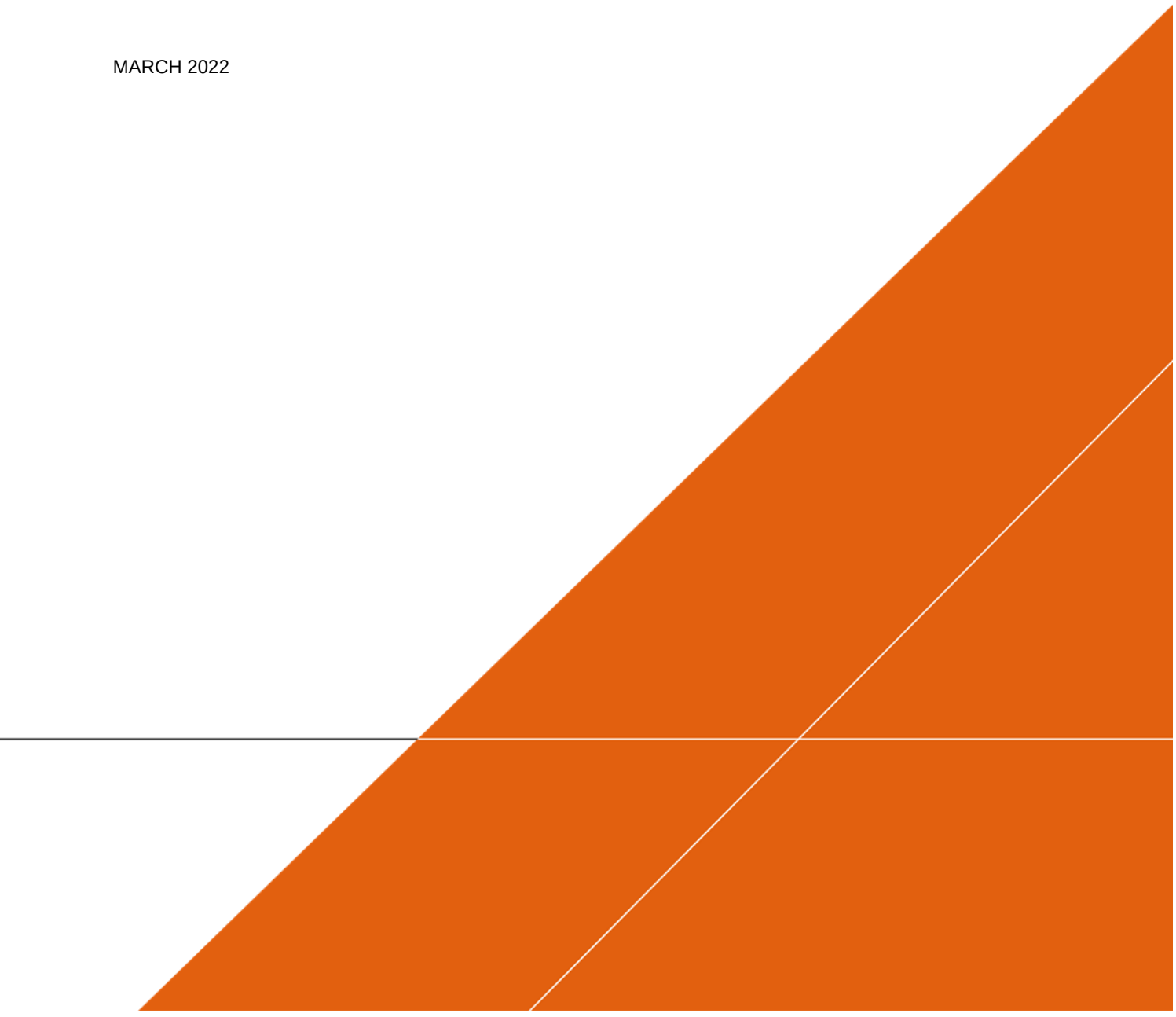
OTTERPOOL PARK

Environmental Statement (ES) Appendix 4.17: Outline Code of Construction Practice

MARCH 2022



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1 Introduction

1.1 Background

1.1.1 Arcadis has prepared this Outline Code of Construction Practice on behalf of Otterpool Park LLP (the Applicant) to accompany an outline planning application for Otterpool Park (the proposed Development).

1.1.2 The application for planning permission relates to an existing outline planning application that was submitted to F&HDC as the local planning authority ('LPA') in 2019 (the '2019 planning application'), under planning reference Y19/0275/FH. Following submission of the 2019 planning application, the applicant is proposing a number of amendments which has resulted in an amended Environmental Statement (ES).

1.1.3 The proposed Development is located to the south-west of Junction 11 of the M20 motorway and south of the Channel Tunnel Rail Link (see Figures 1.1 and 1.2, Appendix A). The proposed Development is described as:

'Outline planning application seeking permission for the redevelopment of the site through the demolition or conversion of identified existing buildings and erection of a residential-led mixed-use development comprising up to 8,500 residential homes including market and affordable homes; age restricted homes, assisted living homes, extra care facilities, care homes, sheltered housing and care villages; a range of community uses including primary and secondary schools, health centres and nursery facilities; retail and related uses; leisure facilities; business and commercial uses; open space and public realm; sustainable urban drainage systems; utility and energy facilities and infrastructure; waste water infrastructure and management facilities; vehicular bridge links; undercroft, surface and multi-storey car parking; creation of new vehicular and pedestrian accesses into the site, and creation of a new vehicular, pedestrian and cycle network within the site; improvements to the existing highway and local road network; lighting; engineering works, infrastructure and associated facilities; together with interim works or temporary structures required by the development and other associated works including temporary mean while uses. Layout, scale, appearance, landscaping and means of access are reserved for approval.'

1.1.4 An Environmental Impact Assessment (EIA) of the proposed Development has been undertaken and an Environmental Statement (ES) has been prepared and submitted as part of the amended outline planning application. The ES concludes that a range of mitigation measures, relating to the demolition, construction and operational stages are necessary and that the framework for approving these mitigation measures will be delivered via planning conditions, S106 agreements and financial contributions.

1.2 Purpose of This Document

1.2.1 This Outline Code of Construction Practice (CoCP) has been prepared as an overarching framework for managing and minimising environmental effects for the demolition and construction phase of the proposed Otterpool Park Development. The Otterpool Park Environmental Statement identifies potential significant adverse effects of the construction phase and proposes mitigation measures, which have formed the basis of this CoCP. It forms a structured plan for ensuring environmental commitments and actions are accurately recorded and implemented effectively on site during the construction phase.

1.2.2 This Outline CoCP sets out a series of proposed measures and standards of work that will be applied by the Contractor(s) throughout the construction period to:

- Provide effective planning, management and control during construction of the proposed Development with the aim of minimising and/or mitigating (where possible) potential environmental impacts upon people, businesses and the natural and historic environment; and
- Provide the mechanisms to engage with the local community throughout the construction period.

1.2.3 As a minimum, the Contractor(s) will be required to comply with applicable environmental legislation at the time of construction of the proposed Development together with any additional environmental controls imposed by the planning approval. For this reason, applicable statutory requirements are not repeated within this outline CoCP.

1.3 Approval of the CoCP

1.3.1 A 'three-tier' approach is proposed in terms of gaining the appropriate consents for Otterpool Park. Planning conditions that would be attached to the outline planning permission, if granted, will require two further consents stages to control the evolving design and delivery of the proposed Development from this current outline stage to the reserved matters stage. The three Tier approach and how this relates to the development of the CoCP, comprises the following:

- Tier 1 (Outline Planning Application): The outline planning application will seek to secure approval for the proposed Development through the submission of an amended Development Specification document, and accompanying Parameter Plans and Parameter Specification.
- At Tier 1 this Outline CoCP sets out the principles of demolition and construction phase mitigation which needs to be secured.
- Tier 2 (Detailed masterplan for each phase): This tier will include the submission of a phase-specific masterplan, design code and delivery plan. This documentation will set the definition of and provide a framework for each of the Indicative Development Phases. It will inform and establish a base against which reserved matters applications will be submitted for approval. Tier 2 consent applications will need to demonstrate accordance with the principles agreed as part of Tier 1.
- At Tier 2 there will be no update of this Outline CoCP.

- Tier 3 (Reserved matter applications): Following Tier 1 and 2 approvals, reserved matters applications will seek approval for individual parcels or infrastructure within the Tier 2 approved Indicative Development Phases. These reserved matters applications will provide an implementable level of detailed design in accordance with the Framework for that key area secured in Tier 1, including the design parameters and the requirements of the outline planning permission conditions.
- At Tier 3 a phase-specific CoCP will be prepared by the Principal Contractor. The Indicative Development Phase-specific CoCP will elaborate on the principles set out in this document to tailor for the phase coming forward and cognisant of any additional information which has come forward over the intervening time period. The Phase specific CoCP will also take into account any legislation, guidance or best practice which has come forward over the intervening time period from this Outline CoCP.

1.3.2 The detailed CoCP (Tier 3) will contain information related to the following in addition to the measures within the Outline CoCP:

- Any requirements attached to the planning approval for the proposed Development.
- Any further mitigation measures, as agreed with the statutory environmental bodies, F&HDC, landowners and other relevant stakeholders;
- Mitigation measures developed following the completion of additional surveys (e.g. ecology) prior to the works commencing; and
- Environmental commitments in the Contractor(s) Environmental Management System (EMS).

1.3.3 A number of additional construction management documents are referred to within this CoCP. These are listed in Table 1 alongside the Tier stage at which the document will be produced.

Table 1 Delivery Process for Construction Management Documents

Document	Tier 1	Tier 2	Tier 3
Soil Resource Plan	X	X	✓
Soil Management Plan	X	X	✓
Dust Management Plan	X	X	✓
Arboricultural Impact Assessment	X		✓
Ecological Survey Reports (various habitats and species)	X		✓
Written Scheme of Investigation (Cultural Heritage)	X		✓
Further Ground Investigation and Remediation Strategy (if required)	X		✓
Unexploded Ordnance (UXO) Mitigation Strategy	X	X	✓

Document	Tier 1	Tier 2	Tier 3
Construction Traffic Management Plan (CTMP)	X	X	✓
Construction Logistics Plan (CLP)	X	X	✓
Construction Travel Plan	X	X	✓
Site Waste Management Plan (SWMP)	✓ - Produced as an outline	X	✓ - Updated based on the outline SWMP
Materials Management Plan	X	X	✓
Stakeholder Communications Plan	X	X	✓
Control of Pollution Act (CoPA), Section 61 Application	X	X	✓
Demolition Survey and Demolition Environmental Management Plan	X	X	✓ - Provide based on the outline CoCP

1.4 Legal Compliance

1.4.1 All relevant legislation, including requirements for licences, permits and/or consents shall be identified prior to the commencement of demolition and the appointed Principal Contractor will be required to provide details of how compliance is to be achieved, as part of the demolition and construction process.

1.5 Enforcement

1.5.1 The provisions of the Outline CoCP will be imposed by the Applicant on the Contractor(s) by means of the works contracts. The contracts will incorporate both general requirements and site specific requirements.

1.5.2 The Contractor(s) (and any sub-contractors) will be required to comply with the terms of the detailed CoCP and appropriate action will be taken by the Applicant with the aim of ensuring compliance.

1.6 Structure of this Document

1.6.1 This Outline CoCP is based on established good management practice and includes the following information:

- Introduction (Section 1)
- Project overview (Section 2): describing the proposed Development;
- Environmental management and implementation (Section 3): including environmental management structure, roles and responsibilities, environmental objectives and targets and co-ordination with other projects/phases;

- Communication engagement and communities (Section 4): outlining the approach to community engagement;
- Demolition and construction information (Section 5): a description of information available at this stage of the application, and general requirements for the demolition and construction works;
- General requirements by environmental topic (Section 6): Measures to manage environmental impacts identified as requiring demolition and construction measures; and
- Monitoring and review (Section 7): Procedures for recording and reporting monitoring results, completion of audits and review of the CoCP.

2 Project Overview

2.1 Site and Surroundings

2.1.1 The site of the proposed Development is located on approximately 589ha of land directly south-west of Junction 11 of the M20 motorway, and south of the Channel Tunnel Rail Link (CTRL) in the administrative area of Folkestone & Hythe District Council (F&HDC) in Kent (see Appendix A). The site is centred around National Grid Reference TR112 365 in the general area of Otterpool Manor buildings. Much of the site is greenfield in nature and is predominantly occupied by agricultural uses and associated farm holdings, as well as some residential and light commercial uses. A range of historic land uses associated with both rural and commercial/industrial activities have been present on the site.

2.1.2 The site is linked off-site to the north-west and south-east via the A20 Ashford Road that traverses the central part of the site. The site is bounded by a section of Harringe Lane and farmland to the west and Harringe Brooks Woods and more farmland to the south-west. The southern boundary wraps around Lympne industrial estate and either side is surrounded by farmland. The south-eastern and eastern boundary is bordered by the settlements of Lympne and Newingreen and further north the eastern boundary runs parallel with the A20 before terminating at the intersection of the A20 (Ashford Rd) with the CTRL (otherwise known as High Speed 1, HS1) line. The northern site boundary runs largely parallel with and adjacent to the CTRL line, and encompasses Westenhanger Castle, and the settlement of Sellindge. Within the main site area the site boundary excludes parcels of land at Otterpool Manor and Upper Otterpool and properties at Westenhanger.

2.1.3 There are a number of public rights of way (PRoW) that route internally within the site area, providing connections between the villages of Sellindge, Newingreen, Lympne and Westenhanger. These include Public Bridleways HE271A and Public Footpaths HE221A, HE227, HE275, HE281, HE302, HE303, HE314, HE315 and HE316.

2.1.4 The site is characterised by the East Stour River that flows from east to west across the northern part of the site and to which a number of smaller tributaries and drainage channels are connected. The majority of these water courses flow from east and south to the north and west. The site has some associated flood risk associated with the East Stour River and its tributaries.

2.1.5 There are a number of existing land uses on the site although a large proportion of the site area is occupied by farmsteads and associated agricultural land for a mixture of arable and livestock breeding purposes. There are farmsteads located at Somerfield Court Farm (west of Barrow Hill, Sellindge), Red House Farm, Benham Water Farm and Elms Farm (east of Barrow Hill, Sellindge), Hillhurst Farm (east of Westenhanger) and several smaller practices located adjacent to the A20 in the area of Newingreen. Westenhanger Castle, a Grade 1 listed scheduled monument with associated grounds is located within the northern site boundary.

2.1.6 Land within the site that lies to the north of the A20 is mainly occupied by a mixture of agricultural land, the East Stour River watercourses and a man-made lake in the centre of the former Folkestone Racecourse which is now closed. Hillhurst Farm lies in the north-eastern corner of the site and Westenhanger Castle lies at the north east end of the application site to the south of the M20 and becomes a focal point that helps define the character of the wider settlement. Barrow Hill Farm lies 50m east of the northern stretch of the A20 that runs through Barrow Hill, Sellindge. Close to the intersection of the A20 and Otterpool Lane is a café and small lorry parking area, beyond further north of which lies Barrow Hill Farm. At the eastern end of the A20 within the site lies Holiday Extras corporate office and a farm building.

