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By email - vicechair@lancwest.com

15th January 2021

Subject: Environmental Contamination following the Grenfell Fire –
Review of Stage 1 & Stage 2 Scope

EPS Ref: UK20.5139

Dear David,

I hope you are well.

Please find below my initial review and comments of the AECOM Stage 1 Overarching Report and associated Technical Appendices. The key points are outlined in this letter, with a more detailed scrutiny presented in the technical appendix. Please forward this as you see fit, including to the Multi-Agency Partnership if that would be beneficial. I have tried to use plain-English, but if you require any further technical clarification, please feel free to let me know.

This is not a formal peer-review, rather it is intended to inform your Association of what I consider to be the key points, scrutinise the available information where necessary and potentially generate some constructive dialogue to assist in resolving the issue to the satisfaction of all concerned. Obviously this is not the end of the investigation, with the field work for Stage 2 recently undertaken and the final report yet to be published, so these points can be revisited and refined as necessary.

Whilst the nature of the contamination and the associated ongoing investigations are inherently complex and largely without precedent in many aspects, the key outcomes and possible approaches to resolving the problem may not be as complex. Indeed, a less scientific approach may generate better engagement from the affected community while also utilising fewer resources (including funding not yet spent). The focus, in my view, should be on resolving the problem; not simply investigating the site beyond what is necessary to make a decision.

Realistically I cannot see how any areas which are (or were) littered with visible debris from the fire should not be subject to a form of thorough clean-up (remediation) of both land and property. The question, therefore, is what area is affected to the point whereby remediation is needed, and that is where technical resources should be directed. But the majority of reasoning to inform that decision seems to be available already.

CONTEXT

In the Stec report (2019), it was recommended that any health effects, together with long-term fire exposure monitoring, should be carried out and supervised by a multidisciplinary team with medical, environmental, fire and combustion toxicology expertise. Under the medical specialism, I would also include indirect effects such as stress and mental health. This seems to emphasise one of the key difficulties with this issue; it is exceptional and draws on expertise from several specialisms, not one expert in any particular field, so channelling it down one route, one based on soil quality in this case, seems destined to result in an unsatisfactory conclusion.

I doubt the Multi-Agency Partnership or Scientific Advisory Group wish to see this problem continue on for years. Realistically I doubt they expect that presenting the residents with a very small number representing a contaminant concentration in the shallow soil (for substances which exist across London for the most part) is really going to resolve it or generate any degree of confidence and satisfaction in the process, particularly when the same residents may have witnessed the debris falling off the tower onto the land in question. That aspect, the commitment and acceptance of the outcomes of this work by those affected, is clearly at least as important as the technical findings, since it was those people who drove the need for it at the outset.

NATURE OF THE CONTAMINATION

The problem, as we know, was caused by deposition from the fire in 2017 onto surrounding land both in terms of falling debris in close proximity to the tower, where some visual fragments still remain in certain areas today, as well as any deposition further afield from the plume of smoke. But it's not simply that issue which drove the need for this investigation, rather it was the residents concern that they may still be at risk.

That in itself presents challenges in characterising the significance of the contamination, but it also must be acknowledged that the Tower continued to deposit dust until it was wrapped, and it almost certainly will do so again in the future when it is demolished. So the source 'event' may not actually have finished and could yet compromise any soil data gathered in the interim.

As outlined in the appendices to the letter, there is significant amounts of uncertainty within the characterisation of the site which needs to be fully taken into account. The opening text in the guidance for the legislation being applied states that it must be relevant to the assessment of risks arising from the presence of contaminants in soil, and that is the starting point for this assessment. So from that point on, we are looking almost exclusively at soil-based data when we know the source included fallen debris, charred soot or indoor dust. Perhaps equally relevant is that the work will inevitably be conducted by soil-based specialists. If we ask a soil-based question, we shouldn't be surprised when we get a soil-based answer; it is only human nature to revert to what we understand the most.

Critically the AECOM work has not assessed fallen debris, charred soot or indoor dust and does not seem to try and bridge that gap (by using data such as the Stec report or similar, as outlined later). It is unavoidable that analysis of just shallow soils is not going to generate fully representative information on the source of the contamination at this site, hence why I raised this point at the Community Webinar in October.

