

Land contamination: risk management (LCRM)

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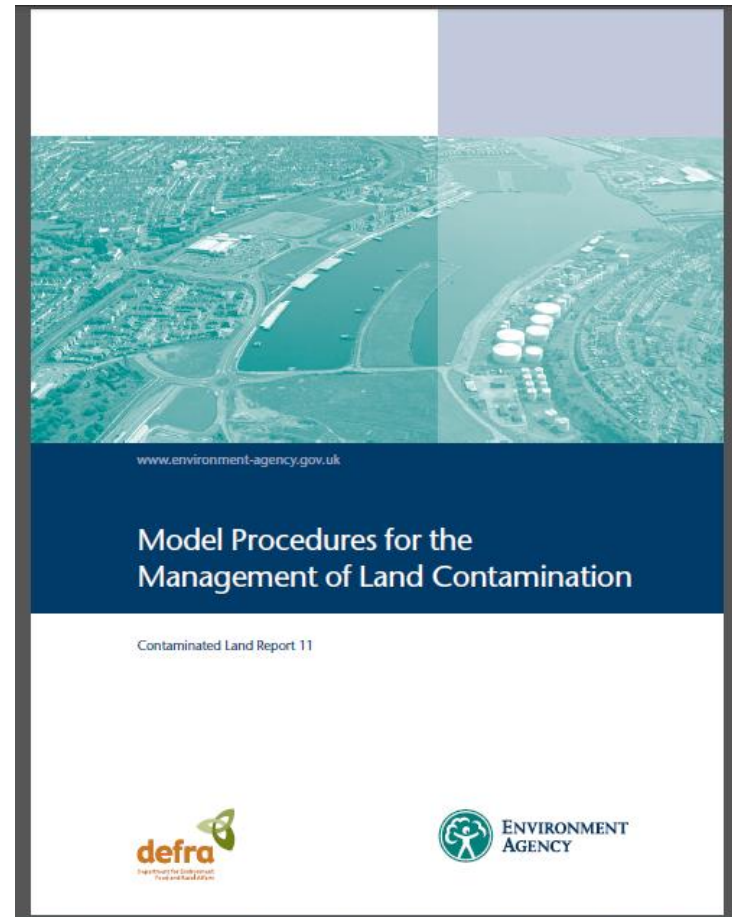
Updated LC guidance published

- 5th June 2019 the EA published an update to Model Procedures for the Management of Land Contamination (CLR11)
- Updated online guidance is called Land contamination: risk management (LCRM)



CLR11 – a legend.....

- Published in 2004
- Research document
- UK wide guidance
- Overarching technical framework
- Stood the test of time
- Never updated



CLR11 – a legend.....

- archived in April 2016
- archived means National Archive
- we cannot host archived content on GOV.UK
- CL:AIRE hosted it on the WALL
- we had a temporary link on GOV.UK

CLR11 was too significant we needed to find a solution

What does archived mean?

- archived content can only be used for historical reference
- it's no longer official
- doesn't represent current government or EA approach
- can't be used as such
- we shouldn't be relying on it or referencing it

Restore CLR11 back on GOV.UK?

GOV.UK only shows up-to-date and current information

We must use the GOV.UK rules for publishing

- must be a clear user need
- no general advice or good practice
- clear structure
- must be accessible content – main reason

We must use clear language:

- no need for jargon
- simple language
- technical content retained
- remains accessible

Accessible content



- concise, clear and understandable to all
- 1 in 5 people have a disability
- navigable
- assistive technology

We must comply with:

<http://www.legislation.gov.uk/ukxi/2018/852/contents/made>

Content is viewed differently:

- smart phones and tablets
- drive against static PDFs

What was the solution?