2.1.7 To the south of the A20, the land east of Otterpool Lane is predominantly occupied by farmland and a number of small holdings along the A20 itself. Part of the East Stour traverses the site from south to north, and disused quarry workings south of the A20 form a designated a geological site of Special Scientific Interest.

2.1.8 Land to the west of Otterpool Lane and the northern stretch of the A20 is occupied mainly by agricultural land and the East Stour. Other features in the area include Park Wood and Somerfield Court Farm located west of Barrow Hill, Sellindge, and Springfield Wood located adjacent to the western site boundary.

2.1.9 The surrounding area is occupied by mainly agricultural land uses and to a lesser extent, light industrial, commercial and residential uses. Much of the northern site boundary is bordered by the CTRL line, beyond which lies the M20 motorway that connects London with the Kent coast and ultimately Europe via the Channel Tunnel. The strip of land located between the CTRL line and the M20 consists of agricultural land, Westenhanger railway station and a motorway service station adjacent to junction 11 of the M20. Further to the north from the M20 lie the villages of Stanford and Sellindge, set within mainly agricultural land.

2.1.10 Land to the east of the site is occupied by predominantly agricultural uses and wooded areas in the north, and the settlements of Newingreen and Lympne further southward. The eastern site boundary is largely abutted by the Kent Downs Area of Outstanding Natural Beauty (AONB) which extends to areas north and south of the site.

2.1.11 To the south of the site, land uses comprise farmland with other notable features such as Lympne Industrial Estate, Port Lympne Wildlife Park and Harringe Brooks Woods, the latter is designated as ancient woodland. The Kent AONB boundary lies approximately 300m from the southern boundary at its nearest point. The AONB is this area forms an E-W orientated south-facing escarpment and is occupied by farm land, a number of woodlands and Lympne Castle. Further south of this lies Romney Marsh and the town of West Hythe.

2.1.12 Land to the west of the site is mainly in agricultural use with some interspersed woodland areas. Harringe Court is present approximately 50m from the site on Harringe Lane and comprises residential and farm buildings. Partridge Farm is present approximately 400m west of the site and a solar farm is located directly north-west of it. To the north of the solar farm between the CTRL and the M20 is a converter station and sewage works which are approximately 500m north-west of the site boundary.

2.2 Description of the Proposed Development

2.2.1 The proposed Development is a new garden settlement, which includes up to 8,500 new homes, a mixed-use town centre, local centres, primary and secondary schools and extensive areas of open space. The outline application seeks permission for the maximum parameters set out in Table 2. The proposed Development is anticipated to be constructed over an approximately 19-year period from 2023 to 2042.

Table 2 Total proposed residential units and floorspace by use

Land use	Including	Proposed floorspace (sqm) GEA (unless otherwise specified)
Residential	Residential units and Extra Care accommodation	8,500 units
Education and Community Facilities (Use Class E and F)	Schools, nurseries, crèches, reserve school floorspace and/or SEN, health centres, place of worship, community centres.	Up to 67,000
Hotel	Hotel	Up to 8,000
Leisure	Sports pavilion and indoor sports hall	Up to 8,500
Mixed retail and related uses	Shops, professional services, restaurants, cafes, drinking establishments, hot food takeaways, offices, businesses	Up to 29,000
Employment	Commercial business space in hubs, commercial business park, light industrial business park.	Up to 87,500
Total		Up to 200,000

Notes:

1. All floorspace areas are gross external areas;

2. The Table excludes certain infrastructure elements for which planning permission is sought in principle including roof top and basement plant, on site utilities such as substations, energy infrastructure, the potential waste water treatment plant, waste storage, any built structures proposed for use as service yards, service corridors, loading bays and any external hard landscaping, footways and roads;

3. The Table excludes floorspace for the creation of undercroft, surface and multi-storey car parking, for which planning permission is sought in principle;

4. The Table excludes floorspace for the creation of green infrastructure and open space and small built structures associated with this space including small changing rooms, toilet facilities, entrance booths etc. for which planning permission is sought in principle;

5. Residential floorspace includes retirement and extra care facilities; and

6. Planning permission is also sought in principle for such temporary development as may be necessary for the construction of the development.

3 Environmental Management and Implementation

3.1 Management Structure

3.1.1 The anticipated roles and responsibilities of the parties involved in the demolition and construction works are set out below. All parties will be responsible for ensuring the requirements of the Outline CoCP are met.

The Developer/Applicant

3.1.2 The Developer will be responsible for providing all strategic infrastructure, strategic foul and surface water drainage, structural landscaping informal public open space and landscaping works.

3.1.3 In order to achieve this the Developer will appoint a Principal Contractor, a Project Manager and a site Environmental Manager.

Principal Contractor

3.1.4 The Principal Contractor may vary between the various Phases of the proposed Development. They will be responsible for the day-to-day management of health and safety, as well as environmental and quality performance during demolition and construction works. The Principal Contractor will be responsible for implementing the measures set out in the CoCP, including monitoring the performance of sub-contractors and maintaining records to demonstrate compliance with, and implementation of, the CoCP.

Project Manager

3.1.5 The Project Manager will be responsible for directing the Principal Contractor on the delivery of the measures set out in the CoCP. This will include checking that the Principal Contractor has allocated sufficient resources to allow delivery of the CoCP, participating in communication with the F&HDC and other third parties, e.g. the Environment Agency, as required and arranging for the periodic review and update of the CoCP. The Project Manager will regularly review the findings of the monitoring programme, co-ordinated by the site Environmental Manager and the Principal Contractor as necessary.

Site Environmental Manager

3.1.6 A suitable qualified site Environmental Manger will be appointed to report on the implementation of the CoCP and to oversee any environmental monitoring programmes. The Site Environmental Manager will facilitate communication on environmental matters between the project partners and any relevant statutory consultees, will carry out site environmental inspections and audits as necessary, and will co-ordinate the environmental monitoring programme. The site Environmental Manager will also be responsible for monitoring the Principal Contractor to ensure that all relevant legal consents, licences and exemptions are in place in advance of relevant works commencing and that all requirements are adhered to.

Ecological Clerk of Works

3.1.7 An Ecological Clerk of Works will be appointed to oversee site clearance, in particular any works that have the potential to disturb notable ecological features. They would also ensure that the mitigation measures proposed adhere to best practice guidelines and take account of any changes in legislation that may have occurred.

3.1.8 An ecological clerk of works would be employed to ensure that the ecological protection measures outlined in the CoCP are adhered to. They would also undertake regular monitoring to ensure that the protection measures remain in place for the time that they are required.

3.1.9 The Ecological Clerk of Works would report to the site Manager and Environmental site Manager/Clerk of Works to ensure that remedial actions are undertaken in a timely manner.

All Staff and Subcontractors

3.1.10 All staff and subcontractors have the responsibility to:

- Work to agreed plans, methods and procedures to minimise environmental effects;
- Understand the importance of avoiding pollution on-site, including noise and dust, and how to respond in the event of an incident to avoid or limit environmental effects;
- Report all incidents immediately to their manager;
- Monitor the work place to potential environmental risks and alert their manager if any are observed and
- Co-operate as required during site inspections and audits.

Contact Information

3.1.11 The location of a large notice board on the site will set out contact details of the site manager (phone, email, postal address) and a ‘Considerate Constructors’ contact telephone number.

3.2 Communication

3.2.1 Regular communication must be maintained between representatives at all levels of the contract to ensure that everyone is fully aware of the proposed Development’s environmental issues. Communication methods must include inductions, toolbox talks, briefings, letters/memos/emails etc. and review meetings.

3.2.2 The Applicant and Contractor(s) will agree responsibilities for communication with statutory bodies, local residents/businesses and other members of the public that may be affected by construction activities.

3.2.3 Pro-active communication with regulatory environmental bodies will be established to facilitate the efficient progression of the works. The Contractor(s) Environment Manager will liaise regularly with local authorities and their relevant environmental departments. This is particularly important in the event that construction work outside of the standard site working hours is necessary.

3.2.4 The Contractor(s) will appoint community engagement specialist(s) who will be responsible with the Applicant for leading consultation with affected communities, possibly through the production of newsletters.

3.2.5 The Contractor's Construction Environmental Manager/Advisor will be the single point of contact for the regulatory authorities. The Contractor(s) will provide the regulatory authorities with relevant contact details prior to the commencement of construction.

3.2.6 Section 4 provides further details about the approach that will be adhered to in respect of communication at a community engagement level.

3.3 Environmental Objectives, Targets and Programme

3.3.1 Development specific environmental objectives and targets for construction preparation and construction phases will be agreed between the Application and the Contractor(s). These are likely to include environmental, social and sustainability targets and key performance indications ("KPIs"), such as targets for re-using and recycling waste on site.

3.3.2 Scheme objectives may include:

- Zero pollution incidents;
- Minimise waste sent to landfill;
- Minimise disruption to nearby residents (and associated complaints);
- Protect and enhance the historic landscape; and
- Protect and enhance biodiversity.

3.3.3 The Detailed CoCP will set out the final agreed objectives and will include a programme of actions to achieve the proposed Development's objectives and targets. Progress towards achieving the environmental objectives and targets will be monitored, measured and reported by the Contractor on a monthly basis to the Applicant.

3.4 Collaboration and Co-ordination Across Concurrent Projects

3.4.1 Whilst the procurement strategy for the proposed Development is yet to be confirmed, it is anticipated that construction will be split into a number of phases, and that some of these may proceed concurrently. That is there will be on-going construction activity in more than one location under the control of different Contractors.

3.4.2 As a consequence, there will be a need for the Contractor(s) to co-ordinate activities outside site boundaries to reduce risk of conflict and to maximise opportunities for reducing overall impact on surrounding communities and the environment.

3.4.3 The Applicant will have particular regard to co-ordination of activity by the Contractor(s) in respect of:

- Traffic management: working collaboratively with the aim of avoiding potential conflict in arrangements and minimising disruption to road users;
- Community liaison: communicating upcoming activity to affected communities and responding questions/concerns raised;
- Emergency response: maintaining communication with emergency services and ensuring that emergency response plans do not conflict;

- Access to site: communication and collaboration in respect of arrangements for site access and abnormal loads with highway authorities and emergency services;
- Construction workforce: monitoring the impact of the workforce on the community in its travel to and from work and its use of temporary accommodation; and
- Other construction projects: maintaining communication between the works on the proposed Development and those of other relevant projects in the area.

4 Community Engagement and Communication

4.1 Engaging With Communities

4.1.1 The Applicant strongly recognises the benefits that early community engagement can bring to a project. Engagement will continue throughout the construction of the proposed Development and will comprise various initiatives including amongst others: public liaison groups, newsletters, notice boards and community engagement initiatives.

4.1.2 The Contractor(s) will prepare a Community Engagement Plan for their construction stage of the proposed Development that will provide the approach to community engagement and a step-by-step guide to the enquiries and complaints procedure. The Contractor(s) will incorporate relevant community engagement measures detailed in the Applicant's Community Engagement Strategy.

4.1.3 The Contractor(s) Plan will include procedures to:

- Maintain effective community engagement throughout the construction period;
- Inform affected communities in advance of the relevant construction works;
- Inform affected communities in advance about the programme of the construction works;
- Provide information on the enquiry and complaints procedures and how this is operated.
- Details of regular meetings and public consultation events;
- Methods for consulting with the project team regarding any issues related to the construction works;
- Regular forums with the local authorities and local communities;
- Written records of all meetings/discussions held as well as the identification of how actions have been addressed; and
- Community meetings will be attended by the Applicant together with members of the Contractor's site team, including the Contractor(s) community engagement specialist(s) and local authorities as may be necessary to cover the matters to be discussed.

4.2 Community Engagement Requirement

4.2.1 During construction, a programme of high quality, effective and sustained communication is to be incorporated into the Contractor(s) Community Engagement Plan, including:

- Online – the Applicant's website and other digital media including relevant links to its partners' and stakeholders' websites. These will be updated to reflect construction and community liaison requirements of the Proposed Development, and will include the following:
  - The latest information on the progress of the construction works;
  - Areas affected by construction;
  - Mitigation in place to reduce adverse effects of construction;
  - Information regarding planned construction works; and

  - Road closures and works recently completed.

- Newsletter – a Proposed Development newsletter will be issued on a regular basis and will provide information regarding construction progress and planned works;
- Provision of information on progress of construction works – distribution will include relevant stakeholders such as: the relevant local authority, council and councillors, constituency and regional members of Parliament;
- Notification to local residents, businesses and parish councils and other key stakeholders– the Contractor(s) will notify occupiers of nearby or affected properties, businesses and adjacent or affected parish councils a minimum of two weeks in advance of planned construction works that may affect them. The notification will provide details of the enquiries and complaints procedure developed in accordance with the requirements set-out below (at Section 4.3). Information included in the notifications will include, as appropriate:
  - The location of the planned works;
  - The activities to be carried out;
  - The duration of the planned works and the periods within which works will be undertaken (i.e. whether during normal working hours, during the evening or overnight);
  - The anticipated effects of the planned works;
  - The measures to be implemented in line with the detailed CoCP to mitigate the impact of the planned works; and
  - Enquiries and complaints procedure.

4.3 Enquiries and Complaints Procedure

4.3.1 A project information line will be used to deal with enquiries and complaints from the public. The information line will consist of a phone line, email and website contact facility. The phone line will be staffed 24 hours a day, 7 days a week. The relevant contact number, email and website addresses for the information line will be displayed on signs around the construction site. Responsibility for maintaining the information line will be confirmed by the Applicant.

4.3.2 An enquiry and complaint handling system will be implemented by the party responsible for maintaining the information line and include measures to:

- Log enquiries and complaints in a register;
- Deal with enquiries and complaints appropriately, recognising that they may be due to the effect of construction works on the interests of, and impacts on persons and their properties;
- Pass on the enquiry or complaint to the correct person for review and appropriate action if the person recording it cannot do so;
- Take appropriate action and response to enquiries or complaints; and
- Outline the process to review enquiries and complaints regularly to assess the adequacy, efficiency and effectiveness of the enquiries and complaints system and the measures being taken to respond to any enquiries or complaints.

4.3.3 The extent of the action taken will depend on the nature of the complaint. All complaints will be investigated to establish the cause of the complaint and whether the works comply with the proposed Development's environmental requirements and other relevant requirements such as legislation, standards and codes of practice.

4.4 Internal Communication

4.4.1 It will be the responsibility of the Contractor(s) to ensure that the environmental issues and protocols related to the works are communicated to all staff, and that the staff on site adhere to the contents of the detailed CoCP.

4.4.2 It will be the responsibility of the Contractor(s) to ensure that an appropriate communication matrix is implemented throughout the works for the proposed Development. Prior to, and during, the works the Contractor(s) will communicate to all personnel on site:

- Site specific environmental information which all personnel should be aware of;
- Details of the detailed CoCP and associated emergency response procedures;
- Details of any pending/actual enforcement action; and
- Any other specific environmental requirements relating to the site.

