

REMEDIATION METHOD STATEMENT

The Sycamores, 43 Kneesworth Street, Royston, SG8 5AB

Project Reference:
CON288-ROYS-001

Site Address:
The Sycamores
43 Kneesworth Street
Royston
SG5 8AB

Report Date:
20 August 2025

Version Number:
Version 1.0

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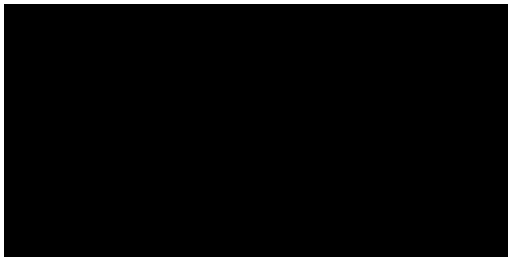
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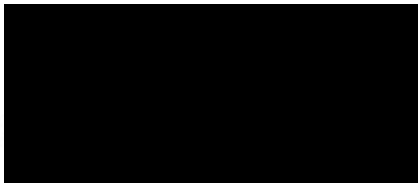
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REMEDIAL METHOD STATEMENT SUMMARY

Step	Action
1.	A combination of clean cover in soft landscaped areas and buildings/ hardstanding to act as a pathway break will be effective at the site to ensure that risk of exposure to heavy metals recorded in the Made Ground is reduced.
2.	Within garden and landscaped areas, topsoil will need to be imported. It is recommended that Made Ground is excavated to a depth of 600mm in these areas and replaced with clean cover soils. If Made Ground still exists at the base of the excavation then a capillary break should be incorporated at the base either comprising geotextile membrane or crushed concrete. The imported materials should comprise at least 150mm thickness of good quality organic topsoil.
3.	Whilst a certificate confirming contaminant concentrations for all imported soil should be obtained from the supplier prior to importation, independent chemical analysis of the material will also need to be undertaken once it is in place to confirm its quality and suitability for use in garden areas. All contaminant concentrations must be below published screening criteria for a residential end use and the thickness of the imported layer will also need to be measured and photographed for validation purposes.
4.	Should any previously unidentified contamination or deleterious materials be encountered during ground works, further assessment will need to be undertaken.
5.	All waste material must be disposed of to an appropriately licensed site. The chemical testing and assessments previously carried out may be used to aid classification of any soil that is to be disposed of. However, further testing might be required by the tip prior to disposal. Copies of the waste consignment documentation should be kept for validation purposes.
6.	A Validation Statement will need to be produced following completion of the remedial works, detailing the measures undertaken, including all relevant documentation, and confirming that the site is suitable for its proposed use.

1. INTRODUCTION

Stansted Environmental Services Limited (SES) has been commissioned by Unbuttoned Limited, the Client, to provide a Remediation Method Statement for a site known as The Sycamores, 43 Kneesworth Street, Royston, SG8 5AB.

It is understood that the existing building on site is to be converted from an office to a single dwellinghouse (Class C3) to include replacing 10 existing car parking spaces with a drive and gardens.

The existing and proposed site layouts are included in Appendix A.

1.1 Planning Status

The proposed scheme, covered by North Hertfordshire District Council Planning Permission 22/01840/FP (dated 15th September 2022), is for change of use from office to single dwellinghouse (Class C3) to include replacing 10 existing car parking spaces with a drive and gardens.

The permission has the following condition attached:

- 6 *(a) No development approved by this permission shall be commenced prior to the submission to, and agreement of the Local Planning Authority of a written preliminary environmental risk assessment (Phase I) report containing a Conceptual Site Model that indicates sources, pathways and receptors. It should identify the current and past land uses of this site (and adjacent sites) with view to determining the presence of contamination likely to be harmful to human health and the built and natural environment.*
- (b) If the Local Planning Authority is of the opinion that the report which discharges condition (a), above, indicates a reasonable likelihood of harmful contamination then no development approved by this permission shall be commenced until a Site Investigation (Phase II environmental risk assessment) report has been submitted to and approved by the Local Planning Authority which includes:*
- (i) A full identification of the location and concentration of all pollutants on this site and the presence of relevant receptors, and;*
- (ii) The results from the application of an appropriate risk assessment methodology.*
- (c) No development approved by this permission (other than that necessary for the discharge of this condition) shall be commenced until a Remediation Method Statement report; if required as a result of (b), above; has been submitted to and approved by the Local Planning Authority.*
- (d) This site shall not be occupied, or brought into use, until:*

