# Remedial Strategy & Implementation Plan

**21 Ramsey Road**
Warboys
Huntingdon
PE28 2RW

**Prepared for:**

**Burmor Construction Ltd**
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| | |
|---|---|
| **EPS Project Reference:** | UK25.7416 |
| **Date Issued:** | 30th May 2025 |
| **Report Status:** | Issue 1 |

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## 21 RAMSEY ROAD, WARBOYS

### NON-TECHNICAL CLIENT SUMMARY

This report provides a review of the current condition of the above referenced site, based on the findings of previous investigations, as well as a summary of what actions are needed to reduce potential risks from contamination to future site users during forthcoming redevelopment. Pertinent findings and details are presented as follows:

- The site currently comprises a residential property with associated outhouse and fuel tanks across the eastern end of the site, with the remaining land undeveloped. Proposals comprise the demolition of the existing property and construction of 24 new houses with associated garden areas, infrastructure and open space.
- Previous intrusive investigation across the site completed in 2020/2021 identified concentrations of contaminants in made ground soils towards the east of the site to be unsuitable for use within proposed garden areas / landscaped areas across a section of the east of the site. As such recommendations were made for 300mm of clean cover soil to be installed in these areas through the redevelopment.
- However, since the production of that report, alterations have been made to the proposed development layout meaning no residential properties are to be located within this area now. As such EPS considers it prudent that this section of the site now is re-classified as public open space. Comparison of the identified concentrations of contaminants in this area with generic assessment criteria for this land use does not identify any failures.
- On this basis, the previously recommended soil cover system is not considered to be required, although some limited precautionary remedial measures have still been outlined to address potential risks from the above ground tanks on site (where some minor soil sampling is required) and potential asbestos containing material.
- This report should satisfy all pre-commencement planning requirements relating to contamination. Upon completion of the works, EPS (or equivalent) will need to revisit the site, compile the necessary records and issue a brief Verification Report which would aim to satisfy all remaining requirements. This report should be submitted to the Local Authority.

By their very nature, the above bullet points represent a simplified summary of our work and must not be relied upon to form the basis for key decisions. A full picture is provided in the following report, or alternatively give us a call and we'll talk you through it.

| | | |
|---|---|---|
| **Project Reference:** | UK25.7416 | |
| **Title:** | Remedial Strategy & Implementation Plan - 21 Ramsey Road, Warboys | |
| **Client:** | Burmor Construction Ltd | |
| **Date:** | 30th May 2025 | |
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| **Status:** | Issue 1 | |

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| Michael Judson | Marcus Bell | Marcus Bell |
| Principal Consultant | Director | Director |

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If third parties have been contracted / consulted during compilation of this report, the validity of any data they may have supplied, and which are included in the report, have been assessed as far as possible by EPS however, EPS cannot guarantee the validity of these data.

No part of this report, or references to it, may be included in published documents of any kind without approval from EPS.

This report and its contents, together with any supporting correspondence or other documentation, remain the property of Environmental Protection Strategies Ltd until paid for in full.

Where ground investigations have been conducted, these have been limited to the level of detail required for the site in order to achieve the objectives of the investigation.

The report has been written, reviewed and authorised by the persons listed above. It has also undergone EPS' quality management inspection. Should you require any further assistance regarding the information provided within the report, please do not hesitate to contact us.

The National Planning Policy Framework requires a competent person to prepare site investigation information, which is defined as a person with a recognised relevant qualification, sufficient experience in dealing with the type(s) of pollution or land instability, and membership of a relevant professional organisation. EPS considers that it fulfils these criteria and would welcome any request for staff CVs or case studies to demonstrate it.

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# 1 INTRODUCTION

In May 2025, Environmental Protection Strategies Ltd (EPS) was commissioned by Burmoor Construction Ltd to complete a Remedial Strategy & Implementation Plan for the proposed development at 21 Ramsey Road, Warboys, Huntingdon, PE28 2RW ('the site'); see Figure 1

The work was commissioned in order to support planning proposals for the development of *'24no. dwellings, including affordable housing (Use Class C3) together with parking areas, landscaping and other associated infrastructure, following the demolition of no.21 Ramsey Road and associated outbuildings'* under Huntingdonshire District Council's Planning Reference 23/02505/REM. A proposed development plan is included as Appendix A.

