

City of London Contaminated Land Inspection Strategy 2021 – 2030

This document has been prepared by the Pollution Control Team of the City of London Corporation Department of Markets and Consumer Protection in consultation with stakeholders. For further information the team can be contacted on 020 7606 3030 or publicprotection@cityoflondon.gov.uk.

Foreword

In 2000, new contaminated land legislation came into force (Part 2A of the Environmental Protection Act 1990). The legislation gave local authorities a number of statutory duties relating to the inspection and remediation of contamination. This strategy revises and updates the original 2001 strategy and subsequent reviews in 2004 and 2015. It contains information about the characteristics of the City and seeks to set out clearly the City's approach to dealing with contamination using Part 2A over the next 9 years. It also includes the City's wider approach to considering and regulating contaminated land through development management, whilst reflecting the uniqueness of the Square Mile. The strategy has been written to reflect the revised Statutory Guidance issued by Defra in April 2012, which provides clarity to regulators and reflects the experience since Part 2A was introduced. As well as fulfilling our statutory obligations to have a targeted approach, rather than a blanket approach, it is intended that this strategy will be a useful resource for developers and their consultants. The strategy supports other City policies and strategies and it is intended to support the City's Code of Practice for Deconstruction and Construction, which ensures the potential negative health implications of developments are mitigated. I hope you will find this strategy informative and useful.

Deputy Keith Bottomley, Chairman of Port Health and Environmental Services Committee

City of London - Contaminated Land Inspection Strategy 2021-2030

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1 Summary

- 1.1 Part 2A of the Environmental Protection Act 1990 is the legislative framework behind the contaminated land regime in England. Under Part 2A the City of London Corporation (City Corporation) is required to take a strategic approach to inspect the land within its geographic boundaries, to identify and prioritise contaminated land most likely to pose an unacceptable risk to human health and publish this information within a written Strategy. Where land is classified as contaminated under Part 2A the City Corporation is required to identify the person(s) liable to pay for the remediation and to ensure that it is carried out to the required standard. The Department for Environment Food and Rural Affairs (DEFRA) published revised Statutory Guidance in April 2012. This requires all local authorities to periodically review their existing Inspection Strategy to ensure it remains up to date.
- 1.2 This Strategy revises and updates the 2015 Strategy. It contains information about the characteristics of the City of London and seeks to set out clearly the City Corporation's approach to dealing with land contamination using Part 2A over the next 10 years. It also summarises the City Corporation's wider approach to considering and regulating contaminated land through development management, whilst reflecting the uniqueness of the Square Mile. Work on any identified high priority sites on City Corporation owned land will be completed utilising the City Corporation's in-house resources and employing external services as required.
- 1.3 This Strategy will be reviewed and, if necessary, updated further in 2026.

2 Context

- 2.1 This Strategy outlines how the City Corporation will fulfil its statutory duties to investigate potentially contaminated land in the City of London as laid out in the Defra Contaminated Land Statutory Guidance (the Statutory Guidance). It should be read in conjunction with the Statutory Guidance, as that contains the legal and scientific detail behind the City Corporation's Strategy. Reference is also made to supplementary planning guidance which details the City Corporation's expectations of how land quality issues will be addressed and managed, primarily through the redevelopment of land under the planning process. The targets set out in the Strategy reflect the current and anticipated future financial circumstances the City Corporation will face over the Strategy period (2021-2030).

3 Objectives

- 3.1 The objective of the Strategy is to set out a framework detailing a proportionate approach to management of the risks raised by land contamination, whilst ensuring that any unacceptable risk to human health or the wider environment from land contamination is removed.
- 3.2 All investigations and risk assessments completed by City Corporation will be site specific, scientifically robust and will ensure only land that poses a genuinely unacceptable risk is determined as contaminated under Part 2A.
- 3.3 The City Corporation will consider the various benefits and costs of taking action, with a view to ensuring that corporate priorities and statutory requirements are met in a balanced and proportionate manner.