- (i) All works which form part of the Remediation Method Statement report pursuant to the discharge of condition (c) above have been fully completed and if required a formal agreement is submitted that commits to ongoing monitoring and/or maintenance of the remediation scheme.*
 - (ii) A Remediation Verification Report confirming that the site is suitable for use has been submitted to, and agreed by, the Local Planning Authority.*
 - (e) Any contamination, other than that reported by virtue of condition (a) and (b), encountered during the development of this site shall be brought to the attention of the Local Planning Authority as soon as practically possible; a scheme to render this contamination harmless shall be submitted to and agreed by the Local Planning Authority and subsequently fully implemented prior to the occupation of this site.*
- Reason: To ensure that any contamination affecting the site is dealt with in a manner that safeguards human health, the built and natural environment and controlled waters.*

A Phase I Desk Study & Preliminary Risk Assessment (Preliminary Environmental Risk Assessment) and Phase II Generic Risk Assessment (Environmental Risk Assessment) have been prepared for the site further details of which are presented in Section 3.0.

1.2 Project Objectives

The overall objective of the work has been to obtain and provide adequate information on the presence and extent of any potential contamination and should it be confirmed, provide a strategy for progression in support of the proposed residential redevelopment of the former business park.

A number of reports have already been completed for the site, which are discussed in Section 3, below.

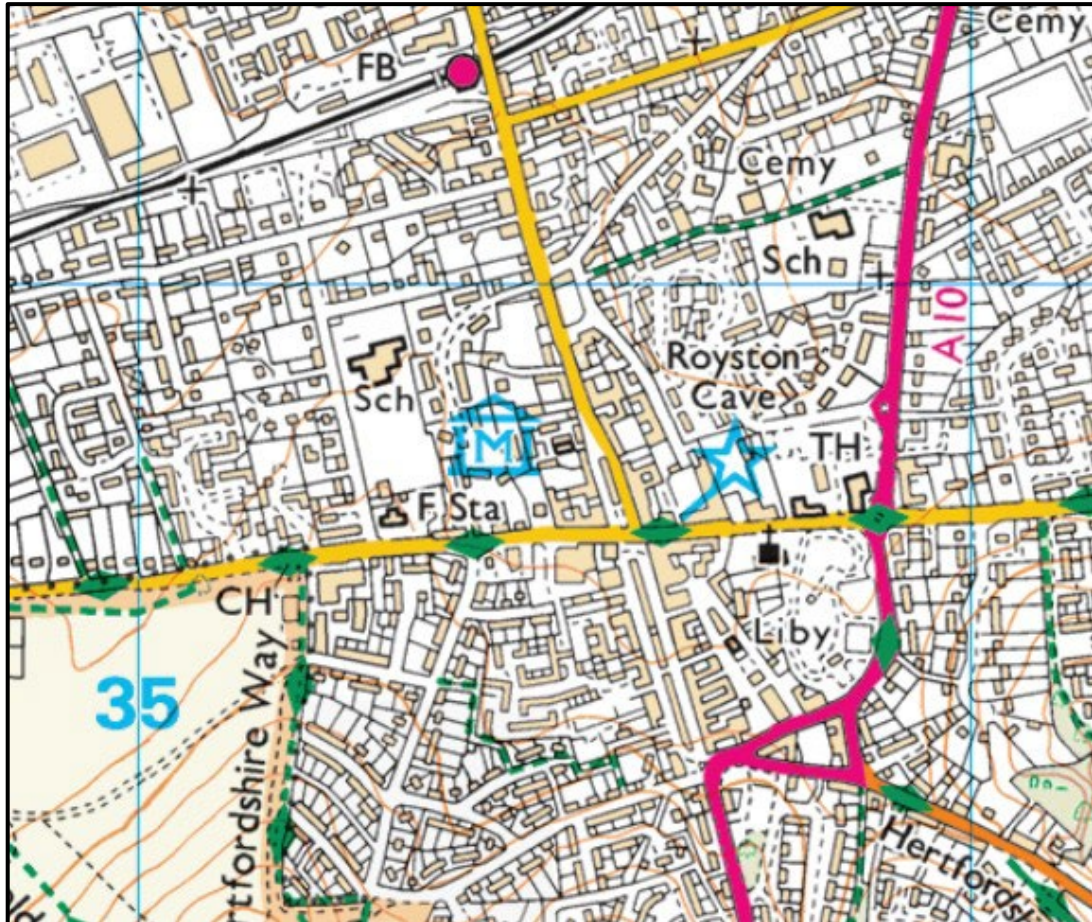
Attention is drawn to the fact that whilst every effort has been made to ensure the accuracy of the data supplied and any analysis derived from it, there is the potential for variations in ground conditions and contamination between and beyond the specific locations investigated. No liability can be accepted for any such variations. Furthermore, any recommendations are specific to the clients' requirements and no liability will be accepted should these be used by third parties without prior consultation with SES.

