

Chapter 4. Priority Actions and Timescales

This section outlines how the Council intends to undertake the inspection of the Island. The Council may purchase information about potentially contaminated sites from Landmark Ltd (a partner of Ordnance Survey that provides historic mapping in digital format). The Council may alternatively analyse historic mapping of the island and other sources of information in order to identify potentially contaminated sites for further investigation. A cost/benefit exercise will be undertaken in order to get a better understanding of the time that would be saved by purchasing the data from Landmark Ltd.

A significant part of the investigation will be the prioritisation (for further investigation) of the potentially contaminated sites on the Island (of which there are over 1000) (Landmark, 2001). The methodology that will be used is outlined below. Details of timescales are also provided in this section of the strategy.

4.1 Prioritisation of potentially contaminated sites:- Scope and purpose

The period up to April 2002 will be devoted to gathering the information needed to identify the potentially contaminated sites. These potentially contaminated sites identified from the data sources listed in Table 7 of section 5.3 will then be prioritised. Sites requiring further detailed investigation will be identified from the list.

DETR Circular 02/2000 suggests that the Island should be divided into sections in order to concentrate on areas, one at a time. However, it also states that the Council must “*ensure that resources are concentrated on investigating in areas where the Council is most likely to identify contaminated land*”. The Council will therefore not divide the Island into discrete areas, as this may lead to a delay in investigating a site which poses a more significant risk, in an otherwise uncontaminated area of the Island.

In order to determine whether any land appears to be contaminated land, a detailed risk assessment will be necessary. However, to first identify the most serious and pressing problems, a preliminary screening tool will be used to identify and prioritise sites identified from Landmark data or the Council’s own research, where a coincidence exists between a source of contamination, a pathway and a receptor. This is consistent with the “*ordered rational and efficient*” approach referred to in the statutory guidance.

4.2 Risk Prioritisation Methodology

The Risk Prioritisation Methodology has been devised by MAPAC (based on DETR guidance CLR 6). The provisional methodology for risk-ranking the potentially contaminated sites is outlined here. The risk assessment will require a brief desk-top study and site visit for each site identified as having the potential to be contaminated.

The risk prioritisation methodology used was developed for the local authorities in Greater Manchester by Steph Pickford (see Appendix 4). The methodology is therefore to be used widely and has been scrutinised by a large number of local authorities. The DEFRA (formerly DETR) guidance (Contaminated Land Research Paper 6, [CLR6]) on which the methodology is based, is now 5 years old and is being reviewed. The Council's methodology may change to meet the new guidance.

The datasets of potential sources, pathways and receptors (see Table 7 of section 5.3) are to be loaded onto the GIS to aid identification of coincidence between potential sources, pathways and receptors.

4.2.1 Description of methodology

The Risk Prioritisation Methodology will rank the potentially contaminated sites in order according to their potential, but not actual, risk since the assignment of scores is empirical only. Site rankings are not absolute, although pilot tests have attempted to ensure that the worst types of sites are accentuated upwards and vice versa.

Steps 1 to 5 of the methodology are followed to prioritise potential sites based on existing information as identified in Table 7 of section 5.3. Step 6 suggests reference methods to identify new sites, and by repeating Steps 2 to 5, each new site is processed to assign and rank its risk score. The output will be a continually updated list of sites in ranked order of priority, for further prioritisation into workable Priority 1, 2 and 3 categories. At this stage, further investigation can begin on the highest ranked sites within the Priority 1 category.

4.2.2 Further prioritisation

The risk prioritisation methodology will produce a list of sites based on the suitability of the site for its given environmental setting in ranked order of priority for more detailed review. A further prioritisation will be required to break down the list of sites into manageable pieces to enable timescales to be set for working through the list.

Without actually processing all the sites already known about, it is not possible to predict at this stage how many sites will fall into the nominally selected brackets of high risk, medium risk and low risk. Indeed, since the prioritisation is generic and not absolute in nature, the setting of score ranges will have to be done at the same time as undertaking the procedure itself.

For example, once the first hundred or so sites have been processed with scores assigned, it will become more apparent where to set the bandings, based upon the assessor's judgement and experience in contaminated land issues.

High-risk sites are classed as Priority 1, and detailed investigation of such sites will need to take place first. Next are medium risk sites, or Priority 2, and

then low risk sites, or Priority 3. There will also need to be flexibility to amend the priority classification based on additional information, officer knowledge, or indeed other Council drivers or intentions for setting targets. This may be the case where the Council might wish to start undertaking detailed investigations on certain land in its ownership earlier than timetabled for its designated Priority Class, to fit in with budget funding availability, and so on.

Consideration will also need to be given to ensure that other factors are accounted for in discerning between sites with similar scores falling into the same Priority Class, based on the following factors in order of priority:

- Is significant harm taking place
- Is significant harm likely to take place
- Is pollution of controlled waters occurring or likely to occur
- What is the sensitivity of the type of receptor that is affected
- What is the known likelihood or magnitude of harm

Similarly, officer experience and judgement will be required to differentiate between sites of similar priority ranking, with reference to published guidance and other relevant authoritative sources.

From this point onwards, the prioritised sites will need to be investigated in further detail, highest risk sites first, using full risk assessment techniques.

4.3 Other factors affecting priorities for investigation

Although the order in which the sites will be more thoroughly investigated will be largely determined by the methodology outlined above, there are two other factors that will affect this order. These are sites that the Council owns and sites which the planning department wishes to designate in future Unitary Development Plans.

Council owned sites with the same risk-score as a site in alternative ownership will be given priority, unless the site in alternative ownership poses an imminent risk to human health. This lead will demonstrate the Council's commitment to remediating land where necessary.

Another factor affecting the prioritisation of the sites will be the land that the Council wishes to designate for development in the Unitary Development Plan. Such land will be investigated with priority over non-urgent sites, as and when the next version of the Unitary Development Plan is being prepared. Unitary Development Plan land investigations will be carried out at the request of the Planning department.

4.4 Resource requirements for risk prioritisation

The single largest resource required to undertake the prioritisation procedure will be that of time, which will need to be accommodated within the Environmental Protection Section of Environmental Health. The development of a database to store, manage and retrieve the findings in a ranked order of

priority, will take up additional staff resources. In addition, the costs of datasets and software that may be required are significant.

4.5 Timescales

Landmark Ltd hold a database of over 1000 potentially contaminated sites on the Island. If the Council were to purchase this data from Landmark, the Council could begin to undertake the prioritisation of these sites in November. If the Council chooses to undertake its own analysis of historic mapping in order to create a database of potentially contaminated sites, this would take several months and delay the start of the prioritisation stage of the inspection. A trial will be undertaken to establish how much time would be saved by purchasing the data, in order to make a fully informed decision as to whether or not to make the purchase. Despite this uncertainty, and the difficulty involved in estimating how long it will take to undertake a desk-top study and walk-over survey for each of the sites, the Council has set a number of preliminary targets:

Provisional Timetable

July 2001- Nov 2001	Strategy formation
Aug 2001- Apr 2002	Information Gathering
Apr 2002- Apr 2004	Risk Prioritisation
Apr 2004- end date unknown	Site investigations and any necessary remediation

N.B. Urgent remediation will be undertaken throughout the inspection programme when it is deemed necessary.