Unless the Multi-Agency Partnership are engaging with other specialists, and taking account of the uncertainties in the data, then my concern would be that soil data ultimately informs the decision-making process in isolation. For instance, if there is visual evidence of debris on the surface and eye-witness accounts of it falling during the fire (as documented in the AECOM report), does a set of shallow soil samples tell us what we need to know? If it was my garden, I would take some convincing that the land was clean and my children could play in it, if I had seen bits of charred aluminium and debris on the surface.

The delay in AECOM's sampling is also significant. The fire occurred three and a half years ago, and the current AECOM soil investigation only started in June 2019, with the Stage 2 sampling completed in late 2020 looking at soil (with some homegrown produce). In some instances it may no longer be possible to address this issue taking account of both the time delay and changes in site conditions, but it still leaves significant uncertainty in the dataset which cannot be ignored in the conclusion.

But gathering the soil data will be useful and forms an essential line of evidence in the decision-making process. Whether it should form the entire basis for decision-making, particularly given the gaps and uncertainties described above, is a point to debate and potentially resolve. I think AECOM's work will have two critical positive outcomes, in that it will help delineate the contamination both laterally (how far out has been affected), as well as vertically (how deep within the soil).

In terms of any possible health effects caused by this issue, while it is outside of my area of expertise to provide any insight beyond the published toxicology data used in the contaminated land assessments, it must be recognised that the majority of contaminant land exposure is based on long term risks, not short term or transient risks. Typically, this results in a modelled increased risk of cancer over a lifetime of exposure, but the contamination at Grenfell may have been transient, present at the time and shortly after where it affected people's health, but not so much now. How can that be accounted for in the current assessment and is it ongoing or can it occur again once the tower is demolished? As stated previously, for the fire itself and any smoke or substances inhaled at the time, I am not qualified to comment on any long-term health effects or associated toxicology within the body.

As it currently stands, the 'site' appears to sit in Category 4 of the legal definition of contaminated land, which would not mandate any clean-up (remedial action) if the local authority confirmed that judgment. That includes land where visual debris was deposited and may even remain today. The Stage 2 data will, I expect, only further confirm that position, as the data would have to encounter far more severe soil contamination to push it up into Category 1 or 2 where such action would be considered. The question is are we simply talking about a 'soil' problem here or is there more to consider, including aspects outside of the technical realms of contaminated land assessment. Less tangible factors such as the stress caused by the lack of any clean-up, or a moral duty to those affected should also be considered. The final value judgement under this legislation rests with the Royal Borough of Kensington and Chelsea and that in itself may be a problem, since I understand that public trust in the authority is compromised. If there is no public confidence in the conclusion, an objective of the work has undoubtedly failed.

That means that a discussion on actually resolving the problem must be had; so what may that resolution look like and would it generate closure indefinitely?

RESOLUTION

Remediation (i.e. the clean-up of contaminated land) can often be a very expensive exercise, particularly if deep groundwater is concerned, and it also often falls short of achieving the original targets for a raft of reasons, usually associated with properties of the ground itself. Both phases of AECOM's work appear to involve very expensive forms of analysis; samples have been taken in duplicate and the approaches are labour-intensive. That is good practise but some of the sampling alone will have cost in excess of £500 per test just for the lab analysis I expect, not including any of AECOM's costs, and the end result will not have materially improved the actual quality of the ground at all. In addition, while I would recommend that efforts are made to bridge the gaps and uncertainties in the data as outlined in this letter, in some cases it may not be realistically possible. The data may no longer be available and even if materials such as debris were tested further, it may become very complex while not providing a conclusive answer as the framework to assess those risks (under contaminated land management) is not well-established. Therefore, remediation may simply represent a more pragmatic solution.

Remediation at this site would not involve any groundwater or deeper soils and that is a significant advantage, in that it's actually likely to be fairly simple. We are probably only talking about replacing the upper 100mm of soil and thoroughly removing any remaining dust/debris inside (and on top) of buildings and property. If such a solution was pursued, ideally it would have to be final and generate closure to this aspect of the Grenfell legacy. We can appreciate MAP's position in that regard – there must be no doubt that it has been fully resolved and is conclusive to generate the necessary confidence from all concerned (including them), there can be no possibility of having to do any remediation twice.

