

From: Lisa Horsley <lhorsley@idom.com>
Sent: 01 April 2019 14:30
To: Planning
Cc: Stone, Daniel; Tse, Wai
Subject: FW: Planning Consultation Y19/0266/FH - Telephone Engineering Centre Biggins
Wood Road
Attachments: ufm24.rtf
Categories: Yellow Category

Good afternoon,

Thank you for your recent consultation. I can confirm that I have reviewed the following document:

1. Desk Study Report (ref: 1185/DS) by Peter Baxter Associates for CL Architects Ltd dated 18 February 2019.

The document has been reviewed in the context of the Council's standard land contamination condition which is split into five sections as set out below:

1. Desk Study and Conceptual Model.
2. Intrusive Site Investigation and Risk Assessment;
3. Remedial Strategy and Verification Plan;
4. Verification Report; and
5. Contamination Discovery Strategy.

The condition should be implemented in a phased manner; with each phase only required should a potential risk be identified by the preceding phase. Information has been submitted with regard to part 1 of the condition.

The document includes a desk study / site walkover with a conceptual site model and contamination risk assessment. The report concludes that risks are low and that no further action is required.

However given the former light industrial nature of the site, I am of the opinion that site investigation is appropriate to confirm the ground conditions, soil chemistry, the presence/absence and quality of perched waters / groundwater and the ground gas/vapour regime. This will allow a robust risk assessment to be undertaken capable of ensuring that the site is suitable for its intended sensitive residential use.

I would also note that the report cites the presence of underlying impermeable Gault Clay beneath the site (on the basis of geological mapping) which would mitigate contaminant migration. However I would note that the site is situated towards the base of the Gault Clay and therefore the thickness of Gault Clay beneath the site may be very limited. This should be verified by site investigation. The permeable Folkestone Formation aquifer lies beneath the Gault and is a more sensitive receptor. The conceptual site model does not make any assessment of the potential for perched waters and any contamination sat on top of the Gault Clay. I do not concur with the risk assessment or conceptual site model for the site as presented in the Desk Study. I recommend that intrusive site investigation is undertaken to confirm soil quality and perched/groundwater quality. A broad suite of contaminants of concern are considered to be applicable given the light industrial nature of the site history and adjacent industrial uses (TPH, PAH, VOCs, heavy metals, asbestos). In addition, ground gas and vapour monitoring is appropriate given the presence of the infilled brick pits and adjacent laundry.

At present I am unable to recommend discharge of any elements of the standard land contamination condition.

Best regards,

Lisa

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-----Original Message-----

From: planning@folkestone-hythe.gov.uk <planning@folkestone-hythe.gov.uk>

Sent: 27 March 2019 10:32

To: Lisa Horsley <lhorsley@idom.com>; Robert Glavin <rglavin@idom.com>; Christine Clark <cclark@idom.com>

Subject: Planning Consultation Y19/0266/FH - Telephone Engineering Centre Biggins Wood Road

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