- Land contamination: risk management (LCRM)
- it is EA guidance and now published on GOV.UK
- it's based on parts 1 and 2 of CLR11
- reformed content not new
- framework, scope and purpose remain the same
- user focussed in GOV.UK style
- live online document
- accessible
- technical language and content retained

LCRM

- <https://www.gov.uk/guidance/land-contamination-how-to-manage-the-risks>

The screenshot shows the GOV.UK page for 'Land contamination: risk management'. The page has a blue header with the GOV.UK logo and a search bar. Below the header, there is a blue box with the title 'Land contamination: risk management' and a link to 'Give feedback about this page'. The box also contains metadata: 'From: Environment Agency', 'Published: 5 June 2019', and 'Updated: 5 June 2019, see all updates'. Below this is a search bar with the text 'Search this manual'. The main content area is white and contains a 'Contents' section with a heading 'How to assess if there's unacceptable risk, decide which options are the most suitable to manage the risk and implement remediation if needed.' followed by a 'Feedback' section. The feedback section states that the guidance is based on the Model procedures for the management of land contamination - contaminated land report (CLR11) and that the Environment Agency wants feedback on this guide, particularly on the structure and technical content.

Before you start

What you need to know before you start the risk management process.

Stage 1: Risk assessment

How to do a land contamination risk assessment (RA).

Stage 2: Options appraisal

How to do a land contamination options appraisal (OA).

Stage 3: Remediation

How to develop a remediation strategy, implement it and verify remediation has worked.

Site investigation

How to plan for a site investigation.

Reporting requirements

The reports you must produce and the information they can include.

Future of CLR11

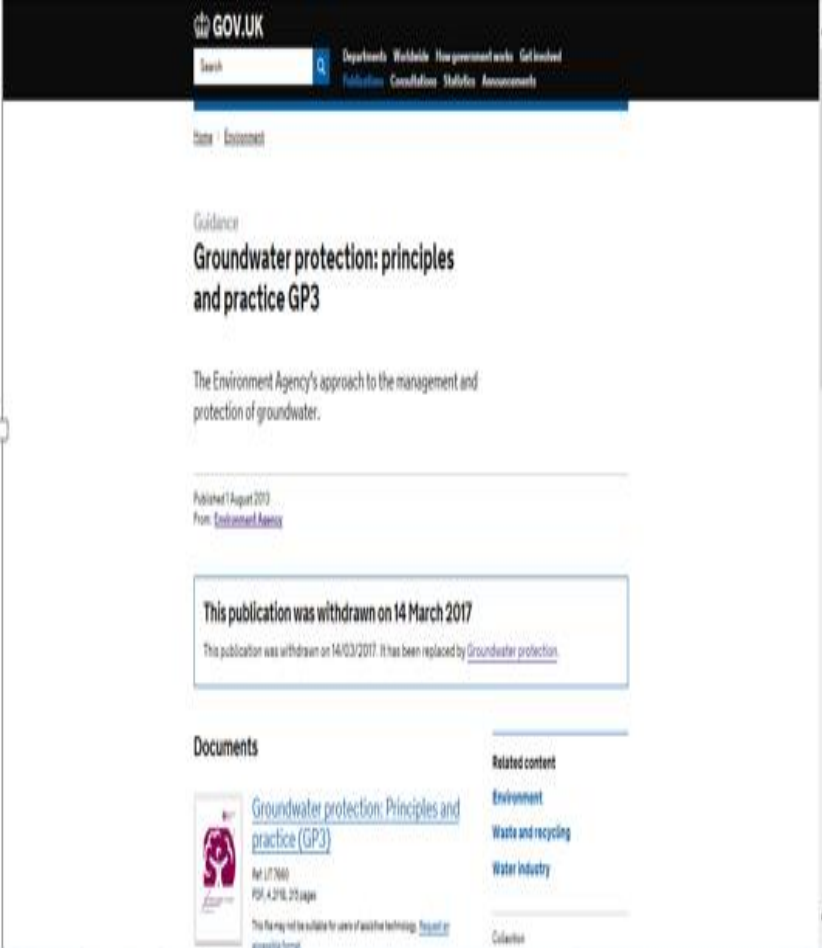
CLR11 will be permanently withdrawn when LCRM is republished.