If a robust and defensible 'ringfence' can be applied so the remediation does not extend within a limitless boundary into North Kensington, that kind of remediation seems eminently achievable to me. There is some reasoning for where this boundary could be drawn in both AECOM's and Stec's existing reports (such as the eye-witness accounts). One key valuable outcome of the AECOM work may be to show that significant soil contamination has not occurred from the plume further afield, or has not migrated/leached down into the soil column, and allow a distinction to be formed between the plume area, and that relatively restricted area where debris was deposited (which could perhaps form the area requiring remediation). Indeed, part of AECOM's brief was to confirm the extent of any soil contamination that has resulted from the debris and particulate fallout from the fire. So in that regard, the objective would be achieved. I should also add that 'knowing where to stop' in remediation under this legislation is a common challenge because public health authorities have a duty to protect people, they are not constrained by a single redline as a planning development might be.

If you described this form of remediation to a typical contractor, they would probably say it is straightforward and not even really remediation, rather intensive landscaping and deep cleaning. Furthermore, the roads around Grenfell are so tight that it would make sense to combine the plant movements with the demolition of the tower itself, as it would not be preferable to undertake any remediation yet, before the tower has come down (and potentially re-contaminating the ground). Removing the contaminated material and replacing it with new clean material is transparent, it's easy for people to buy-into as they can see the physical difference, unlike complex risk assessments or other forms of remedial treatment.

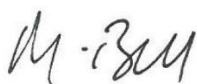

Indeed, as described later, I understand there may be some intention to re-landscape areas close to the tower anyway, and ad-hoc landscaping efforts have already taken place in the past as described later. Although I should highlight that putting a modest thickness of compost on top of the fallen debris, which seems to be the case in some areas, is obviously not sufficient and hopefully is considered only a temporary measure.

Whether the legislation 'Part 2A' and associated categorisation is formally applied or not at the end of this process, it is not necessarily final. There is precedent for undertaking voluntary remediation by local authorities within or outside of Part 2A (I have done both), which has required more challenging remediation and been applied to far-less exceptional sites than this. There are also some significant downsides to carrying out formal works under Part 2A which your Association should be aware of which can be less desirable, such as permeant entries on a public register (which can affect future property sales and mortgaging).

In summary, this is an interim position as we await AECOM's Phase 2 report. However, I doubt the outcomes will change significantly. The most likely form of resolution to this problem, in my view, would take the form of a remedial scheme, which of course would have its challenges, particularly in terms of what area it is applied to, making sure it is only those areas significantly affected, but that seems a realistic solution to resolving this problem for all concerned.

I trust that this information is clear and of interest.

Yours sincerely,

Author:	Reviewed/Authorised
	
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APPENDIX A – TECHNICAL COMMENTS OF STAGE 1

Stage 1 Overarching Report AECOM Project number: 60595731 1st October 2019)

Legislation & Guidance

1. **Overarching guidance:** The report was issued in October 2019 and is based on the Environment Agency's CLR11 Model Procedures guidance, which was withdrawn by that time and replaced by the Land Contamination: Risk Management guidance (in June 2019). A footnote is added to Table 1 acknowledging this and that the scope, framework and purpose of the revised guidance is the same. That is largely true, but the terminology and structure is slightly updated and not reflected in the AECOM report. The Stage 2 report should adhere to the new guidance, and this summary below is based on its structure.
2. **Overarching Legislation:** The selection of 'Part 2A' of the Environmental Protection Act 1990 as a legislative tool may have been unavoidable, but it does not seem particularly well suited if used in isolation to inform the future decision-making at this site, since it is based on soil quality alone and associated specific risk categories. The statutory guidance for the Part 2A legislation states that '*Enforcing authorities should seek to use Part 2A only where no appropriate alternative solution exists*'.

Perhaps more significantly, those who implement Part 2A are generally contaminated land specialists. Whereas this issue at Grenfell is broader than simply what levels (of quite common, for the most part) contaminants now remain in soils, and it requires a more holistic, multi-disciplinary response. As recommended in the Stec report, *Any health effects, together with long-term fire exposure monitoring, should also be carried out and supervised by a multidisciplinary team with medical, environmental, fire and combustion toxicology expertise.*

The source of contamination comprised dust (including indoors), debris and charred soot deposited on the ground surface, not just soil. These materials may also have existed transiently and posed short term risks. Part 2A is largely aimed at contamination caused through historical legacy (such as landfills, gasworks, chemical works) now developed into housing and for generally for dealing with the risks posed by a lifetime of exposure, and the resulting increase in risks such as cancer.