4 Statutory Guidance

- 4.1 The legislation behind the Contaminated Land regime in England is Part 2A (Sections 78A- 78Y) of the Environmental Protection Act 1990 (EPA 1990), which came into force in April 2000 (inserted by Section 57 of the Environment Act 1995). This established the regulatory system for the identification and remediation of land contamination.
- 4.2 The overarching objectives of the Government's policy on contaminated land and the Part 2A regime are:
 - To identify and remove unacceptable risks to human health and the environment;
 - To seek to ensure that contaminated land is made suitable for its current use;
 - To ensure that the burdens faced by individuals, companies and society as a whole are proportionate, manageable and compatible with the principles of sustainable development.
- 4.3 The legislation places a duty on the City Corporation to inspect the area from 'time to time' for the purpose of (a) identifying contaminated land and (b) deciding whether such land should be designated a special site, which then becomes the responsibility of the Environment Agency (EA).
- 4.4 Defra published the Contaminated Land Statutory Guidance in April 2012. This requires local authorities to adopt a "strategic approach" to inspecting their areas and prioritise land most likely to pose the greatest risk to human health and the environment and publish this information within a written Strategy. The Statutory Guidance requires the City Corporation to keep their written strategy under periodic review to ensure it remains up to date. This Strategy specifies a 5 year review in line with the Guidance "good practice."
- 4.5 The City Corporation published its first written Strategy in 2001, this was reviewed and updated in 2015. The 2015 review set out how the City Corporation would develop an approach to inspection of the City of London for land that may be contaminated land. The 2015 strategy covered a 5 year period and is superseded by this document.

4.6 There is other statutory guidance which the City Corporation needs to consider in relation to Part 2A:

- National Planning Policy;
- Local Planning Policy;
- Building Regulations;
- Environmental Permitting (England and Wales) Regulations 2016; and
- Environmental Damage (Prevention and Remediation) Regulations 2015.

5 Approach to contaminated land assessment

5.1 The approach to contaminated land assessment is detailed in the Land Contamination Risk Management (LCRM) documentation. The guidance sets out a three stage approach:

a Risk Assessment

b Options Appraisal and

c Remediation and Verification.

5.2 Risk assessment is based on the Source-Pathway-Receptor contaminant linkage concept. For a risk to exist then all three elements of the linkage must be present. This is the case for land quality assessments completed under both planning and Part 2A.

Source: Contaminants in soil, groundwater, gas or vapour;

Pathway: Physical contact with contaminated soil or groundwater, inhalation of dust, consumption of edible plants grown in contaminated soil and/or soil attached to edible plants, inhalation of indoor or outdoor gases or vapours, permeation of contamination into water supply pipes, migration of contamination in groundwater, migration of contamination via over ground flow;

Receptor: Humans, controlled waters (groundwater or surface water), ecological receptors (animals and sites designated as environmentally sensitive land uses), buildings and structures.

5.3 Assessment under Part 2A

5.3.1 For land to be determined as contaminated land under Part 2A there must exist a 'Significant Possibility of Significant Harm' (SPOSH) from contamination in, on, or under the land, such that it presents an unacceptable intake (UI) for users of that land (i.e. in such a form and quantity that it presents a hazard by means of one or more pathways that has a *significant* possibility of causing *significant* harm to someone). It is noted that there is no clear Government guidance on what constitutes "unacceptable intake" or "significant possibility of significant harm". However, the regime and associated Statutory Guidance¹ is clear that only those sites that present a 'significant possibility of harm' or are found to be causing 'harm' should be dealt with under Part 2A.

5.3.2 The Statutory Guidance sets out four categories of sites to assist in the decision making process, where Categories **1** and **2** 'would encompass land which is **capable** of being determined as contaminated land on the grounds of SPOSH' and, Categories **3** and **4** would 'encompass land **not capable** of being determined on such grounds'. Further technical supporting information was provided by DEFRA in respect of screening levels for Category 4 land (i.e. not Contaminated Land as defined by Part 2A). These are often referred to as C4SLs. The C4SLs consist of **cautious** estimates of contaminant concentrations in soil that are considered to present an **acceptable level of risk**, within the context of Part 2A, by combining information on human health toxicology, exposure assessment and normal ambient levels of contaminants in the environment. That is to say that exceedance of a C4SL does not, in and of itself, constitute SPOSH.

