

FORMER BAYER CROPSCIENCE LTD SITE, HAUXTON, CAMBRIDGESHIRE

Environmental Statement – Remediation Non-Technical Summary November 2008





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1. Introduction

- 1.1 This document is a Non-Technical Summary (NTS) of the Environmental Statement (ES) that accompanies a planning application submitted on behalf of Harrow Estates Plc for the remediation and restoration of the former Bayer CropScience Ltd site at Hauxton, Cambridgeshire. The ES and this NTS have been prepared in accordance with the requirements of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999. In accordance with the aforementioned Regulations, this NTS provides the following information:
 - Description of the site;
 - Outline of the proposed development and of alternatives considered;
 - Overview of the EIA process; and
 - Summary of the key environmental effects identified within the ES and a description of measures to mitigate any adverse effects.

2. Description of Site

The Site

2.1 The 14.9 ha application site is part of a former agrochemical manufacturing works that had been operational since the late 1940s. The previous owner Bayer CropScience Ltd began winding down manufacturing operations in 2003 and ceased operations in April 2006.

Figure 2.1 Site Location Plan



2.2 The site is located approximately 6.5 km to the south of Cambridge City Centre and lies to the north west of a series of villages that are similar in character including Hauxton, Harston and Little and Great Shelford (see Figure 2.1). Hauxton is the nearest settlement to the site. It is a small village of approximately 340 homes with a primary school and local amenities consisting of open space and a village hall.

Figure 2.2 Existing Site Plan



2.3 The application site (outlined in red in Figure 2.2) is located to the east of the A10 and is comprised of two distinct areas; the developed land to the east of the A10, and the River Cam Corridor.

Developed Land to the East of the A10 (the Main Site)

- 2.4 The 8.7 ha works site previously had extensive buildings on it, including a large footprint of warehouse buildings, three and four storey office blocks and additional large scale infrastructure including storage tanks and manufacturing plant buildings up to seven storeys in height. Most of the buildings have already been demolished as part of the decommissioning process in advance of the remediation process.
- 2.5 The works site includes hardstanding within the main site protected by a security wall. The site also has a large area of car parking to the north for 276 cars.
- 2.6 The Mill House, which stands adjacent to the Riddy Brook and the area of car parking, is a Grade II listed building, although the interior of the building has been vastly altered to accommodate office use.

2.7 There was previously a residential cluster outside the industrial perimeter fence comprising three vacant houses on the southern part of the site fronting onto Church Road. These properties have been demolished.

Road Frontages

- 2.8 The site has a primary frontage onto the A10 (Cambridge Road) where there is a 50 mph speed limit on this stretch of the road. The speed limit of the A10 falls to 30 mph to the south of the site on the approach to Harston.
- 2.9 The site also fronts onto Church Road that leads into the village of Hauxton. The site is screened at the junction between the A10 and Church Road by landscaping implemented as part of the development of a large warehouse building.
- 2.10 Vehicular access to site is currently through two access points from the A10 one towards the north end of the site, the second further south towards the junction between the A10 and Church Road. There was also an emergency access to the site from Church Road. The listed Hauxton Mill can be accessed from a small junction from the A10.
- 2.11 Full details of the existing highways environment can be found in the Transport Assessment that accompanies this planning application.

Public Access

- 2.12 Due to the nature of the previous manufacturing use, public access is limited to a statutory footpath cutting across the car park area to Hauxton Mill. Otherwise the site is secured by a high security wall / fence and monitored by CCTV.
- 2.13 The current site has two access points from the A10 and a minor emergency access on Church Road. In additional there are three residential access points on the A10. The most northerly of the A10 access is on the historic line of Mill Lane and serves the car-park. The southerly access used to serve the works and office buildings of the site.

Contamination

2.14 Past chemical manufacturing operations have contaminated the ground water in certain concentrated areas on the previously developed site, which require a stringent remediation strategy to be authorised by the Environment Agency before redevelopment can proceed.

