

State of Contaminated Land (SoCL) 2025: Summary of troubleshooting workshop

SoCL: Key information

Defra has asked the Environment Agency to prepare and publish the next State of Contaminated Land report under Section 78U of the Environmental Protection Act 1990. Each Local Authority must complete the online survey (Section 78U(2)). The core reporting window is 1 January 2014 to 31 December 2024. The deadline for responses is Friday 9 January 2026. Publication is expected in Summer/Autumn 2026.

The online survey has two parts:

- Section A (compulsory): strategy, strategic & detailed inspection, determinations, remediation.
- Section B (voluntary but important): staffing, resilience, costs, barriers/support, suggestions.

About this document

The National Contaminated Land Officers Group (NCLOG) held a SoCL troubleshooting workshop on the 8th December 2025. This document is a summary of the questions and answers covered in the workshop.

This document contains:

- Advice on key overarching points and questions
- Answers to questions received by the NCLOG Committee about specific questions in the SoCL
- Answers to other questions

Please note that this document does not constitute formal advice.

If you have further questions that are not answered in this document, then you can email the NCLOG Coordinator Ellie Savage ellie@the-ies.org and we will do our best to help. Please also note that the NCLOG Committee will be 'on Christmas break' from 15th December until the end of the year.

Overarching points & questions

SoCL is important

CLOs are encouraged to complete the survey honestly and accurately. It is important that the EA receive a realistic picture of how LAs are progressing with Part 2A, including both successes and challenges. This information will help inform future policy, guidance and support.

The survey also links to wider Government priorities around growth and development. Defra uses the survey results to inform its funding and delivery pipeline. In particular, information on the number of higher-risk sites is used to understand future funding needs, so accurate reporting is essential.

Funding

The EA and Defra will review responses to the voluntary funding questions to understand how LAs can be better supported.

The [Autumn Budget](#) (see p.101) announced an £80 million Land Remediation Pathfinder Scheme (LRPS) to support public bodies in England where landfill tax makes remediation unviable. The scheme will fund a small number of pilot projects across a range of site types and help improve understanding of remediation costs and benefits. Funding is expected to run from 1 April 2027 to 31 March 2031, with the scheme launching in summer 2026. Further details will be provided in due course.

At this stage, Defra sees this as the best way to link potentially contaminated land to available funding schemes. It is a good idea to share this information with your major projects team as they may have sites that may benefit. If they apply then this builds momentum and helps demonstrate the need for CL funding in government.

Please submit on time

Local Authorities should complete the survey by the deadline of 9 January 2026. The EA and Defra will follow up with LAs that have not responded, and delays in completing the survey may delay publication of the final report.

Can survey responses be subject to an FOI?

The EA has confirmed that LA survey responses will remain as work in progress, as such would not be subject to an FOI. The final report will collated responses and will not identify individual LAs.

Prioritisation

LAs use a range of prioritisation methods, and the Environment Agency (EA) recognises this. Where sites have not been formally ranked (for example as high, medium or low risk), officers should review their site list and provide a reasoned estimate of the number of sites considered to be of higher concern. This does not need to be exact and can be based on professional judgement. Please do not put zero if you haven't placed your list into priority groupings.

If helpful, officers may look for a natural break in site scores that indicates a group of higher-risk sites. Alternatively, where no clear distinction exists, it may be reasonable to estimate the highest-risk proportion of sites (for example, the top 25%). The free-text box at the end of the survey can be used to briefly explain how the prioritisation has been derived.

For any additional ranking questions, officers should apply their best professional judgement and answer as honestly as possible. It may be helpful to start by identifying the highest- and lowest-risk sites and then work towards the middle.

PFAS screening

NCLOG is not aware of any LAs that have screened their full site lists specifically for PFAS. This reflects the fact that PFAS are emerging contaminants and that some prioritisation work may have been carried out many years ago. There is also currently limited Part 2A-specific guidance on PFAS, which may limit what actions LAs can reasonably take.

Officers should answer PFAS-related questions honestly, focusing on site types where PFAS contamination is plausible. The EA is gathering information on PFAS across a number of work areas, and it is recognised that this information may not yet give a complete or fully accurate picture.

Any other comments?

The free-text section in the final question should be used to clarify any responses or to provide additional relevant information, where helpful.

Specific Survey Questions and Responses

Q8 Inspection Strategy Review

The guidance does indicate 5 yearly reviews, but we know this hasn't happened in a lot of LAs. It would be more interesting to understand if some haven't been updated to reflect the 2012 guidance let alone is it up to date now!

If you do not have a date for the review of your strategy, assume 5 years from the published date of your strategy.

