



City Development

# CONTAMINATED LAND: AN INSPECTION STRATEGY FOR LEEDS

NINTH REVIEW  
MARCH 2011

## **1.0 INTRODUCTION**

Under Part 2A of the Environmental Protection Act 1990, each local authority has a statutory duty to prepare, implement and keep under periodic review its Contaminated Land Inspection Strategy (CLIS). Chapter 11 of Leeds City Council's Strategy document says a review will be carried out after each year of the Strategy's implementation. This approach was considered to be the most efficient and effective way of making sure that the Strategy remains up-to-date and reflects current practice, but also that it is realistic and achievable. Annual reviews were deemed the best way of enabling timescales and targets to be revised appropriately.

In the last Annual Review, it was decided more appropriate to report the Part 2A work progress in line with the financial year end. The date of this Review has therefore changed to coincide with the end of March. The new statutory guidance to be published on 1 October 2011 may require a revised Contaminated Land Inspection Strategy to be published in line with the new statutory guidance. Next year, it is intended to provide an updated annual review either as a standalone document or as part of any new revised Contaminated Land Inspection Strategy that may need to be published.

This document comprises Leeds City Council's Ninth Annual Review of its CLIS; it is not intended to be a standalone document, but should be read in conjunction with the original CLIS document and earlier Annual Reviews.

### **1.1 Who has undertaken the Review?**

The Ninth Annual Review has been undertaken, and this document prepared, by the Contaminated Land Officer and others involved in the implementation of the CLIS within Leeds City Council's City Development Department. A copy of this review has been provided to the Environment Agency for their information.

### **1.2 Structure of the Review Document**

The layout of this review follows a similar format to that of earlier reviews, which follow the listing of the principal features of the CLIS methodology as presented in Chapter 5 of the CLIS document. For each feature, the progress made in the ninth and part of tenth year of implementing the CLIS is discussed, including details of any proposed changes to procedures, timescales or targets.

### **1.3 Definitions & Terminology**

Various terms and abbreviations used throughout this document may have a specific meaning within the context of the Part 2A Contaminated Land regime and/or they have already been defined within the Glossary and text of the original CLIS document. On this basis, definitions will not be repeated here.

### **1.4 Publication**

This Review document can be viewed and/or downloaded free of charge from the Council's website at [www.leeds.gov.uk/contaminatedland](http://www.leeds.gov.uk/contaminatedland). Alternatively, a hard copy can be purchased for £10.00 from the Contaminated Land Officer at the Leonardo Building, 2 Rossington Street, Leeds LS2 8HD.

## 1.5 Enquiries

Any enquiries about this Review, earlier Annual Reviews or the CLIS document should be addressed to:

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Further information about the CLIS can also be found at [www.leeds.gov.uk/contaminatedland](http://www.leeds.gov.uk/contaminatedland). The CLIS and subsequent annual reviews can also be viewed on this website and downloaded free of charge.

## 2.0 CONTAMINATED LAND GIS & DATABASE

The Contaminated Land GIS and associated attributes tables have continued to be developed as and when necessary.

The 'Potentially Contaminated Land' (PCL) database referenced in the earlier annual reviews continues to be expanded to store site-specific information supplementary to that held in the GIS attributes tables.

The database for storing and managing data collated at the detailed inspection stage of the Part 2A process has been further developed.

## 3.0 DEVELOPMENT OF KEY DATASETS

The GIS holds over 250 datasets providing a range of information relating to contaminant sources, pathways and receptors. It is intended that all the datasets will cover the whole of the Leeds District; indeed, this is already the case for the majority of the datasets.

### Datasets in the process of being acquired/developed

- 'Potentially Contaminated Land' (PCL) Dataset

The PCL dataset is comprised predominantly of potentially contaminated sites that have been investigated and/or remediated through the planning and redevelopment process, through voluntary remediation or have been brought to the Council's attention through other means.

The PCL dataset has continued to be developed during the past year. New PCL sites have been added to the dataset including digitising the site boundary onto the GIS system and inputting site-specific details into the database.

- Early Year Centres (nurseries) – private

Details have recently been provided to the Contaminated Land Team of premises which are recorded as ‘Day Nurseries’ for the purposes of calculating rateable values by the Leeds Valuation Office. This data will be incorporated into the prioritisation process.