5.4 Duties

5.4.1 Local Authorities

- Where possible inspect the Borough to identify contaminated land;
- Prepare a strategy for inspection of their area;
- Determining whether any land meets the definition of Contaminated Land under Part 2A i.e. land that is causing harm or has potential of causing harm;
- Establish whether sites should be designated as "Special Sites" and thus become the enforcing responsibility of the Environment Agency;
- Consult the Environment Agency on sites where there is pollution of controlled waters and where the Local Authority considers that land meets the definition of a Special Site;
- Where the Agency carries out an inspection on behalf of the Council, the inspection duty and the decision as to whether land is Contaminated Land, remain the sole responsibility of the Council;
- Act as enforcing authority for all contaminated land which is not designated as a "Special Site"; and
- Maintain a public register of sites for which a remediation notice has been served, or where a remediation statement or declaration has been published.

5.4.2 Environment Agency

The Agency is a primary source of information and advice for local authorities. In addition, the Agency has its own regulatory functions to perform under Part 2A:

- Assist and provide guidance to local authorities in identifying contaminated land, particularly in cases of water pollution;
- Undertake inspections of Potential Special Sites following LA request;
- Act as enforcing authority for any land designated as a Special Site;
- Maintain a register of Special Sites remediation; and
- Publish periodic reports on the State of Contaminated Land.

5.4.3 Both LA and EA

- Establish who should bear responsibility for the remediation of land;
- Decide, after consultation, what remediation is required and ensure that such remediation takes place either through agreement or by serving a remediation notice. In certain circumstances the local authority may need to undertake the remediation;

- Where a remediation notice is served or the authority carries out the work, to determine who should bear what proportion of the costs for the work; and
- Record certain prescribed information regarding regulatory actions on a public register.

6 The City's Characteristics

6.1 Physical and Land designations

- 6.1.1 The City of London is located in the historic heart of London, to the north of the Thames. The City Corporation provides local authority services for this area, known colloquially as the 'Square Mile'. It has approximately 8,000 residents and a working population of approximately 500,000. It is a primarily commercial area with a rich history and iconic London landmarks, attracting thousands of tourists per annum. The City Corporation also owns, leases and manages property and land within and outside the City of London.
- 6.1.2 Residential accommodation is distributed across the City of London. Most residential properties in the City of London are residential flats and are concentrated in the following areas: The Barbican Estate, Golden Lane Estate, Middlesex Street Estate and Mansell Street. There are also a very small number of detached, semidetached, and terraced residential properties within the area. Some of these dwellings have access to private and communal gardens which would create a direct contact or inhalation pathway for exposure if contaminants are present.
- 6.1.3 There are no nature reserves or other designated protected habitats within the Square Mile. Much of the open space in the City of London comprises hard-standing, with raised planter beds; pockets of managed green open space also exist in some areas. There are several managed public spaces and gardens throughout the area which could be utilised by the working population and residents. Some of these areas contain soft landscaping and others are hard standing with raised planter beds.
- 6.1.4 The City of London dates from Roman times and has a rich history. It is the historic core from which the rest of London developed. It has a rich historical heritage with more than six hundred listed buildings and other protected structures in the City. Although predominantly non-industrial, there have been a wide range of historic land uses, which could potentially have given rise to contamination.
- 6.1.5 All of the City of London is considered to have archaeological potential, except where there is evidence that remains have been removed previously. The archaeological potential of a site is considered as part of development management process.
- 6.1.6 Due to the City's position, extensive areas were damaged by war time bombing. Historic land uses which may have led to contamination prior to this time will have been destroyed in part during the bombing. Thereafter, World War II site redevelopment would have created areas of made ground of significant thickness locally and the composition of this made ground is unknown. Material may also have been removed or redistributed within the City during the post war redevelopment and thereafter; this would all be undocumented.
- 6.1.7 Due to the intensive bombing across the City, unexploded ordinance (UXO) has been found during excavations. Buried UXO therefore remain a risk which must be managed during excavations.