4.4.3 As the construction of the proposed Development progresses, should updates be required to the detailed CoCP(s) or their associated appendices, it will be the responsibility of the Contractor to provide the Applicant with any proposed amendments. In addition, the Contractor(s) will also communicate any environmental incidents or issues associated with the environmental monitoring throughout the works.

4.4.4 Monthly contract review meetings will be undertaken, during these meetings the following will be reviewed:

- Environmental requirements;
- Objectives and targets for the works (including environmental) to ensure that targets are being met; and
- A review of all environmental incidents and any non-compliances, the purpose of which will be to ensure that appropriate actions have been undertaken to rectify these matters.

5 Demolition and construction information

5.1 Demolition and Construction Works

5.1.1 Demolition and construction is assumed to include the following mix of activities:

- Demolition and site clearance;
- Enabling works, including site preparation (excavation and grading);
- Provision of infrastructure, distributor and estate roads, footpath/cycleway links, mains drainage and other services;
- Diversion and under-grounding of utilities and installation of new services;
- Completion of green infrastructure; and

5.1.2 Construction of buildings/groups of buildings, parking and other hard surfaced areas followed by finishing and fitout. Plan OPM(P)4004_L – Indicative Phases is submitted in support of the outline application. This plan supports the Parameter Plans, is indicative, and does not commit to a certain phasing of the development. The plan represents a subdivision of the masterplan primarily to assist the understanding of the specific geographic points in the specification and provide descriptions with a cross reference to the parameter plans. The detail of each phase will come forward at Tier 2 and 3 consenting stages.

5.2 Demolition and Construction Equipment

5.2.1 The details of equipment requirements are not yet known. The following plant are likely to be used:

- Tracked/wheeled 360 degree excavators;
- Excavator mounted hydraulic breakers;
- Excavator mounted hydraulic crushers;
- Dumpers;
- Concrete crushing plant;
- Mobile craneage/ tower cranes;
- Eight-wheeler trucks;
- Air compressors;
- Diamond cutting tools / saws;
- Hand held tools including breakers (pneumatic and hydraulic);
- Power tools including percussion drills, cutting disks, pipe-threaders;
- Hand /power tools;
- Wheel washing plant;
- Scaffold;
- Mobile access platforms;
- Delivery trucks (drive by);

- Skips and skip trucks;
- Forklift trucks; and
- Sheet piling.

5.3 Licences and Consents

5.3.1 The Contractor will seek to obtain consents from the relevant local authority where necessary under S61 of the Control of Pollution Act 1974 for the proposed construction works, excluding non-intrusive surveys. Applications will include details on proposed working hours.

5.3.2 Any conditions included in consents/licences/permits will be documented in the detailed CoCP(s) and considered as part of the planning, design and construction process.

5.3.3 A copy of all relevant environmental applications and consents/authorisations is to be kept in a project environmental file and copies provided to the Applicant of all applications and consents/authorisations as soon as practical after submission and receipt.

5.3.4 Refer to Section 0 for further information on ecological licence requirements.

5.4 Contractor's Method Statements

5.4.1 The Contractor(s) will set out the procedures to be followed for construction operations in method statements that will address health, safety, site security and the environmental issues associated with construction operations. The operations requiring a method statement will be identified using a risk-based approach. As a minimum, method statements will be prepared for site preparation, construction activities and reinstatement of land and/or infrastructure following completion of the main construction works.

5.4.2 Method statements will define any specific environmental control measures to be implemented to meet the requirements of this Outline CoCP and will consider the cumulative effects of concurrent construction activities.

5.4.3 The Contractor's approach to method statements will be reviewed and accepted by the Applicant. An assurance programme will be established by the Contractor to monitor compliance with these planned arrangements.

5.5 Considerate Constructors Scheme

5.5.1 Each Principal Contractor engaged for the proposed Development will be required to manage the site and achieve formal certification under the Considerate Constructors Scheme (CCS), operated by the Construction Federation.

5.6 Training and Awareness

5.6.1 All Construction staff (and subcontractors) will complete general environmental awareness training as part of the site induction process including their responsibilities under the CoCP. The training will ensure that all personnel understand their obligation to exercise due diligence for environmental matters. Suitable induction training and on-going programmes of environmental training will, as a minimum, include;

- Importance and relevance of the CoCP;
- Roles and responsibilities in relation to compliance with consents and designations, permits and operating procures;
- Location of sensitive receptors and areas of high environmental value;
- Familiarisation with site environmental controls;
- Spill response and emergency procedure;
- Hazard and risk management to ensure personnel understand the potential impacts and proposed mitigation measures; and
- Community 'complaints management procedure.

5.6.2 The Contractor(s) will be responsible for identifying the training needs of their personnel to enable appropriate training to be provided and will engage suitably qualified and experienced professionals for this purpose. The training will include site briefings and toolbox talks to equip relevant staff with the necessary level of knowledge on health, safety, community relations and environmental topics, and an ability to follow environmental control measures and to advise employees of changing circumstances as work progresses.

5.7 Hours of Working

5.7.1 Normal working hours will be:

- 08:00-18:00 Monday to Friday;
- 08:00 – 13:00 Saturdays; and
- No working on Sundays, Bank Holidays or other public holidays.

5.7.2 Under special circumstances it may be necessary to work outside of these hours. In such cases, the scope of works and durations of activities will be agreed with F&HDC beforehand.

5.8 Construction Compound Selection

5.8.1 Construction of the proposed Development will require the establishment of a number of construction compounds to accept material deliveries, provide distribution of plant and equipment and provide office and welfare facilities for workers and a base for vehicle recovery.

5.8.2 These locations will need to be located in such a way to allow easy access and egress from site. These locations have not yet been identified for the proposed Development.

5.8.3 The actual sites to be used and the period they are required for will be selected by the Contractor(s) on the basis of:

- Location - A suitable compound location will be necessary to service the works in the local area. This minimises travelling time and associated carbon output;
- Construction schedule – Subject to development of the detailed construction programme, other compounds may only be required for part of the overall construction period (while the works in the adjacent area are undertaken);
- Access – are there any existing compound areas that could be used;

- Environmental issues – Consideration of environmental impact of proposed sites (e.g. presence and maintenance of any sensitive ecology, or heritage assets) and avoidance of any areas of retained habitats and advanced planting.
- Contamination – Prior to a construction compound area being prepared, a baseline survey would be undertaken to determine the current land quality across the compound area.

5.8.4 Details of construction compounds will be provided at Tier 3 of the application.

5.9 Material Storage and Compound Areas

5.9.1 Measures will be put in place to provide for:

- The safe handling and storage of fuel chemicals and potential contaminants; and
- To protect soil and controlled waters from contamination.

5.9.2 A secure and bunded storage area will be located on-site and will be provided for the duration of the construction period. Plant and equipment will be stored in areas which are less susceptible to possible pollution incidents, or in dedicated areas of hard standing. Spill kits will be available for use in the event of an incident.

5.9.3 All deliveries will be supervised by a responsible person. Any fuel deliveries will take precautions to ensure that fuel storage tanks are checked before and during delivery to prevent overfilling.

5.9.4 Where practical, construction compounds would be located to avoid or minimise environmental and community impacts, provide the best access for personnel and deliveries in relation to major structures and worksites, and meet other construction requirements for the Project

5.9.5 Natural surveillance, i.e. the ability to see into public areas and routes during construction, should be ensured, along with appropriate fencing, signage and safety precautions.

5.9.6 Construction compounds would be located away from PRoWs, National Trails and cycle routes where practicable. Landscaping would be strategically used in order to reduce the visual impact of construction compounds on neighbouring land uses (such as residential properties) as well as for users of PRoW, in addition to reducing noise impacts.

5.9.7 Further details related to material storage and compound areas will be provided at Tier 3 of the application.

5.10 Haul Routes

5.10.1 Routing and access of construction vehicles and haul roads has not yet been determined. This will be determined on a phase by phase basis during Tier 3 applications.

5.10.2 For the purpose of this assessment it has been assumed that any of the public highways up to 500m from the proposed Development could be used for construction access. A Construction Traffic Management Plan will be provided to identify appropriate routing for Heavy Goods Vehicles via the M20 and A20, avoiding existing settlements where possible and minimising noise and air quality impacts.

5.11 Wheel Washing Facilities

5.11.1 The wheel washing facilities will include measures such as:

- Use of recycled water where possible;
- Disposal of collected debris as controlled waste at a licensed waste disposal facility; and
- Vehicles carrying spoil, loose aggregate and workings to be sheeted at all times.

5.11.2 Where works traffic has to use public highways the Principal Contractor will take necessary precautions to prevent damage to roads and footpaths.

5.11.3 Details relating to wheel washing facilities will be provided at Tier 3 of the application.

5.12 Security and Health and Safety Arrangements On-site

5.12.1 Construction worksites will be under the control of the Contractor(s), who has a statutory duty to prevent unauthorised access to the Site. The Contractor(s) will carry out site specific assessments of the security and trespass risk at each site and implement appropriate control measures.

5.12.2 Security operations will be developed and implemented in accordance with the latest British Standards applicable to the Security Industry i.e. BS 7858:1996 and BS 7499:1998; and full compliance with the Private Security Industry Act 2001. The general security of the site falls into two main categories:

- Maintaining a secure perimeter; and,
- Preventing unauthorised access.
- Measures implemented by the Contractor(s) to prevent unauthorised access to the site may include:
- Use of high perimeter fencing or hoarding but only where necessary for site security and public safety;
- Lighting at site perimeters (designed as per the lighting specification set out above);
- Security guards and patrols;
- CCTV and infrared surveillance, computerised access control systems and alarm systems where required;
- Communications initiatives for local schools to warn of dangers;
- Consultation with neighbours on site security matters;
- Consultation with local crime prevention officers on security proposals for each site with regular liaison to review security effectiveness and response to incidents; and
- Immobilisation of plant out of hours, removing or securing hazardous materials from site, securing fuel storage containers and preventing unauthorised use of scaffolding to gain access to restricted areas and neighbouring properties.

5.12.3 The control measures will take into account any PRoW on site that remain open during construction, and ensure appropriate measures are implemented to ensure the safety of PRoW users.

5.13 Pest Control

5.13.1 Measures will be implemented to ensure that the risk of infestation by pests or vermin is minimised through the timely disposal of food wastes or other material attractive to pests. If any infestation occurs, the Site Manager (or nominated representative) will implement corrective measures/actions to deal with the infestation as required by the Council's Environmental Health Officer.

5.14 Unexploded Ordnance

5.14.1 The site is located in an area at risk of Unexploded Ordnance (UXO). Prior to excavation works in the medium and high UXO risk areas and especially in the area where pipe mines were installed, further assessment would be undertaken to establish the accurate UXO risk. This may involve both non-intrusive (desk based and geophysical surveys) and intrusive surveys (excavations to determine if objects are UXO). The process to establish the UXO risk and remove any devices encountered would be undertaken in a systematic approach as detailed in a UXO Mitigation Strategy at Tier 3. This strategy needs to be agreed with the local planning authority and relevant organisations prior to implementation.

5.15 Lighting

5.15.1 Site lighting and signage will be provided by Contractor(s) to enable the safety and security of the construction sites. Lighting will also be designed, positioned and directed so as not to intrude unnecessarily on adjacent buildings, ecological receptors, structures used by protected species and other land uses to prevent unnecessary disturbance, interference with local residents, railway operations, or passing motorists. This provision will apply particularly to sites where night working will be required. In addition, at construction sites where potentially significant impacts are identified, the Contractor will develop and implement lighting controls as part of their detailed CoCP.

5.15.2 Where appropriate, lighting to site boundaries will be provided and illumination will be sufficient to provide a safe route for the passing public. Motion sensor lighting will be used where appropriate to prevent unnecessary usage. The final lighting scheme to be implemented by the Contractor(s) will be required to comply with the latest British Standards relating to lighting.

5.16 Emergency Procedures

5.16.1 Procedures will be set in place to respond to any emergency incidents that may occur on-site, it will be the responsibility of the Principal Contractor to ensure that suitable procedures are in place. This will include items such as accidents on site environmental hazards (Flooding, heavy rain, high winds) and other risks that may occur on site. It will specifically include a site pollution incident response plan, to be developed by the Principal Contractor prior to works commencing on site.

5.16.2 All appropriate staff will be trained and made aware of the spill contingency plan set in place. In the event of any incident, the Developer will be notified. Additionally, the Environment Agency and any other interested bodies will be notified as required.

5.17 Utilities

5.17.1 Measures will be implemented by the Principal Contractor to ensure the safety of works in the vicinity of utilities.

5.18 Emergency Access

5.18.1 The Contractor(s) will ensure that the requirements of the relevant fire authority will be followed for the provision of site access points. The accesses may vary over time and will be updated as required and should also be suitable for emergency services.

5.19 Fire Protection and Control

5.19.1 The Contractor(s) will ensure that appropriate plans and management controls are in place for all construction sites,

6 General Requirement by Environmental Topics

6.1 Introduction

6.1.1 This chapter of the CoCP details the environmental mitigation measures identified in the Environmental Statement that are required to be incorporated by the Contractor(s) in their detailed CoCP, identifying appropriate measures to provide the required mitigation. The Contractor(s) shall also incorporate relevant best practice measures in addition those listed below.

6.2 Agriculture and Soils

6.2.1 Measures will be implemented to mitigate impacts to agricultural land and agricultural businesses. These comprise implementation of a Soil Resources Plan and Soil Management Plan.

6.2.2 The sustainable use of the soil resource would be undertaken in line with the Construction Code of Practice for the Sustainable Use of Soil on Construction Sites (Ref. 1). This would be achieved by the development of a Soil Resources Plan (based on a detailed pre-construction soil survey) and a Soil Management Plan (SMP) to identify the soils present, proposed storage locations and handling methods and how the resource will be re-used. The SMP, associated SRP, would form part of the Detailed CoCP. Measures which would be implemented include (but are not limited to):

- Completion of a Soil Resources Survey and incorporate results into a SMP;
- Link the SMP to the Site Waste Management Plan (SWMP);
- Ensure soils are stripped and handled in the driest condition possible and bunded/scraped to relevant degree to allow surface water run-off;
- Only stockpile reusable soil for durations in line with the Environment Agency standards;
- Ensure that, where possible, all soil for reuse is stored on the relevant parcels of land. (i.e. soil won from housing parcels will be left stored correctly for reuse by the housebuilder);
- Clear segregation of parcel stockpiles to avoid cross contamination and damage;
- Ensure any main stockpile material (not on parcel) is managed by qualified contractors and any reused material issued to housebuilders has relevant transfer note as per EA requirements.