#### 4.0 PRIORITISATION OF SITES FOR INSPECTION

The GIS-based software package, GroundView™, is a tool to prioritise sites that have been identified as potentially Contaminated Land. The adopted method begins by comparing the location of areas of potential contamination with areas where there are sensitive receptors. By overlaying these two types of data, a preliminary list of sites that have two parts of a potential pollutant linkage is compiled in prioritised order. The principles and methodology behind GroundView™ are explained in Appendix F of the CLIS document.

***Identification and prioritisation of sites likely to require Detailed Inspection have now been completed for all of Leeds. A total of 2800 sites are currently recorded on the database as summarised below:***

Identification & Prioritisation of Site Completed	Priority Area	General area covered	No. of sites currently known
Yes	1a	Meanwood	35
Yes	1	City Centre, Holbeck, Beeston, Wortley & Armley	333
Yes	2	Guiseley & Yeadon	145
Yes	7	Hunslet, Stourton & Cross Green	218
Yes	3	Morley, Gildersome, Middleton & East Ardsley	229
Yes	4	Horsforth, Pudsey & Calverley	456
Yes	5	Rothwell & Oulton	206
Yes	6	Garforth, Micklefield & Kippax	100
Yes	Rest of Leeds	Rest of Leeds not covered by Priority Areas 1a and 1 to 7	1078
TOTAL			2800

During 2010, a more complete dataset for allotments in Leeds was made available to the Contaminated Land team. These allotment sites have been digitised as a source and receptor. As a result, the numbers of sites in the above table has increased from the last annual review with regard to Priority Areas 1a, and 1 to 7.

Please note that other sites requiring detailed inspection may have been identified and added to the list or may be identified at a later date for various reasons, for example, through noting additional historical land uses that were not included within the Historical Land Use dataset (as this dataset is derived from only 5 epochs of data).

Further details on the approach towards, and progress regarding, the prioritisation work are provided below.

#### **4.1 Selection of datasets for preliminary prioritisation - Humans**

The approach to prioritisation has not changed since the Autumn 2004 Annual Review and continues to target, as far as possible, the highest priority, most sensitive receptors, ie humans. A buffer zone of 5m has been placed around the source datasets in order that Groundview can readily identify those sites where potential sources and receptors lie adjacent to each other. The justification for this approach has been included in Appendix 1 of the Autumn 2008 Annual Review.

At a later date, it is intended to assess potential sources of contamination in relation to the lesser sensitive receptors of controlled waters, ecology and property. Sites where allotments are acting as source and receptor have been captured as noted earlier but have yet to be assigned a prioritisation score.

#### **4.2 Scoring system and 'rolling' prioritisation list**

The scoring system and concept of the 'rolling' prioritisation list has not changed since the last Annual Review. For completeness, this is reiterated as follows. Except for Priority Area 1a which has been addressed separately as the initial pilot study area, when prioritisation of sites within a certain Priority Area has been completed, these sites will be combined with the list of sites available at that time so that ***there is one overall 'rolling' prioritisation list.*** The sites that represent the highest risks will be subject to detailed inspection first regardless of the area in which they are located.

#### **4.3 Potential Source - Railway line land use**

The general methodology outlined in the 2006 Annual Review is being used when identifying sites for detailed inspection where the historical land use data highlights railway lines as a potential source of contamination.

Where potential receptor sites (eg back gardens of residential properties) are located adjacent only to current or past railway lines, it was previously stated that an attempt would be made to address these sites and add them to the prioritisation list at the time of carrying out the prioritisation process for each area. The areas of past railway lines that may have an impact on human receptors have been identified but a method for translating these areas into actual Part 2A sites is yet to be devised.

#### **4.5 Potential Receptor - Controlled Waters**

The definition of Contaminated Land has been amended by Government so only 'significant' and the 'significant possibility' of pollution of controlled waters requires addressing under the Contaminated Land regime as opposed to all pollution of controlled waters. Guidance on what is meant by 'significant' and 'significant possibility' was recently proposed in a draft revision of the statutory guidance that is due to come into force on 1 October 2011. Once the revised statutory guidance is in force, a more detailed methodology for dealing with these sites will be considered further.

### **5.0 DETAILED INSPECTION, DETERMINATION AND REMEDIATION**

Detailed inspection, determination and remediation work completed so far is outlined in Appendix 1. A summary of the work carried out to date is provided below.