The aim of this report is to appraise the current site conditions, specifically the environmental risks (expressed here as 'plausible contaminant linkages'), then outline a form of remediation appropriate to mitigate the risks and ensure safe redevelopment.

A plan showing the site location is provided as Figure 1, whilst a plan showing the current layout of the site is included as Figure 2.

## 1.1 Objectives

The objective of this Remedial Strategy & Implementation Plan is as follows:

a) To review updated proposed site plans in the context of the previous remedial recommendations made and re-evaluate the risk level.
b) To outline the appropriate form(s) of remediation necessary to remove potentially unacceptable risks to receptors to ensure safe development.

## 1.2 Scope of Work

To prepare a Remedial Strategy & Implementation Plan in accordance with the principles and requirements of the Environment Agency's *Land Contamination: Risk Management* ('LC:RM'), the *National Planning Policy Framework* and DEFRAs '*Contaminated Land Statutory Guidance'* and the NHBC's *Standards and Technical Requirements*, the following tasks were undertaken:

<u>Remedial Options Appraisal:</u>

- Review of remedial objectives
- Development of a Remedial Strategy

<u>Implementation of the Remedial Strategy:</u>

- Define the process of remediation
- Present a Verification Plan to determine how remediation has performed in relation to strategy.

## 1.3 Limitations and Constraints

The purpose of this report is to present a Remedial Strategy & Implementation Plan for the site in terms of risks from contaminated land. When examining the data collected from the investigations made during the assessment, Environmental Protection Strategies Ltd (EPS) makes the following statements:

A Remedial Strategy has been presented based on the findings of an investigation carried out by EPS as well as information provided by third parties, the validity of any data others may have supplied, and which are included in the report, have been assessed as far as possible by EPS, however, EPS cannot guarantee the validity of these data. No investigation method is capable of completely identifying all ground conditions that might be present in the soil or groundwater under a site.

This report does not include specific survey for the presence of either Potential Asbestos Containing Material or Japanese Knotweed at the subject site.

The data upon which this report is based is from EPS' original 2021 investigation, the site has not been revisited since by EPS. EPS therefore assumes, and has not been advised to the contrary, that the site conditions have not changed in the interim. If any substantial or material changes have occurred to the site in that period, EPS reserves the right to revisit the recommendations made in this report.

## 2 BACKGROUND & PREVIOUS REPORTS

This section provides a review of the previous work undertaken, including background site and geo-environmental context.

### 2.1 Previous Reports

A previous Phase I Contamination Assessment and a subsequent Phase II Geo-Environmental Assessment have been completed for the site by MLM and EPS respectively in January 2020 and February 2021. For background and reference, it is recommended that the reader review the following reports / documents which are briefly summarised below:

- *Phase I Contamination Assessment - 21 Ramsey Road, Warboys, PE28 2RW* (10th January 2020) Revision C03 – MLM Ref: JW/777154
- *Phase II Geo-Environmental Assessment - 21 Ramsey Road, Warboys* (EPS Reference UK20.5220, date February 2021 (Issue 2))

The desk study report gathered background information on the site and includes a preliminary risk assessment and subsequent conceptual site model. The site was identified to comprise a residential property to the east and undeveloped land to the west, with a couple of above ground fuel storage tanks identified in proximity of the house. A brick outhouse, partially boarded up and in a poor state of repair, was located along the southern boundary to the south of the house, with possible asbestos containing materials in the form of roofing panels. Historically a number of previous structures were noted towards the east of the site which had been demolished prior to the construction of the current house.

Geological maps of the area show the site to lie on superficial Oadby Member (diamicton) underlain by bedrock of the West Walton and Ampthill Clay Formation, which are classified as secondary (undifferentiated) and principal aquifers respectively, with the site not lying in a source protection zone for groundwater abstraction.

The Phase I Desk Study included a Conceptual Site Model which identified a number of plausible contaminant linkages that have the potential to become active as a result of the presence of two above ground heating oil tanks, previous phases of construction and demolition, as well as infilling (of former ponds) on site; and an off-site fuel filling station or vehicles garage (80m south approximately). As such, some further intrusive investigation was recommended.

The EPS ground investigation comprised the excavation of eight trial pits to a maximum depth of 2.0m. At the time of the investigation the site was found to be broadly unchanged from the site walkover completed by MLM. Ground conditions comprised initial layers of topsoil and made ground, with the latter limited to the eastern end of the site around the existing residential property, generally underlain by firm to stiff, brownish grey/orangish brown with grey mottling, slightly sandy, gravelly clay. No visual or olfactory evidence of contamination was identified within the soils.