The River Cam Corridor

- 2.15 The River Cam Corridor lies in the Green Belt to the east of the main site and includes the River Cam and Riddy Brook water courses. It is an area of contrast to the historic industrial use with high environmental potential but heavily compromised by the presence of the adjoining industrial complex to the west. There are open fields to the north of the River Cam (referred to as the North Meadow in the ES) and belts of mature vegetation border the main site, the River Cam and the Riddy Brook.
- 2.16 The River Cam Corridor also includes the Grade II listed Hauxton Mill where the River Cam flows under the Grade II listed Hauxton Bridge carrying the A10.
- 2.17 There is poor vehicular access to the River Cam Corridor from the A10 although there is pedestrian access along the banks of the Riddy Brook running from the Mill towards Hauxton. This route and its immediate environment are poorly managed and are in need of attention to ensure its longevity.
- 2.18 The area has ecological value and future potential that can be enhanced through appropriate measures.

Site Ownership

2.19 The site is currently in single occupation owned by Harrow Estate Plc's parent company, Bridgemere UK Plc.

Site Surroundings

- 2.20 To the north of the site, beyond the North Meadow, lie agricultural land and the Westfield Cottages. The M11 motorway also runs to the north of the site with Junction 11 connecting to the A10.
- 2.21 To the east of the site lies further agricultural land and beyond this the Grade II listed St Edmund's Church and the village of Hauxton itself.
- 2.22 Immediately to the south of the site lies Church Road which provides access from the A10 to Hauxton. On the opposite side of Church Road lies some disused and now flooded gravel pits. Harston is a short distance southwards along the A10.
- 2.23 The site is bounded to the west by the A10. On the opposite side of the A10 is a Waste Water Treatment Plant (WWTP) which is still operational to pump and treat water from the land east of the A10 before discharge to the local river system. On the west of the A10 are also two residential properties and Rectory Farm with associated agricultural land.

3. Proposed Development

3.1 The ES assesses the likely environmental effects of the remediation of the site.

Level of Remediation

3.2 The ES sets out an assessment of the likely effects of completing remediation works on the site to a standard whereby the appropriate regulators (the Local Authority and the Environment Agency) are satisfied that the risks to the environment from contamination at the site in both soil and groundwater have been addressed to satisfy their requirements under Part IIa of the Environmental Protection Act and, to allow re-development with both commercial and residential end uses.

Remediation Approach

- 3.3 The overriding strategy to achieve the remediation of the site is to excavate all materials at the site to ensure that uncertainty regarding contaminants and geological conditions are removed. This will involve excavation of approximately 250,000m³ of soil material across the Main Site area. This material will be segregated, classified and treated as appropriate on site then returned to the excavated areas after being validated. The validation will be done by a specialist environmental consultant who will prepare a report for submission to the authoritites. It is envisaged that 90,000m³ of materials will require formal treatment. Groundwater will be separated, treated and disposed of from the site under an appropriate consent. Following remediation, the soils will be replaced at the site and a clean cover system of soil will be brought onto the site to provide finished levels.
- 3.4 The remediation will involve a number of phases set out below:

Preparation Works

3.5 The preparation works will include work such as setting up site compounds, the upgrading of the Waste Water Treatment Plant (WWTP) to the west of the A10 outside the application boundary, securing the perimeter of the site and general site clearance and preparation.

Remedial Treatment Works

3.6 The remediation will be carried out on site under a Mobile Treatment Licence. It will use a variety of techniques and technologies. The remediation activities will be regulated and approved by the Environment Agency through inspection and / or review of environmental material. The general approach to remediation of the site is to carry out a number of activities working in 3 Zones (see Figure 3.1).

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Figure 3.1 Remediation Zones