### Area 1A and Financial Year 2006/07 <sup>(1)</sup> in Appendix 1)

The Area 1A data was reported in preceding Annual Reviews. For the remaining 10 sites in Meanwood that required further detailed inspection, a grant from DEFRA was obtained in February 2008 and a detailed site investigation carried out during August and September 2008 followed by delineation works in 2 phases in 2009. A summary update of each site is listed below:

- PLS7 and 18 comprising of 41 properties in total were determined as Contaminated Land between May and July 2009. The remediation works were carried out between March 2010 and July 2010 with final reporting completed by November 2010.
- PLS9 – 6 properties were determined as Contaminated Land in September 2010 and detailed remediation design works completed for these 6 properties in March 2011. It is currently intended to apply to the Environment Agency for grant funding to carry out the remediation works. The remainder of the properties at PLS9 were reassessed and were not considered to be Contaminated Land based on the guidance and information available except for one property where further sampling is to be carried out.
- PLS6 and 8 – a grant was obtained from the Environment Agency to undertake vapour monitoring which was carried out in May 2010. In addition, dust monitoring was carried out at PLS8 in May 2010. All results were reassessed and PLS6 and 8 were not considered to be Contaminated Land based on the guidance and information available.
- PLS5, 20, 21 and 541 – further detailed site investigation works were carried out in August and September 2010. Based on the guidance and information available, none of these sites were considered to be Contaminated Land.

### Financial Year 2007/08 <sup>(2)</sup> in Appendix 1)

In Spring 2007, the top 29 sites on the rolling list were selected for commencing routine detailed inspection works. By October 2007, 20 of the sites had been looked at. 5 were reprioritised as the potential contaminative historical land use was adjacent only. 4 were removed from the list: 2 were removed as they were hard surfaced and no pollutant linkage could be identified; 1 was removed as the suggested current land use was no longer applicable and again no pollutant linkages could be identified; and 1 was removed from the list as a conversation with the Environment Agency suggested that there had been no potentially contaminative land use present on the site. A further 3 were put on hold, 1 as the site boundary needed further consideration and 2 as the site was undergoing redevelopment through the planning process. Soil sampling and, in some cases, air monitoring were considered necessary at the 8 remaining sites. Limited site investigations were carried out at these sites in October 2007.

By March 2008, soil sampling and, where necessary, air monitoring were considered necessary at the 9 remaining sites. Limited site investigations were carried out at these sites in March and April 2008.

The accumulated data was reviewed and it was concluded that, of the 17 sites subject to limited investigation, 13 of the sites required no further sampling and 4 of the sites needed some further work undertaking.

In addition, in this year, further site investigation work was carried out at 8 sites in Meanwood (PLS5, 6, 7, 8, 9, 20, 21 and 541).

#### Financial Year 2008/09 <sup>(3)</sup> in Appendix 1)

In January 2009, the top 22 sites on the rolling list were selected for commencing routine detailed inspection works. Desk studies were completed and soil sampling was carried out at 21 of those sites in March 2009. The remaining site was put on hold as this site was being considered at the time under the planning process.

Of these 21 new sites where soil sampling was undertaken, it was concluded that further soil sampling was required at 13 of them. At 1 of these 21 sites (PLS895), it was concluded a consultant would be required to do some detailed site investigation works

Of the 4 sites needing further SI at the end of March 2008, soil sampling was undertaken for 2 of those sites in March 2009. At the time of soil sampling, it was not possible to contact the management company at one site (PLS459) and therefore further soil sampling at this site was postponed. Due to access problems, PLS830 was sampled in May 2009. Of the 2 sites sampled at the end of March 2008, it was concluded that at one site (PLS484), a consultant would be required to do some detailed site investigation works.

Detailed site investigation works were also commenced at the 10 sites in Meanwood in this year for PLS5, 6, 7, 8, 9, 18, 19, 20, 21 and 541. This work was procured and project managed by the Contaminated Land team. An environmental consultant carried out the detailed site investigation works.

#### Financial Year 2009/10 <sup>(4)</sup> in Appendix 1)

For financial year 2009/10, further site investigation work was carried out at 15 sites across the rest of Leeds. Of these, it was concluded that 3 sites needed further sampling.

The detailed site investigation works by the environmental consultant were finalised at the 10 sites in Meanwood in this year and reporting concluded for PLS5, 6, 7, 8, 9, 18, 19, 20, 21 and 541. In addition, naphthalene monitoring work was necessary at Meanwood, part of which was carried out by the environmental consultant and the other part by the Contaminated Land team.