Laboratory testing was undertaken on shallow soils obtained from across the site, which found that concentrations of Lead, Mercury and Dibenz(ah)anthracene exceeded generic assessment criteria protective of a residential end use in the made ground identified towards the east of the site, with Lead considered to be the risk driver. On this basis, remedial measures were recommended in the form of installation of 300mm of clean cover soils in gardens and landscaping areas across the east of the site, however no remedial requirements were made for a larger section to the west.

## 2.2 Revised Risk Evaluation

The risk assessment undertaken within the EPS Phase II report was completed on the basis of the proposed development plan presented at the time of writing, which included two residential properties located within the eastern section of the site where low levels of lead, mercury and dibenz(ah)anthracene contamination was identified. On this basis, a land use classification of residential (with homegrown produce) was applied to the entire site and comparison of the concentrations of these contaminants with generic assessment criteria for this land-use identified exceedances which led to the recommendation of a 300mm clean soil cover system in garden and landscaped areas across a section of the site to the east. This was documented on a proposed remedial area plan in the EPS report.

However, since the production of this report, the proposed development plan for the site has altered. The updated plan includes 24 residential properties towards the west of the site however the eastern area which comprised that for which remedial measures were recommended is now proposed to only represent landscaped open space, with no houses or private garden areas. On this basis, EPS considers it reasonable to re-classify the land use applicable to this section of the site as Public Open Space – Residential ($POS_{Resi}$). When accounting for this change, comparison of the identified concentrations of contaminants in this area with generic assessment criteria for a $POS_{Resi}$ land use does not identify any exceedances.

On this basis, EPS considers this area of the site to also be suitable for its proposed end use, with the previously outlined clean soil cover system no longer required across this area. As such, the below remedial strategy does not include for this requirement and only outlines the requirements to address limited other risk highlighted within the previous work, such as the presence of above ground fuel storage tanks on site.

## 2.3 Regulatory Context

The original Phase I completed by MLM was submitted to the local authority as part of the outline planning application (Ref: 20/00308/OUT). Comments made by the Environmental Health team in March 2020 led to contamination conditions relating to site investigation and subsequent remedial/verification works (if necessary) being attached to the outline consent.

At the time of writing this document it does not appear that EPS' subsequent Phase II has been submitted to planning either as part of the outline, full or reserved matters consents.

## 3 STAGE 1: RISK ASSESSMENT

In accordance with the Environment Agency's *Land Contamination: Risk Management*, the three stages to managing contaminated land (Risk Assessment, Remedial Options Appraisal/Remediation and Verification) have been outlined in the following sections.

A framework for the assessment of risks arising from the presence of contamination in soils has been produced by the Environment Agency and the Department for the Environment, Food and Rural Affairs (DEFRA) and is presented with the report: '*Using Science to Create A Better Place: Updated Technical Background to the CLEA Model* – Science Report SC050021/SR3'. This guidance document defines a series of standard land-uses which have been further developed into six generic land uses in the Category 4 Screening Levels project for Land Affected by Contamination (DEFRA/Contaminated Land: Applications in Real Environments (CL:AIRE) Project Report SP1010, 2014) which form a basis for the development of the Conceptual Site Model.

The proposed development plan for the site includes construction of 24 residential properties with associated gardens and infrastructure, as well as an area of open space. As such, the two sections of the site fall into the Residential (with home-grown produce) and Public Open Space (resi) classifications as defined within Science Report SC050021/SR3 or CL:AIRE's C4SL framework.

Based on the information presented in the previous reports and the updated risk evaluation in section 2.4 above, the plausible contaminant linkages which have the potential to be active or may become active as a result of the proposed re-development of the site are shown below within the CSM. These contaminant linkages will require further action or control measures:

| Source | Pathway | Receptor |
|---|---|---|
| Contaminated Soil (Made Ground/Localised Oil Impacted Soils) | Direct contact with / ingestion of soil | Site Users / Construction Workers |
| | Inadvertent contact with / inhalation of fugitive soil dust | |
| | Direct uptake and / or adherence of contaminated soil to vegetation and subsequent ingestion | Site Users |

## 4 STAGE 2: REMEDIAL STRATEGY

The Environment Agency's *Land Contamination: Risk Management* (2023) guidance states that a Remedial Strategy must include a clear set of remediation activities and detail on how they will be implemented and verified.