- Phase separation Waters encountered during the remedial works will be stored in lagoons which will be created on site. This water will then have the silt removed before being pumped to the upgraded WWTP where the contaminated water will be treated.
- Breaking, lifting and crushing of concrete slabs and ground obstructions Slabs and ground obstructions will be lifted from Zone 1 and then crushed in Zone 2. On completion of Zone 1, Zone 2 slabs and foundations will be lifted and crushed. Throughout, the ongoing management and treatment of groundwater will continue.
- Mass excavation of made ground, sorting and segregating soils Where appropriate, existing concrete slab foundations will be used for the sorting and treatment of contaminated soils. The High Bay warehouse located in Zone 2 will be retained as the main location for the sorting and processing of materials. Otherwise, material treatment will be carried out on engineered liners which are made from strong plastic to prevent any contamination from leaking out.
- Soil processing and screening The principle remedial technology to be utilised is bioremediation. This process involves the removal and treatment of materials using biological methods. The soils will be removed and formed into 'windrows' which are basically long narrow mounds of soil. The windrows are 'turned' regularly by using specialist machine exactor buckets to allow sunlight and air to enhance the natural bio-degrading process of any contaminants. The Ultra-Violet light present in sunlight assists the breakdown of certain organic chemicals and the introduction of air allows the growth of naturally occurring bacteria which treat the contamination as food.
- Off-site waste disposal and recycling Materials that can not be treated on site, such as asbestos waste and drummed materials will be removed for disposal off-site to specialist disposal centres. Where possible, materials that can potentially be recovered such as metals and timber will be sent off-site for recycling. All off site waste disposal will be carried out in accordance with the waste 'Duty of Care' requirements, ensuring that the waste is safely stored in a manner that does not result in ground contamination.
- The Mill House and High Bay Warehouse The existing information indicates that the area around the Mill House is not contaminated. However, additional site investigation is proposed in the vicinity of this building to confirm that this is the case. If necessary, remediation will be carried out and bearing in mind its Listed Building status, consultations will need to be carried out and gained. The High Bay warehouse will be demolished during the remediation of Zone 2.
- Decommissioning of Boreholes There is at present a network of borehole son the site which are
 used to monitor both the level and the quality of the groundwater. A number of these existing
 boreholes will be retained to provide a monitoring network during and after the remediation works to
 demonstrate the effectiveness of the remediation. Other boreholes will be removed or filled in to
 seal them.
- Control of Substances Hazardous to Health (COSHH) Regulations 2002 Assessment Assessments have been undertaken for the hazards associated with the materials to be handled at the site.

- Reinstatement, validation procedures and reporting Reinstatement of the site will be completed in phases. Site levels will be left lower than boundary levels in readiness to receive the cover system which will be installed as part of the development phase after which it will match the existing levels at the site boundary. Validation reporting will comprise the soil and water analysis and the final report will be submitted by the environmental consultant to the local authority and Environment Agency for approval.
- Environmental Monitoring A number of groundwater boreholes will be monitored regularly during and after remediation. The River Cam and Riddy Brook will be monitored upstream and downstream in a similar manner. The monitoring data will support the validation process, and will be submitted to the local authority and Environment Agency for approval. Air quality will also be monitored during the works to ensure that excessive dust is not generated and that odours are minimised.
- 3.7 Extremely challenging targets have been set for the remediation of various contaminants as part of the remediation for the site. These targets will be monitored and updated if necessary during the remediation works as more information is made available. Any proposed revision to the targets will be agreed with the local authority and Environment Agency and will still represent a very high standard of remediation. The revised targets will need to demonstrate that the level of residual contamination does not present an unacceptable risk to human health, controlled waters and that the requirements for remediation under Part IIa of Environmental Protection Act 1990 have been satisfied.
- 3.8 Flood mitigation works could also be carried out in relation to the River Cam and Riddy Brook including the establishment of a shallow swale in the North Meadow in conjunction with the remediation of the site.

Outline of Alternatives Covered

Alternative Schemes

- 3.9 The preferred remediation approach has been prepared following consideration of the existing information on the existing contamination on the site and potential alternative approaches to the remediation of the site to allow re-development with both commercial and residential end uses.
- 3.10 In general there are three broad approaches which could be adopted in order to break pollutant linkages, i.e. from the source to a receptor, identified at the site:
 - Remove or treat the (source of) pollutants
 - Remove or modify the pathway through which contamination may spread
 - Remove or modify the behaviour of the receptor that can be affected by any contamination
- 3.11 Given the particular circumstances of the contamination at the Hauxton site and the proposed redevelopment, the most appropriate approach was considered to be a combination of source treatment and the removal of potential contamination pathways.