6.2 Geology, Hydrogeology and Hydrology

- 6.2.1 The underlying geology is an important consideration when considering contaminated land, especially with consideration to controlled waters as the permeability of the soils affect the migration of contamination in both soil and groundwater. Mobile contaminants generally move more freely within coarse textured soils, such as sand and gravels as opposed to less freely through fine textured soils, such as silty clays.
- 6.2.2 The superficial geology across the City of London includes a mixture of alluvium, silts and River Terrace Deposits. The thickness of the gravels and alluvium varies and during the development management process, the excavation and construction of basements has resulted in the removal of superficial deposits in many areas. The underlying solid geology of the City comprises London Clay overlying the Lambeth Group, a mixture of sands, silts and clays. The Thanet Sand Formation and Upper Chalk underlie the Lambeth group. Borehole records indicate the London Clay to be approximately 35m thick and the Upper Chalk is generally encountered at approximately 60-70m below ground level. In addition to the creation of basements in the superficial geology, there has also been an increase in the number of developments where foundations (often bored pile foundations) extend to the Thanet Sands.
- 6.2.3 London Clay is a silty clay of negligible permeability and hence it is designated as an Unproductive Stratum by the Environment Agency. The London Clay confines the underlying soils (Lambeth Group, Thanet Sands and Upper Chalk) which are considered collectively to be a Principal Aquifer, largely preventing infiltration from above. There is therefore a risk that the Principal Aquifer could be contaminated through deep excavations, deep boreholes or piled foundations penetrating through the London Clay.
- 6.2.4 The majority of the Borough is underlain by the Taplow Gravel Formation (Secondary A Aquifer). The River Thames and southern area of the Borough adjacent to the river is underlain by Alluvium (Secondary Undifferentiated Aquifer). The Langley Silt Member (Secondary Undifferentiated Aquifer) is also present centrally and towards the east of the Borough.
- 6.2.5 Surface water features within the Borough include the River Thames which forms the southern boundary of the City. In addition, there are two historic rivers flowing through the City, being the Fleet and the Walbrook. Both historic rivers are now canalised/culverted and are incorporated into the sewer system, reducing the risk from contamination from historical land uses entering surface water receptors.
- 6.2.6 A small number of premises in the City are licenced by the EA to abstract groundwater. Environment Agency records have identified licences which include private abstractions for drinking water on Lombard Street and the Bank of England. The remainder of licences are predominantly for heating and cooling water, with some sites using the water for domestic purposes (e.g. flushing toilets). The location and information relating to the private water supplies in the City is periodically reviewed and updated. Given the presence of water abstracted for drinking purposes in the City, there is a requirement to ensure groundwater is protected.

7 What have we done already?

7.1 As part of the 2001 Strategy development the City Corporation set about the process for strategic inspection of the City of London. The following work was completed as part of the initial Strategy by the City Corporation:

- identified and recorded sensitive receptors;
- identified and recorded current potential sources of contamination (based on historical maps and 'Kelly's Directories' available at that time.);
- assessed information provided by the EA;
- assessed geological and groundwater data for the City;
- developed an initial GIS system of data management; and
- developed procedures for:
 - site inspections in the event of contaminated land being suspected;
 - dealing with pollution incidents or spillages; and
 - dealing with complaints or concerns about potentially contaminated land.

7.2 Following the 2001 Strategy and review in 2004, there was no strong evidence suggesting contaminated land was present in the City (as defined by the legislation). A review of the Strategy was undertaken in 2015 to assess whether the City Corporations approach was sufficient and whether any new information was available. The 2015 review highlighted areas where additional work could be undertaken to improve data on which regulatory land contamination decisions were based. In particular the review identified the following broad priorities and areas for improvement:-

- Gain improved understanding and additional information on potential sources of contamination;
- Requirement to identify and record locations and nature of current receptors;
- Requirement to identify current potential contaminant linkages; and
- Requirement to prioritise sites where contaminant linkages may be present, to identify sites that may require 'Detailed Inspection' as set out in the Guidance i.e. to assess whether sites are 'suitable for the current use'.