6.2.3 A target of 50% GI has been set for the proposed Development, including habitats, playing fields, amenity, parks, allotments, orchards and cemeteries. Implementation of appropriate soil handling and re-use measures would ensure that the soils used across the site in these areas would be of the required characteristics and in the required condition to support a variety of specified activities. These include:

- For example, surplus nutrient-poor soils (topsoil or subsoil) would be re-used in areas of habitat creation (to enable the establishment and sustainability of species-rich habitats) whilst surplus nutrient-rich soils would be prioritised for areas designated for food

production or in areas of landscape planting. This will ensure that the retained soils can continue to provide a range of valuable ecosystem services.

- All soils would be stored away from watercourses (or potential pathways to watercourses) and any potentially contaminated soil would be stored on an impermeable surface and covered to reduce leachate generation and potential migration to surface waters.
- Industry standard measures would be put in place to control pollution, including from fuel or chemical stores, silt-laden runoff or dust.
- A considerate construction approach would be used to minimise potential impacts on the remainder of the landholding and on neighbouring landholdings agricultural enterprises during the construction phase, including during different phases of the Development (for example ensuring continuation of livestock drinking water supplies).
- Toolbox talks would be used to inform all those working on the site of the requirements for soil handling and minimisation of disturbance to neighbouring agricultural activities.
- All fencing around the proposed development would be sufficient to resist damage by livestock and will be regularly checked and maintained in a suitable condition. Any damage to boundary fencing would be repaired immediately.
- Measures contained in relevant Defra and Environment Agency best practice guidance documents on the control and removal of invasive weed species would be implemented where appropriate.
- Works would cease, and the Animal Health Regional Office would be advised, should animal bones be discovered which indicate a potential burial site.
- All movement of plant and vehicles between fields would cease in the event of a disease outbreak and official Defra advice would be followed to minimise the biosecurity risk associated with the continuation of works.

6.3 Air Quality

6.3.1 The IAQM Guidance (Ref. 2) on the assessment of dust from demolition and construction provides potential mitigation measures to reduce impacts as a result of fugitive dust emissions during the construction phase. Therefore, those mitigation measures detailed in the guidance commensurate with a high risk site should be adopted, and are set out in Table 3.

Table 3 Dust Mitigation Measures

Mitigation Measure	High Risk Measures H=Highly recommended D=Desirable
Communications	
Develop and implement a stakeholder communications plan that includes community engagement before work commences on site.	H
Display the name and contact details of person(s) accountable for air quality and dust issues on the site boundary. This may be the environment manager/engineer or the site manager.	H

Mitigation Measure	High Risk Measures H=Highly recommended D=Desirable
Display the head or regional office contact information.	H
Dust Management	
Develop and implement a Dust Management Plan (DMP), which may include measures to control other emissions, approved by the Local Authority.	H
Site Management	
Record all dust and air quality complaints, identify cause(s), take appropriate measures to reduce emissions in a timely manner, and record the measures taken.	H
Make the complaints log available to the local authority when asked.	H
Record any exceptional incidents that cause dust and/or air emissions, either on- or off-site, and the action taken to resolve the situation in the log book.	H
Hold regular liaison meetings with other high risk construction sites within 500m of the site boundary, to ensure plans are co-ordinated and dust and particulate matter emissions are minimised. It is important to understand the interactions of the off-site transport/ deliveries which might be using the same strategic road network routes.	H
Monitoring	
Undertake daily on-site and off-site inspection, where receptors (including roads) are nearby, to monitor dust, record inspection results, and make the log available to the Local Authority when asked. This should include regular dust soiling checks of surfaces such as street furniture, cars and window sills within 100m of site boundary, with cleaning to be provided if necessary.	H
Carry out regular site inspections to monitor compliance with the DMP, record inspection results, and make an inspection log available to the local authority when asked.	H
Increase the frequency of site inspections by the person accountable for air quality and dust issues on site when activities with a high potential to produce dust are being carried out and during prolonged dry or windy conditions.	H
Agree dust deposition, dust flux, or real-time PM_{10} continuous monitoring locations with the Local Authority. Where possible, commence baseline monitoring at least three months before work commences on site or, if it a large site, before work on a phase commences. Further guidance is provided by IAQM on monitoring during demolition, earthworks and construction.	H
Preparing and maintaining the site	
Plan site layout so that machinery and dust causing activities are located away from receptors, as far as is possible.	H
Erect solid screens or barriers around dusty activities or the site boundary so that are at least as high as any stockpiles on site.	H
Fully enclose site or specific operations where there is a high potential for dust production and the site is active for an extensive period.	H
Avoid site runoff of water or mud.	H
Keep site fencing, barriers and scaffolding clean using wet methods.	H
Remove materials that have a potential to produce dust from site as soon as possible, unless being re-used on site. If they are being re-used on-site, cover as described below.	H
Cover, seed or fence stockpiles to prevent wind whipping.	H

Mitigation Measure	High Risk Measures H=Highly recommended D=Desirable
Operating vehicle/machinery and sustainable travel	
Ensure all vehicles switch off engines when stationary - no idling vehicles.	H
Avoid the use of diesel or petrol powered generators and use mains electricity or battery powered equipment where practicable.	H
Impose and signpost a maximum-speed-limit of 15mph on surfaced and 10mph on unsurfaced haul roads and work areas (if long haul routes are required, these speeds may be increased with suitable additional control measures provided, subject to the approval of the nominated undertaker and with the agreement of the Local Authority, where appropriate).	H
Produce a Construction Logistics Plan to manage the sustainable delivery of goods and materials.	H
Implement a Travel Plan that supports and encourages sustainable travel (public transport, cycling, walking, and car-sharing).	H
Operations	
Only use cutting, grinding or sawing equipment fitted or in conjunction with suitable dust suppression techniques such as water sprays or local extraction, e.g. suitable local exhaust ventilation systems.	H
Ensure an adequate water supply on the site for effective dust/particulate matter suppression/mitigation, using non-potable water where possible and appropriate.	H
Use enclosed chutes and conveyors and covered skips.	H
Minimise drop heights from conveyors, loading shovels, hoppers and other loading or handling equipment and use fine water sprays on such equipment wherever appropriate.	H
Ensure equipment is readily available on site to clean any dry spillages, and clean up spillages as soon as reasonably practicable after the event using wet cleaning methods.	H
Waste Management	
Avoid bonfires and burning of waste materials.	H
Demolition	
Soft strip inside buildings before demolition (retaining walls and windows in the rest of the building where possible, to provide a screen against dust).	H
Ensure effective water suppression is used during demolition operations. Hand held sprays are more effective than hoses attached to equipment as the water can be directed to where it is needed. In addition, high volume water suppression systems, manually controlled, can produce fine water droplets that effectively bring the dust particles to the ground.	H
Avoid explosive blasting, using appropriate manual or mechanical alternatives.	H
Bag and remove any biological debris or damp down such material before demolition.	H
Earthworks	
Re-vegetate earthworks and exposed areas/soil stockpiles to stabilise surfaces as soon as practicable.	H
Use Hessian, mulches or trackifiers where it is not possible to re-vegetate or cover with topsoil, as soon as practicable.	H

Mitigation Measure	High Risk Measures H=Highly recommended D=Desirable
Only remove the cover in small areas during work and not all at once.	H
Construction	
Avoid scabbling (roughening of concrete surfaces) if possible.	H
Ensure sand and other aggregates are stored in bunded areas and are not allowed to dry out, unless this is required for a particular process, in which case ensure that appropriate additional control measures are in place.	H
Ensure bulk cement and other fine powder materials are delivered in enclosed tankers and stored in silos with suitable emission control systems to prevent escape of material and overfilling during delivery.	H
For smaller supplies of fine power materials ensure bags are sealed after use and stored appropriately to prevent dust.	D
Trackout	
Use water-assisted dust sweeper(s) on the access and local roads, to remove, as necessary, any material tracked out of the site. This may require the sweeper being continuously in use.	H
Avoid dry sweeping of large areas.	H
Ensure vehicles entering and leaving sites are covered to prevent escape of materials during transport.	H
Inspect on-site haul routes for integrity and instigate necessary repairs to the surface as soon as reasonably practicable.	H
Record all inspections of haul routes and any subsequent action in a site log book.	H
Install hard surfaced haul routes, which are regularly damped down with fixed or mobile sprinkler systems, or mobile water bowsers and regularly cleaned.	H
Implement a wheel washing system (with rumble grids to dislodge accumulated dust and mud prior to leaving the site where reasonably practicable).	H
Ensure there is an adequate area of hard surfaced road between the wheel wash facility and the site exit, wherever site size and layout permits.	H
Access gates to be located at least 10m from receptors where possible.	H

6.4 Biodiversity

6.4.1 In order to mitigate biodiversity effects during construction, a number of measures are required. In general terms these comprise the following:

- Appropriate measures are put in place to protect water quality in the East Stour watercourse and its tributaries. This would also protect downstream habitats.
- Appropriate measures are put in place to control dust and other emissions that could affect air quality.
- Site compounds, storage facilities and staff facilities are suitably bunded and located in places that would not have an adverse effect on the environment; in particular, retained habitats are protected.
- In advance of site clearance, protective fencing is installed to protect retained and/or ecologically sensitive habitats (the watercourse, mature trees and hedgerows) and their associated buffer zones to ensure that they are not subject to accidental damage.
- Haul routes, storage compounds and staff facilities would be located away from retained habitats to minimise disturbance to the species they support.
- Pre-construction surveys are carried out by an ecologist to confirm the nature and extent of any ecological constraints in advance of site clearance, to ensure that appropriate mitigation measures including licences are in place in advance of site clearance, and to confirm that no new constraints have arisen since the publication of the Environmental Statement.
- An ecological clerk of works is in place to oversee site clearance, in particular any works that have the potential to disturb notable ecological features. They would also ensure that the mitigation measures proposed adhere to best practice guidelines and take account of any changes in legislation that may have occurred.
- To avoid impacts on breeding birds, works close to retained habitats would commence outside of the bird breeding season (i.e. they would commence in the period between the months of September and February, inclusive). Where this is not possible, specialist ecological supervision would be provided to confirm the absence of nesting birds prior to vegetation removal and ensure the protection of any confirmed nesting sites. Should the presence of nesting birds be established, buffer zones would be fenced to ensure the birds are not disturbed and works would cease in the locality until the young birds have fledged. Note: the area of buffer zones for ground nesting species such as skylark may exceed a 50m radius.
- In advance of construction, bird nesting boxes would be installed in the hedgerows and on retained trees, in suitable locations away from the construction. This would ensure alternative nesting opportunities are provided to mitigate for any disturbance effects.
- Prior to any removal of hedgerows, pre-construction checks for any species of conservation concern, such as reptiles and hedgehogs, would be undertaken. Any features of value to hibernating reptiles would not be disturbed during the reptile hibernation period (October through to March). Should hedgehog(s) be found at this time, they would be moved to a safe location.

- The construction site drainage solutions would incorporate measures to ensure that all surface water runoff is balanced and treated and returned to the watercourse at greenfield runoff rates.
- Care is taken with the design of site drainage to prevent unbalance of and untreated silt laden surface water runoff from entering retained habitats.
- If night-time construction lighting is required, it would be kept away from the watercourses and the hedgerows, during the period April to November when bats are active.
- Schedule 9 plants (invasive species) are not allowed or caused to spread within or outside of the proposed development area:
- An ecological clerk of works would be employed to ensure that the ecological protection measures outlined in the CoCP are adhered to. They would also undertake regular monitoring to ensure that the protection measures remain in place for the time that they are required.
- The Ecological Clerk of Works would report to the site Manager and Environmental site Manager/Clerk of Works to ensure that remedial actions are undertaken in a timely manner.

6.4.2 In addition to the measures outlined above the following measures are required, and discussed further in the below paragraphs:

- Habitats:
  - Bespoke method statements and translocations;
  - Additional habitat surveys;
- Species:
  - Additional species surveys;
  - Licences; and
  - Bespoke method statements and translocations.

Habitats

6.4.3 In advance of site clearance, protective fencing will be installed to protect retained/ translocated and/or ecologically sensitive habitats (the watercourse, mature trees and hedgerows, prevention of spread /eradication of non-native invasive species) and their associated buffer zones to ensure that they are not subject to accidental damage. For trees, where appropriate, this should be as specified within the appropriate AIA (Arboricultural Impact Assessment), likely to be required at Tier 3 of the Application process. An ecological clerk of works would supervise the works to ensure that the method statements were adhered to. The method statements and translocation works would be included as part of the Detailed CoCP, likely to be required at Tier 3 of the planning process.

6.4.4 Additional habitat surveys are required to inform construction mitigation, these are set out in Table 4. It is anticipated that these surveys would be completed at Tier 3.

Table 4 Details of future habitat surveys required

Species	Further surveys required
Habitats general	It may be necessary to update the surveys should site conditions change, and to update the habitat information throughout the extended buildout process. The management of the site will be monitored to ensure that where possible, the site continues to be managed as it currently is to maintain the status on the site.
Invasive non-native plants	Update surveys may be required to determine the distribution of invasive non-native species within the site and to inform eradication / mitigation plans.
Trees and arboriculture	At the reserved matters (Tier 3) application stage of the planning process, it will be necessary to fully evaluate the quality of the tree stock and tree numbers by carrying out a detailed Arboricultural survey in line with BS 5837: 2012. This would be a pre-requisite of any detailed planning application and complying with the F&HDC Local Plan. Given the scale of the proposed development and uncertainty over specific proposed development plots at outline planning application stage, more detailed information would be provided at the reserved matters application stage, as agreed with F&HDC / KCC. An Arboricultural Impact Assessment (AIA) will also be required once detailed design footprints are available to assess the impacts and any required tree removal, protection required for protection for the trees to be retained, and a tree replacement strategy. A full topographical survey would be required to accurately complete the AIA report. Within the area supporting the traditional orchard, there may be a need for further surveys prior to development occurring in this area. These may include surveys for veteran trees and surveys for saproxylic species. There may also be a requirement to take scionwood for propagation of the cultivars to preserve cultural heritage. This would need to be determined in liaison with appropriate stakeholders, once access to this area is permitted at the appropriate juncture in the planning process (likely when reserved matters for proposed development in this area are being addressed)

Species

6.4.5 In order to inform the planning process and mitigation, a range of further surveys are considered to be required. The surveys which are considered likely to be required are presented in Table 5 below. Recommended survey timings are presented in Figure 1, and are anticipated to be completed at Tier 3.

Table 5 Further surveys required throughout the planning and construction process

Species	Further surveys required
Invertebrates	The vast majority of the habitats that have potential for invertebrates are being retained further detailed surveys are not deemed necessary to inform the masterplan design or ES. There are a small number of areas which would benefit from further survey to inform the detailed design for the subsequent detailed planning applications (at Tier 3) and to provide a baseline. Due to the extended timeframe for build out of the proposed Development (at least 19 years in duration), the timing of the surveys should be aligned with the detailed design.