Q9 Strategic Inspection

We have 2 different ways of considering the number of potential sites - current land use boundaries or historical boundaries. Current boundary sites are approx. 10 x more than historical. For example, a single historical factory site could comprise hundreds of residential plots and a single residential plot will comprise multiple sections (e.g. house, garden, garage). Do we go off historical boundaries or current boundaries?

LAs have approached this in different ways, using either current land-use boundaries or historical site boundaries. If possible, count based on historical boundaries for sites with previous potentially contaminative land use.

Q11 Current number of potentially contaminative sites

Would like clarification that this refers to current land use?

Potentially contaminative land use refers to anything historical, regardless of current land use.

Q11 Current number of potentially contaminative sites

Is this every site identified on both internal and brought in data for our LA (e.g. Landmark data and EA map layers).. looking at over 3000 sites?

If overlapping sites have not been merged, then it may be necessary to include all polygons. You could explain this in the free-text box at the end of the survey.

Q12-14 Prioritisation review

An initial prioritised list of sites with previous potentially contaminative land use

was produced but at a later date the prioritisation system was changed resulting in a new list that needs further work before initial strategic inspection is complete. We no longer have access to the previous list. Should the answer be yes or no?

Prioritisation is the final, high-level stage of strategic inspection and is used to help decide where further work should be focused, such as planning reviews, site walkovers or more detailed investigations. Suggest that responses should reflect the work that has already been carried out, for example where an initial prioritisation and site list review have been completed.

If you know that the number of highest-priority sites has changed, this should be reflected in your response. If you are unsure, do not select any of the number options. Where prioritisation methods have changed and older site lists are no longer available, briefly explain legacy data loss/caveats in the free-text box at the end of the survey.

Q15 DoE Industry Profiles

We are in an area with boat yards on a major river, but not ship building/breaking. Should boat yards/workshops be included in the ships category or as miscellaneous.

If the DoE Industry Profile provides useful information for this land use, it should be selected. If not, select “miscellaneous.” The aim is to best reflect the historical land use.

Is this talking about high priority sites that still need detailed inspection? or include those that have been assessed?

Would suggest it is the sites that are still in progress. If a site has been assessed and is no longer a high-priority site, it should not be included. If it has been assessed and remains high priority, it should still be counted.

If your priority list has not been reassessed and you know that many sites will be addressed through planning, use the original number of high-priority sites as a default. In other words, record the highest number from the existing list.

Q17 Detailed Inspection dating

A number of sites have IT based desktop inspections which were used to screen them for further assessment but we only have part of each record. Can these be considered detailed inspections?

For clarification: Section 2.2 of the 2012 Statutory Guidance describes Strategic Inspection as:

1. Collecting information to make a broad assessment of land within an authority's area e.g. sourcing and querying: historic directories, maps (to identify old industrial or commercial activities and sites including country/town gasworks and landfills), geological maps (Artificial Ground) and other published datasets.
2. Identifying priority land for more detailed consideration, e.g. Prioritisation (taking into account potential contamination sources, migration pathways and receptors).

We have a site that was inspected Mar 2012 - June 2014. Seems to be missing an option for sites that span pre and post 2014?

Would put that in the third option, as the question asks for date of completion.

Q20 Risk summaries & written statement

Would this only externally published? Numerous sites on a potential list have been screened out, with internal summary statement.

Would suggest to count documents produced (internal and/or external), not just those published online, as these documents have aided decision making.

Q22 How many sites do determinations cover

Possible ambiguity - e.g. At our Council, 1 determination relates to a single source site, but 36 current properties (house sites).

Statutory guidance left the definition of site boundaries up to the regulator, so variability is going to be unavoidable. Larger sites may or not be split up into multiple determinations. Put in the number of records of determinations, so the example given would be 1 site (not 36).

Q23 Borrow pits classification

Should Victorian borrow pits be included under landfill or waste disposal other?
This depends on whether it has been backfilled or not. If it has been backfilled (or if unknown) treat under "Landfill"; otherwise record under "other waste disposal/treatment"

Q24 Substance counting

Would 1 determination with arsenic and lead count as 2 - each element counted separately. Or is it number of determinations which list metals, so would be 1. If say 4 determinations - all reference BaP, is that 4 or 1?

To avoid undue burden suggest putting some elements into groups as this is how numbers are usually reported. 1 determination with As and Pb (metals) = 1. BaP risk level is generally high so we split this from other PAH. 4 determinations each referencing BaP = 4

Q25 Receptor counting

Similar to above - assume this is cumulative. If 4 determinations all list HH that would count as 4?

Correct, you should count cumulatively, therefore each determination listing a receptor type counts once for that determined site.

Q27

If you have not reconsidered any of your determinations, how do you answer

Answer 0.