Works completed following 2015 Strategy

7.3 A third party and internal review process was completed which concluded that several useful datasets were available to take forward for prioritisation of potentially contaminated sites for more detailed inspection. However, the data available on historical land uses was considered limited in both temporal coverage and scale of mapping reviewed. Further research into historical land uses in the area was commissioned.

7.4 A detailed review of historical land uses was undertaken which included a review of additional historical OS mapping dating from the 1860s (1:1250 and 1:2500 scale) and available GOAD insurance plans. Locations and dates of historical land use with a contamination potential were recorded on the City Corporation's Land Quality Geographical Information System (LQGIS).

7.5 A combined layer of historical land use with contamination potential was created within the LQGIS. Having completed the above data collection work, the detail and volume of information available on historical land use in the City of London is considered to represent

best practice, with the City Corporation now having a thorough and detailed understanding of historical land use and potential historical contaminative industries in the area.

- 7.6 The City Corporation's maintained datasets relating to 'current' land uses were utilised to identify locations of current receptors. Receptors were split into the following broad categories, with a focus on assessing potential risks to human health.
- Residential land (flats, housing with and without private and communal gardens);
 - Educational land (schools/nurseries);
 - Office/Retail/ Commercial land use (offices, hotels, shops); and
 - Ancient monuments/listed buildings/park and open spaces (gardens, parks, allotments/nature conservation areas etc).
- 7.7 Having identified historical land uses, locations of current receptors and data on current land use, the LQGIS was used to identify areas where contaminant linkages may exist.
- 7.8 The City Corporation has developed a site prioritisation procedure whereby source, pathway and receptor layers are combined in the LQGIS to identify locations where contaminant linkages may exist.
- 7.9 It is important to stress that the presence of a potential contaminant linkage on site does not provide sufficient evidence to confirm that a site meets the legal definition of contaminated land. In that the presence of a potential contaminant linkage does not demonstrate that there is either 'significant possibility of significant harm' or evidence that 'Harm is being caused' on site, rather it is the starting point for the City Corporation to consider whether more detailed inspection is required. It is also important to stress that the use of the LQGIS site prioritisation process is only a tool to assist with identifying sites for more detailed inspection. The prioritisation of sites is an evolving process and 'prioritisation' of a site or parcel of land for more detailed inspection is based on information contained within the LQGIS at the time that the assessment is undertaken. Results of any prioritisation exercise are therefore subject to change at any point and may not be reflective of actual site conditions. It is for this reason that a register of site prioritisation outputs is not maintained or published.

8 Current and future actions

8.1 What are we doing now? (and will continue to do)

8.1.1 Responding to enquiries and complaints about contaminated land

The Pollution Control Team is the main recipient of complaints regarding pollution (including contaminated land). Once a request for service is received, Environmental Health Officers investigate and advise.

8.1.2 Processing planning applications

The planning system has, and continues to be, the main mechanism in the identification and management of land affected by contamination. Potentially contaminated sites are dealt with via the development control procedures by applying planning conditions on development schemes, requiring contamination assessments and where applicable remedial work and verification;

8.1.3 Undertaking site inspections and site visits as/where required

A site visit might be required in one of the following scenarios:

- A site has been identified as requiring further inspection as part of the Council’s duties under Part 2A;
- A site may be visited in conjunction with a planning application that has been made or to oversee remediation or investigation works required by a planning condition; and
- A site may be visited in response to a complaint from a member of public.

8.1.4 *Responding to land search requests*

The Pollution Control Team responds to land search enquiries which request what the City Corporation knows in regard the condition of the site and the surrounding area and what intentions the City Corporation has in regard to inspection of the land under Part 2A.

