Information on Hackney’s approach to dealing with contaminated land under Part 2A of the Environmental Protection Act 1990

This guidance has been prepared for environmental professionals in order to assist with decision making for contaminated land issues. Anyone using this guidance should have a working knowledge of Part 2A of the Environmental Protection Act 1990 (Part 2A) and associated guidance.

We are routinely asked whether areas of land will be determined as contaminated land under Part 2A. Typically, unless sufficient desk study and site investigation information is available for a site, we are usually unable to comment. Unless information is provided to us to review we will typically not consider a site out of its prioritised order.

This guidance sets out how the Council is currently going about identifying areas of land for further inspection under Part 2A. By clarifying our inspection programme, we hope that those wishing to identify the status of property under Part 2A will be more able to gauge whether action may be taken in the future. We have provided a few case studies as illustrations of the types of conclusions we may come to as an Authority during the inspection process (see Annex 1). You may also wish to refer to the Pollution Section’s ‘Procedure Note Part2A/01: The identification of sites of potential concern and completion of desk study, site visit and intrusive investigation work under the contaminated land regime’ (Procedure Note Part2A/01).

For legal reasons we are unable to state that action will never been taken in relation to a piece of land under Part 2A. However, we are able to draw conclusions on whether further information and/or investigation is required or, where sufficient information is available, whether property will be determined as contaminated land. The amount of information needed to draw conclusions and decide on appropriate courses of action will vary from site to site.

Typically if we are provided with the following information we will usually be able to provide comment in relation to a site. Sufficient:

- Desk study information
- Site investigation information
- Remediation and verification information

The following disclaimer applies to this guide:

Whilst all reasonable care has been taken to ensure the accuracy of any environmental information or advice provided, the Council does not warrant that it is complete or without error and accordingly accepts no liability for any loss or damage howsoever caused arising from any reliance placed by any person upon the information and data provided herein.
Other regimes dealing with contaminated land

Most desk study, site investigation and remediation and verification information becomes available through the Planning Regime. Where the Council doesn’t already hold planning information for contaminated land issues for a development you may wish to contact the developer of the site in order to obtain information.

The Environmental Damage (Prevention and Remediation) Regulations 2009 came in to force on the 1 March 2009. These regulations set out the legal framework for responding to environmental damage, which includes damage to:

a) Protected species or natural habitats, or a site of special scientific interest,
b) Surface water or groundwater, or
c) Land

These regulations apply to any damage which occurred after 1 March 2009. With few exceptions Part 2A only applies before 1 March 2009.

Possible sources of contamination considered

When considering contaminated land the Council must consider possible impacts from chemicals of concern. These may include:

- Inorganic compounds (e.g. metals, etc.)
- Volatile inorganic compounds (e.g. mercury, etc.)
- Volatile organic compounds (e.g. petroleum which results in vapours)
- Non Volatile compounds (e.g. PAH's)
- Gasses (e.g. methane, etc.)
- Radiation

Chemicals of concern may be present for a number of reasons including as a result of previous industrial or commercial uses at or near a site, as a result of contaminated waste materials being placed over an area (i.e. made ground), and/or as a result of the deposition of contaminants from transport (e.g. lead, PAH's, etc.). Table 3 identifies various industrial and commercial sources of contamination arranged by potential hazard. It is important to note that, while the uses identified in Table 3 are arranged in an order that generally represents the hazard that may be posed, a lower hazard industry may still pose high risks depending on site circumstances. Conversely a high risk industry may be found to pose low risks.

Government guidance indicates that the Council should consider the specific circumstances of an area when deciding whether land is contaminated land. Over much of London lead and PAH levels are elevated as a result of emissions from vehicles and deposits of ash and clinker containing wastes. Compounds of arsenic are also commonly elevated in soils due to naturally elevated levels. Local areas may also have been impacted over quite a wide area by previous industrial uses. For this reason it is unlikely that land will be determined as contaminated land where levels of a chemical of concern are significantly elevated above appropriate guideline values or site specific acceptability criteria, but are similar to levels found in the local area.
Often information on background concentrations of chemicals of concern are available from nearby site investigation information available through the Planning process or from investigations undertaken under Part 2A.

It is also important to remember that land not identified as a site of potential concern by the Council may ultimately be determined as contaminated land or dealt with under the Environmental Damage Regulations as a result of unrecorded industrial uses, pollution incidents, unrecorded activities, fuel storage (for heating and transport), etc.

