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Our Ref: DCS/EH/JPD/121005002

Your Ref: 429 R01 Rev1

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Ask For: Mr Jonathan Driver

Date: 05/10/2012

Dear Dr. Grant,

Re: Yachthaven, Copse Lane, Hayling Island; Report on Witnessing Waste Removal (429 R02 Rev0)

Thank you for submitting the report on waste removal at the Yachthaven site off Copse Lane, Hayling Island. I have reviewed the report, and would like to provide comments, as outlined below.

Location of Fly Tipped Waste

It is noted that the photographs presented within Appendix A are of later date than the Waste Transfer Notes presented within the waste removal report No. 429 R01 r0, and that they show the site in much cleaner condition than when last visited by Environmental Health. The volumes of waste that remain on the site are agreed to be relatively small, and your comments regarding the nature of the waste / combustion residues are noted, and appear to be consistent with Environmental Health notes from July site visits.

The *Site Location & Topography* section of the report states "At the north the site has a metalled access road off Copse Lane that forms the western site boundary with an area of partially demolished buildings and fly tipped material to the east". I do not dispute this description as it relates to this part of the site, indeed fairly significant volumes of waste have previously been observed in the vicinity of the structures.

However, tipped waste, uncontrolled fires & burning were noted at a location (approximately) some 70m south-southeast of these structures, at the end of the eastern 'arm' of the semi-metalled track; broadly within the area of imported soils indicated within report No. 429 R01 r0.

This does not quite tally with the description of imported soils being limited to coastal grassland in the south-east corner of the site, and fly tipped waste confined to the north of the site (on the east side of the track). Consequently I am pleased to see that some intrusive investigation is planned within the coastal grassland area.

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Potential for Soil Contamination

The statement that the imported soils at the southeast of the site are considered unlikely to have led to significant contamination is broadly agreed, the primary concern was burned tipped waste, and in particular (in the context of the ecological receptors), metals contamination / metals within particulate combustion residues.

Similarly, it is understood that the shallow geology is predominantly stiff Reading Clays across the majority of the site, and that significant vertical migration is unlikely.

However, this section also states that runoff / percolation to surface waters is considered unlikely. My understanding of local geology was that of a shallow band of granular made ground at the surface, underlain by impermeable, stiff clays. With the land being broadly flat, there is no particularly significant gradient, however it would be reasonable to assume that any shallow groundwater flow within / from saturated soils would tend toward the nearby Chichester Harbour.

This is particularly pertinent given the statement in relation to the fly tipped / burned materials that *"metals residues are likely to have washed from fire residues and fly-tipped materials under rainfall"*, and comments above regarding the location of fly-tipped waste.

It is acknowledged that some additional investigation is to be undertaken within the south-eastern portion of the site, and unless there is a particular reason to indicate that runoff / leaching is unlikely (i.e. PH / TOC for particular determinands etc.), I would prefer to see an indicative leachate test to confirm the assumption. Similarly, EQS values would be considered appropriate for comparison within areas where leaching / runoff is considered probable.

I can confirm that I am content for intrusive investigation to be undertaken following the demolition of on-site structures, and removal of demolition waste and the remainder of fly-tipped materials.

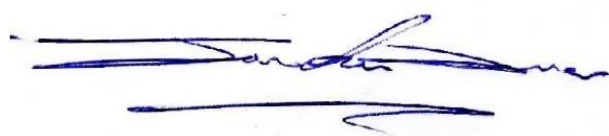
Recommendations & Further Actions

Notwithstanding the above, the proposals within this section are agreed. I confirm no objection to proceeding on this basis.

I can also confirm that I have responded to development control, stating that I do not consider the remaining issues to pose a barrier to planning consent.

If either you, or your client would like to discuss any of the above comments, please don't hesitate to contact me.

Yours Sincerely



Jonathan Driver
Environmental Control Officer