Q36 Professional membership

For clarification are NCLOG members of IES (I don't think we are but is probably worth confirming).

NCLOG members are not automatically members of the IES, though many members of NCLOG are also IES members.

Note that IEMA transitioned and is now known as ISEP (Institute of Sustainability and Environmental Professionals) .

If my Principal officer is a chartered EHO, and may occasionally get involve with contaminated land work (but isn't the main officer), should I still include his professional membership for Q36?

If they do not usually get involved in contaminated land work then would suggest no.

Q39 Level of resilience

The question focuses in on technical knowledge/confidence. This is not resilience for the authority. Many LAs will have a single person covering the CL role. For CoLC, 100% of staff (1 person) undertaking technical work are technically robust. The resilience is very low though - if that person leaves, there is no cover in the authority.

The EA agrees with this.

Q47 Planning application volume

Doesn't appear to include pre-apps? Also, does it include Discharge of condition applications?

Advice is to include pre-apps, outline/full, discharge of conditions, and overall to try and estimate as best you can. The EA would like to be able to reflect as much of our hard work as possible. Though appreciate there will be some uncertainty as they are asking for estimation of average.

Q48 Brownfield Register & SHLAA/SHELAA

This is a tricky question, hard for us to answer accurately. Looking at GIS layers, we have e.g. partial overlaps, 3 different separate sources on one BF site etc. With approx. 100 BF sites, we don't have time to count the dwellings & will have to leave this blank. Policy have pointed out this is further complicated by BF sites being subdivided into live, archived and pending categories so it's not a simple comparison.

After reading the question again, in regard to SHELAA sites are you able to confirm if you think the EA are requesting all SHELAA sites that are considered available, suitable and deliverable with previous industrial or potentially contaminative uses, or just those that are also included on the brownfield register?

The number of potentially contaminated sites recorded in your [Brownfield Land Register](#) should be based on your GIS layer. Site boundaries may cover multiple land uses, so count any sites that overlap with the Brownfield Land layer/register.

Recording these sites is useful because government funding is sometimes available for brownfield redevelopment. Including potentially contaminated land helps highlight opportunities for remediation and allows the LA to flag any planning consultation interest. It also ensures windfall sites with previous potentially contaminative land uses can be captured.

For SHLAA (SHELAA figures will be fine if you cannot separate out the SHLAA number), record only potentially contaminated sites that fall into the available, suitable, and deliverable category—typically sites considered viable for development. Not all, or indeed any, potentially contaminated sites may fall into this category.

Including potential contaminated land in SHLAA assessments helps consider early viability and increases the likelihood of remediation if government or MHCLG funding is directed toward housing delivery.

(See [here](#) for an explanation of SHLAA and SHELAA)

Q51 Part 2A vs Planning split

Tricky question to answer and will create much variability. For many may be only 1 or 2 dealt with through Part2A, vast majority (>95%) through planning. Not strictly all, but nearest option. Should perhaps have had a ‘nearly all sites’ option rather than ‘all sites’ to mirror the ‘hardly any sites’ option. Doesn’t capture the change from the start of the regime to now. Also, as CLOs may not have been there throughout the period can this be answered accurately?

Select the option that best reflects the overall split between Part 2A and planning for all-time site management. Using “nearly all via Planning” is acceptable where appropriate. The question covers all potentially contaminated and determined CL sites that have been considered. The EA recognises this is somewhat subjective, so please select the option you feel most accurately reflects the all-time split.

Any other questions

I work for two councils that remain sovereign councils but operate a joint officer structure. Am I required to respond as one or two councils?

Each council that the EA has contacted will need to send its own response. As such, the response will need to be for each council.

Do we think after each submission there will be a period when the EA will be querying points whereby they do not understand the response given rather than accepting the answers at face value?

They might if they felt people had misunderstood/needed more information.

A key reason my Council does not have a "high priority" category is because search companies have regularly requested a list of high risk sites and our prioritisation list is work in progress. As such giving a "gut feel" or top 25% indication would still be of concern.

We discussed this with the EA and they suggested it is better to provide an estimate rather than leave the field blank. These numbers feed into their pipeline and are not being used to judge individual LAs and the individual responses will not be released or be available via FoI. The aim is simply to give an indication of how many high-priority sites exist in practice (even if this may be different to the technical or 'on-paper' answer). Over time, we hope this type of data collection will become more standardised and carried out more regularly.

Would the EA be able to provide a copy of our LA's previous SoCL return, as I'm struggling to find this? It may help to answer some of the pre-2013 information, as there's no CL staff who still work here from then.

Cranfield University carried out the previous SoCL so would suggest contacting them. Though it perhaps unlikely that they would still have individual datasets. We have raised this query with the EA also.