**Land uses that may be affected by contaminated land and the prioritisation of sites of potential concern for further investigation**

Typically the Council has identified areas of potential concern by comparing records of previous land use with the current use of land. Table 2 sets out the broad categories of land use considered.

By considering the types of land use (see Table 2) against the hazard rating of industrial land uses present on a site (see Table 3), it is possible to generate a prioritisation score (see Table 1). The prioritisation score is a very crude measure of risk and shouldn’t be used to determine whether land is likely to be contaminated land. However, it is perhaps likely that a greater proportion of sites associated with higher class industry types will be investigated by the Council under Part 2A. Further details of how sites have been prioritised are available within the Procedure Note Part2A/01 and individual prioritisation documents.

Within Hackney, groups of sites of potential concern are prioritised instead of individual sites of potential concern. As a result it is possible that a group of sites of potential concern may contain both higher scoring and lower scoring sites of potential concern. The score of a group of sites of potential concern, which should be based on the highest risk situation in the group, will determine the order in which a group is considered further under Part 2A. The prioritised list of sites is provided within Annex 2.

The inspection programme is currently progressing slowly. On the date this guidance was issued a single review document had been published.

**Process of identifying whether land will be investigated under Part 2A**

Each group of sites of potential concern will be reviewed in order to determine whether further investigations are needed to decide whether one or more areas in the group should be determined as contaminated land under Part 2A.

In coming to a decision the Council will usually obtain readily available information from the Pollution Section, the Planning Authority, the Hackney Archives and sometimes the developer of a site (i.e. information from a desk based study). For certain land uses the Council may decide that there is unlikely to be any significant impact from an identified use. In such cases the Council would usually not collect further information or undertake any intrusive investigations.

Generally, unless there is evidence that contamination is either present and likely to cause harm or a significant possibility of significant harm to people or another receptor (for example a river or a building), it is unlikely that the Council will take the decision to carry out further investigations under Part 2A.
Annex 1 includes a number of case studies to help illustrate the types of situation that may be encountered and decisions that need to be made for individual sites.

Unless available desk based study information and information obtained from visiting a site suggests that significant contamination is 'more likely than not' to be present and likely to affect site users or the environment, typically it is unlikely that a site will be investigated further under Part 2A.

Some of the factors that the Council will take in to consideration when considering whether to investigate a site further under Part 2A include whether:

- After the collection of available information, whether a site is likely to be suitable for use
- How sensitive the land use is – industrial developments are less likely to be progressed further under Part 2A unless there is significant evidence that harm or pollution of controlled waters is occurring or imminent.
- There are records that significant contamination has existed at a site where it is unlikely that the contamination was remediated properly during development
- Any reports of odours or observations associated with contaminated land have been received by the Council – where such reports are received they would be investigated immediately by the Pollution Section
- Any observations were made during a site visit either as part of a general visit by the Pollution Section or as part of a site visit undertaken as part of the Council’s inspection duty for contaminated land
- Where significant contamination is likely to be present, whether there is a likelihood of a person coming in to direct contact with any contamination – for example whether a site is covered with a permanent hard surface or, for gardens and landscaping, whether there is good evidence that soil is suitable for use to an appropriate depth
- A previous historical use is so insignificant that it may be discarded – for example the Council would typically not consider investigating a small sub station site associated with a sensitive end use unless there was evidence of contamination being present
- A property associated with potentially contaminated land is unlikely to be affected by any contamination – an example would be a fifth story apartment in a block of apartments where ground floor properties may be affected by vapour issues from hydrocarbon contamination
- The site is underlain by a sub floor car park or commercial offices and so the residential portion of the development is not in direct contact with potentially contaminated soil

**Recommendations for buying land associated with a site of potential concern**

Purchasing property is typically a large investment and so, where there are possible concerns with possible areas of contaminated land, it is a good idea to get advice from a property specialist such as a solicitor, a surveyor or an environmental specialist.

When buying property the types of contaminated land information that may need to be collected are listed below.

- Information from the Pollution Section, Land Charges Section and Planning Authority
- Site investigation, remediation and verification information directly from the developer (where this was not available from the Council)
• Pre acquisition investigation work
• Private environmental searches

In some circumstances, where sufficient information is not available to make a decision, investigation work at a property may be the only way to resolve an issue.