Species	Further surveys required
	While the Folkestone Racecourse Lake is being retained, there will be landscaping around the northern and southern margin. This work would need to be proceeded by detailed surveys, which should be conducted at an appropriate time in the planning process. If any modification works are required within this area, detailed invertebrate surveys may be required to inform the detailed planning, design and mitigation. There was a limited resource of bare ground habitat, largely isolated areas within the site's grassland and scrub habitat. There are some large, predominantly bare mounds and areas of bare ground in the grassland surrounding these mounds north of the Link Park area (TN165 and 167 in ES Appendix 7.5). Ground nesting solitary bees (probably *Lasioglossum* spp.) were observed to be active in this area. It may be necessary to conduct invertebrate surveys to inform detailed design and mitigation prior to proposed development within this area. There were also significant areas of bare ground in the disused lorry park (TN180 and 182 in ES Appendix 7.5), but minimal aculeate (barbed invertebrates such as bee and wasps) activity was observed in this area. Surveys, where required should be conducted at an appropriate stage of the planning process. Standardised pond netting and sweeping/beating of marginal vegetation based surveys should be undertaken in May, June and July.
Badger	Considering the extended timescales for buildout of the project, it is considered that further survey and input will be required to inform mitigation proposals. Further surveys are likely to be required where significant sett disturbance/destruction is deemed necessary. Bait marking surveys may be required to inform the detailed planning of the proposed development. Bait marking is a technique that relies upon badgers marking their territorial boundaries with latrines. Bait is placed outside the main sett, with indigestible coloured markers within it. Then when the badger later defecates, coloured markers allow the surveyor to trace which main sett the badger belongs to and therefore map clan distribution. Bait marking surveys may also be conducted to help further determine the boundaries of different clan territories. Considering the high density of main setts within the site recorded during the 2016–2020 surveys, it is considered that the proposed development could affect the behaviour and territories of social groups. It is likely that this will need to be understood within the detailed planning of mitigation for each proposed development parcel. Bait marking is also likely to be required to establish if there are alternative neighbouring setts that badgers could colonise if destruction of the current sett they occupy is deemed necessary and could also help to determine the most suitable locations for mitigations e.g. replacement artificial setts, if required. Camera trapping to assist the surveys may also be required, camera traps may be used to monitor the use setts and determine the significance of the sett to a clan.
Bats	Bat surveys referred to within this document are considered sufficient to inform the EIA, masterplan design, and outline planning. However, due to the evolution of the detailed design and the requirement for an extended build out, subsequent surveys are likely to be required. These surveys will inform detailed planning and construction mitigation and avoidance. This section of the report outlines the survey work likely to be required as the

Species	Further surveys required
	proposed development progresses. The following surveys are likely to be required during the buildout: • As the masterplan evolves into a detailed design, additional areas may require scoping for potential impacts to bats. • Further 'preliminary roost assessment' surveys of structures (PRA), as access to previously inaccessible areas is obtained. • Once detailed design is finalised, hibernation surveys may be required on buildings to be removed which have been identified as having hibernation potential during the building assessments (where safe to do so) ES Appendix 7.12. • Further, and more detailed PRA and subsequent emergence / re-entry surveys to identify roosts to safeguard individual roosts (of structures to be removed, once this is known). These should be timed appropriately and be designed to ensure that sufficient data can be collected to allow a licence from Natural England to be obtained (determined by the current best practice and licence guidelines at the time of the development); • No tree roosting potential has been considered to date. Assessment of the roosting potential of trees, especially those identified within these surveys as likely to support bat roosts; once the details of tree impacts and removal is known. Followed requirement for emergence / re-entry surveys where required. • Monitoring of the bat usage of the site may need to be conducted, to inform detailed design and the success of avoidance mitigation for existing roosts and communing corridors.
GCN	The requirement for further survey at later stages of the planning process will be determined by the details of the proposed development, and the mitigation approach determined. If an individual licence approach (or site wide licence) is determined to be the most appropriate mitigation strategy for a given parcel, updated population surveys may be required but should be considered in line with NE's relatively new planning policy implementation approach which allows more holistic decisions to be undertaken.
Water vole	Updated water vole surveys are likely to be required to inform the licencing to facilitate water vole mitigation and for detailed design iteration. The need for further survey would be monitored throughout the build out process.
Birds (wintering and breeding), reptiles	Due to the extended build out of the project, surveys to update the baseline information on the site may be required throughout the buildout of the site, in relation to changing site habitats.

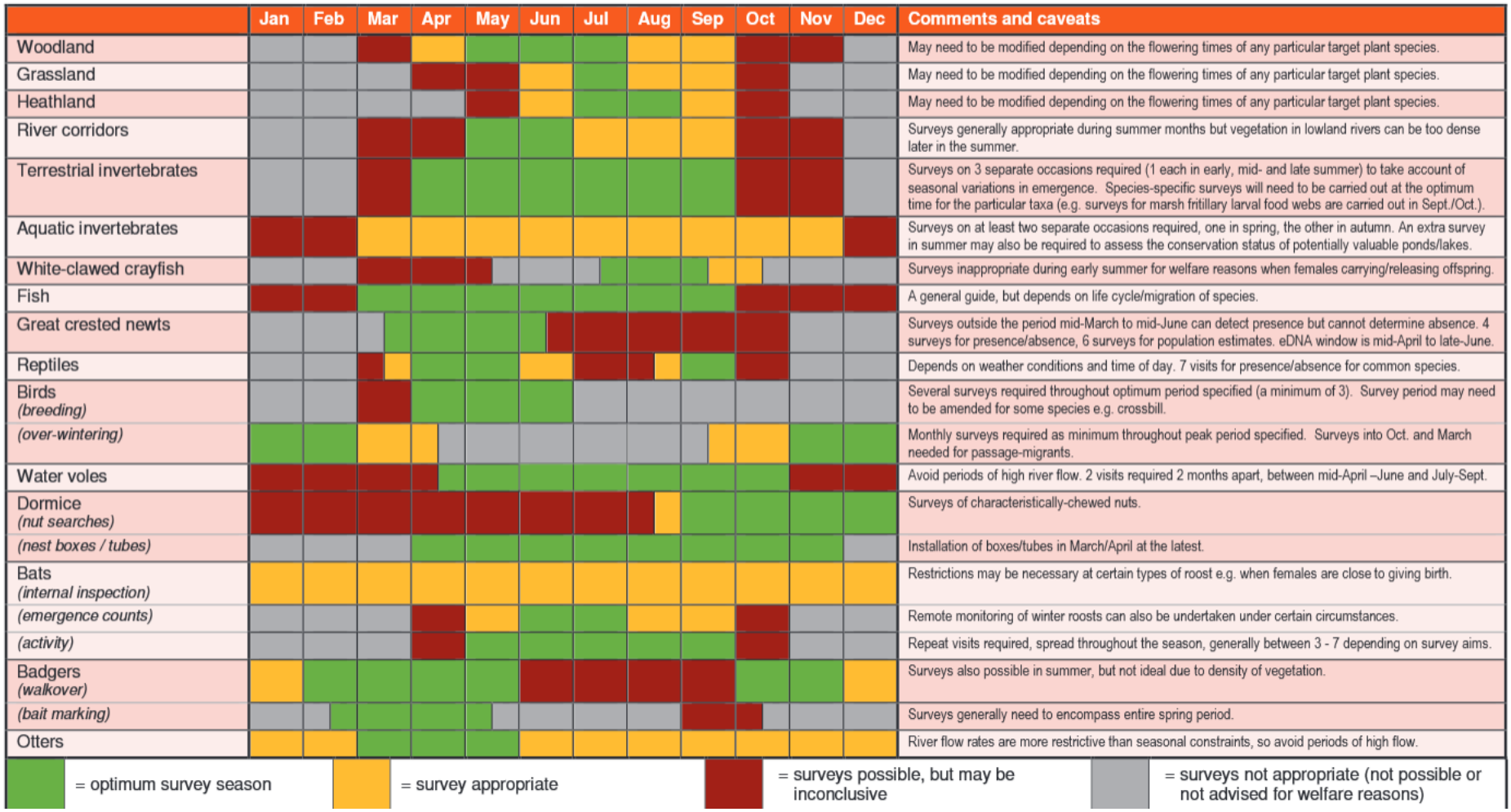


Figure 1 Species survey timings

6.4.6 As a component of the construction phase of the proposed development, a number of protected species licenses are likely to be required. These will need to be obtained from Natural England. The timing of the application for these licences will depend upon the exact chronology of the buildout. The licences considered likely to be required in relation to the project are presented in Table 6 below. Mitigation timings are presented in Figure 2.

Table 6 Licences for protected species that may be necessitated during the construction phase of the proposed development

Species	Licence requirement	Licence type	Notes
Great crested newts	Confirmed	Derogation licence	The exact licensing approach will depend upon the regulatory framework in place at the time of application.
Badgers	Confirmed	Licence to interfere with setts for development purposes	Setts will need to be closed to enable the proposed development (although the design has been iterated to avoid impacts).
Bats	Confirmed	Derogation licence	For the removal of structures and / or trees where bat roosts are present. Additional roosts may be identified which will require licensing.
Water voles	Confirmed	Conservation licence	Translocation and displacement will be required from ditch 1 and potentially areas of the East Stour River.
Kingfisher	Potential	Conservation licence	To be avoided. The progression of works and the Noise Mitigation and Management Plan should avoid the need to obtain this licence.
Barn owl	Potential	Conservation licence	To be avoided. The progression of works and the Noise Mitigation and Management Plan should avoid the need to obtain this licence.

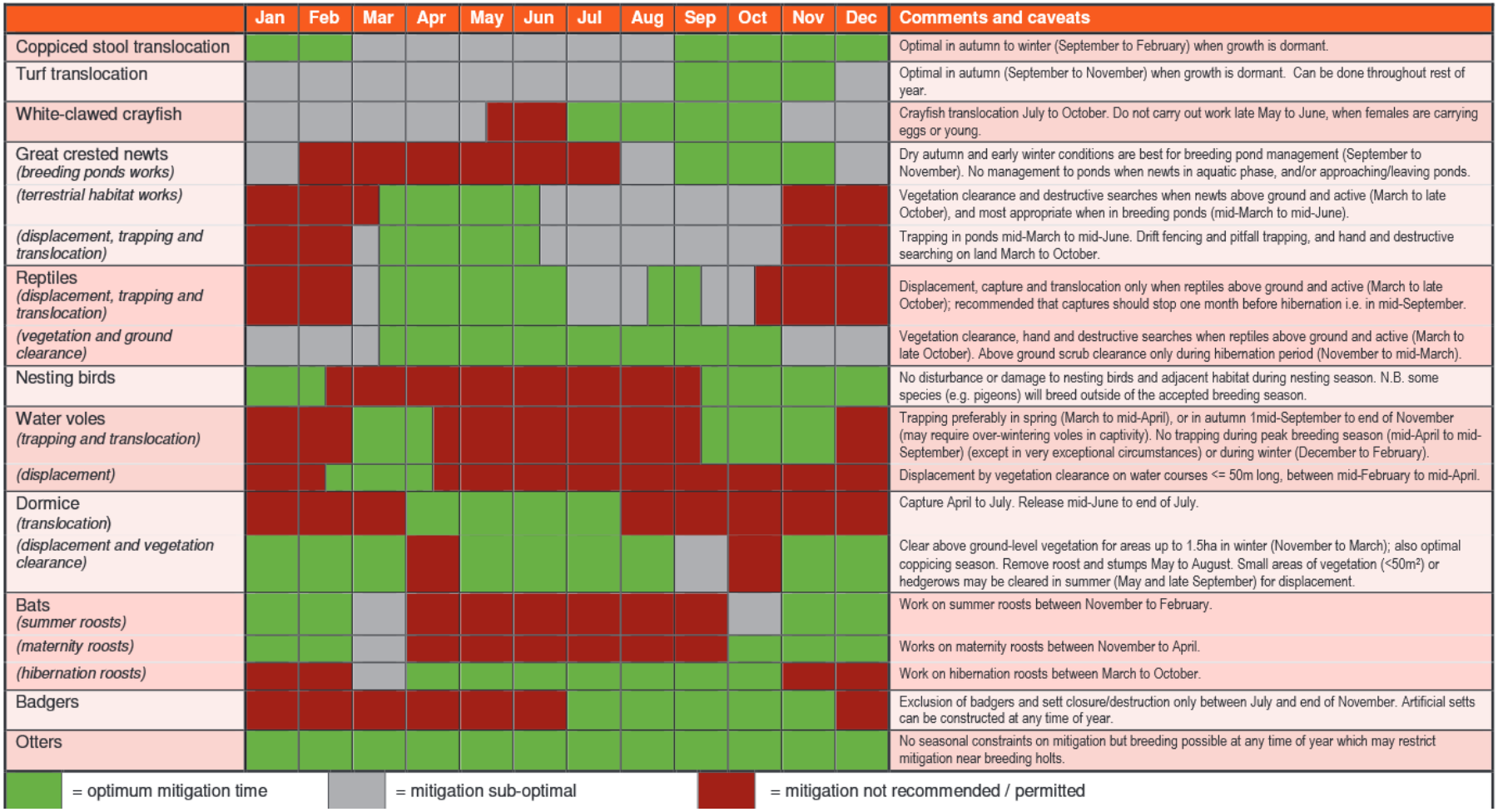
6.4.7 Where impacts to legally protected or notable species cannot be fully mitigated through design, a range of approaches to limiting impacts to these species from construction impacts are proposed. These are specified in detail in each of the dedicated species survey reports, presented in ES Appendix 7.3 – 7.17. A summary is provided in below in Table 7 which proposes more detailed measures that would be required for the Detailed CoCP at the reserved matters stage. The timings of the mitigation outlined within this section are presented in Figure 2.

Table 7 Summary of construction specific mitigation for species

Species	Additional construction mitigation
Invertebrates	• Clear demarcation of areas that are to be retained with minimal disturbance to the buffers. Many species of invertebrate overwinter as eggs, larvae or adults in the soil, leaf-litter, under bark, etc. so it is imperative that these habitats are not disturbed in the buffers surrounding the more important retained habitats. This would be secured in the Detailed CoCP. • Translocation of microhabitat features into retained GI where possible – including deadwood, bare earth mounds and banks etc. • Creation of invertebrate micro habitats including log piles throughout the clearance of the site.
Badger	• Displacement of badgers from setts to be removed is likely to be required. replacement setts may also be required. This is detailed in ES Appendix 7.18. • Setting appropriate offsets from any badger setts to be retained (with appropriate fencing and demarcation if required) during construction to ensure that disturbance to setts is minimised. • Ensuring that badgers are not attracted to works sites, by ensuring good housekeeping particularly with regards to storage of food and disposal of waste. • Measures should be implemented to prevent badgers becoming trapped in excavations, including covering and ramping open excavations, as necessary.
Bats	During demolition on the site, there may be a need to safeguard roosting bats within structures and trees to be removed. Mitigation for these individuals is likely to require a licence form the statutory Authority (Natural England) and may specify: • Specific timings for works; • Displacement and exclusion of bats from structures; • Supervision by a licensed ecologist of demolition works. • Suitable alternative roosting provision will also be likely to be required, which may include bat barns and houses and / or bat boxes. During the construction phase of the proposed development, a range of measures will need to be implemented to ensure that impacts to bats are minimised. Prescriptions for the provision of tool box talks for on-site contractors and staff, informing them of the legal protection afforded to bats; • Prescriptions for site lighting to minimise the impacts and disturbance to bats; • Pollution control measures; • Buffers and offsets from sensitive areas.
Dormouse	• In advance of site clearance, protective fencing is installed to protect retained and/or ecologically sensitive habitats (woodlands, mature trees and hedgerows) and their associated buffer zones to ensure that they are not subject to accidental damage (to be determined on a phase by phase basis). • An ecological clerk of works is in place to oversee site clearance, in particular any works that have the potential to disturb notable receptors. They would also ensure that the mitigation measures proposed adhere to best practice guidelines and take account of any changes in legislation that may have occurred. • The ecological clerk of works would ensure that hedgerow translocation is undertaken in accordance with an agreed method statement. They would also ensure that the retained and translocated hedgerows are monitored to ensure that they are managed appropriately.

