



Landholder's View: Getting Land Managed

What do we now want from Practitioners?

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**The Authoritative Voice of
Contaminated Land Management
from a Land Holders' Perspective**

SAGTA / SoBRA C4SL Workshop

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Contents

- What we want from practitioners
- Immediate, short and longer term needs
- What we all really need



Practitioners

- Who are 'practitioners'?
 - Mainly consultants
 - Could be contractors
 - But mainly supervised by consultants and working to consultant specifications
 - Definitely includes LAs, PHE
 - But also covers landowners/clients
- It's all of us!



Immediate Needs

- Uncertainty over something is precarious for the industry
- Industry to ‘move together’ to uniform and consistent ‘adoption’
- We need everyone to acknowledge the facts:
 - C4SLs are the result of current Statutory Guidance and legislation
 - C4SLs were derived from a comprehensive research project
 - The project was undertaken by a very well resourced, flexible and widely experienced team (that’s why they got the project!)
 - The project involved a significant amount of stakeholder engagement and SG had much discussion and debate
 - Nothing was ‘forced through’ or taken for granted
 - Only the latest science and research was used and applied by well respected professionals operating within their specialism
 - The output itself is quality science
 - Took a long time – good that it wasn’t rushed
 - Significantly more review than expected – COC / COT, peer review, Chief Scientist



C4SLs in Part 2A Use

- C4SLs are certainly not the Part 2A threshold
- They are simply a screening tool to dismiss sites easily and consistently
- However, their exceedance does not mean more work is needed
- If a site is Determined, the C4SLs are not remediation targets, as this is the C2/C3 Boundary



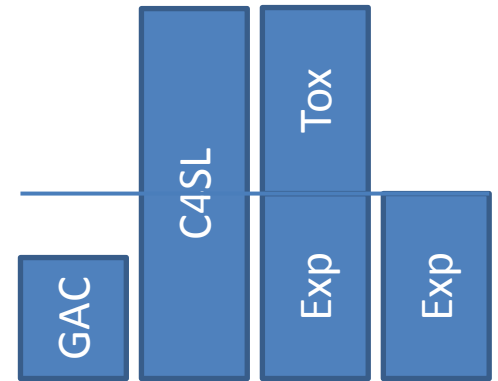
C4SLs in Planning Use

- There is nothing to stop C4SLs being used in planning!
- There is no need for any discussion as to whether C4SLs can or can't be used in planning!
- C4SLs are a useful screening tool
 - Screen against GAC then C4SL?
 - However, their exceedance does not mean more work is needed
- C4SLs are certainly not remediation targets
 - But may choose to be applied as so by the landowner/developer
 - NPPF P120 & Planning Practice Guidance “... responsibility for securing a safe development rests with the developer and/or landowner”
 - If a site requires remediation, the remediation level is the C3/C4 Boundary

Short Term Needs



- ‘Semi-C4SL’ for all GACs could be immediately and easily rolled out
 - Just apply C4SL Exposure changes
 - Would be very beneficial if all done as one available to download from an independent centrally location
- Develop proper (Exp & Tox) C4SLs, targeting:
 - “CLEA” metals, PAHs (but have surrogate marker), (lower range) TPHCWG, BTEX and a few solvents (TCE, PCE, etc.)
- Must follow the C4SL framework
 - No amendments because ‘I don’t agree with ...’
 - Overview by SG representative of industry to ‘sense check’





Longer Term Needs

- Language change?
 - Many sites appear to be described as ‘moderately contaminated’ (from CIRIA 552 ‘Contaminated Land Risk Assessment: A Guide to Good Practice’) but is it actually this in relation to Cats 1-4?
- Proper DQRA to be undertaken
 - ‘Play’ with CLEA often done
 - Many elements identified in research that were not implemented in a ‘screening level’ but should be used
- Change that individuals cannot do everything
 - Practitioners should only work in their specialist area and people should seek help of appropriate others when necessary
- C4SL Framework (esp Tox) presented could be developed further for C3SL
- C4SL framework should be followed by JIWG for asbestos

What do we really want?