Further information on the types of environmental information available from the Pollution Section and from other organisation are included within the ‘Guidance on how to obtain environmental information from the Pollution Section’.

Typically where new site investigation, remediation and verification information is provided to the Pollution Section we will review this information. However, any such review of the information, while it may aid decision making, would be for the Council's own purposes under Part 2A.
## Tables:

### Table 1: Phase 1 Prioritisation:

<table>
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<tr>
<th>Industry rating</th>
<th>Receptor</th>
<th>Very sensitive</th>
<th>Sensitive</th>
<th>Open space/adjacent</th>
<th>Civic/public building</th>
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### Table 2: Description of receptors:

**Very sensitive**: schools, residential property with gardens and allotments  
**Sensitive**: Residential property without gardens (including flats with landscaping)  
**Open space**: Areas of open space used for sports and general uses  
**Adjacent**: Where a Very sensitive or Sensitive use is situated adjacent to an Industry  
**Civic/public buildings**: Buildings with a civic or public use other than schools and open space  
**Commercial**: What would normally be considered a commercial use  
**Industry**: What would normally be considered an industrial use

### Table 3: Industry hazard ratings:

**High Class A Hazard Industries**
- MINERALS: Abrasives, asbestos, etc. and products  
- CHEM_I: Organic, Inorganic and miscellaneous chemicals production  
- RADIATION: Radioactive materials processing and disposal  
- GAS: Oil Refining and production of gas from coal, lignite, oil or other carbonaceous material other than waste  
- REFUSE: Waste disposal including hazardous wastes incinerators & sanitary depots, drum and tank cleaning, solvent recovery but not including landfilling  
- OIL: Major oil & petrol storage and all gasometers which are not gas works  
- Landfill_1: Hazardous landfill.

**High Class B Hazard Industries**
- CHEM_II: Manufacture of cosmetics, fertilisers & pesticides, detergents, oil, organic based pharmaceuticals, other chemical products incl. Glues, gelatines, recording tapes, photographic film, bleach works  
- PAINT: Paint, varnishes, printing inks, mastics, sealants and creosote, dye manufacturing  
- ABATTOIR_ANIMAL_TANNERY: Animal slaughtering basic processing, by-products and tannery. Leather works.  
- FOUNDRY: Furnaces & metal processing/castings/forges/smelting-ferro and aluminium alloys-manganese works, slag works  
- PLATING: Electro-plating, galvanising & anodising  
- MAG: Civilian manufacture & storage of weapons, ammunition, explosives & rockets including ordnance
- **MOD**: All military establishments including firing ranges (if not specified as civilian)
- **SCRAP**: Recycling of metal waste incl. Scrap yards and car breakers
- **HEAVY_ELEC**: Manufacturing of distribution, telecoms, medical, navigation, metering and lighting
- **HEAVY_TRANS**: Manufacture & repair incl. Ships, aerospace, rail engines and rolling stock
- **HM WORKS**: Heavy products manufacture - rolling and drawing of iron, steel & ferroalloys – includes tube works, domestic appliances, boiler works
- **L TRANS**: Manufacture of cars, lorries, buses, motorcycles, bicycles
- **MACH**: Manufacturing of engines, buildings & general industrial machinery, including nuts & bolts, gas fittings, wire rope/cable and ordnance accessories
- **Landfill_2**: Old landfilling associated with industry.