2. SITE SETTING

2.1 Site Location

The site is located at The Sycamores, 43 Kneesworth Street, Royston, SG8 5AB and may be approximated by the National Grid reference TL 35538 40912. The site location is shown in Figure 1.

FIGURE 1: Site Location Plan



2.2 Site Description

The proposed development site is irregular in shape, covering an area of approximately 1000m² and is roughly level. The site is immediately bounded by Kneesworth Street to the west and other residential and commercial buildings to the south, east and north of the site.

2.3 Geological and Hydrogeological Setting

Reference to the British Geological Survey website (www.bgs.ac.uk) indicates that the site is underlain by the Holywell Nodular Chalk Formation. No superficial deposits are shown.

The Holywell Nodular Chalk Formation has been identified as a Principal Aquifer by the Environment Agency. The site lies between the Groundwater Source Protection Zone 2 (Outer Zone) and Zone 3 (Total Catchment).

The closest surface water feature is located 636m to the northwest.

2.4 Proposed Development

It is understood that the existing building on site is to be converted from an office to a single dwellinghouse (Class C3) to include replacing 10 existing car parking spaces with a drive and gardens.

3. PREVIOUS WORKS UNDERTAKEN AT THE SITE

A Phase I Desk Study Report was carried out by SES for the site:

- Phase I Desk Study & Preliminary Risk Assessment: The Sycamores, 43 Kneesworth Street, Royston, SG8 5AB. Ref. CON288-ROYS-001, dated 27th June 2025.

At the time of the walkover, the site could be accessed from Kneesworth Street via a dedicated driveway located to the south of the building. The site comprised a three-storey Victorian building with a parking area situated at the rear. The entire parking area and the driveway were covered with gravel. An area of soft landscaping was identified in the northeastern corner of the site, raised approximately 500mm above surrounding ground level. This area included several mature trees, including sycamore, yew, and walnut. A hard-surfaced area with concrete slabs was present adjacent to the eastern side of the building, extending to the northern site boundary where a shed used for storage was located. Another mature yew tree was identified in the southern corner of the site, adjacent to the driveway, with several rubbish bins located at its base.

A building, named The Sycamores, is shown on site since the first Ordnance Survey map dated 1886. No changes occurred on site since then. The surrounding area has gone through a substantial residential development since 1970s with industrial facilities mainly present between 500m and 100m to the northwest of the site.

The research has identified the car park usage as a potential source of contamination, posing a risk to future site users. The risk to groundwater was considered to be low as the site is underlain by the Holywell Nodular Chalk Formation.

Significant pollutant linkages were identified associated with the site and, therefore, further works with respect to contamination were recommended.

A Phase II Generic Risk Assessment was subsequently undertaken:

- Phase II Generic Risk Assessment: The Sycamores, 43 Kneesworth Street, Royston, SG8 5AB. Ref. CON288-ROYS-001, dated 16th July 2025.

Intrusive investigations were undertaken by SES on 4th July 2025 comprising three hand dug trial pits to a maximum depth of 1.15m bgl. Suitable soil samples were taken and subjected to a range of contaminant testing.

The intrusive investigation has shown that there are pollutant linkages due to elevated heavy metals (arsenic, lead and beryllium) within the Made Ground.

TABLE 1: Post Investigation Conceptual Site Model

Potential Source	Contaminants of Concern	Medium	Potential Pathways	Receptors	Linkage Potentially Active?	Risk Level
On-site – current and historical • Car park usage	Arsenic, lead and beryllium	Soil	Direct contact/ingestion	Site users	✓	Moderate
			Inhalation of volatiles			
			Airborne migration of soil or dust	Off-site users	✓	Moderate/Low
			Leaching of mobile contaminants	Principal Aquifer	✓	Moderate/Low
		Groundwater	Direct contact/ingestion	Site users Off-site users	x x	Low
			Inhalation of volatiles	Site users Off-site users	x x	Low
			Vertical and lateral migration in permeable strata	Principal Aquifer	x	Low
Off-site – current none Off-site – historical: none		Groundwater	Direct contact/ingestion	Site users	x	Very Low
			Inhalation of volatiles	Site users	x	Very Low
		Service conduits	Direct contact/ingestion	Site users	x	Very Low
			Inhalation of volatiles	Site users	x	Very Low

Therefore, some limited remediation will be required in garden areas and soft landscaped areas of the proposed development, but this should be limited to a minimum thickness of clean cover. To this end a Remediation Method Statement (RMS) should be prepared as required by Part C of Condition 6 relating to contamination (ref: 22/01840/FP).