EPS considers the following outline objectives to be appropriate for the remedial work at this site. This section represents the Remedial Strategy for the site.

| Pathway (Receptor) | Mitigation Measures |
|---|---|
| Soil ingestion / inhalation (site users) | The likelihood of contamination around the above ground oil tanks appears limited, however, the tanks were not externally bunded so they do represent a potential risk of historical leaks from the tank and feedpipe. They should be removed in accordance with best practice and a suitably qualified consultant (EPS or equivalent) should attend site following removal to inspect and sample the exposed soils beneath the tank. |
| Inhalation of Airborne Fibres (construction workers & site users) | Although no visual asbestos was noted in the soils on site, ACMs were identified within the fabric of the brick outhouse in the walkover. It is possible that once the vegetation is cleared and site stripped that fragments are identified. In these circumstance EPS should be notified and the risk assessment will need to be revisited and a Safe Working Method prepared (in accordance with guidance from CL:AIRE & JIWG, 2016).<br><br>Where wastes are generated which potentially contain asbestos, they must be disposed of in accordance with the Control of Asbestos Regulations (2012). If the ACM identified on-site is to be removed, care must be taken to avoid any sheets being broken and fragments being worked into the ground surface as that would render the existing Conceptual Site Model and risk assessment obsolete and need to be revisited by EPS. |
| Soil ingestion / inhalation (construction workers) | Appropriate health and safety precautions should also be adopted during any excavation works to avoid exposure to contaminated soils. Reference should be made to relevant health & safety guidance including the following CIRIA document: *R132 Guide to Safe Working on Contaminated Sites.* |

# 5 STAGE 3: REMEDIATION & VERIFICATION

The following section of this report provides an outline scope of work for the deployment of recommended remedial measures outlined in previous chapters, with specifications of any materials required and details of any verification work needed to satisfy relevant planning conditions for any future planning application.

A brief Verification Report will be needed upon completion to present the following information and for submission to Huntingdonshire District Council.

## 5.1 Verification Requirements

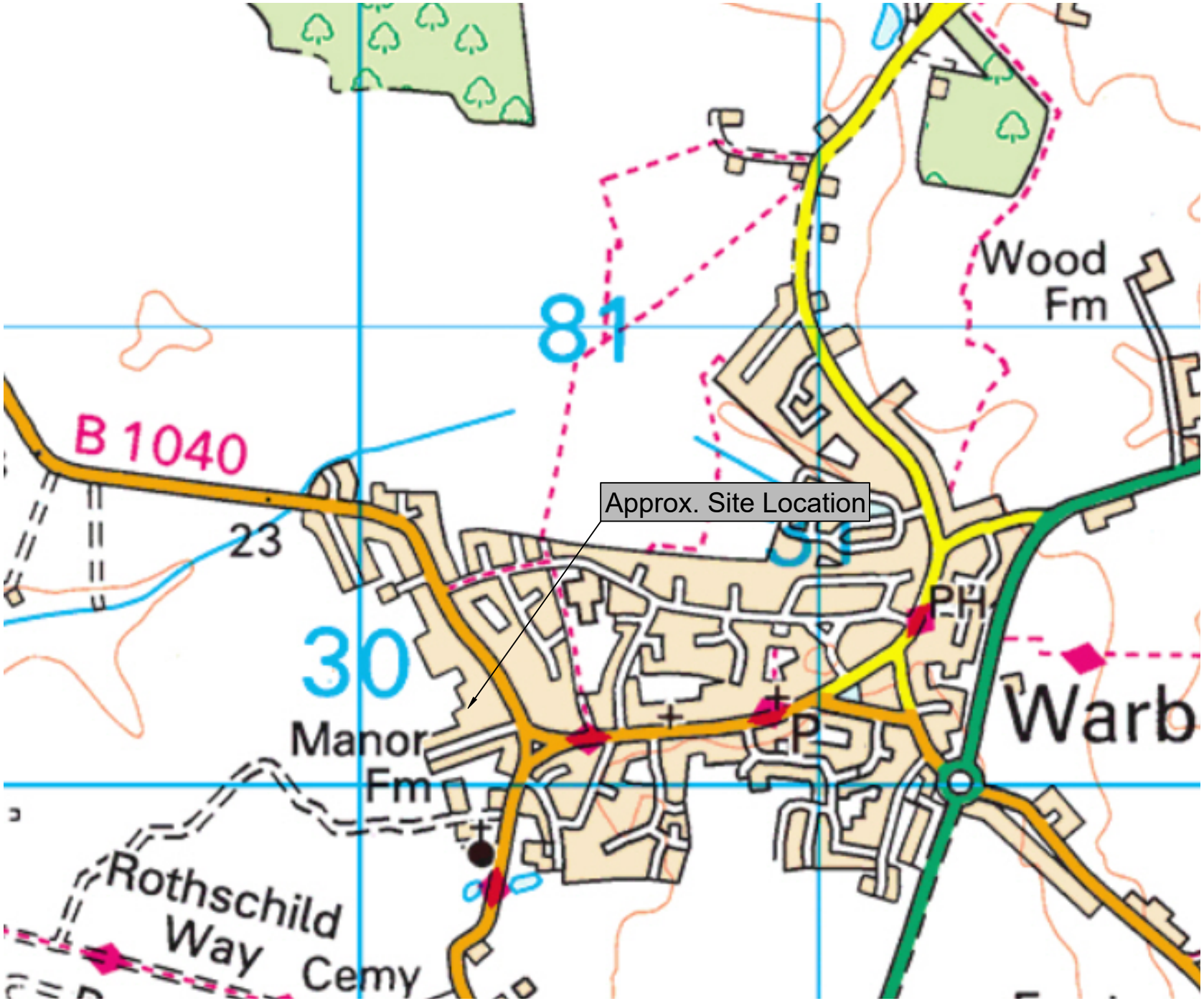
In order to address the remaining limited potential risks associated with the above ground fuel tanks present at the site, the following verification work should be completed, with the findings completed in a brief verification report:

- Photographs of the process must be retained and provided to EPS for inclusion within their verification report.
- EPS (or another suitably qualified consultant) should attend site to obtain samples from the soil below the tanks for laboratory testing, as well as screen the soils using a Photo-ionisation Detector

## 5.2 Contingency

However, there is limited potential for variables to be encountered which may require a revised remedial strategy or making the current strategy unachievable. One possible scenario would be the encountering of unforeseen contamination. Such an eventuality is covered by the planning process and a method statement outlining the process, whereby EPS and the Local Authority should be notified is included as Appendix B.

# FIGURES




| Rev | Date | Drawn | Description | Ch'k'd |
|---|---|---|---|---|
| | | | | |

eps

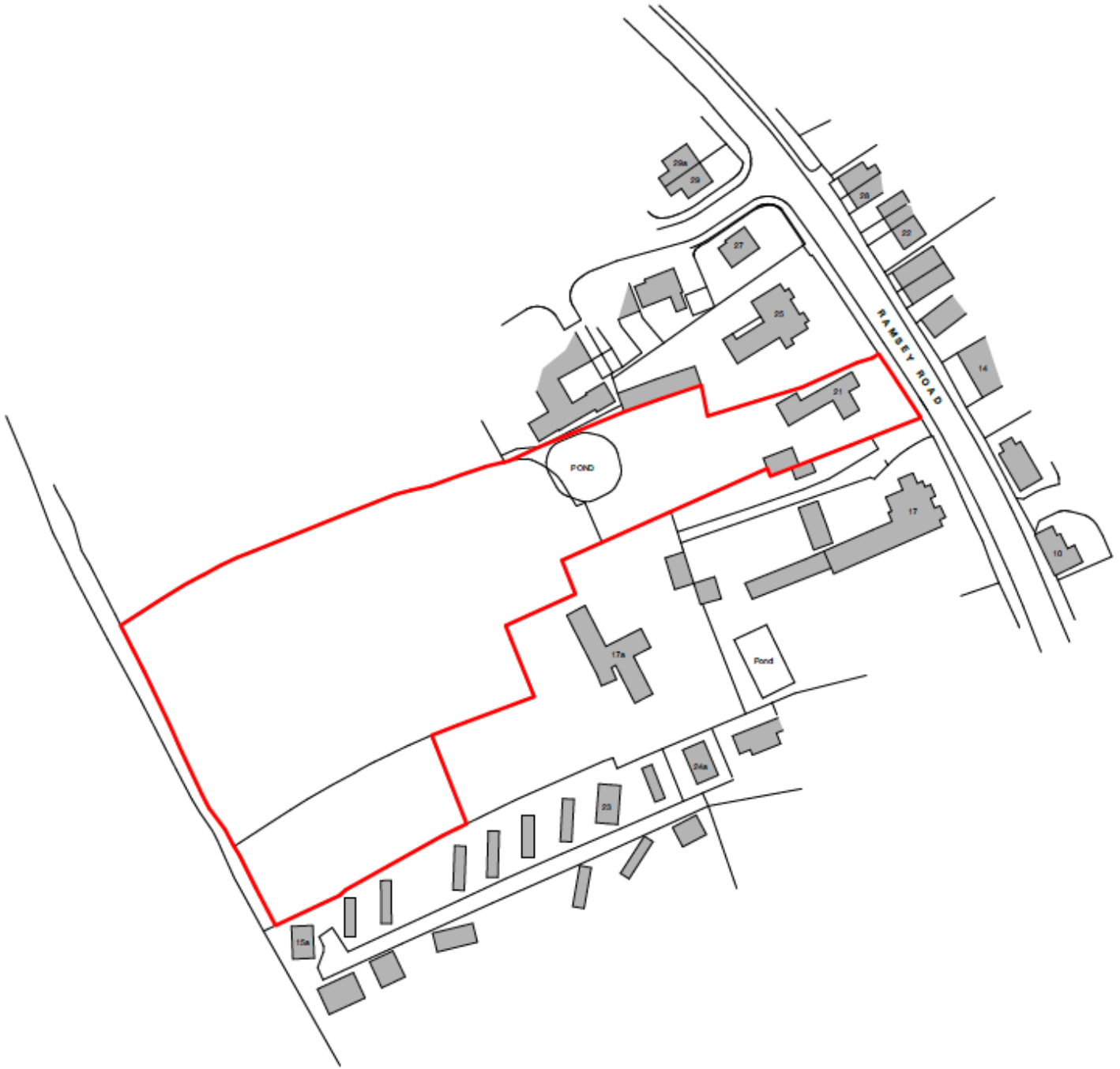
The Geotechnical and Environmental Engineers
www.epstrategies.co.uk

Site: 21 Ramsey Road, Warboys

Client: Burmor Construction Ltd

Title: Figure 1 - Site Location Plan

| | | | |
|---|---|---|---|
| Surveyed: | - | Drawn by: | MJ |
| Checked by: | MB | Date: | 28/05/2025 |
| Scale [A4 Sheet] | - | Drawing Reference | UK25.7416_01 |
| Job No | UK25.7416 | Rev | - |




KEY:

SITE BOUNDARY

| Rev | Date | Drawn | Description | Ch'k'd |