- 3.12 As it is unlikely that any one approach would address all of the contaminants. A combination of different approaches was considered for the site. It was therefore possible to identify technologies that may provide an appropriate and cost-effective approach when used in combination to remediate the site. A number of possible options were discussed.
 - Option A This option would involve chemical oxidation of the contaminated area through the injection of a chemical reagent which would neutralise the contaminant(s). This involves injecting an oxidising chemical into the ground which then reacts with the contamination to form a new compound which poses no risk.
 - Option B Air Sparge / Soil Vapour Extraction could also be used in combination with chemical oxidation in some locations provided it would work within any necessary time period for development.. This method blows air into the soil and groundwater and extracts vapours. The oxygen present in the air helps bacterial to grow and breakdown the contaminants and the extraction of vapours removes contamination in vapour form.
 - Option C Ex-situ treatment process could be undertaken comprising a combination of chemical oxidation and bio-remediation; some off-site disposal of material may be required with this option. This would involve the excavation of soil materials onto the surface of the site and the introduction of air using physical means. The current pump and treat facility in the southern area of the site would be retained to de-water the site area, and a filter pond would be incorporated to reduce suspended solids prior to entering the treatment plant.
 - Option D This option involves bringing in suitable fill material from outside the site to raise levels above the required flood risk levels.
- 3.13 A series of initial laboratory and field trials were undertaken and using the results of the field trials the preferred remedial options considered comprised a combination of:
 - Pump & Treat groundwater
 - Chemical Oxidation
 - Bio-treatment of soils and groundwater.
- 3.14 Following on from the assessment of remedial options and detailed computer modelling, the remediation was tendered to specialist contractors capable of carrying out the work. The results of the tendering process confirmed that the preferred remedial techniques proposed were the most cost-effective.'

Alternative Sites

3.15 The presence of any preferable suitable sites was investigated but no suitable alternatives were identified.

4. The EIA Process

The Requirement for an EIA

- 4.1 The applicants have not submitted a Screening Application to South Cambridgeshire District Council (SCDC) in order to establish whether an Environmental Impact Assessment (EIA) of the proposals is required. Instead, following initial consideration of the potential environmental effects of the scheme a voluntary Environmental Statement has been prepared, in accordance with the provisions of the Town and Country Planning (Environmental Impact Assessment)(England and Wales) Regulations 1999.
- 4.2 The ES provides detailed information on the likely significant environmental effects of the proposed development. It also describes the measures that are proposed to mitigate any adverse effects and provides a statement as to the significance of any predicted impacts both before and after mitigation.

Approach to the EIA

- 4.3 The general approach to the ES follows best practice guidance and covers those areas referred to in Schedule 4 'Information for Inclusion in Environmental Statements' of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999.
- 4.4 The main objective of producing the ES is to provide a systematic analysis of potential environmental effects, which may occur as a consequence of the proposed development and to identify those likely to be significant. The ES considers the following environmental topics:
 - Air Quality;
 - Noise and Vibration;
 - Soils, Geology and Ground Contamination;
 - Water Resources;
 - Ecology;
 - Landscape and Visual;
 - Archaeology and Cultural Heritage;
 - Waste Management;
- 4.5 Where adverse impacts are identified, the ES proposes appropriate mitigation measures (incorporating design and operational measures), that seek to prevent, reduce or offset effects of adverse effects and to enhance beneficial effects.

5. Likely Environmental Effects and Measures to Mitigate Adverse Effects

5.1 The ES contains full details of the likely environmental effects of the proposed remediation and puts forward appropriate mitigation measures to minimise adverse effects where necessary. A summary of the main issues is provided below:

Air Quality

- 5.2 The ES has investigated potential air quality impacts associated with the remediation and restoration of the former Bayer CropScience Ltd site.
- 5.3 Emissions from vehicles engines and fuel driven plant and equipment are not likely to be significant. Where practicable, on-site plant and equipment engines will be sited away from residential receptors in order to minimise the limited effects on air quality.
- 5.4 Dust and volatile organic emissions due to the remedial works will be mitigated through point source controls and best practice techniques. Fugitive emissions of dusts, vapours and odours are likely to occur and could present a risk to human health and cause a nuisance. Best practice techniques for minimising fugitive emissions will be employed, combined with air quality monitoring that will enable the assessment of environmental conditions and consideration of best practice techniques to be undertaken on an ongoing basis.
- 5.5 Fugitive emissions during the remedial works are likely to have a minor adverse effect and are therefore considered not to be significant.