It is by no means inevitable though that the solution to the problem of contamination around the Grenfell Tower needs to be resolved through a statutory involuntary mechanism such as formal Part 2A intervention. Voluntary approaches to land remediation are encouraged by the guidance and not without precedent. Indeed, voluntary remediation has been undertaken, outside of the Part2A regime on much less complex and contentious sites than this.

If the 'Grenfell Cough' was a medical phenomenon, which requires input from relevant experts, and it was related to any residual deposits on buildings or the ground and the risks they persistently pose to people (as opposed to what may have been inhaled during the fire), I doubt an assessment structured around Part 2A would generate particularly relevant conclusions. Particularly if those conclusions were based on soil analysis alone, sampled 3+ years after deposition. The Environmental Damage (Prevention and Remediation) Regulations (2015) would perhaps have been better suited and less constrained by the

categorisation process under Part 2A, had they been applicable (such as if the building held an environmental permit or if it was a Site of Special Scientific Interest). But I think the more relevant point is that Part 2A probably should form part of the assessment and decision-making process, but not all of it.

However, Part 2A does specifically allow for assessing the impact on the health, quality of life and respiratory tract effects and it also makes one allowance which might be quite pertinent. The statutory guidance states that in cases where significant harm may be being caused, or is likely to have been caused in the past; and there is a significant possibility that it may happen again, the local authority may choose to consider whether to determine the land as 'contaminated' on grounds of significant possibility of significant harm (as an alternative to consideration that significant harm is being caused, currently). This might be relevant given the source of the contamination was not just the fire itself, but also the dust deposited by the building afterwards (prior to the tower being wrapped) and the demolition of the tower, which has yet to happen and may release further contamination.

Stage 1 Risk Assessment - Preliminary Risk Assessment & Conceptual Site Model

3. **Non-Soil Data:** Stage 1 does not draw particularly heavily on the Stec report (Stec et al., 2019), particularly in terms of non-soil data. This seems a missed opportunity given that her work, even if not using the same sampling protocols, had access to samples of charred soot, debris and soil much closer to the time of the fire and may have been of great value in bridging the uncertainties and gaps within AECOM's work. If Professor Stec's work does not actively form part of the conclusions, then a significant allowance for uncertainty must be made, otherwise it unavoidably generates the impression that the dataset is more complete and representative than it really is, and also that data is being 'cherry-picked'. The Stec soil contamination results, albeit quite limited, are included by AECOM and suggest a more significant problem caused by the fire, the non-soil data also presents some quite concerning findings. If no such account is made for these gaps and uncertainties, then more caveats should be attached to the resulting conclusions from AECOM about how they can be utilised by RKBC in forming their value judgment under Part 2A, since it will ultimately be the Borough Council's decision.
4. **Short-Term Risks:** Section 6.2. The majority of the identified contaminant linkages (i.e. the risks) are based on chronic risks primarily associated with excess lifetime cancer risks along with some other health effects. If there is a gap in the dataset for the reasons outlined above, has there been any attempt to model the potential acute risks caused by deposition of dust/debris inhalation around the time of the fire, or persisting to the present day? For instance, are there any areas which could justify a localised pilot study perhaps (in a part of a building which still has original dust/debris deposits)? See point 12.
5. **Lead (metal):** The report states that there is no direct evidence that lead was released as a result of the Grenfell Tower fire, but linkage S1 in Table 8 is based on lead, and it forms a key part of the Stage 2 scope. Lead is one of, if not the most common contaminant of concern in brownfield redevelopment across England, whereas the Grenfell Fire is a highly unique, if not entirely exceptional, source of contamination. The focus on lead concentrations seems likely to inevitably form a key part of the resulting conclusions and decision-making (even if not intentionally), when the work clearly states that it's not a result of the fire. This is unusual for a Part 2A investigation and might prove quite unhelpful in

future by ‘muddying the waters’, when contamination is picked up incidentally, then subject to risk assessment and concluded upon but which existed across London anyway.

The published background concentration for lead (final column, table 5) of 820mg/kg should be stated as the upper 95th percentile confidence limit, i.e. the upper limit of ‘normal’ levels of contaminants in soil, so very few results should be near that concentration in this dataset. In my experience, I would say that the majority of concentrations should be well below this level in urban gardens and public open spaces. Indeed, a representative concentration of around this value in a residential setting, with a high bioavailability, would be a potential Part 2A issue in its own right. The BGS background maps for the area indicate a concentration for lead of around 400mg/kg, which seems more realistic. However, AECOM’s research into background contaminant concentrations including Technical Note 12 and the review of previous ground investigations (Figure TN10/12-01), is notably thorough.