The risk assessment is based upon the available information relating to the site. Should ground conditions inconsistent with those outlined in this report be encountered, SES should be contacted to enable further assessment. The findings of the CSM should be confirmed upon finalisation of the proposed redevelopment plans.

4. MANAGEMENT OF CONTAMINATION

4.1 Options Appraisal

The risk management from contaminated lands set out by the Environmental Agency in the Land Contamination Risk Management (LCRM), 2020, is divided in three stages as follows:

- Stage 1: Risk Assessment
- Stage 2: Options Appraisal
- Stage 3: Remediation and verification

Based on the results of investigations carried out on-site, a conceptual site model was developed and appropriate risk assessments have been undertaken with respect to the residential development at The Sycamores, 43 Kneesworth Street, Royston, SG8 5AB.

Human health risk assessment undertaken with regard to the proposed development indicates that the Made Ground materials encountered on site are unsuitable for use as near surface soils due to elevated levels of heavy metals.

In order to develop the remediation strategy for the site an options appraisal has been undertaken to review the various remedial techniques that may be applicable to the site and the proposed development.

It is considered likely that an integrated approach to remediation will be required as no one technique will effectively address all of the identified constraints. In addition, development constraints will demand a degree of flexibility offered by integrating the remediation techniques considered appropriate while minimising the negative environmental impacts of the remediation itself. An integrated approach will also strive to maximise the benefit of remediation using best practice and robust methods (not entailing excessive cost).

In order to achieve an integrated approach for the site to address the identified constraints a combination of the following operations is considered appropriate:

Barrier Systems

A combination of clean cover in soft landscaped areas and buildings/hardstanding to act as a pathway break will be effective at the site to ensure that risk of exposure from heavy metals recorded in the Made Ground are not unacceptable.

Selective Excavation and Treatment/Disposal

Made Ground materials at the site have been found to be impacted in places. Given the volume of materials requiring treatment and space considerations at the site, on-site treatment is not considered practical at this stage. Made ground materials identified as being impacted should be excavated and taken off site for either treatment or disposal at a suitably licenced facility.

4.2 Remediation and Verification

For stage 3, Remediation and Verification, there are four steps to follow;

- Develop a remediation strategy
- Remediate
- Produce a verification report
- Do long term monitoring and maintenance, if required.

The risk assessment has identified the presence of elevated heavy metals within the Made Ground which may impact on human health. Relevant pollutant linkages have been identified, as demonstrated in the updated conceptual model.

An important part of the risk management process is identifying and informing all stakeholders with an interest in the outcome of the risk management project. To this end, if the regulators have not yet been contacted with regard to the redevelopment of this site, it is recommended that they be supplied with a copy of both the Phase I Desktop Study & Preliminary Risk Assessment and the Phase II Generic Risk Assessment in order to enable liaison to be undertaken with them.

Following liaison with the relevant regulatory bodies, a remediation strategy should be formulated, which should incorporate an options appraisal and summarise in detail the chosen remedial approach, along with the verification proposals. The remediation strategy should then be approved by the relevant regulatory authorities prior to implementation.

Once remediation is complete, a verification report will need to be formulated. This should provide a complete record of all remedial activities conducted on site and include all the data obtained to support the remedial objectives and demonstrate that the remediation has been effective. Any unexpected conditions encountered during the remedial works should also be detailed within the verification report.

4.3 Remedial Targets

In order to provide assurance that the remediation works have been undertaken to a standard that is acceptable to Regulators and that will provide a site that is suitable

for the proposed development it is necessary to derive and set remedial targets that can be applied to the works at the site. The remedial targets can be used to determine where materials at the site require treatment/removal as well as for validation proposes.

The options appraisal indicates that barrier systems are the most appropriate technique to mitigate the risk presented to end users of the site. Barrier systems mainly in the form of hardstanding areas and floor areas associated with the proposed development will effectively break the direct contact exposure pathways between the contaminants of concern in the soil and the end user.