8.2 ***What do we need to do?***

8.2.1 The Statutory Guidance requires the City Corporation to continue to identify and prioritise sites that may be potentially contaminated by their historic or current use, followed by detailed inspections/investigations of sites where a need for further investigation has been identified.

8.2.2 The tasks and delivery timescales proposed for the Strategy review period are as follows:

No	Target	Proposed Deadline
1	Review land search procedure and ensure it meets current best practice.	October 2021
2	Maintain GIS mapping layers and datasets, including linking up information held on planning with LQGIS.	Annually
3	Review of sites identified with potential contaminant linkages and decide whether more detailed inspection is required.	January 2022 and annually thereafter
4	Carry out detailed inspection of potential Part 2A sites.	As priorities dictate and resource permits
5	Review Strategy (every 5 years).	January 2026

8.3 ***How are we proposing to do it?***

8.3.1 *Identification of potential sites and prioritisation for detailed inspection*

8.3.2 The work already undertaken means that the City Corporation has a database of potential sites of interest across the City. The database will be regularly updated when new information becomes available– for example when reports are submitted to City Corporation via the planning development process.

8.3.3 The contaminated land register for the City of London will be maintained in accordance with Statutory Guidance requirements.

- 8.3.4 Only those sites with the highest priority ranking will be subject to more detailed inspection. It is envisaged that all but the highest risk sites will be addressed via the planning process. High risk sites under private ownership will be addressed by identifying and contacting the landowner and initialising the assessment process in accordance with the Statutory Guidance. High risk sites within the City of London under City Corporation ownership will be assessed in accordance with the Statutory Guidance requiring a phased approach. A Desk-based (Phase I) study, including a site visit will be undertaken. If the Phase I assessment concludes a significant potential risk might exist to one or more identified receptors then moving onto the next phase. an intrusive (Phase 2) site investigation will be considered. It is envisaged that this work would be undertaken by the Pollution Control Team and the services of specialist environmental consultancies.
- 8.3.5 Investigation of sites where a potential unacceptable risk has been identified will be prioritised as follows:
- 1) Human Health Receptors
 - a. Residential/Education End Use
 - b. Commercial End Use
 - 2) Controlled Waters Receptors
 - 3) Ecological and Environmentally Sensitive Land Uses (Ecosystems)
 - 4) Buildings and Structures.
- 8.3.6 The detailed inspection of a site will be limited to a site walkover and desktop study in the first instance. The City Corporation will follow the Statutory Guidance at all points of the process and will work with the Environment Agency and external experts where appropriate.
- 8.3.7 Where evidence of significant harm or a significant possibility of significant harm is identified the site will be actioned in accordance with the Statutory requirements under the EPA 1990 and the relevant Statutory Guidance to secure satisfactory remediation of the site, identify liable persons and recover costs as appropriate

8.4 *What are the possible outcomes of a detailed inspection?*

- 8.4.1 The Statutory Guidance describes in detail the possible outcomes of detailed inspection for all receptors. Sites will be assigned categories (1-4). Generally, sites in Category 1 will require immediate action (designation as contaminated land); sites in Category 2 may require immediate action. These categories represent sites where an unacceptable risk is found to be present or there is evidence of harm being caused, this will trigger the process of determination of the site as contaminated land. The City Corporation will then decide based upon all available information and in line with the Statutory Guidance, whether remediation of the site should be carried out. If remediation is carried out this will only be done where necessary and the City Corporation will work with residents, land owners and all interested parties and appropriate persons to minimise disruption as much as possible. Sites in Category 3 may not meet the stringent definition of contaminated land but may require observation or monitoring and sites in Category 4 are unlikely to meet the definition of contaminated land with no further action required. For controlled water receptors the City Corporation will consult with the Environment Agency.