#### Financial Year 2010/11 <sup>(5)</sup> in Appendix 1)

Financial year 2010/11 included the Contaminated Land team procuring and project managing the remediation of 41 properties and the detailed site investigations of PLS484 and PLS895. Consultants were employed to do this work. Work by the Contaminated Land team also included the procurement and project management of vapour monitoring and dust monitoring works at PLS8 and vapour monitoring only at PLS6. In addition, the Contaminated Land team itself carried out detailed site investigation /statistical analysis/risk assessment works at 45 properties (PLS5, 6, 20 and 21) in Meanwood.

Further site investigation work was carried out at 2 sites outside of Meanwood in August/September 2010 with some further risk assessment work being carried out for an additional site outside of Meanwood.

Desk Studies for 10 new sites were completed. Of these, 4 required no limited soil sampling work (2 being dealt with under planning; 1 reprioritised and 1 where can be removed from list as no pollutant linkage present based on available information) and limited site investigation work was carried out at 6 sites in March 2011, for which reports are currently being drafted.

### Determination and Remediation

Leeds City Council continues to be closely involved with sites which are being investigated and remediated 'voluntarily' (i.e. outside of any regulatory regime) by their current landowners/occupiers. In addition, many sites are investigated and/or remediated at the redevelopment stage and the government has stressed the importance of this. Section 2.51, Annex 2 of Planning Policy Statement 23 (published 2004) states that:

**'As a minimum, after carrying out the development and commencement of its use, the land should not be capable of being determined as Contaminated Land under Part 2A of the EPA 1990'.**

Given that the Council now holds detailed records on these sites, it is anticipated that the process of detailed inspection will be more straightforward in future.

As detailed in Chapter 1 of the CLIS document, the ultimate purpose of the Inspection Strategy is to identify sites which meet the definition of Contaminated Land. ***To date, 47 properties have been determined as Contaminated Land in Leeds. Of these, 41 have been remediated and therefore are no longer Contaminated Land. It is intended to remediate the remaining 6 properties.***

Please refer to Section 6.0 of the First Annual Review Autumn 2002 on the Council's approach to those sites so far that have been brought to the Council's attention where there is known to be potential for Part 2A 'pollution of controlled waters'.

## **6.0 DEALING WITH COUNCIL LAND**

Please refer to Chapter 7 of the First Annual Review (Autumn 2002) with regard to the Council's key means through which it is addressing its own land contamination issues. There have been no significant changes from the earlier Annual Reviews with regard to the work undertaken in the past year for dealing with Council land.

## **7.0 URGENT SITES**

Chapter 5 of the CLIS document highlights how 'urgent sites' will be prioritised for inspection as and when they are brought to the Council's attention. Such sites can be from any part of the district and are those which are considered to present an immediate risk of serious pollution or harm to human health. ***To date, no sites have been considered to be 'Urgent'.***

## **8.0 RADIOACTIVE CONTAMINATED LAND REGULATIONS 2006**

The Contaminated Land Inspection Strategy continues to take into account radioactivity under the Radioactive Contaminated Land (Modification of Enactments) (England) Regulations 2006 brought into force in August 2006, as outlined in the 2006 Annual Review (Section 9.0).

## **9.0 BEST VALUE PERFORMANCE INDICATOR**

The best value performance indicator for contaminated land work, BVPI216a and b, was withdrawn at the end of March 2008.

Targets for Contaminated Land work have been included in the Service Development Plan 2008/09 and 2009/10 for the Sustainable Development Unit.

## **10.0 WORK PROGRAMME**

This section presents a revised work programme for the implementation of the Inspection Strategy. Predicted timescales are based largely on what outputs can be realistically achieved bearing in mind typical workload, financial constraints and resources.

### **10.1 Work progress during the past year**

During 2010 and up to March 2011, resources have generally been focussed on completing the Part 2A work in Meanwood including: remediation works at PLS7 and 18, the dust and vapour monitoring works at PLS6 and 8; the additional detailed site investigation work at PLS5, 20, 21 and 541 and the reassessment of all data at PLS5, 6, 8, part of 9, 20, 21 and 541. Resources have also been concentrated on the detailed inspection of PLS484 and 895. Routine detailed inspection has also been carried out on 10 new sites, including the acquisition of data through desk studies, limited soil sampling and, where necessary, air monitoring with risk assessment, conclusions and recommendations. Further site investigation/risk assessment has been carried out on 3 sites where we already hold limited site investigation data

Further details of work undertaken are listed below:

#### Detailed Work at 9 sites in Meanwood

##### Remediation of PLS7 and PLS18

- Remediating 41 properties determined as Contaminated Land in PLS7 and PLS18.
- Procurement of works.
- Project management.
- Regular meetings with the Health Protection Agency and Primary Care Trust.
- Updating the Part 2A Public Register and completion of remediation project in November 2010.