|---|---|---|---|---|
| | | | | |

The Geotechnical and Environmental Engineers
www.epstrategies.co.uk

Site: 21 Ramsey Road, Warboys

Client: Burmor Construction Ltd

Title: Figure 2 - Current Site Layout Plan

| | | | |
|---|---|---|---|
| Surveyed: | - | Drawn by: | MJ |
| Checked by: | MB | Date: | 28/05/2025 |
| Scale [A4 Sheet] | - | Drawing Reference | UK25.7416_02 |
| Job No | UK25.7416 | Rev | - |

# APPENDIX A

# Proposed Development Plan

# Proposed Site Layout

Scale: 1:500




Scale (m)

0 10 20 30 40 50

N

**schedule of accommodation**

| housetype | code | area | quantity |
|---|---|---|---|
| 2B4P House M4(2) | A | 79m² | 07 no. units |
| 2B4P House M4(2) | A+ | 80m² | 01 no. units |
| 3B5P House M4(2) | B | 93m² | 09 no. units |
| 4B6P House M4(2) | C | 106m² | 01 no. units |
| 1B2P Maisonette M4(3) | D | 60m² | 01 no. units |
| 1B2P Maisonette M4(2) | D | 64m² | 01 no. units |
| 2B3P Bungalow M4(3) | E | 70m² | 02 no. units |
| 3B5P House M4(2) | F | 93m² | 02 no. units |

| | |
|---|---|
| **Total Number of Units** | **24 no. units** |
| **approximate site area :** | 1.03Ha / 2.55 acres |
| **density :** | 23 dwellings per hectare |
| **parking provision :** | 4-Beds - 03no. spaces<br>3-Beds - 02no. spaces<br>2-Beds - 02no. spaces<br>1-Beds - 02no. spaces |