Species	Additional construction mitigation
	• Any contractors involved in the removal or disturbance of potential dormouse habitat should be aware of the legal protection afforded to dormouse. Should a dormouse be incidentally found during works, all work in the area must stop immediately and the advice of a qualified ecologist be sought.
GCN	During detailed design and construction of the proposed development, it is likely that additional actions may be required to safeguard GCN. These actions may include: • Habitat creation plans to be evolved with the detailed design and phasing of the proposed development (i.e. outlining the habitats within the proposed development parcels) to create and enhance habitats; • Habitat manipulation to displace great crested newts into retained habitats adjacent to habitats to be removed; • Tool box talks to be created and provided to on site staff to inform them of the protected status of Great Crested Newts; • Licensed capture and translocation of GCN from areas to be lost into retained / enhanced habitats may be required, this will need to be determined in liaison with Natural England. There is potential that a small number of GCN may be moved from the pond to be lost to the newly created area in the north west, to 'seed' this area with a population of GCN, which will have connectivity to the metapopulation in the west of the site (around pond 5, 9,11 and 12). • The exact details of the additional construction mitigation for GCN will need to be determined as reserved matters applications for proposed development within the site are progressed. An outline of how mitigation for impacts to GCN are being approached is presented in ES Appendix 7.18.
Water vole	In areas where water bodies which support water vole would be removed to facilitate the proposed development, there is likely to be a requirement for measures to safeguard individual water vole and populations of water vole. These measures may include translocation (where by animals are captured and moved to newly created or enhanced habitats) or displacement (whereby animals are encouraged to move away from the works through habitat manipulation. The preferred method between these two broad options will be outlined in more detail in the water vole mitigation strategy (ES Appendix 7.18), however, it is likely that the exact methodology will need to be determined on a phase by phase and development parcel by development parcel basis, as the most appropriate option will need to be determined by: • The water vole population in the affected water bodies at the time of the mitigation implementation; • The status of adjacent water bodies, with regards to habitat, connectivity and population status; • The habitat and population status of translocation receptor areas; and • The current best practice guidelines. The broad approach to mitigation will be outlined in the Water Vole Mitigation Strategy (ES Appendix 7.18), with details applicable to each phase / parcel being finalised at the appropriate time in the planning process. It is likely that an appropriate conservation licence to conduct translocation works would need to be obtained from the relevant statutory body (Natural England). The is a risk of pollution to water bodies due to construction. This could Adversely impact the availability of foraging resources, adversely impacting the water vole population. It is therefore important that best practice industry pollution prevention measures are implemented, for example, soil would be prevented from entering the watercourses using soakaways and silt

Species	Additional construction mitigation
	fencing and all chemicals and waste materials would be stored in secure containers with drip trays etc.
Birds	All nesting birds are protected by law and the site clearance to enable the proposed development is likely to have impacts to nesting bird habitats. In addition to those general measures outlined, the following mitigation should be included: • Pre-construction nest checks for barn owl and kingfisher in particular should be undertaken where there is appropriate habit with the potential to be disturbed. • In advance of site clearance, protective fencing is installed to protect retained and/or ecologically sensitive habitats (woodlands, mature trees and hedgerows) and their associated buffer zones to ensure that they are not subject to accidental damage (to be determined on a phase by phase basis). • Haul routes, storage compounds and staff facilities would be located away from retained habitats to minimise disturbance to the species they support. • An ecological clerk of works is in place to oversee site clearance, in particular any works that have the potential to disturb notable receptors. They would also ensure that the mitigation measures proposed adhere to best practice guidelines and take account of any changes in legislation that may have occurred. An ecological clerk of works would be employed to ensure that the ecological protection measures outlined in the Detailed CoCP are adhered to. They would also undertake regular monitoring to ensure that the protection measures remain in place for the time that they are required. During the progression of the work there will be a requirement for a Noise Mitigation and Management Plan with regards to breeding birds. This mitigation would be evolved with the scheme.
Reptiles	During construction of the proposed development, it is likely that displacement and translocation actions will need to be undertaken to ensure that individual reptiles and populations of reptiles are safeguarded during the works. This is likely to include: • Habitat Enhancement Creation and Management plans to be evolved with the detailed design and phasing of the proposed development • Detailed Reptile Mitigation Strategies will be required to be evolved with the detailed design and timing of the proposed development. An outline reptile mitigation strategy is presented in ES Appendix 7.18. • Habitat manipulation to displace reptiles into retained habitats adjacent to habitats to be removed; and • Manual capture and translocation of reptiles from areas to be lost into retained / enhanced habitats. It is likely that there will need to be a suite of enhancement conducted to ensure that areas identified for reptiles to be translocated into are prepared for the translocation ahead of the translocation commencing. It is also likely that a suite of monitoring and maintenance works will be required in relation to the proposed project.



	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Comments and caveats
Coppiced stool translocation													Optimal in autumn to winter (September to February) when growth is dormant.
Turf translocation													Optimal in autumn (September to November) when growth is dormant. Can be done throughout rest of year.
White-clawed crayfish													Crayfish translocation July to October. Do not carry out work late May to June, when females are carrying eggs or young.
Great crested newts *(breeding ponds works)*													Dry autumn and early winter conditions are best for breeding pond management (September to November). No management to ponds when newts in aquatic phase, and/or approaching/leaving ponds.
(terrestrial habitat works)													Vegetation clearance and destructive searches when newts above ground and active (March to late October), and most appropriate when in breeding ponds (mid-March to mid-June).
(displacement, trapping and translocation)													Trapping in ponds mid-March to mid-June. Drift fencing and pitfall trapping, and hand and destructive searching on land March to October.
Reptiles *(displacement, trapping and translocation)*													Displacement, capture and translocation only when reptiles above ground and active (March to late October); recommended that captures should stop one month before hibernation i.e. in mid-September.
(vegetation and ground clearance)													Vegetation clearance, hand and destructive searches when reptiles above ground and active (March to late October). Above ground scrub clearance only during hibernation period (November to mid-March).
Nesting birds													No disturbance or damage to nesting birds and adjacent habitat during nesting season. N.B. some species (e.g. pigeons) will breed outside of the accepted breeding season.
Water voles *(trapping and translocation)*													Trapping preferably in spring (March to mid-April), or in autumn 1mid-September to end of November (may require over-wintering voles in captivity). No trapping during peak breeding season (mid-April to mid-September) (except in very exceptional circumstances) or during winter (December to February).
(displacement)													Displacement by vegetation clearance on water courses <= 50m long, between mid-February to mid-April.
Dormice *(translocation)*													Capture April to July. Release mid-June to end of July.
(displacement and vegetation clearance)													Clear above ground-level vegetation for areas up to 1.5ha in winter (November to March); also optimal coppicing season. Remove roost and stumps May to August. Small areas of vegetation (<50m²) or hedgerows may be cleared in summer (May and late September) for displacement.
Bats *(summer roosts)*													Work on summer roosts between November to February.
(maternity roosts)													Works on maternity roosts between November to April.
(hibernation roosts)													Work on hibernation roosts between March to October.
Badgers													Exclusion of badgers and sett closure/destruction only between July and end of November. Artificial setts can be constructed at any time of year.
Otters													No seasonal constraints on mitigation but breeding possible at any time of year which may restrict mitigation near breeding holts.

= optimum mitigation time = mitigation sub-optimal = mitigation not recommended / permitted

Figure 2 Mitigation timings

6.5 Climate Change

Greenhouse Gas Emissions

6.5.1 A demolition survey is to be undertaken on each specific structure on site and reuse opportunities to be assessed. These may include crushed material to be used as infill, and structural elements as rebar steel reused for the same purpose.

6.5.2 Construction works would be carried out in accordance with the best practicable means, as described in Section 79 (9) of the Environmental Protection Act 1990, to reduce fumes or emissions. This would include all vehicle engines and plant motors to be switched off when not in use.

6.5.3 The following measures are to be adopted in the detailed CoCP where relevant:

- Low carbon materials;
- Low carbon construction methods;
- Local supply chains;
- Reuse opportunities;
- Efficient use of construction plant;
- Earlier connection to the grid;
- Good practice energy management on site;
- Onsite measurement, monitoring and targeting;
- Fuel efficient driving – freight;
- Fuel efficient driving – waste removal;
- Renewable Transport Fuel Obligation – freight and waste removal;
- Construction consolidation Selected projects;
- Sharing knowledge about alternative sustainable fuels;
- Reducing the transport of waste; and
- Fleet conversion to fuel efficient passenger vehicles.

Vulnerability of the proposed Development to climate change

6.5.4 The following risks will be assessed on a frequent basis on-site to determine appropriate mitigation measures:

- While there is no specific projection of high wind speeds or intensity of storms from climate change, working conditions are to be assessed each day;
- Climatic conditions will be assessed on day-to-day basis, while identification of physical risks constantly observed and mitigated.
- The flooding risk of the construction site is to be considered, with mitigation and adaptation measures in place, for both workers and equipment.
- High temperature may hinder working conditions, if required workers resting areas will be provided.

6.6 Cultural Heritage

6.6.1 The exact form and scope of construction mitigation to take place will be defined following the completion of the evaluations across the proposed Development site. Of necessity therefore, the mitigation measures proposed below are fairly broad but will likely involve the following:

- Reducing temporary effects to the settings of heritage receptors from increased construction traffic flow controlled through and around the application site using traffic management i.e. control of vehicle movement through the site, speed limits and defined routes (refer to Section 6.13).
- Reducing temporary impacts to the settings of heritage receptors caused by construction activity through increased dust (refer to Sections 6.3). This would be achieved by fencing, hoarding and bunding, damping down of the construction area as well as limiting the hours in which construction can be carried out.
- Protecting heritage assets from physical harm during construction by:
    - Carefully siting haul roads to avoid them
    - Use of hoarding or fencing to demarcate and protect certain heritage assets from construction
- Conducting toolbox talks to inform sub-contractors and construction crew as to where these heritage assets are and how to avoid them.

6.6.2 'Preservation by Record' would take place in Tier 3, prior to construction, except in the case of archaeological watching brief which will take place during construction. A mitigation strategy has been drawn up as part of the Heritage Strategy (Appendix E of the Heritage Strategy). This mitigation strategy will be regularly updated during Tiers 2 and 3 of the application.

6.6.3 Physical impacts to non-designated built heritage receptors which would be demolished or changed as part of the Development would be mitigated through historic building recording. Recording would be completed in line with guidance issued by Historic England (Historic England, 2016: Ref. 3).

6.6.4 Any construction activity in the vicinity of hedgerows of historical value or historic woodland would be managed to avoid causing accidental damage to them. Where practicable, exclusion zones should be set up around the hedgerows and historic woodland to avoid accidental damage.

6.6.5 The archaeological contractors, working on behalf of the Applicant, will be required to submit and agree a written scheme of investigation (WSI) with the local planning archaeological advisor prior to the commencement of this work.

6.7 Geology, Hydrogeology and Land Quality

6.7.1 A preliminary intrusive ground investigation has taken place across the site to establish the general ground conditions. This has targeted potential contaminated land areas. The data has been assessed using the source-pathway-receptor principles and a Conceptual Site Model for the proposed Development has been created. Further intrusive investigations will be undertaken across the site for detailed design which will increase the understanding of ground conditions and potentially identify areas of contamination across the site. Archaeological supervision should be undertaken during these further investigations to confirm the presence of archaeological remains across the site.

6.7.2 To date contamination concentrations in areas targeted for investigation have been found to be low. However, if unacceptable risks are identified in further intrusive investigations due to the concentrations of contaminants found, remedial action would be proposed to reduce the risk to receptors. This could include removal of contaminated materials or remediation by appropriate *in-situ* or *ex-situ* techniques. The action required would be detailed in a Remediation Strategy which would be developed after further investigations and regulatory approved via the anticipated standard contaminated land planning conditions.

6.7.3 To reduce the spread of contaminants, contaminated soils (identified by intrusive investigation works and subsequent assessment) within areas to be excavated would be removed prior to the main works as detailed in a Remediation Strategy. Materials would be treated so they can be reused within the site or if this is not possible materials would be disposed of at an appropriate waste facility. Re-use criteria (protective of human health and groundwater) would be defined within the Remediation Strategy which would be regulatory approved via a planning condition prior to implementation.

6.7.4 During these works a watching brief protocol would be adopted, with site workers remaining vigilant such that visual or olfactory signs of contamination are noted and that contaminated soil is kept separate from other materials. Suspected contaminated material would be analysed to determine if it is suitable for re-use on the site or requires disposal off-site to an appropriate permitted soil waste facility. It is assumed that a sustainable approach to material management will be adopted and that material will be re-used on-site.

6.7.5 Prior to any construction compound area being prepared, a baseline survey would be undertaken to determine the current land quality across the compound area. This would highlight localised contamination if present. If appropriate such areas would be remediated prior to, or as part of, the soil stripping / enabling works or other measures such as the use of an appropriate cover system / barrier to reduce the risk of exposure to site workers.

6.7.6 Within the construction site compounds, specific areas would be designated for the storage of chemicals, waste oils and fuel and refuelling activities. These areas would be bunded and placed on hardstanding to prevent downward migration of contaminants. Any transfer of fuel or other potentially contaminated liquids would only take place within a designated fuel transfer area. Drip trays would be provided to reduce the risk of spillages. These areas would be designed with appropriate drainage to ensure any spillages can be isolated. Waste water generated from the construction compound would be disposed of via appropriate means, e.g. pumped out and removed from site by tanker.

6.7.7 An Emergency Response / Spill Response Plan would be produced by the Main Works Contractor. Appropriate equipment (e.g. spill kits, absorption mats) would be made easily accessible on-site and personnel would be trained in using them. Clear protocols and communication channels would be provided to ensure that any spillages are dealt with immediately and adequately. This would prevent large areas of soil / geology potentially becoming contaminated and in turn protect surface water quality.