4.4 Proposed Strategy – Soil

The remediation strategy should be applied to areas of private gardens and general landscaping at ground level.

Further analysis of the environmental sampling data revealed instances where arsenic beryllium, lead concentrations surpassed the Generic Assessment Criteria (GAC) within the proposed garden area.

To mitigate the risk posed by this contamination, it is recommended that the Made Ground in these affected areas be excavated to a depth of 600mm and replaced with a capping layer composed of clean, inert material. This capping layer will serve as a critical barrier, effectively breaking the exposure pathway between the identified contaminants and the eventual end-users of the site, ensuring their safety and well-being. Where Made Ground is still present at the base of the excavation, a capillary break layer will be required to prevent migration of contamination into the clean material. This layer may either consist of 150mm of clean concrete or geotextile.

Furthermore, to safeguard future maintenance workers who may interact with underground services, specific precautions are advised. Where services are installed at depths that intersect with or fall below the identified source of contamination, it is deemed prudent to line the trenches and fully encapsulate the services with clean, inert material. This preventative measure will significantly minimize potential exposure to contaminants during future maintenance activities, thereby protecting the health and safety of personnel working on site.

Where material is being imported to raise site levels and/or finish landscaped areas following excavation, it must be obtained from a reputable source and the supplier should provide a certificate of analysis confirming the chemical and physical nature of the material prior to importation. Independent analysis should then be undertaken when the material is imported to the site in order to confirm its chemical composition. Samples must be analysed in an accredited laboratory for a range of contaminants, the results of which can be screened against current criteria for residential end use.

A watching brief must be kept by the developer during all ground works. The excavation of material across the site must be documented by photographs and waste consignment documentation.

All design proposals must be approved by the Local Authority prior to development commencing.

4.5 Management of Unidentified Sources of Contamination

There is the possibility that sources of contamination may be present on the site, which was not detected during the investigation. Should such contamination be identified or suspected during the site clearance or ground works, this should be dealt with accordingly. A number of options are available for handling this material, which include:

- The removal from site and disposal to a suitably licensed tip of all material suspected of being contaminated. The material would need to be classified prior to disposal;
- Short-term storage of the suspected material while undertaking verification testing for potential contamination. The storage area should be a contained area to ensure that contamination does not migrate and affect other areas of the site. Depending upon the amounts of material under consideration, this could be either a skip or a lined area; and
- Having a suitably experienced environmental engineer either on-call or with a watching brief for the visual and olfactory assessment of the material, and sampling for verification purposes.

4.6 Risk Management During Site Works

During ground works, some simple measures may have to be put in place to mitigate the risk of any known or previously unidentified contamination affecting the site workers and the environs. The majority of the proposed measures represent good practice for the construction industry and include:

- Informing the site workers of the contamination on site and the potential health effects from exposure;
- Where appropriate, the provision of suitable Personal Protective Equipment (PPE) for workers who may be potentially impacted by working in areas of the contamination;
- Ensuring good hygiene is enforced on site and washing facilities are maintained on the site. Workers are discouraged from smoking, eating or drinking without washing their hands first;
- Dust monitoring, and if necessary, suppression measures should be put into practice where contamination is becoming airborne; and

- Where contaminated materials are being removed from the site they should be disposed of at a suitably licensed landfill, with a 'duty of care' system in place and maintained throughout the disposal operations.

4.7 Validation and Monitoring

This Remediation Method Statement will be followed by a Validation Report, which is to be produced following completion of the works detailed above. It should provide a complete record of all remedial activities conducted on site and include all the data obtained to support the remedial objectives and demonstrate that the remediation has been effective. To this end, copies of Waste Transfer Notes and chemical test reports for all imported soils and topsoil should be included in the report.

Secondary aggregate produced from on-site crushing operations will be tested at a frequency of one sample per 250m³ for those materials to be reused onsite. Testing of secondary aggregate will be as follows:

- **Metals Suite** - arsenic, boron (water soluble), cadmium, chromium (hexavalent), chromium (total), copper, lead, mercury, nickel, selenium and zinc.
- **Organic Suite** - petroleum hydrocarbons – TPH CWG speciated analysis, benzene, toluene, ethylbenzene and xylenes (BTEX), polycyclic aromatic hydrocarbons (PAH) – USEPA 16 suite, phenols.
- **Others** - pH, cyanide (free) organic matter content and asbestos.