Noise and Vibration

- 5.6 The ES has assessed the likely noise and vibration effects of the proposed development. The remediation works associated with the proposed redevelopment schemes will involve a number of different processes, each with a variety of construction equipment on site. These will create different levels of noise and vibration.
- 5.7 A number of mitigation measures will be employed including the contractor adhering to guidance outlined in BS5228 'Noise Control on Construction and Open Sites', limiting noisy site works to between 8:00 and 18:00 Mondays to Friday only and responding to and addressing any complaint or registered concern about noise levels.
- 5.8 During the specific phases the following mitigation measures should be employed:

- Concrete Breaking the use of an Antigo breaker will allow the concrete breaking to be completed quicker than using other breakers. Temporary acoustic screening will be considered.
- Excavation and Treatment quieter plant to be selected where practicable. Acoustic screening should be considered, preferably using solid hoarding due to the length of this stage of the remediation.
- Restoration quieter plant to be selected where practicable. Acoustic screening should be considered, preferably using solid hoarding but a temporary screening would also be beneficial.
- 5.9 The mitigation detailed above is expected to reduce noise levels. The extent and method of mitigation will depend on the practicalities associated with installing screening as described, as well as utilising quiet plant as far as practicable. This in turn will determine the acoustic impact.
- 5.10 However, during concrete breaking, it is expected that a short term major adverse impact will remain. During excavation and treatment at Church Road, the noise impact will be moderate, and minor or negligible elsewhere. During restoration, at Church Road the noise impact will be moderate, and minor or negligible elsewhere.

Soils, Geology and Ground Contamination

- 5.11 The ES provides an assessment of the potential impacts on the soils, geology and contaminated land at the site and the associated effects of the proposed remediation.
- 5.12 It is possible that during remediation works, an increase in pollution will occur as the ground is opened up, potentially releasing contaminants into the environment and allowing greater infiltration of rainfall and hence leaching of contaminants in surface water and groundwater. Such risks are considered in the method statement and are controlled as far as reasonably practicable in accordance with best practice for such works through processes described in Section 3 of the Non-Technical Summary. This will be reinforced through regulation of the process under the Mobile Treatment Licence issued by the Environment Agency.
- 5.13 In addition to controlled water risks, the remedial works will introduce construction workers as human health receptors. COSHH assessment has been carried out, based on the proposed method statement, and this confirms that exposures are minimised and reduced as low as is reasonably practicable. The health and safety aspects are regulated under the Mobile Treatment Licence issued by the Environment Agency.
- 5.14 The potential for impact of contaminated land on property receptors is not considered to be significant, as all the properties remaining on site are currently vacant.
- 5.15 It is considered that there is the potential for short-term minor adverse effects on the soils, geology and contaminated land on the site during the remediation of the site after the implementation of mitigation

measures. Following the effects on the soils, geology and contaminated land on site following the remediation process will be major beneficial and long term.

Water Resources

- 5.16 The ES provides an assessment of the potential impacts and their associated effects on water resources as a result of the remediation and preparation for future development of the application site.
- 5.17 A comprehensive series of mitigation measures have been set out in the Remediation Method Statement to mitigate potential impacts on the water resources during the remediation and restoration of the site. These include:
 - Minimising land clearance and ensuring that cleared land is reseeded as soon as practicable to minimise exposed land.
 - Use of pollution control procedures and the provision of spillage containment equipment on site.
 - Removal of surface and foul water drains.
 - During excavation of the contaminated soils from site, groundwater control procedures will need to be implemented.
- 5.18 Following assessment of the potential effects of the remediation on the water environment and provision of mitigation to potentially significant effects, it can be concluded that there are very minor residual effects. There will be negligible increases in flood risk from the local water courses and drains, and surface water run-off. There will be negligible effects on the hydrological, ecological and morphological regimes of the local water courses and drains. The local water course and drains will not suffer pollution or water quality degradation as a result of the construction and operation of the development.