Stage 1 Risk Assessment - Generic Quantitative Risk Assessment

6. ***Sampling Delay:*** Section 1: Environmental checks in and around Grenfell Tower were announced in October 2018. AECOM were appointed in March 2019 and started the soil analysis shortly thereafter. Stage 1 of a two-stage programme was carried out over the spring and summer of 2019. The fire was in June 2017 and these samples were taken two years later, with Stage 2 ongoing in late 2020.

This delay leaves a critical gap in the dataset. It must be acknowledged that this contamination is not like a stable industrial residue left largely undisturbed for 50 years (as this legislation is often applied to). Rather the source of contamination was transient, partially suspended in air and has undergone ad-hoc clean-up/remedial efforts since (see points below on Technical Note 5). This gap is further exacerbated by the absence of any analysis of fallen debris, charred soot or indoor dust, so the current dataset surely can only ever be considered partially complete regardless of how thorough AECOM have been. As stated above, the Stec et al., 2019 report did involve analysis of these materials other than soil and may have helped bridge this gap but only seems to have been referred to in terms of soil concentrations which was a relatively limited part of the Stec report.

Select Technical Notes:

Technical Note 5 - Technical Note 05: Fate of debris – deposition, spread, clean-up

7. ***Ad-hoc Landscaping/Remediation:*** Pages 7-9 cover the changing of soil in various areas. It reads as though soil has been replaced or topped-up soil in various areas, but it seems to have happened in a very ad-hoc fashion. Compost (not soil) seems to have been used and in some cases placed it on top of the soil/debris without removing it first (which did seem to be the case in an area I saw in the cordon in November 2020). It’s unfortunate that this process was not treated as a more formal remedial exercise. The placing of soils or compost on top of the debris is not very helpful as it merely masks the problem and may introduce unrepresentative soils which AECOM then sample. When on site, I got the impression that the project team were not really notified about these landscaping measures presumably undertaken by RKBC, which is somewhat counter-productive and a bit odd, given that surely AECOM are employed by RKBC.

It also seems that the list of areas treated is slightly unclear (P8), as per our discussion. I understand that where the soil is described as replaced it is true, but that only took place in designated 'garden' areas. So in the walkways, that means the planters at the end and not any of the surrounding areas. From our discussion I understand that there was no full-scale soil removal and replacement, just a refreshing of the soil in closed planters. Some of these areas, such as Pond House is in Chelsea and Russell Road in Olympia are not near the fire area or possible plume. In addition, I understand the reference to a 5-year rolling program of soils replacement (P8) was not widely known amongst residents.

8. **Deep Cleaning:** On page 12, it states '*Deep cleaning of residential properties has been completed by RBKC at more than 300 residences on the Lancaster West estate.*' This didn't appear to reflect discussions we had previously and I now understand that the deep-cleaning of flats consisted of what the neighbourhood director at the time called a 'wash-and-brush-up'. i.e. they may have had the walls painted. In one flat, after initially resisting, RBKC did undertake the painting but there was no attempt to clean soft furnishings or carpets etc. I understand that in many cases residents were rushed out of their homes on fire safety grounds, and not allowed to return for a period of days. As it occurred in the middle of Summer, windows and doors were therefore left open and residents returned to houses full of dust/debris, which when cleaned up in some cases becomes dusty again as the Tower continued to deposit debris until it was wrapped.

On P7, the report states RBKC '*noted that where the offer of a deep clean was not taken up, this was largely (but not entirely) where people were not in residence*'. I understand from our discussion that the cleaning of flats was voluntary and a lot of residents didn't know it was available. So it is not wholly accurate to say that the only flats that weren't cleaned were empty. It's important to note that voluntary measures, requiring the resident to come forward, are not appropriate when the driver is public health. Public health works should be done as default where there is an identified need.

Technical Note 8: COPC Toxicity

9. **PAH suite:** The Stec report states that 7,12 dimethylbenzo(a)anthracene has a 20-fold higher toxic equivalence factor than its parent compound and twice that of Benzo(a)Pyrene which is typically the Poly Aromatic Hydrocarbon of greatest concern. This would not be included in a typical PAH suite, but was there a reason was this compound was not included in AECOM's PAH suite?