In addition, at least one sample per 20m³ of imported subsoil and topsoil (subject to a minimum of three samples) should also be taken and analysed for the suite given above. A plan showing the proposed location of validation samples is given in Appendix D.

A Certificate of Conformity should be provided for imported organic topsoil to be used as a growing medium, to show that the topsoil can be classified as a '*Multipurpose Topsoil*' in accordance with BS3882: Specification for topsoil (2015).

Any unexpected conditions encountered during the remedial works should also be detailed within the verification report.

Upon completion of the remediation works a validation report will be produced for the approval of the regulators. The remediation works Validation Report will detail the works undertaken in accordance with this strategy and will include as a minimum:

- Waste Transfer Notes for all soils removed from site.
- Records of any additional materials suspected of being contaminated including the results of further testing;

- A photographic record of the works;
- Records of validation testing including laboratory certificates; and
- Records of environmental monitoring.
- Records of the gas membrane installation and verification including 'As Built' drawings detailing the void space beneath the ground floor slab.

5. LAND RECLAMATION TAX RELIEF

Redevelopment of the site may be eligible for land reclamation relief on all activities associated with the remediation of the site at a rate of 150% of the original expenditure. Areas where this relief could be applied would include, but not necessarily limited, to the following:

- SES' fees in developing the remedial strategy and verification works, including any investigation work.
- The appointed contractor's fees to undertake the remedial works.
- The disposal costs of waste soils
- The cost of importing clean soils for the cover system and barrier pipework.

It is advised that further advice is sought from a suitably qualified financial advisor.

6. CONCLUSIONS

Stansted Environmental Services Ltd has been commissioned by Unbuttoned Limited, to produce a Remediation Method Statement for The Sycamores, 43 Kneesworth Street, Royston, SG8 5AB. It is understood that the existing building on site is to be converted from an office to a single dwellinghouse (Class C3) to include replacing 10 existing car parking spaces with a drive and gardens.

The intrusive investigations have shown that there may be pollutant linkages due to elevated heavy metals within the Made Ground.

The RMS proposes that an integrated approach to remediation should be adopted. To this end the following works are proposed:

- A combination of clean cover in soft landscaped areas and buildings/ hardstanding to act as a pathway break will be effective at the site to ensure that risk of exposure to asbestos fibres recorded in the Made Ground are not unacceptable.

Should any previously unidentified contamination or deleterious materials be encountered during ground works, further assessment will need to be undertaken as per the Method Statement in Appendix B.

All waste material must be disposed of to an appropriately licensed site. The chemical testing and assessments previously carried out may be used to aid classification of any soil that is to be disposed of. However, further testing might be required by the tip prior to disposal. Copies of the waste consignment documentation should be kept for validation purposes.

A Validation Report will need to be produced following completion of the remedial works, detailing the measures undertaken, including all relevant documentation, and confirming that the site is suitable for its proposed use.

This report may be used to assist in the discharge of Condition 6, part c of North Hertfordshire District Council Planning Permission 22/01840/FP (dated 15th September 2022).