##### PLS6 and 8

- Successful application for grant to undertake vapour monitoring at PLS6 and 8 dust monitoring at PLS8 only.
- Procurement of consultant to carry out vapour and dust monitoring and reporting of findings.
- Reassessment of results for PLS6 and 8 to conclude that these sites were not considered to meet the definition of Contaminated Land based on the guidance and information available.

#### PLS9

- Determination of 6 properties as Contaminated Land in September 2010.
- Successful application for grant to fund detailed design of remediation works of 6 properties.
- Procurement of consultant to carry out detailed design of remediation works and reporting of findings.
- Reassessment of results for remainder of properties at PLS9 to conclude that they were not considered to meet the definition of Contaminated Land based on the guidance and information available, except for one property where further sampling is intended to be carried out.

#### PLS5, 20, 21 and 541

- Further detailed site investigation works were carried out in August and September 2010 by the Contaminated Land team.
- Assessment of results for PLS5, 20, 21 and 541 to conclude that these sites were not considered to meet the definition of Contaminated Land based on the guidance and information available.

#### PLS484

- Successful application for grant to fund detailed site investigation works.
- Procurement of consultant to carry out detailed site investigation works and risk assessment, and reporting of findings.
- Reassessment of data and conclusion to determine one property.

#### PLS895

- Successful application for grant to fund detailed site investigation works.
- Procurement of consultant to carry out detailed site investigation works and risk assessment, and reporting of findings.
- Ongoing communication with residents.

#### Other ongoing detailed inspection work

- Completion of Phase I Desk Study reports for 10 sites.

- Undertaking soil sampling and, where necessary, air monitoring at 6 new sites.
- Further site investigation works/reassessment of data at 15 sites where already hold limited site investigation data (3 of these sites needed investigative work twice over the two years).

#### Database, GIS and prioritisation work

- Completion of the remaining 50% of the 'rest of Leeds' prioritisation work.

## 10.2 Revised Work Programme

Taking account of the progress made during the ninth and part of the tenth year of implementation of the CLIS, ***the significant points from the Work Programme for the upcoming year is anticipated to be as follows:***

- (i) The prioritisation process continues to focus on targeting the most sensitive end uses and the work programme is therefore primarily addressing human receptors at this stage. A separate work programme will be considered at a later date for other less sensitive receptors within the district of Leeds, that is, controlled waters, ecology and property as defined in the legislation and guidance.
- (ii) Work will commence on devising a plan for assigning 'sites' to railway line source and deciding on a score for allotment/allotment Score/Receptor.
- (iii) It is proposed to continue to prioritise the carrying out and successful completion of remediation works at PLS9 and PLS484. In relation to this, it is intended to apply for a grant from the Environment Agency for the remediation works.
- (iv) Routine detailed inspection includes completing the Site Investigation reports from the March 2011 soil sampling work. In addition, it is intended to carry out desk studies and associated limited soil sampling/air monitoring work on the next batch of sites in 2011/12.
- (v) As noted in previous annual reviews, it has become increasingly difficult to estimate when detailed inspection for the whole of Leeds will be complete. This is primarily due to variable factors including:
  - a. unknown workloads, for example, where land has been determined as Contaminated Land there has been an increase in workload meaning less resources spent on the routine sampling work of that year
  - b. staff resources
  - c. financial resources and available budget
- (vi) In the annual review 2007, a figure of 30 sites per annum had been viewed perhaps as a probable maximum rate given the work and resources at the time. In the past two years or so though, much resource has been taken up with the DEFRA/Environment Agency-funded detailed site investigation work at the 10 sites in Meanwood and therefore completing 30 new sites through routine detailed inspection has not been possible. However, we will continue to try to achieve this number of sites being reviewed per annum.
- (vii) The new statutory guidance to be published on 1 October 2011 may require a revised Contaminated Land Inspection Strategy to be published in line with the new statutory guidance. Next year, it is intended to provide an updated annual review either as a standalone document or as part of any new revised Contaminated Land Inspection Strategy that may need to be published next year.