**Key**

- Application site boundary
- Proposed Housing
- Existing Surrounding Buildings
- Private Rear Garden Area
- Public Open / Green Space
- Principal Highway / Road
- Private Drive
- Car Parking Spaces
- Pedestrian Footpaths
- Rear patio area (Sheds shown are indicative locations for cycle storage - installation is the responsibility of the owner / tennant)
- Existing Tree Planting
- Existing Root Protection Area
- Existing Tree Planting Removed
- Proposed Tree Planting (indicative only - to be designed and specified by Landscape Architect)
- Proposed Hedge / Shrub Planting (indicative only - to be designed and specified by Landscape Architect)
- Housetypes - Primary Point of Access
- Primary Site Access

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**Source File:**
23015 Model.pln

| Rev | Date | Drawn | Note |
|---|---|---|---|
| P02 | 26/09/2023 | JKG | Basin moved and layout updated. |
| P03 | 08/11/2023 | JKG | Attenuation Basin size amended and layout updated (Plots 01-09) to suit. |
| P04 | 28/11/2023 | JKG | Sheds added for cycle storage. |
| P05 | 18/12/2023 | JKG | Drawing status updated to 'Planning'. |
| P06 | 19/01/2024 | JKG | Parking numbers added. |
| P07 | 02/04/2024 | JKG | Layout amended following feedback from Planning. New Type F added, parking amended. SoA updated. Paving updated. |
| P08 | 25/04/2024 | JKG | Layout and SoA updated. |
| P09 | 07/06/2024 | JKG | Parking for Plots 14, 15 & 23 updated. |
| P10 | 02/07/2024 | JKG | Attenuation Basin and footpath link updated. Updated following comments from Planners / Urban Design. |
| P11 | 30/07/2024 | JKG | Tree removed adjacent to Plot 14. |

burmor construction

STONEWATER

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Client
Burmor Construction / Stonewater

Project Title
Proposed Residential Development at Ramsey Road, Warboys

Drawing Title
Proposed Site Layout

Drawing Status
Planning

| | | | |
|---|---|---|---|
| Scale(s): 1:500 | | Original Paper Size: A1 | |
| Drawn: JKG | | Date: 12.07.23 | |
| Project Number: 23015 | Drawing Number: 0102 | Revision: P11 | |

# APPENDIX B

# Method Statement for Encountering Unexpected Contamination

**METHOD STATEMENT**

**ACTIONS TO BE TAKEN IN THE EVENT OF DISCOVERING UNEXPECTED CONTAMINATION DURING INTRUSIVE GROUNDWORKS**

If at any point during intrusive groundworks at a site, evidence of unforeseen contamination is encountered in the form of significant noxious odours, discolouration, or instability within soils or sheen/ discolouration in groundwater, the following actions will be taken:

- Intrusive works in the immediate area of the impacted ground will be suspended and the continuation of work in other areas of the site will be considered within the context of the site specific health & safety plan.
- Environmental Protection Strategies Ltd (EPS) will be contacted and appraised of the situation so that arrangements can be made to characterise the impact and determine what action may be necessary in addition to the scheduled site works. Where possible / health & safety plan permits, digital photographs of the impacted ground will be taken and emailed to EPS at the address below to assist in the initial assessment
- It may well be necessary for EPS to attend site to undertake visual inspection and obtain samples for field and/or laboratory analysis, although the actions taken will be dependent on the nature of what is encountered
- In cases where EPS consider the unforeseen contamination likely to pose a significant risk of significant harm to adjacent site users or local environmental receptors, the local authority and the Environment Agency will be informed of the situation and the actions being taken
- Once appropriate action has been agreed and undertaken, a written summary will be produced by EPS for submission to the Local Authority, (and where relevant, the Environment Agency) in accordance with planning requirements. The submission will include details of work undertaken, analytical results of investigative and validation samples obtained and conclusions and recommendations for any further actions considered necessary
- Where regulatory bodies have been involved, site works should only recommence following their agreement and in all cases should only recommence when the site manager considers it safe to do so within the context of the site specific health & safety plan.

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