

Darren Johnson AM  
Stephen Knight AM  
Nicky Gavron AM

City Hall  
The Queen's Walk  
London SE1 2AA  
Switchboard: 020 7983 4000  
Minicom: 020 7983 4458  
Web: [www.london.gov.uk](http://www.london.gov.uk)

Mathew Major  
Concern and Advisory Team (CAT)  
Health and Safety Executive  
Head Office  
Redgrave Court  
Merton Road  
Bootle  
Merseyside L20 7HS

**Our ref:** DJ5320  
**Your ref:**  
**Date:** 3<sup>rd</sup> August 2015

Dear Mr Major

**Re: Demolition of Earls Court Exhibition Centres**

Some residents living around the Earls Court Exhibition centres have contacted us regarding the demolition of the centres and their concerns, as set out below:

**Asbestos**

The developer Capital & Counties Plc (Capco), Royal Borough of Kensington & Chelsea Council (RBKC) and the Health and Safety Executive (HSE) have neither published nor given access to the Asbestos Survey and Risk Register to local residents. Residents require transparency in order to give them confidence that hazardous substances, such as asbestos in Earls Court One, are being dealt with safely.

In the Community Engagement Report Capco says that "*The building does contain some asbestos.*" The phrase gives the suggestion that there is only "some". However, the Capco Waste Strategy predicts there will be 235 tonnes of Asbestos Composite Materials disposed of as waste.

Capco also says that "*This material will be removed from the building early in the deconstruction process prior to soft strip works.*" However, in the Waste Strategy it says that asbestos will be removed over all three Construction Sequences. The third sequence occurs from Years 9 to 19 only.

Further to this, in the response from "the developer" in RBKC Council's reply to the "38 Degrees" petition raised by my constituents calling for an immediate halt to all works on public health grounds, it says that the only remaining asbestos is in the roof and walls and will be removed by September 2015. Which also contradicts the Waste Strategy.

It is also difficult to understand how approx. 235 tonnes of Asbestos Composite Materials could be removed from inside the building as well as the exterior roof and walls prior to soft stripping. It is hard to imagine a scenario where that quantity of walls and roofs are removed prior to desks, cupboards, fridges, water coolers, doors, etc

The plan having changed from a complete envelopment of the site to enveloping the site floor by floor, also raises concerns amongst residents that the developers are changing the plan without notifying them of the impact of this. It is unclear whether this change has occurred for reasons of Health and Safety or as a way of saving money.

---

## **Air Quality**

Earl's Court is an Air Quality Management Area so it is already an overly polluted part of Kensington and Chelsea where the local council, the Mayor and the Government are simply failing to control levels of Nitrogen Oxide in the environment to such an extent that they are breaking the law.

The law limits the number of "spikes" in Nitrogen Dioxide (NO<sub>2</sub>) to a maximum of 18 events per year, but in Earl's Court this limit was exceeded 54 times, three times as many as permitted.

In addition the overall average NO<sub>2</sub> concentration, averaged over the last year was more than double the legal maximum.

## **Noise and Vibration**

The developer's submission appear to be assessed on the impact of '10 days in any 15-day period or for a total of days less than or equal to 40 in any 6-month period' and do not consider the accumulative impact of noise over the course of the 20-year project on the health and wellbeing of residents.

The World Health Organisation (WHO) states levels for outdoor living as being:

Serious annoyance, daytime and evening 55 db  
Moderate annoyance, daytime and evening 50 db

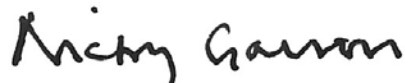
Yet the figures that we are looking at through stages 33-83 are between 73-83db.

These are matters of serious public health concern and I would be grateful if you would investigate them urgently.

Yours sincerely



**Darren Johnson AM**  
London Assembly  
Green Party Group



**Nicky Gavron AM**  
London Assembly  
Labour Party Group



**Stephen Knight AM**  
London Assembly  
Liberal Democrat Group

---