## Appendix 1

	Area 1A <sup>(1)</sup>	Rest of Leeds (as per the rolling prioritisation list) <sup>(2)</sup>	Rest of Leeds (as per the rolling prioritisation list) <sup>(3)</sup>	Rest of Leeds (as per the rolling prioritisation list)	
Financial year (Apr to Mar)	2006/2007	2007/2008	2008/2009	2009/2010 <sup>(4)</sup>	2010/2011 <sup>(5)</sup>
Desk Studies completed + no further work recommended OR site reprioritised OR site being redeveloped OR other reason for not progressing to limited sampling stage.	12  (PLS 4, 14, 15, 16, 17, 22, 23, 24, 26, 27, 28, 352 – desk studies completed by November 2006 - no further work recommended)	12  (PLS 123, 172, 177, 225, 336 – sites reprioritised as on closer inspection they are adjacent only to the former potentially contaminative uses; PLS 246, 663, 198, 701 - removed from list as no pollutant linkage present based on available information;  PLS 278 – on hold as site boundary needs more thought; PLS 827, 923 –on hold as being considered under the planning process)	1  (PLS 1117 - on hold as being considered under the planning process)		4  (PLS 1904 – desk study completed by March 2011 - no further work recommended.  PLS 1967 - reprioritised; PLS1219 being dealt with under planning; and PLS923 continues to be dealt with under planning)
Desk Studies completed + limited site investigations carried out (the first line represents new sites; the line below represents sites where additional limited site investigations were necessary.	23  (PLS 1, 2, 3, 5, 6, 7, 8, 9, 10, 11, 12, 13, 18, 19, 20, 21, 25, 351, 353, 541, 542, 543, 544 – site work completed by August 2007)	17  (PLS 167, 168, 185, 414, 459, 460, 478, 484 – site work completed by October 2007 + 190, 502, 734, 764, 807, 828, 830, 896, 910 – site work completed by April 2008)  9 PLS1358 (inc 5, 6, 7, 8, 9 and 541) 18, 20, 21 - further SI work carried out from Aug to Nov 2010 and also DS written for PLS1358.	21  (PLS 700, 895, 1025, 1041, 1128, 1142, 1189, 1207, 1243, 1248, 1255, 1258, 1280, 1329, 1377, 1408, 1432, 1456, 1466, 1587, 1595 – site work completed in March/April 2009)  2 (PLS 484, 896 – further SI work completed in March 2009)	15  (PLS 830 – further SI work completed in May 2009); (PLS 459, 700, 1041, 1142, 1189, 1207, 1243, 1255, 1258, 1280, 1329, 1377, 1456, 1595 – further SI work completed in March 2010)	6  (PLS 1117 (no longer being considered under the planning process), 1217, 1218, 1951, 1967, 2357 - site work completed in March 2011)  3 (PLS 1041, 1207 further SI work completed by Aug/Sep 2010. At PLS 1255, further SI work was not possible, however further risk assessment was carried out on the data available)
Further limited site investigation work required.	10  (PLS 5, 6, 7, 8, 9, 18, 20, 21, 541 – further SI work anticipated to be carried out in 2008)	4  (PLS 459, 484, 830, 896 – further SI work anticipated to be carried out in 2009)	14  PLS 459 – not carried out yet and anticipated to be carried out in 2010; PLS 700, 1041, 1142, 1189, 1207, 1243, 1255, 1258, 1280, 1329, 1377, 1456, 1595 further SI work anticipated to be carried out in 2010)	3  (PLS 1041, 1207, 1255 – anticipated to be carried out in Aug/Sep 2010)	Unknown at present.
Detailed site investigation work required.	1  PLS19 - detailed site investigation required)	9  (PLS 5, 6, 7, 8, 9, 18, 20, 21 and 541 - detailed site investigation required)	2  PLS484 and 895 - detailed site investigation required)		Unknown at present.
Detailed site investigation works carried out by a consultant or by LCC.			10  (PLS 5, 6, 7, 8, 9, 18, 19, 20, 21, 541 )	10  (PLS 5, 6, 7, 8, 9, 18, 19, 20, 21, 541 ongoing)	8  (PLS 5, 6, 8, 20, 21, 541, 484, 895)
Remediation works.				2  (PLS7 and 18 started)	2  (PLS7 and 18 completed)

**NOTES**

PLS = Priority List Site

sites in red = where additional work has been necessary and therefore the work has spread out over more than one year.