8.5 *Who pays for this?*

Part 2A of the Environmental Protection Act 1990 makes it clear that, wherever possible, the original polluter and/or a developer ('Class A appropriate person') that knowingly developed a contaminated site without ensuring suitable levels of remediation are completed should pay for any remediation needed in later years. The City Corporation has a duty under the legislation to make all reasonable effort to ensure that this is the case. However, where it is not possible to identify the 'Class A appropriate person', for example where the contamination and/or the development occurred many years ago and the people and companies involved no longer exist, in accordance with the Statutory Guidance, the responsibility for dealing with the contamination passes to the current landowner ('Class B appropriate person'). Under the legislation the City Corporation has a duty to identify appropriate persons and apportion liability.

8.6 *What are the wider benefits of this strategy?*

From the work completed to date, the City Corporation has an extensive understanding and detailed, searchable record of historical land use in the City of London. This information is used by Environmental Health, Planning and Building Control Teams when considering new developments. The information is used to provide more detailed and useful replies to environmental information requests and will enable the City Corporation to focus regulatory effort on the highest risk sites in the Borough.

8.7 *How will we measure our progress in implementing this strategy?*

The strategic inspection process is by nature an iterative process. It is normal that sites will be added and removed from the database as information becomes available. We aim to add more detailed knowledge about sites each year using existing resources. This increased knowledge will enable the Council to refine the prioritisation process further, reduce the number of sites that might need more detailed investigation and identify those that may need detailed investigation most urgently.

8.8 *How does this strategy interact with the planning system?*

- 8.8.1 The National Planning Policy Framework (NPPF) makes specific reference to dealing with land contamination and land contamination is a material planning consideration. The development management process is the primary way in which land contamination issues are investigated, managed and remediated.
- 8.8.2 Where a site is affected by contamination, responsibility for securing a safe development rests with the developer and/or landowner. As an absolute minimum this means that the site must be incapable of being designated as contaminated land as defined under Part 2A.
- 8.8.3 Under most circumstances the City Corporation will expect any planning application for land which may be affected by contamination to be accompanied by a report either at application stage or will be required by a pre-commencement planning condition. Reports submitted should comply with current LCRM Guidance and with the British Standard

BS10175:2011+A2:2017 “Investigation of potentially contaminated site – Code of Practice”. Reports should identify that the site under consideration has been assessed as suitable for use or in the event that further works are needed, detail the works required to make the site suitable for use. Reports will need to be submitted for approval at each stage, on completion of the Phase 1 desk study, prior to investigations commencing, prior to remediation works and on completion of any required remediation. All reports should be completed by a suitably qualified “competent” person as defined in the NPPF.

9 Contact us

If you would like to talk to us about this strategy or other matters related to contaminated land in detail please contact the Pollution Team via telephone 0207 606 3030 or email pollution team Pollution@cityoflondon.gov.uk or visit the City Corporation web site <https://www.cityoflondon.gov.uk/services/environmental-health/other-public-health>

References

Contaminated land Statutory Guidance-

<https://www.gov.uk/government/publications/contaminated-land-statutory-guidance>

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<https://democracy.cityoflondon.gov.uk/documents/s57004/City%20Contaminated%20Land%20Strategy%202015%20-%202020%20FINAL.pdf>

Environmental Protection Act 1990 section 78A-78Y-

<https://www.legislation.gov.uk/ukpga/1990/43/section/78A/england+wales>

National Planning Policy-

<https://www.gov.uk/government/publications/national-planning-policy-framework--2>

City of London Planning Policy-

<https://www.cityoflondon.gov.uk/services/planning/planning-policy>

Building Regulations

<https://www.gov.uk/government/collections/approved-documents>

Environmental Permitting (England and Wales) Regulations 2016-

<https://www.legislation.gov.uk/uksi/2016/1154/contents/made>

Environmental Damage (Prevention and Remediation) (England) Regulations 2015-

<https://www.legislation.gov.uk/uksi/2015/810/contents>

Land Contamination Risk Management (LCRM)-

<https://www.gov.uk/government/publications/land-contamination-risk-management-lcrm>

Category 4 Screening Levels (C4SLs)

https://www.clare.co.uk/home/news/%5C/%5C/www2.hull.ac.uk%5C/index.php?option=com_content&view=article&id=207&catid=44&Itemid=256