Technical Note 14 – Collated Community Information

10. **Community Evidence:** There is information in this Technical Note, including Figure TN12-01 which incorporates community evidence of where the debris was seen falling. This could be a useful aid in distinguishing those areas affected from debris, and those not.

Environmental Contamination Following the Grenfell Tower Fire Anna A Stec, Kathryn Dickens, Jessica L.J Barnes, and Clare Bedford (the 'Stec Report', 2019)

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11. **Multidisciplinary Response:** P27 states that the Grenfell Tower fire released both acute and chronic toxicants in the fire effluent which may have potential long-term adverse health effects on emergency responders, clean-up workers and local residents. The report states that *Any health effects, together with long-term fire exposure monitoring, should also be carried out and supervised by a multidisciplinary team with medical, environmental, fire and combustion toxicology expertise.* This seems to emphasise one of the key difficulties with this issue: it is exceptional and draws on expertise from several specialisms, not one expert in any particular field.

APPENDIX B – TECHNICAL COMMENTS OF STAGE 2 (SCOPE)

Stage 2 Scope

12. **Non-Soil Data:** P29 states that ‘further investigation should only be justified on the basis of minimising uncertainty so far as is relevant, reasonable and practicable’. This seems logical, in reference to point 3 above, but appears (with the exception of fruit/vegetable testing) only likely to increase the volume of data within the existing dataset, rather than try to address the key gaps and uncertainties (like trying to locate areas of undisputed charred debris or dust deposition).

AECOM’s pilot study of soil concentrations in the Waynflete Square intensely looked at the soil quality in a Part 2A context, but there does not appear to be the same intensity applied to any other form of contaminated material which is known to have existed/still exist (it’s still visible in some areas). A possible approach to assist in addressing these gaps and uncertainties may be to gather all available data, including some not referred to in the AECOM reports (such as any unreported sampling data taken from inside the tower or Kensington Aldridge Academy) or to try and sample undisturbed areas as part of Stage 2.

At Whitstable House (another Tower) which is in the plume path and only around 200 yards away, I understand that Professor Stec thought there may be some in the air vents on top of it (it’s about 200ft tall) which may contain depositions from the fire. If RKBC were agreeable, that location might be suitable for such a study.

13. **Lead:** P23 in Overarching report - there is no direct evidence that lead was released as a result of the Grenfell Tower fire, but features heavily in the Stage 2 works. For a Part 2A investigation that is unusual.
14. **Statistical Analysis:** The comprehensive final dataset should be subject to statistical analysis, ideally utilising CL:AIRE’s 2020 *Guidance on Comparing Soil Contamination Data with a Critical Concentration*. There will be difficulties in doing this, which are inherent to the nature of the investigation and the type of sample data needed to apply this guidance in full, such as issues associated with sampling patterns and non-targeted sampling, but it should be taken into account and the best practise methods employed where possible, even if generating final two-way confidence intervals are not possible. This guidance also includes details on applying statistics to Part2A datasets and using lower confidence intervals (than in planning), or simply the mean which should be also taken into account.

The other points within this guidance, about moving away from single scientific tests to emphasise the importance of comprehensive understanding of a dataset in the context of the Conceptual Site Model, seem particularly pertinent to this site and the points made above.

END

Limitations & Constraints

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No part of this report, or references to it, may be included in published documents of any kind without approval from EPS.

This report and its contents, together with any supporting correspondence or other documentation, remain the property of Environmental Protection Strategies Ltd until paid for in full.

EPS have not undertaken any soil sampling or ground investigations as part of this work.

The report has been written, reviewed and authorised by the persons listed above. It has also undergone EPS' quality management inspection. Should you require any further assistance regarding the information provided within the report, please do not hesitate to contact us.

As stated within DEFRA's Contaminated Land Statutory Guidance (2012), with any complex risk assessment it is possible that different suitably qualified people may reach slightly different conclusions when interpreting the same information. EPS recognises this and considers the views presented within this report to be robust and appropriate but input from the Local Authority and their judgement in line with this guidance would still be welcomed.

EPS are not licensed asbestos surveyors and this report does not reflect any survey undertaken for the presence of Potential Asbestos Containing Material (PACM). Specialist contractors should be commissioned to make detailed assessments and recommendations if these materials are suspected.

The investigation was carried out to assess the significance of contamination resulting from the Grenfell Fire as identified in this report. Unless EPS has otherwise indicated, no assessment of potential impact of any other previous uses has been made.