LCRM replaces CLR11

Reasons:

- we cant link to, host or reference archived content
- CLR11 had never been updated
- 2 versions will cause confusion
- LCRM represents new ways of how we will work
- LCRM can be easily updated

A copy of CLR11 will be hosted by CL:AIRE on the WALL



The screenshot shows the GOV.UK website interface. At the top, there is a search bar and navigation links for 'Departments', 'Workbooks', 'Her government work', 'Get involved', 'Publications', 'Consultations', 'Statistics', and 'Announcements'. The main content area is titled 'Guidance' and features the heading 'Groundwater protection: principles and practice GP3'. Below this, a sub-heading reads 'The Environment Agency's approach to the management and protection of groundwater.' The publication date is listed as 'Published 1 August 2013' from the 'Environment Agency'. A prominent white box with a blue border contains the text: 'This publication was withdrawn on 14 March 2017' and 'This publication was withdrawn on 14/03/2017. It has been replaced by [Groundwater protection](#).' Below this, there are sections for 'Documents' and 'Related content'. The 'Documents' section shows a thumbnail for 'Groundwater protection: Principles and practice (GP3)' with details: 'Ref: L177661', 'PDF, 4.21M, 25 pages', and a note 'This file may not be suitable for users of assistive technology. Request an accessible format.' The 'Related content' section lists 'Environment', 'Waste and recycling', and 'Water Industry'.

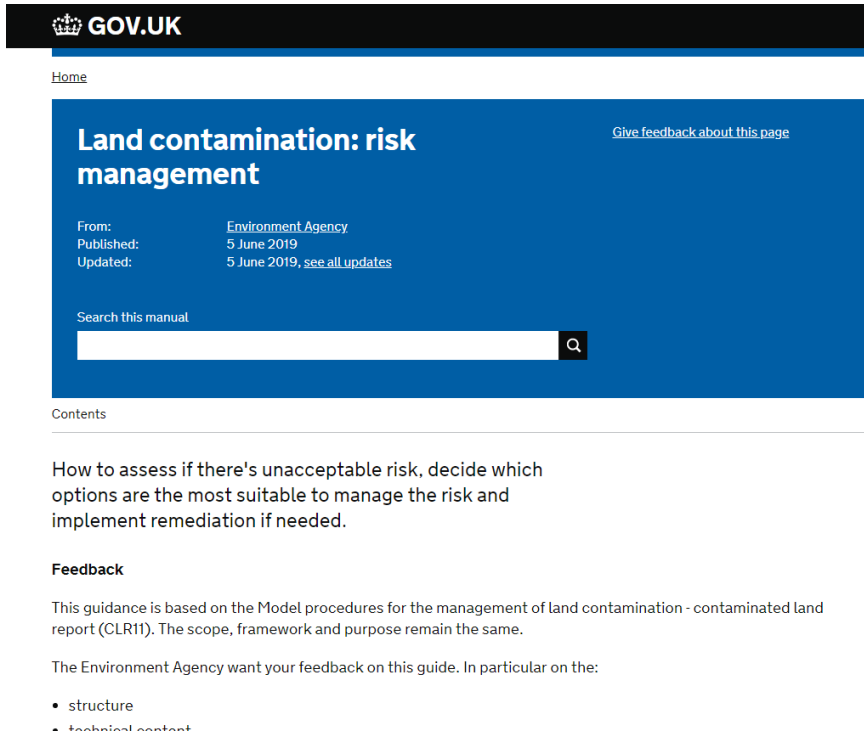
Key points

- CLR11 archived
- significant but non-statutory guidance
- we shouldn't be relying on archived content
- can't reinstate CLR11 back on GOV.UK
- LCRM is reformed not new content

We must:

- use GOV.UK style guide
- comply with new laws on accessibility
- produce clear, structured guidance