6.7.8 During the construction phase, localised contamination may occur within the compound areas through spillages / leakages of fuel and therefore a repeat baseline survey would be undertaken once the construction has finished and the compound dismantled, to demonstrate the area has been returned to its previous state. If contamination has occurred during the lifetime of the compounds, remediation would be undertaken to return the land to its previous land quality state.

6.7.9 The Contractor would prepare detailed method statements and appropriate controls to protect receptors. The plan would include best practice pollution prevention guidelines for activities such as excavation and dewatering, storage of fuels, chemicals and oils, vehicle washing, pollution control and emergency contingency.

6.7.10 To reduce the risk to surface water, excavated materials would be appropriately stored to ensure that water runoff from stockpiles would not enter the water environment via drains and nearby watercourses. If necessary, stockpiles would be covered. Pollution prevention best practice protocols would be adopted to ensure contamination do not enter surface water.

6.7.11 A Site Waste Management Plan (SWMP) (outline version available in ES Appendix 17.3) and a Materials Management Plan (MMP) will be prepared. The MMP would be prepared following the protocols within the CL:AIRE Definition of Waste: Development Industry Code of Practice (Ref. 4) to ensure that excavated material are re-used appropriately, sustainably and remain outside the waste hierarchy.

6.7.12 During the construction phase, construction / site workers would be exposed to soil via accidental ingestion, inhalation or dermal contact. If contamination is present, to mitigate risks all persons engaged in site construction works would be made aware of the findings of the intrusive investigations and the hazards associated with handling potentially contaminated materials via the CoCP and Health and Safety Plan. All works would be conducted in accordance with the Health and Safety Executive publication entitled Protection of Workers and the General Public during the Development of Contaminated Land (HSE, 1991) (Ref. 5) and follow Construction (Design and Management) Regulations (2015) (Ref. 6).

6.7.13 Suitable Personal Protective Equipment (PPE) including Respiratory Protective Equipment (RPE) would be available to all site workers as detailed in the Health and Safety Plan. Appropriate site hygiene protocols would be adopted during the construction phase.

6.7.14 Where any hazardous chemicals would be used in the construction works, risk assessments would be made under The Control of Substances Hazardous to Health Regulations (as amended) and detailed in the Detailed CoCP.

6.7.15 Excavated soils would be appropriately stored to ensure that if dust is generated in dry weather periods, it is not directed towards existing properties. Other best practice measures such as damping down areas, vehicle wheel washing, covering stockpiles and lorries containing soils would be utilised to reduce the impacts from dust. Further information is presented in Section Air Quality.

6.7.16 Structures such as bridges are proposed within the site. Geotechnical techniques such as piling for the foundations of the structures may be used to construct these features. Such techniques can introduce pathways for contaminants into pore water to migrate into underlying groundwater. Appropriate techniques would be reviewed and an appropriate design would be included to safeguard the underlying groundwater regime to ensure that groundwater quality would not be compromised.

6.7.17 Prior to excavation works in the medium and high UXO risk areas and especially in the area where pipe mines were installed, further assessment would be undertaken to establish the accurate UXO risk in this area. This may involve both non-intrusive (desk based and geophysical surveys) and intrusive surveys (excavations to determine if objects are UXO). The process to establish the UXO risk and remove an devices encountered would be undertaken in a systematic approach as detailed in a UXO Mitigation Strategy. This strategy would be agreed with the local planning authority and relevant organisations prior to implementation.

6.7.18 The groundwater is known to be shallow (<1m bgl) in the northern part of the site. During construction of infrastructure and foundations in these areas, groundwater control may be required. Whilst groundwater contamination has not been encountered to date, if during further works, contamination is found, produced groundwater would be disposed of appropriately and with the necessary agreements in place. During such activities, consideration would be given to soil concentrations in the locality to ensure that contaminants do not become mobilised and enter the water environment.

6.8 Human Health

6.8.1 No human health-specific mitigation is required in this CoCP, however a combination of the the measures outlined in this CoCP with respect to air quality, noise and vibration, landscape and visual impact, and transport will mitigate human health effects during the construction phase.

6.9 Landscape and Visual

6.9.1 To safeguard the visual amenity of visual receptors and mitigate the effects upon landscape character receptors identified in this assessment during the construction phase the following best practice measures will be implemented :

- appropriate designs of construction fencing and hoarding surrounding construction areas;
- measures to limit construction site lighting to that required for the activity, its extent and its duration only (meeting health and safety requirements), including horizontal cut-off optics and zero floodlight tilt angles to prevent light spill, and avoiding the location and direction of lighting near to and towards existing residential properties where possible so that they adhere to the lighting strategy prepared at Tier 2 and the Institution of Lighting Professionals (ILP) 'Guidance Notes for the Reduction of Obtrusive Light' with regards to light levels, light spill, glare and skyglow ;
- avoidance of earth/spoil stockpiles over 6m in height;
- location of site compounds, material stockpiles, construction related parking and other visually obtrusive activities away from sensitive receptors such as existing residential properties both inside and outside of the application site boundary;
- all retained woodland, trees, tree belts and hedgerow vegetation will be protected during construction in accordance with BS:5837(2012) (as outlined in the OP-PS); and
- Implementation, management and maintenance of the advance structural planting proposals as outlined on parameter plan *OPM(P)4002_YY – Open Space and Vegetation*, within Chapter 12-LVIA, and within section 5 and the appendices of the Green Infrastructure Strategy) in line with the proposed structure planting strategy that would be a condition to the OPA.

6.10 Noise and Vibration

6.10.1 Measures will be implemented, on the basis of "Best Practicable Means" (BPM), where necessary to minimise noise and vibration impacts at source. The following bullet points identify measures which will be adopted through the CoCP where relevant within construction works.

6.10.2 Plant and equipment will be:

- Modern, silenced and well-maintained plant would be used at all times, conforming to standards set out in EU Directives;
- Machinery, including vehicles, would be shut down or throttled back when not in use;
- Engine compartments would be closed when equipment is in use and the resonance of body panels and cover plates would be reduced by the addition of suitable dampening materials. Any rattling noise would be addressed by the tightening of loose parts or the addition of resilient materials;
- Semi-static and static equipment would be sited and orientated as far as is reasonably practicable away from noise-sensitive receptors and have localised screening if deemed necessary;

- Static plant known to generate significant vibration levels would be fitted with acoustic dampening;
- Generators and water pumps required for 24-hour operation would be super-silenced or screened as appropriate;
- Crane spindles, pulley wheels, telescopic sections and moving parts of working platforms would be adequately lubricated in order to prevent undue screeching and squealing; and
- Where possible mains electricity should be used rather than generators.

6.10.3 Appropriate construction traffic routing would be implemented to minimise noise effects on sensitive receptors. Details of the routing of construction vehicles and visitors to the Site would be agreed with F&HDC. All construction traffic entering and leaving the Site would be closely controlled. Vehicles making deliveries or removing material would travel via designated routes. Measures would be taken to review and reduce where possible the numbers of construction vehicles accessing the application site during peak hours, by adopting measures such as 'just in time' deliveries.

6.10.4 Further measures will be stipulated for the mitigation of demolition and construction traffic and vibration impacts in the detailed CoCP. A Control of Pollution Act Section 61 agreement may be required with the LPA.

6.11 Socio-Economic Effects and Community

6.11.1 No socio-economic and community-specific mitigation is required in this CoCP, however the measures outlined in the rest of the CoCP with respect to working hours, a CTMP, construction compounds, and other measures to control noise, air quality and visual impacts will mitigate these effects during the construction phase.

6.12 Surface Water Resources and Flood Risk

6.12.1 To ensure the quality of the water environment does not deteriorate during construction, best practice construction methodologies and procedures for the management of environmental impacts during construction, including a Pollution Control Plan, will be implemented to safeguard the quality of surface water during the construction phase. Method statements would be prepared, and activities would be managed and monitored by the main contractor, to include the following best practice measures:

- Avoiding the storage of any potentially polluting materials in close proximity to any waterbodies, including stockpiles of soil to reduce potential for sedimentation. Where this is not possible works would be undertaken in accordance with approved method statements and in accordance with environmental permitting requirements/restrictions in order to safeguard the water environment.
- Soil stripping managed to ensure the minimum area of exposed soil at any one time.
- Fuels and chemicals would be stored, and refuelling would take place within bunded areas to prevent leakage, and these would be located away from waterbodies. Drainage from these areas would incorporate an isolation facility such that the outlet could be sealed in the event of a spill.

- Provision made for water treatment to remove silt/sediment before discharge to a surface water feature.
- Regular monitoring of the East Stour downstream of work sites during the construction phase for visual signs of silts/sediments/suspended solids.
- Concrete would be laid only following the suitable preparation of the ground surface and temporary shuttering used to contain potential leaks.
- Designated washing out areas would be set up for concrete lorries with impermeable liners to protect the soil and groundwater below.
- Wastewater generated from construction compound(s) would be disposed of via appropriate means, for example pumped out and removed from site by tanker.

6.12.2 An emergency spillage response plan would document measures to be implemented to prevent pollutants infiltrating into the soils beneath the site and reaching surface water receptors. Appropriate equipment (e.g. absorption mats) would also be made easily accessible on site to deal with accidental spillages and the plan would also provide a full list of protocols and communication channels with the EA in the event of an accidental pollution incident. Should any pollution incidents occur, the EA incident hotline would be called immediately in tandem with dealing with any spillages.

6.12.3 To promote the sustainable use of water resources, measures would be implemented to promote general water use efficiency and particularly to reduce the use of potable water. Examples include rainwater harvesting to provide water supply for the construction welfare facilities and for use in dust suppression, and wheel washing facilities as well as leakage prevention.

6.13 Transport

6.13.1 A Construction Traffic Management Plan (CTMP) would be implemented to minimise the effects of road traffic during the construction phase. It will incorporate:

- Identification of appropriate safe routes for the proposed Development traffic to and from the site via the M20 and A20;
- Construction HGV trips would occur outside of highway network peak hours, and service and delivery trips made within peak hours will be minimised;
- Where possible the development would try and utilise raw materials from local sources to reduce the vehicular traffic impact;
- Staff travelling to work would be encouraged to car-share, walk, cycle and travel via public transport and appropriate vehicle constraint targets will be set out within the CTMP;
- Full staff welfare facilities will be provided as part of the compound construction to reduce the requirement to travel off-site on lunch breaks and encourage sustainable travel by reducing trips off-site;
- Frequent inspections and monitoring to confirm the required measures would be implemented;

- There would be designated and adequate onsite parking facilities for site workers who travel by car, or other vehicles, to ensure that vehicles are not parked on the highway;
- The contractor would implement cleaning measures, such as wheel washing or wash-down facilities, which would serve to minimise the spread of dust, mud and other materials on to the roads; and
- Regular sweeping of roads would be undertaken, both on and off the site to reduce the spread of mud.

6.13.2 Furthermore, detailed measures in relation to construction vehicles have been suggested within Section Air Quality and Noise and Vibration.

6.13.3 The CTMP will form part of the Detailed CoCP.

6.14 Waste and Resource Management

Demolition

6.14.1 Maximising the recovery of materials and components during the demolition works has economic, as well as environmental benefits. For example, the recycling and re-use of demolition waste reduce disposal costs and the amount of landfill tax.

6.14.2 In accordance with contractor tender requirements, contractors would be required to segregate demolition waste prior to removal for off-site recycling purposes. This approach would enable 85% recycling targets to be achieved.

6.14.3 Excavated material that is not re-used on-site would require off-site disposal and would be dealt with in accordance with relevant legislation. This includes the Duty of Care Regulations 1991, which require parties transferring waste to complete and retain a 'transfer note' containing a written description of that waste.

Construction

6.14.4 The Detailed CoCP would be in place prior to construction. This would provide a suite of mitigation measures of particular relevance to waste and would require the contractors to:

- Promote opportunities for the potential reuse and recycling of all material resources and waste;
- Sort and segregate waste into different waste streams (where technically and economically feasible); and
- Manage material use to maximise the environmental and Proposed Development's benefits from the use of surplus materials.

6.14.5 The CoCP would also mandate several subsidiary management plans, which would form part of the suite of mitigation measures of particular relevance to waste. These include:

- The Outline SWMP (ES Appendix 17.3) which would be developed into the full SWMP by the appointed Contractor. The SWMP would ensure that waste is managed in accordance with the waste hierarchy and other relevant legislative requirements. The SWMP would also

detail information on the waste carriers and waste management facilities that would be used; and

- A Materials Management Plan (MMP) would be produced by the appointed Contractor to identify ways to reuse site-won or excavated materials within the construction of the proposed Development, provided it meets the requirements of the CL:AIRE Code of Practice (CoP).

6.14.6 As of 1 December 2013, the SWMP Regulations 2008 were repealed. However, the implementation of a SWMP remains as industry best practice.

6.14.7 A SWMP is used to plan, implement, monitor and review waste minimisation and management on construction sites. The SWMP is also used to record how waste is reduced, reused, recycled and disposed of on a construction site. This effectively means:

- Recording decisions taken to prevent waste through concept and design.
- Forecast waste produced on-site.
- Plan how to reduce, reuse or recover the forecasted waste.
- Implement and monitor the planned activity.
- Review the SWMP and record lessons learnt.

6.14.8 The SWMP is a live document and would be updated regularly during the course of the project. Preparing a SWMP at the early planning stage facilitates the identification and implementation of waste minimisation at the design stage, and reuse and recycling opportunities during on site operations, thereby potentially reducing the quantities of construction waste sent to landfill. Preparing a SWMP also encourages the review of current waste reduction and recovery practice levels, highlighting areas where good and best practice can be achieved.

6.14.9 In addition to the SWMP, the use of Modern Methods of Construction (MMC) would be considered for use in the construction of the proposed Development, subject to commercial and technical viability. MMC typically involves the manufacture of wall/floor/roof panels and/or the manufacture of entire room modules offsite in a factory. It can also include innovative site-based methods, such as use of concrete moulds. The Government is promoting the use of MMC as it is thought to offer potential benefits such as reductions in energy use, through improved air tightness and insulation, and reductions in waste, as materials are less likely to be spoiled in a factory environment and materials are more often ordered to exact specifications.

6.14.10 A further mitigation measure is the diversion of construction waste from landfill, through the concept of 'waste neutrality'. This involves sourcing construction materials that are derived from recycled and/or reused content.

6.14.11 Recycled content is the proportion, by mass, of recycled material in a product, excluding waste material (such as process scrap) re-utilised within the same process that generated it. Where a product material is reused (e.g., is removed and replaced or is moved to another location), then it is considered to have a 100% recycled content.

6.14.12 In order to reduce the consumption of natural resources and the energy associated with extracting, processing and manufacturing them, reclaimed and recycled materials would be considered initially and, where possible, materials and components would be reused during construction.

6.14.13 There would also be a commitment to source materials responsibly and the following would be undertaken where feasible:

- selecting material and building components from sustainable sources;
- securing sustainable materials with reference to the National Green Specification for example: timber from legal and well managed sources such as the Forestry Stewardship Council (FCS);
- reviewing insulation materials containing substances known to contribute to global warming in light of their impact; and
- sourcing materials from the local area or from recycled sources.