### Medium Hazard Industries

- **AIRPORT**: Air & space transport
- **RUBBER**: Natural and synthetic rubber products including tyres and rubber products.
- **TAR**: tar bitumen, linoleum, vinyl and asphalt works
- **CEMENT_CERAMICS**: Concrete, cement, lime & plaster products, also including solitary lime kilns, tableware & other ceramics
- **COLLIERY_MINE_C&C**: Coal mining (and the manufacturing of coke and charcoal) – areas include associated surface activities in area, & coal mine shafts, coal storage/depot, mineral railways
- **BRICK**: Manufacture of clay bricks & tiles, excluding associated brickfields
- **POWER**: Electricity generation and distribution, including large transfer stations
- **BATT**: Batteries, accumulators, primary cells, electrical motors, generators & transformers
- **NEWS_PRINTERS**: Printing of newspaper; paper, card etc. products (packaging); pulp, paper & cardboard manufacture an other printing
- **GLASS**: Glass products manufacture
- **WOOD**: Sawmills, planning & impregnation (i.e. treatment of timber), wood products, telegraph works, timber yard e.g. veneer
- **SEWERAGE**: Sewerage, septic tanks, effluent – including all filter beds
- **FUEL**: Sale of automotive fuel, repair and sale of cars & bikes, parts and motorway services
- **DEPOTS**: Transport depots – road haulage, corporation yards
- **LENG**: Light Engineering – Engineering activities that do not fall into any other categories or can not be determined from descriptions on maps.
- **RBUILD**: Railway Buildings – Buildings associated with the Railway Network
- **RLAND**: Railway tracks – up to 4 tracks wide or 30m and open land
- **LIGHT ELEC**: Computers, office machinery, business/industrial electrical goods, insulated wire & cable for electrical/tel purposes
- **TEXTILES_DYE**: Natural and man made textile manufacture and products including hemp rope and linoleum and dye & pigments
- **LAUNDRY**: Laundries and dry cleaning
- **PLASTICS**: All plastic goods, including building, packages, tubing etc. And the manufacturing of Tar, Bitumen & Asphalt
- **BRICK**: The buildings and where appropriate land associated. Clay excavations should not be included and should be entered under QUARRY_PIT
- **UGST**: Underground storage tank known to be present at site
- **NO_USE**: Any use that is or appears to be of an industrial nature but has no indication of previous use.
- **WORKS**: Description on the map
- **Landfill_3**: Landfill of unknown content.

### Lower hazard Industries

- **DOCKS**: Boat-building, wharf and quays, cargo/transport handling facilities – marine or inland
- **BREW_DISTILL**: Brewing and malting, spirit distilling & compounding
- **FOOD**: Major food processing, includes large Dairies. Exceptionally large scale corn/flour milling
- **GRAVE**: Cemetery, modern burial ground and grave yard
- **HOSPITAL**: All hospitals including sanatoriums but not lunatic asylums
- **GRAVE**: Grave Yards
- **WAREHOUSE**: Description on the map
- **Yards**: Description on the map
- **Landfill_4**: Landfilling that based on it’s age, size and likely nature is unlikely to be as significant.
Annex 1: Case studies

These case studies have been made up for illustration purposes and do not relate to any known site in Hackney or elsewhere. It is essential that any land that is being considered in relation to Part 2A is assessed on available site based information with reference to current legislation and current guidance.

**Case study 1: Lower risk situations**

A check of the Pollution Section’s historical mapping has identified a small sub station site on a grassed area associated with a block of flats. The land is also adjacent to a residential garden which, from historical mapping, is also likely to have been occupied by a part of the sub-station. The garden is of average size, is half paved and half covered in grass and plant beds. The sub-station is likely to have previously underlain part of a plant bed and the lawn. There is no evidence of any impact from PCB contaminated oils and the previous substation forms a relatively small proportion of both landuses. There is no information available from the Planning Authority.

Typically the Council would not investigate the grassed area of landscaping associated with the block of flats further under Part 2A. While there would be the potential for chemicals of concern to be present in the garden area, on the balance of probabilities (i.e. based on the test of whether contamination is more likely than not to be present) the Council would probably decide not to investigate the site further.

If upon inspecting the site or talking to the owner of the site there was evidence that significant oily contamination is present in the part of the garden occupied by the sub-station, the Council would most probably investigate the land.

If no investigation is undertaken at the site the Council would keep the area of the substation under review and reassess it's conclusions based upon any information that comes available in the future.

**Case study 2: Medium risk site**

A residential area with small gardens is associated with a works building on historical mapping. From research of Trade Directories available within the Hackney Archive the use appears to have been an engineering works between the 1940’s and 1970’s.

The houses where built during the 1980’s. While no contaminated land condition was attached to the decision notice of the Planning Application, the developer did submit site investigation reporting to the Council. The site investigation, while not to current standards, generally showed the site to comprise about 2 metres of made ground over about 5 metres of sands and gravels, which in turn was underlain by London Clay. Groundwater was encountered at about 5 meters below ground level – part of a compromised minor aquifer. No monitoring, sampling or analysis of groundwater was undertaken. The historical review identified two tanks on the site.

