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Our ref: Part Ila potential site
WGW
Your ref: WGW Part 2a Final report
Date: 21st August 2018

ENVIRONMENTAL PROTECTION ACT 1990
PART IIA - CONTAMINATED LAND

Walton Gas Works Final SI Report comments

Dear Paul

Further to our recent meeting and discussion on the draft Site assessment report for the old Walton gas Works site, we would like to offer the following comments on the final report. Overall the report addresses the potential Part Ila liabilities in a detailed manner, within the constraints imposed by the site, access arrangements and your agreed timeframes.

With regards to issues related to contamination potential on controlled waters, we find the final report has added more discussion on previous evidence from other reporting and linked this to the short period of monitoring covered by the current investigation. We would have perhaps preferred a stronger discussion on historic incidents, related to gas works related emissions into the river, and additional monitoring of existing and new GW monitoring points. This would have enabled a more rounded discussion on potential groundwater impacts and any additional receptor impacts on the River Thames in the future. The reporting to date indicates variability in reported data taken from a small number of boreholes on a very few occasions. This variability has also been evident in the previously observed impacts in the river from year to year.

We would still recommend additional monitoring is undertaken before the impacts on controlled waters are fully closed out in your investigations. This could verify the extent of source materials beneath the site and adjacent land, taking into account that the clay strata does not have a clean interface surface with overlying materials and gas works products could be released again under different groundwater conditions. However we accept that the impact on the river per se is currently deemed to be low to moderate, given the reported site findings, the period elapsed since significant gas works materials were identified in Boreholes in the Riverside Park and dilution in the Thames.

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We would therefore suggest some on-going monitoring is undertaken to meet the requirements for assessing risk to controlled waters under the Part IIa regime and the aligned Water framework Directive general requirements. This would address the level of uncertainty with regards to this pathway and whether the risk remains low to moderate.

However we accept the main reported conclusions and recommendations, although obviously the harm to human health issues are primarily a matter for yourselves.

I trust you find these comments helpful.

Yours faithfully,



Jonathan Atkinson

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