Feedback received



The screenshot shows the GOV.UK website header with the 'GOV.UK' logo. Below the header is a navigation bar with a 'Home' link. The main content area has a blue background with the title 'Land contamination: risk management' and a link to 'Give feedback about this page'. Below the title is a metadata section with the following information: 'From: Environment Agency', 'Published: 5 June 2019', and 'Updated: 5 June 2019, see all updates'. There is also a search bar with the text 'Search this manual' and a search icon. Below the search bar is a 'Contents' link. The main text of the page reads: 'How to assess if there's unacceptable risk, decide which options are the most suitable to manage the risk and implement remediation if needed.' Below this is a 'Feedback' section with the text: 'This guidance is based on the Model procedures for the management of land contamination - contaminated land report (CLR11). The scope, framework and purpose remain the same. The Environment Agency want your feedback on this guide. In particular on the:' followed by a bulleted list: '• structure' and '• technical content'.

- Structure
- Technical content
- Options appraisal applicability matrix

Over 330 individual responses received

Changes we have made...

- Concentrated on main guidance sections
- OA matrix will be updated over next few months
- Looking to publish before the end of March 2020
- Lot of attention on the layout and structure of the guidance
- Lots of feedback on the usability of the guidance – print, search, navigation and bookmarks
- Decided on new HTML format to improve navigation and usability

Changes we have made...

- There will be 4 HTML's...

 [Departments](#) [Worldwide](#) [How government works](#) [Get involved](#)
[Consultations](#) [Statistics](#) [News and communications](#)

[Home](#) > [Business and industry](#) > [Business and the environment](#)

Guidance

Land contamination risk management

How to assess if there's unacceptable risk, decide which options are the most suitable to manage the risk and implement remediation if needed.

From: [Environment Agency](#)

Applies to: **England**

Details

This guidance applies to England. If you are using this guidance outside of England, check with the relevant regulator about its suitability.

If you are using these documents in Northern Ireland then you must refer to the Department of Agriculture, Environment and Rural Affairs [Practice guide - redeveloping land affected by contamination](#).

Local authorities may also provide independent guidance.

Explore the topic

[Environmental planning](#)

[Land and development opportunities](#)

Is this page useful? [Yes](#) [No](#)

Is there anything wrong with this page?



[Land contamination risk management \(LCRM\): before you start](#)

HTML



[LCRM Stage 1: risk assessment](#)

HTML



[LCRM Stage 2 - options appraisal](#)

HTML



[LCRM Stage 3 - remediation and verification](#)

HTML

Changes we have made...

- Reporting requirements will be included at the end of each section rather than in a separate HTML
- We have improved the site investigation section at the end of the RA- aligns to the terminology in relevant British Standards
- New section on unexploded ordnance
- Clarity over the relationship between SGV's and C4SL's
- Clarity over MCERTS and RMT's
- Information on piling
- New section on risk communication
- New text on treatability studies and innovative techniques
- We are using the term 'contaminant linkage' rather than 'pollutant linkage' and relevant 'contaminant linkages' for consistency

Changes we have made...

- We have revised the structure of the guidance...

Stage 1. Risk assessment (RA)

You will use a tiered approach to RA. The 3 tiers are:

1. Preliminary risk assessment.
2. Generic quantitative risk assessment.
3. Detailed quantitative risk assessment.

Stage 2. Options appraisal (OA)

You will need to follow these 3 steps in order:

1. Identify feasible remediation options.
2. Detailed evaluation of options.
3. Final selection of remediation options.

Stage 3. Remediation and verification

You will need to follow these 3 steps in order:

1. Develop a remediation strategy.
2. Verification
3. Long term monitoring and maintenance, if required.

Changes we have made

- Can search, print and save as a PDF if needed but it is meant to be online guidance. Can link to and go back between the 4 HTMLs.
- Feedback on flowcharts – we will work on one and ask CL:AIRE to host it so we can keep the detail – GOV.UK only allows simple flowcharts.
- Clarification of competent person
- We will keep the following email address open to receive any additional feedback on the reformed content
- groundwater.enquiries@environment-agency.gov.uk

Thank you



@GeoscienceEA