In one corner of the site, and what is likely to be the upward end of the hydraulic gradient, soils were contaminated with what was referred to a mixture of oil and solvents. The exact extent of the contamination wasn’t clearly defined and no soil sampling was completed, although the contamination appeared to coincide with one of the tanks. No investigation was undertaken at the other tank and there was no indication from any available information what the tank may have been used for. The
investigation report also recommended that the oil contamination was removed and that at least half a metre of clean soil was placed in all garden areas. A letter was received from the developer stating that all signs of the oil contamination were removed before the development started.

While there was limited verification information available for the development it appeared that remediation had been undertaken. During a site visit there was no evidence of any contamination such as signs of staining or signs of stress to vegetation. Two thirds of the gardens comprised a paved area (a third of each garden) and a lawn/plant beds (remaining two thirds of each garden). A third of the gardens were entirely paved and a few gardens were being used to grow vegetables. No reports of visual or olfactory evidence of hydrocarbon contamination had been reported for any of the properties.

Based on the available information and despite some uncertainties over the remediation at the site, including a tank that didn’t appear to have been investigated, the indications are that the site has been developed correctly. Among the uncertainties are whether a correct thickness of soil was placed in garden areas, whether any investigation or remediation was carried out in the area of the previously un-investigated tank and whether there is ongoing pollution of controlled water occurring.

Based on the available information, 'on the balance of probabilities', it was decided that the site was unlikely to be determinable as contaminated land and so no further investigations were completed under Part 2A of the Environmental Protection Act 1990. The site will be kept under review and reassessed if additional information becomes available.

Case study 3: Medium risk site
A residential site comprising apartments and landscaping was recently developed under a planning condition for contaminated land. A reasonable level of investigation, a site remediation report and verification report where provided as part of the discharge of the condition. The site had previously been used as a garage for 30 years. Petrol was stored on the site in an above ground storage tank. The remediation of the site included the removal of an area of hydrocarbon contamination and placement of 600mm of clean imported soil in landscaped areas. During routine garden maintenance a ground worker encountered a very strong smell of petrol – after a while the pit that had been dug had a small pool of petrol in it. This was reported to the Council.

On reviewing available information it appeared that the development had been completed satisfactorily and a vapour proof membrane and sub-floor vented to atmosphere had been correctly installed in to the foundation of the development. While no evidence had been provided it appeared very likely that the water pipes at the site were barrier pipe, which is resistant to hydrocarbon contamination. This information had been confirmed by the developer. Based on this information the Council was satisfied that risks to human health were unlikely to exist at the site.

However, the site was situated on a section of river and was above a minor comprised aquifer which was above an outer source protection zone. Based on the compromised nature of the aquifer and fact that the River was canalised, the Environment Agency did not indicate that further investigation was needed. As a result an investigation under Part 2A was not considered necessary. The site will be kept under review and reassessed if additional information becomes available.
Case study 4: High risk site

A residential site with gardens, built in the 1970’s, is situated on a former chemical works from the 1920’s and 1930’s. During a routine site walkover, undertaken as part of the Council’s duty to investigate contaminated land, an area of land was observed to have no vegetation cover. When residents were questioned they stated that the land had always been like that and that a few gardens where the same – the residents had paved the gardens due to funny odours in the soil. The land had always been like that and so no one had bothered reporting it.

After reviewing all of the information a letter was found in the Planning Authorities file for the site identifying that funny odours had been encountered during the piling at the site. There was also reference to a rumour that one of the site investigation staff had gone off sick due to the odours. On historical mapping a drying area was identified in the area of vegetation dye back. Otherwise no further information was available.

Following the Council obtaining a few shallow soil samples, elevated levels of chlorinated hydrocarbons where found. Based on these observations the Council decided to progress the site undertake for further investigation under Part 2A. An application was made to DEFRA for funding to progress an investigation.
## Annex 2: Prioritised list of groups

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<th>Order</th>
<th>Group Number</th>
<th>Prioritisation Score</th>
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<th>Re-mapping (square metres)</th>
<th>Open space (square metres)</th>
<th>Number of people with very sensitive use (metres)</th>
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<td>Lower priority - typically adjacent industry, or industry associated with less sensitive development types.</td>
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Note: 1. Each Group generally represents more than one 'site of potential concern'.
2. Each 'site of potential concern' often represents more than one industrial use/area.