

Mr Carlo Castello
Scott Wilson Ltd
6-8 Greencoat Place
London
SW1P 1PL

Our ref: KT/2010/111570/01-L01
Your ref: .
Date: 16 August 2010

Dear Mr Castello

**PROPOSED RESIDENTIAL DEVELOPMENT OF 207 DWELLINGS AND
ASSOCIATED WORKS - GROUND CONDITIONS REPORT.
ISLES QUARRY, BOROUGH GREEN.**

Thank you for your consultation dated 27 July 2010.

Potential Contamination

We note the comments within the Geo-environmental and Geotechnical Ground Conditions Report 2010 (Scott Wilson Ltd, June 2010). In general the conclusions are agreed and the proposals for further investigative works at the site are acceptable. We would agree that further delineation works are needed, especially in Area 1, to establish hydrocarbon impacts on soil (and thus potential for impacts on groundwater).

We note the comments regarding the limitations of leachate testing that have been carried out so far during the investigation. Further comment on potential risks to groundwater across the whole site should be made once further investigations have been completed. A detailed risk assessment/remediation strategy (including target concentrations protective of human health and groundwater for materials retained on site following development) would be expected to be submitted before the next phase of development work begins on site should a planning permission be granted.

Please note we can only consider issues relating to controlled waters. Any impact on human health should be discussed with the Environmental Health team of the relevant Local Planning Authority.

Piling

With respect to any proposals for piling through made ground, we would refer you to the EA guidance document "Piling and Penetrative Ground Improvement Methods on Land Affected By Contamination: Guidance on Pollution Prevention". NGWCL Centre Project NC/99/73. We suggest that the piling methodology is further discussed with us once the guidance has been utilised to design appropriate piling regimes at the site.

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Waste

Any waste materials being disposed off-site will need to be handled in accordance with duty of care requirements. The waste producer must also pay regard to the requirement for the material to be pre-treated prior to disposal at a landfill.

Drainage

The use of soakaways on site has been discussed prior to the submission of this report with representatives from Scott Wilson Ltd. Our current position is that shallow soakaways discharging into the made ground at the site would be unacceptable due to risk of mobilising contamination via preferential pathways. They may also be unsuitable from an engineering perspective due to the risks of creating ground instability.

The use of deep-bored soakaways discharging into the underlying Hythe Formation geology is also unlikely to be acceptable due to the risk of these systems discharging direct to groundwater with little or no attenuation in the unsaturated zone of the aquifer. Alternatives such as lined permeable paving (with controlled storage and discharge to nearby watercourses) or discharge to the main sewer system should be considered further due to the likely difficulties in using conventional soakaways on site.

Please note that we have only covered issues relating to the submitted document in this letter. Due to the scale of the proposal, we would encourage the developer to contact us at the earliest opportunity to discuss other environmental aspects of the scheme. I enclose an enquiry form for convenience.

Yours sincerely

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Senior Planning Liaison Officer

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