

Subject: RE: Yacht Haven APP/13/00317 Conditions 20, 21, 22

David,

My apologies for the delay in getting back to you. I've been through the verification report – the principle issue is that the only included imported topsoil sample reports concentrations of a 'toxic at low concentrations' PAH congener (Dibenz(a,h)Anthracene) which exceed the generic assessment criteria for all classes of residential use, even if the soil organic matter (SOM) content were raised to above 6% (sample = 3.6%, lower %SOM = more stringent assessment criteria). As we only have one sample (from the soil supplier) we are forced to assume that it represents the most common, median concentration (we have not information to the contrary, and the obtained result is more likely to be the most common possible result than it is to be a statistical outlier).

Were this to be the case in practice (i.e. sample represents median concentration-), it is possible that the soil within garden areas of individual plots could be of unacceptable quality. The relevant risk would be to infants 0-6, in particular, and these are family homes.

The supplier may have additional sample data available, which may provide the necessary comfort. Failing that, it may be necessary to take as placed samples from plots to inform the 'representativeness' of the soil supplier sample relative to the quality of soils actually delivered & placed 'clean-side' of the cover system. Subject to this being resolved, I'm content to accept the verification report.

However, I'm afraid that in the event that the supplier sample proves to be representative of a median concentration (however demonstrated), it is likely that some plots will require remedial work. I am genuinely sorry that this isn't the rubber-stamp sign off that we'd hoped.

The first port of call is for the applicant to contact the supplier and query available test results – the applicant imported >1000 cu.m, and typical per-supplied-volume sample rates would suggest that results from at least 2 additional samples are likely to be held by the supplier.

Best Regards,

Jon

Jonathan Driver
Environmental Control Officer