / or whether additional gas monitoring would be beneficial. The Report concludes that gas protection measures are not considered to be necessary.

Summary

In accordance with Condition 20 Part A, the results of further site investigations are contained within the Geotechnical and Geo-environmental Interpretative Report (Ref. 60588325-ACM-HGT-Z_Z_Z_Z-RP-GIR-0001, dated September 2021), prepared by AECOM. The report concludes that no further remediation is required. Notwithstanding the above, also in accordance with Condition 20 Part A a Remediation Specification Report (Ref. 13931-CRH-XX-XX-SP-LQ-0001 Rem Spec P4, dated September 2022) has been produced describing the inspections and record keeping requirements for 'unforeseen contamination'. In accordance with Condition 20 Part B a Verification Plan is contained within Appendix C of the Remediation Specification Report (Ref. 13931-CRH-XX-XX-SP-LQ-0001 Rem Spec P4, dated September 2022).

Application Procedure

The application has been submitted via the Planning Portal under reference PP-11524532.

The application fee of £116.00 plus service charge has been calculated in accordance with the Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) Regulations 2012 (as amended). An electronic payment for this amount has been made at the time of submission, including the £32.20 admin fee.

We would be grateful if Camden Council could confirm that the application is complete, and we look forward to receiving confirmation of validation shortly. If you have any outstanding queries on this matter, please contact Jenni Cooper (07385



932 401 / jenni.cooper@montagu-evans.co.uk or Guy Bransby (07709 331 014 / guy.bransby@montagu-evans.co.uk) in the first instance.

Yours sincerely,

Montagu Evans

MONTAGU EVANS LLP

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