6.14.14 In addition, the Waste and Resources Action Programme's (WRAP's) online tool kit gives information regarding the recycled content of standard practice materials. The WRAP toolkit makes assumptions about the recycled material content of a number of mainstream products which could be specified, such as blockwork and pipework, and helps to identify alternatives which have a greater recycled material content.

6.14.15 Upon completion of the proposed Development, the contractor would be required to report on the performance of the construction works against the agreed targets. The recommended method for demonstrating compliance is to provide evidence of the actual volumes of waste collected for disposal at landfill and the volumes collected for re-use and recycling. The contractor would be further required to report on the materials used and their source, recycled/re-used content and provide evidence through the collation of waste transfer notes, invoices and manufacturers' data on recycled content of materials.

6.14.16 Where possible waste would be managed in accordance with the proximity principle by using the most suitable sites located closest to the site, however this would depend upon the contractor employed and the location of their waste management sites.

7 Monitoring and Review

7.1 Monitoring

7.1.1 During the works monitoring and reviews will be undertaken by the Contractor(s). Required monitoring is detailed in the CoCP and includes monitoring such as:

- A general review of site activities and compliance with the CoCP. If conditions have changed or non-compliance is recorded this should be actioned within an agreed period depending upon the degree of variance;
- Monitoring of ecological measures by the Clerk of Works;
- Monitoring of traffic management measures;
- Boundary monitoring for noise and vibration; and
- Boundary monitoring for dust.

7.1.2 Monitoring results will be recorded in real time and made available to the F&HDC, including any required remedial actions.

7.1.3 A regular report will be produced by the Contractor(s) recording the monitoring results. The frequency of reporting will be agreed with F&HDC. The report will record the results, highlight any exceedances above pre-determined trigger levels and record any actions that were taken. The report will also record any complaints that were received and how these were dealt with.

7.2 Internal Audit

7.2.1 The implementation of the detailed CoCP(s) will be audited by the Contractor(s) during the construction period. The Contractor(s) will set out in the CoCP an audit plan for reviewing compliance with requirements of the CoCP, for example regular audits and inspections of waste management. The implementation of the CoCP will be audited at a minimum of six monthly intervals during the construction period. Records of these audits will be documented and maintained throughout the duration of the project. The results of audits will be communicated to F&HDC in project review meetings on a regular basis as set out in the CoCP.

7.2.2 Two registers will be set up in the detailed CoCP(s) as follows:

- A Non-Conformance & Corrective Action Register (which forms part of the Contractor's Quality Procedures and is not exclusively for environmental issues); and
- An Environmental Incidents Register.

7.2.3 The Non-Conformance & Corrective Action Register will detail:

- The date the non-conformance was identified;
- A description of the non-conformance;
- The implications of the non-conformance in terms of environmental impacts;
- A description of the elements of the environment affected by the impact (receptors);

- The corrective actions aimed at addressing the non-conformance;
- The persons responsible for implementing corrective actions; and
- The timeframe for implementation of corrective actions.

7.2.4 The Environmental Incidents Register will detail:

- The date that the environmental incident occurred;
- A description of the environmental incident situation;
- The impact of the environmental incidents;
- A description of the elements of the environment which have been subjected to impacts caused by environmental incidents (receptors);
- The actions to be implemented in response to the environmental incident;
- The person responsible for undertaking actions; and
- The timeframe for implementing actions.

7.2.5 Copies of all environmental documentation relevant to the works will be filed on site, and made available for internal inspection, including:

- Any written communication with the Environmental Regulator/competent body/consultee;
- Waste transfer notes;
- Hazardous waste consignment notes;
- Monitoring/performance data (including audits);
- Consents and licences required and obtained;
- Survey records/reports;
- Environmental risk assessments/impact assessments;
- Incident and complaint records; and
- Environmental training records (inductions etc.).

7.3 Review

7.3.1 The Contractor(s) will periodically review its environmental management system with the objective of improving its overall environmental performance.

7.3.2 Reviews will evaluate the suitability, adequacy and effectiveness of the team's environmental performance and will focus upon:

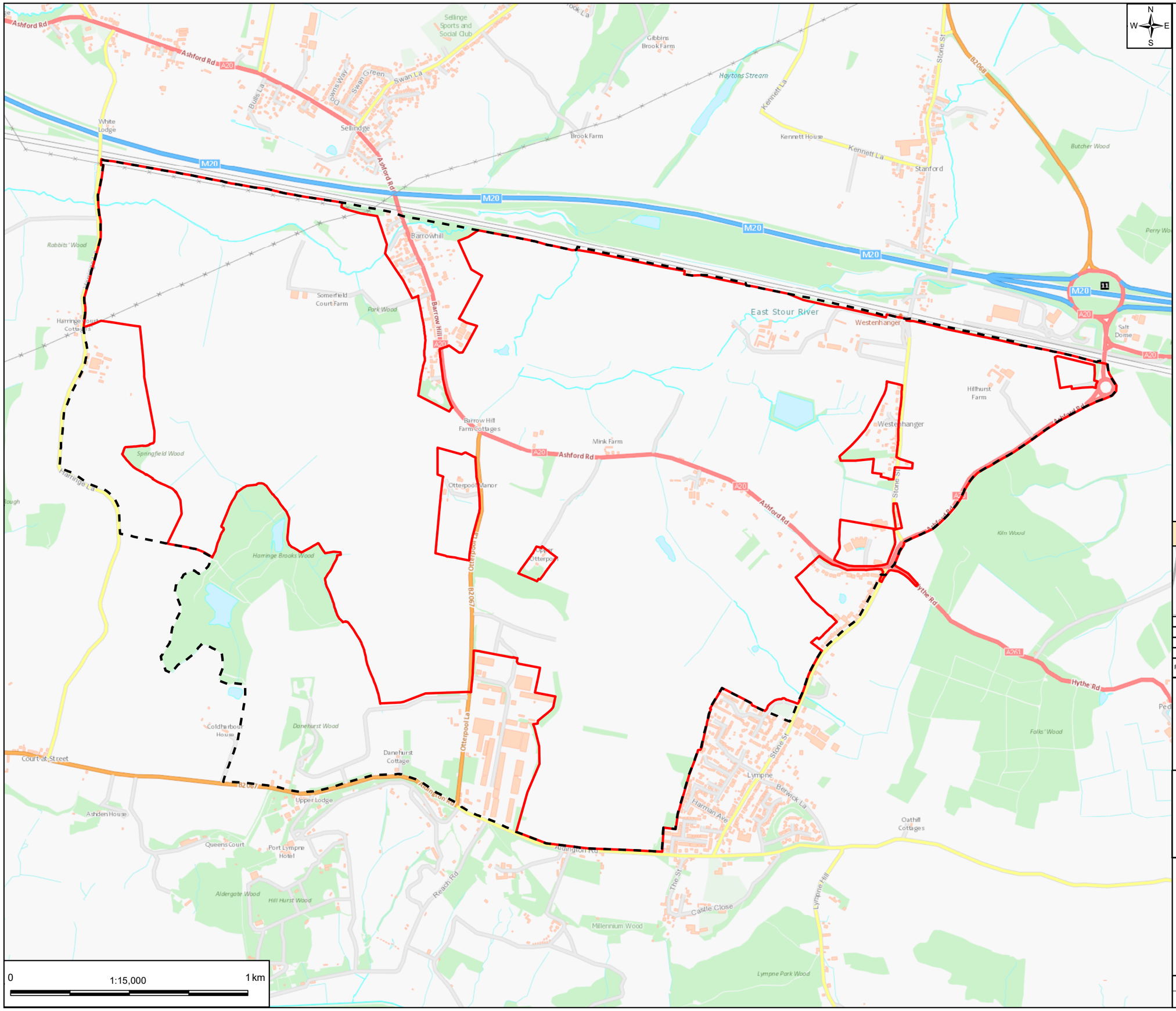
- The results of internal audits and evaluations of compliance with applicable legal and other requirements;
- Communication from external interested parties including complaints;
- Status of corrective and preventative actions;
- Results of the evaluation of environmental aspects from planned or new developments;
- Changes in applicable statutory legislation, procedures and other requirements; and
- Lessons learned from emergency situations and incidents.

8 Reference

Reference Number	Title
Ref. 1	Defra (2009). Construction Code of Practice for the sustainable use of soils on construction sites.
Ref. 2	Holman *et al.* (2014) IAQM Guidance on the assessment of dust from demolition and construction, Institute of Air Quality Management, London.
Ref. 3	Historic England 2016 Understanding Historic Buildings: A Guide to Good Recording Practice
Ref. 4	CL:AIRE (2011) Definition of Waste: Development Industry Code of Practice, Version 2
Ref. 5	Health and Safety Executive (1991) Protection of Workers and the General Public during the Development of Contaminated Land
Ref. 6	Construction (Design and Management) Regulations (2015)

Appendix A

Figure 1.1 and 1.2: Site Location Plans



LEGEND

Outline Planning Application Boundary (OPA)

Framework Masterplan

REV	Date	Description	Drawn	Check	Approv
01	03/11/21	FOR INFORMATION	RM	LD	LD

ARCADIS
80Fen
80 Fenchurch Street
London
EC3M 4BY

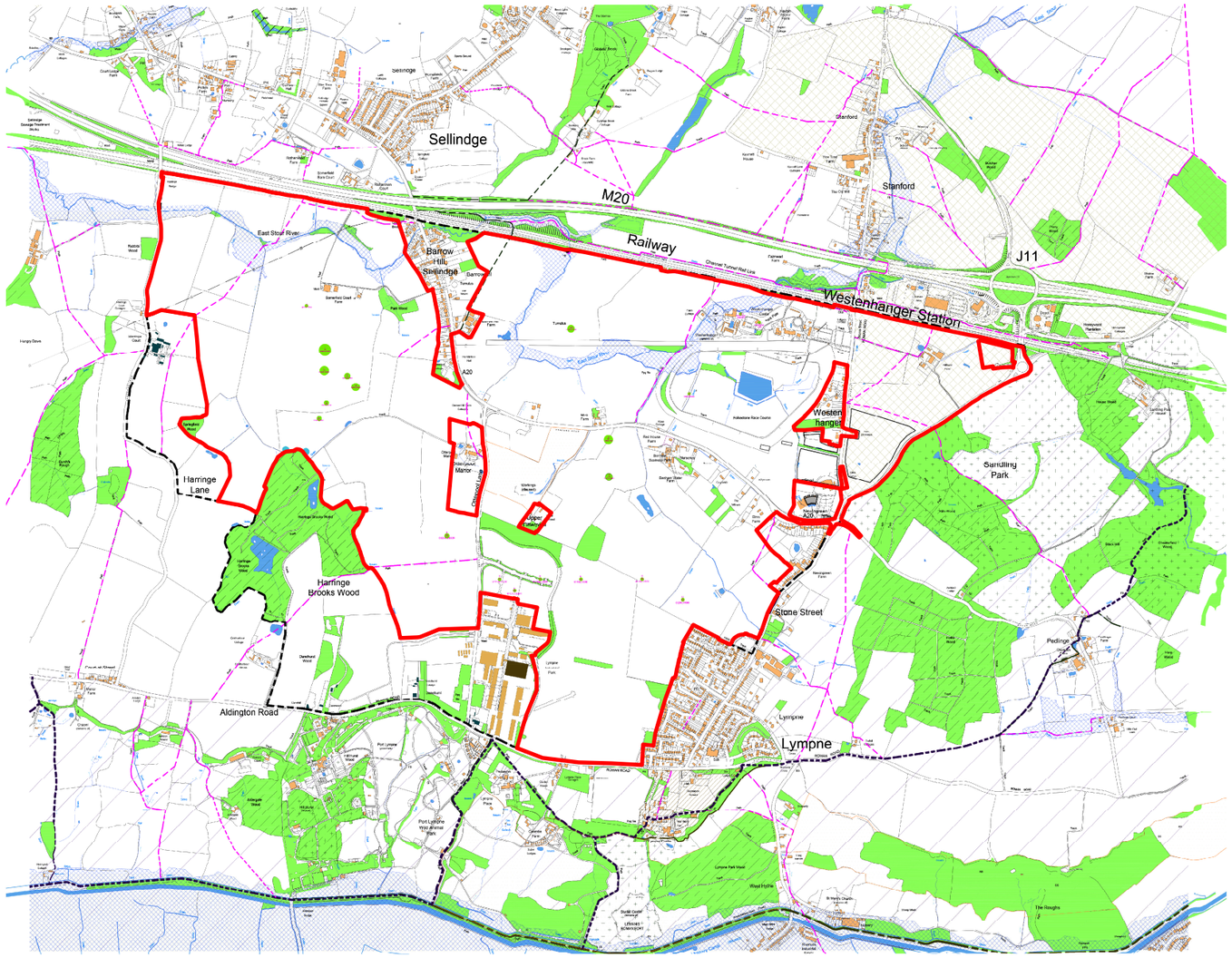
OTTERPOOL PARK
COUNTRYSIDE • CONNECTED • CREATIVE

FIGURE 1.1
SITE LOCATION PLAN

scale	original size	datum	grid
1: 25,000	A3	Sx	OSGB

C:\Users\psi01069\ARCADIS\10029956 - Otterpool Park Stage 4a - 23 GIS\Figures_2021\Front End\Figure 1.1 - Site Location Plan.mxd

DO NOT SCALE FROM DRAWING, ALL DIMENSIONS, LEVELS, COORDINATES, SETTING OUT, TO BE CHECKED ON SITE AND ANY DISCREPANCY REPORTED IMMEDIATELY TO THE ARCHITECT AND PROJECT MANAGER.



Existing

- Existing Communities & Buildings
- Existing Rivers, Streams and Ponds
- Existing Woods
- Existing Ancient Woodlands
- Existing Registered Parklands
- Existing Footpaths
- Existing Bridleway
- Existing Saxon Shore Way
- Existing National Cycle Route 2
- Existing Special Landscape Area
- Existing Conservation Area
- Existing Flood Zone 2 + 3
- Area of Outstanding Natural Beauty (AONB)
- Existing SSSI's
- Location of Heritage Feature

N.B. THIS FIGURE HAS NOT BEEN PRODUCED BY ARCADIS. ANY DATA CONTAINED WITHIN THIS FIGURE IS NOT THE RESPONSIBILTY OF ARCADIS.

REV	Date	Description	Drawn	Check	Approv
01	03/11/21	FOR INFORMATION			

ARCADIS
80Fen
80 Fenchurch Street
London
EC3M 4BY

OTTERPOOL PARK
COUNTRYSIDE • CONNECTED • CREATIVE

FIGURE 1.2
SITE CONTEXT PLAN

scale	original size	datum	grid
1: 25,000	A3	Sx	OSGB

C:\Users\Rob.Millman\ARCADIS\10029956 - Otterpool Park Stage 4a - 23 GIS\Figures_2021\Front End\Figure 1.2 - Site Context Plan.mxd

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