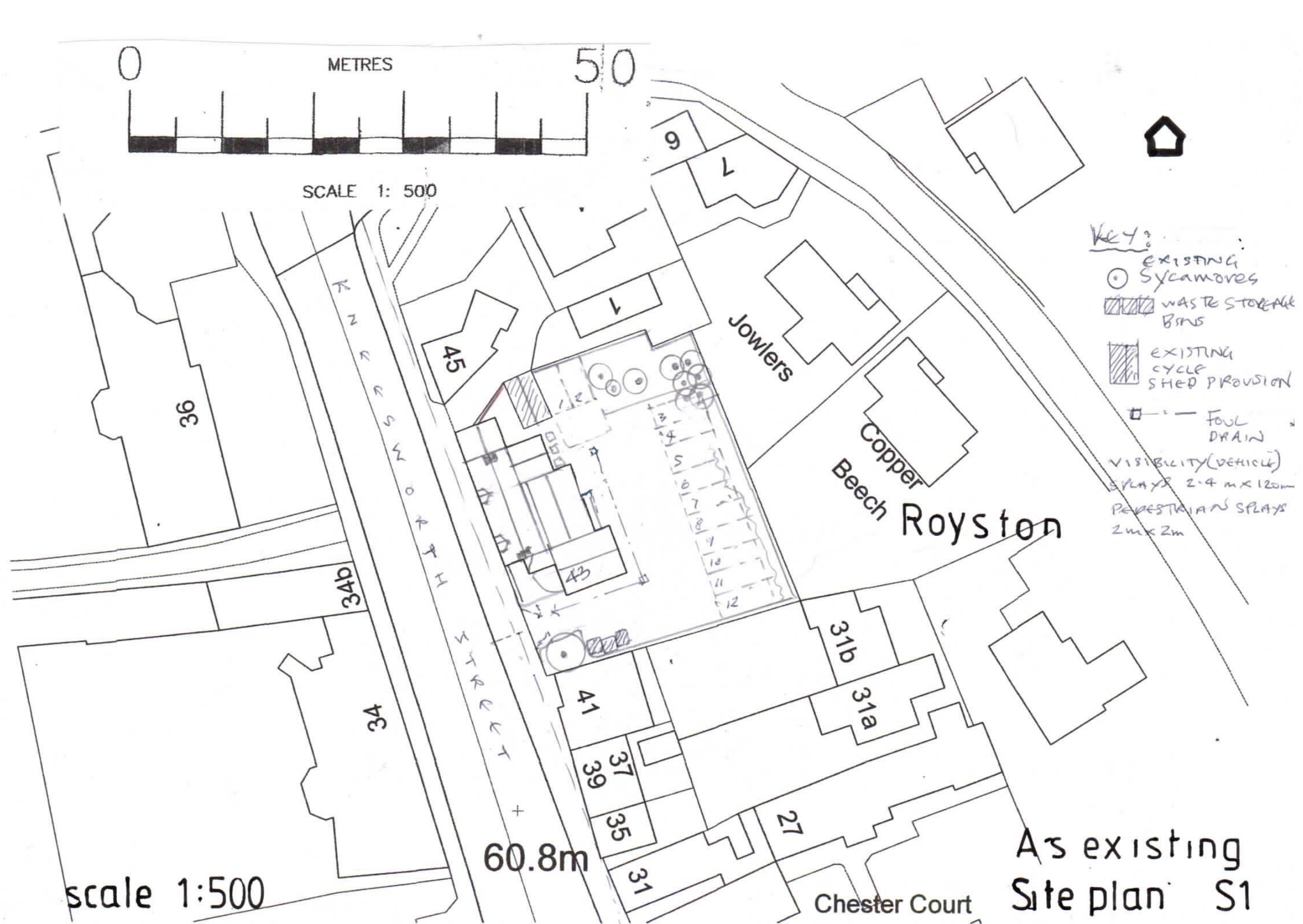
APPENDICES

- A. PLANS & FIGURES**
- B. MANAGEMENT OF UNIDENTIFIED SOURCES OF CONTAMINATION**
- C. VERIFICATION PLAN**

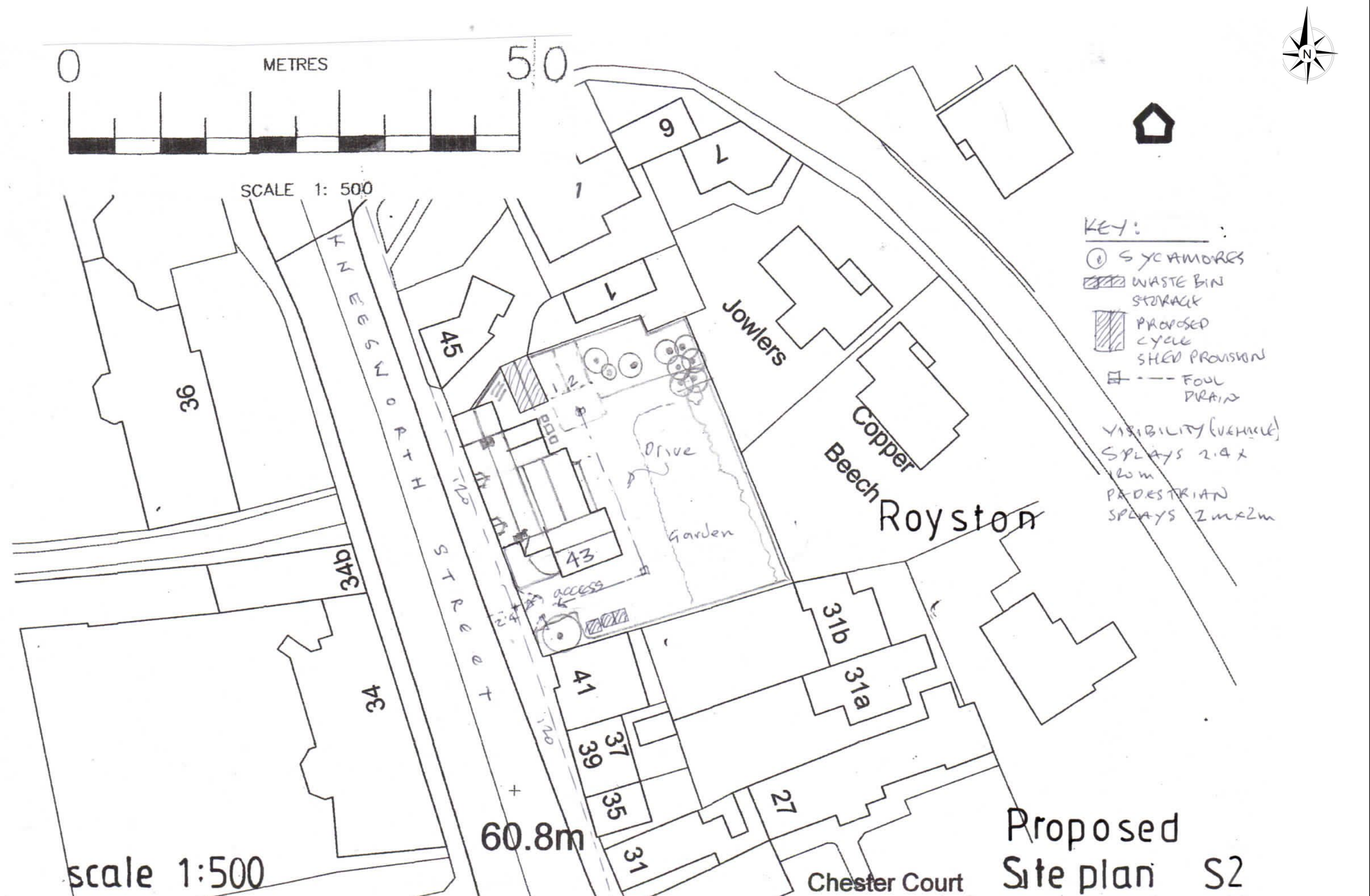
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A. PLANS & FIGURES

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Checked & Approved	WGG	EXISTING SITE PLAN	



Originator	AK	THE SYCAMORES, ROYSTON CON288-ROYS-001	 SES STANSTED ENVIRONMENTAL SERVICES
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B. MANAGEMENT OF UNIDENTIFIED SOURCES OF CONTAMINATION

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MANAGEMENT OF UNIDENTIFIED SOURCES OF CONTAMINATION

The works completed to date will never give a 100% confidence level as to the exact ground conditions per square metre of the site. There are various scenarios that may be encountered during excavation, such as the identification of a former underground storage tank or other underground structure, identification of discoloured soils, a localised but significant change in the type of material encountered and/or detection of unusual or “chemical” odours in the soils,

If any of the above situations arise, or any other unexpected scenario with regards to the potential for contamination, the following Method Statement will need to be followed:

Method Statement for Previously Unidentified Contamination.

There is the possibility that sources of contamination may be present on the site that was previously unforeseen. In the event of identification of such conditions, this method statement should be followed by the Contractors:

- Should such contamination be identified or suspected during the site clearance or ground works, these should be dealt with accordingly.
- Any Employee of the Principal Contractor, or a subcontractor who discovers an area of ‘contaminated land’ or comes across ‘polluted’ ground water, during the course of construction will report the matter immediately to the Site Manager, or in his absence, the most senior member of staff at the site.
- The Site Manager will inform Stansted Environmental Services Ltd, at the earliest opportunity, and in the meantime instruct staff to stop works in the specific area.
 - A member of staff from Stansted Environmental Services Ltd will inspect the site and carry out/or arrange for an appropriate risk assessment to take place.
 - The matter will be recorded and reported to the Local Authority and/or the Environment Agency.
 - Samples will be taken if required to determine the contamination levels and to determine classification of the waste.
 - Where the waste is removed from site, it will be transported to an appropriate landfill site, and detailed logs recorded.
 - Work will only re-commence in the affected area when Stansted Environmental Services Ltd have informed the Site Manager that the matter is completed, (guidance, where appropriate, will be obtained from Wellcome, the Local Authority and/or the Environment Agency, should a change in the methodology be required).

Details of the incident, the assessment, and remedial action taken will be logged by Stansted Environmental Services Ltd, and added to the Health and Safety File on site.

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C. VERIFICATION PLAN

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LEGEND

 Location of validation sample

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