Ecology

- 5.19 The ES assesses the likely ecological impacts arising from the proposed remediation of the site. The ES concludes that the main ecological effects of the remediation process are as follows:
 - There will be negligible impacts on habitats on the main site as the majority is hardstanding.
 - Construction of the flood relief channel will result in the permanent loss of two minor sections of bank habitat of the River Cam and the moderate effect of short-term loss of species poor semiimproved grassland.
 - Works to reduce the restriction of water flow in the Riddy Brook will have on bank habitat and adversely affect local Bullhead and invertebrate populations in the short-term.
- 5.20 A number of mitigation measures will be put in place to minimise effects. To minimise the potential negative effects of remediation of the site standard methodologies will be applied to limit dust and prevent sediments entering the watercourses. Work to the Riddy Brook outside of the Bullhead

spawning season. As part of the site preparation a Habitat Creation and Management Plan will be agreed with South Cambridgeshire District Council.

5.21 Following the implementation of mitigation measures the remediation of the site, together with flood mitigation works are likely to have a minor impact to the local environment and ecology in the short term. However, remediation of the site will eliminate the risk of significant contamination from run-off of surface waters. In addition, there is an anticipated net gain for biodiversity in the medium to long term as the flood swale and surrounding wet meadow habitat develop, and there will also be improvements to the quality of the Riddy Brook through removal of shading trees.

Landscape and Visual

- 5.22 The proposed site, as a former industrial manufacturing complex, is a somewhat incongruous feature within a predominately rural landscape. Overall the landscape character of the actual site has a low quality.
- 5.23 Remediation of the site for residential led mixed-use development will, on its own, not improve the quality of this local environment or have any particular beneficial impact on the landscape character.
- 5.24 In visual terms, the existing industrial elements of the site, taking into account the massing, height and colours of former individual buildings could be seen from various viewpoints above both coniferous and deciduous mature tree belts, hedges and artificial bunds. The availability of these views is limited to the immediate area around the site, essentially (but not exclusively) to within 1.5km.
- 5.25 Remediation of the site even using tall equipment or task lighting will only have noticeable adverse changes to viewpoints that either lack vegetation screening or that are in very close proximity to the site boundary. These effects will only be short-term.
- 5.26 Mitigation measures to alleviate these elements of remediation activities will not be possible and residual effects will not reduce for this type of operation.

Archaeology and Cultural Heritage

- 5.27 The ES provides an assessment of the existing cultural heritage and archaeology assets at the site and the potential effects the remediation will have on these assets.
- 5.28 There is a potential for remediation work to impact upon the setting of the listed buildings in and around the site during the remediation of the site. Impact upon the setting of listed buildings during remediation work is moderate adverse but short-term, indirect and reversible and are likely to comprise noise, vehicle and plant movements, material storage and other construction related operations. To alleviate these effects the remediation process will be undertaken as quickly as possible.
- 5.29 There will be no impacts on archaeological remains as a result of the proposed remediation.

Waste Management

- 5.30 The ES identifies the solid wastes arising from the remediation and restoration of the site and assesses the potential environmental effects associated with their handling and disposal. The assessment measures the waste management processes during the phases of the scheme against those of the baseline situation utilising a table of assessment criteria.
- 5.31 Inherent in the design of the Remediation Method Statement has been waste minimisation and sustainability. Therefore the majority of the waste generated on site will be treated on site and where material is suitable for use it will be re-used on site in line with the provisions of the waste hierarchy. Only when all other options have been explored is waste disposed of to landfill.
- 5.32 The ES concludes that whilst implementation of the proposed mitigation measures will reduce the quantity of waste arising and divert as much as possible from landfill, there will inevitably be residual waste arisings. The site remediation and restoration is assessed as having a minor adverse effect on waste management in the short-term and the post remediation status is assessed as having a neutral effect until redevelopment takes place. The overall impact of the scheme on waste management is assessed as minor adverse.

6. Summary and Conclusions

6.1 The proposed approach to the remediation and preparation of the former Bayer CropScience Ltd site at Hauxton for redevelopment has been prepared with the aim of avoiding adverse effects on the environment. It is clear from the ES that the significance of the predicted effects associated with the proposed development are mainly either negligible or beneficial, with only a minimal number of adverse effects that cannot be satisfactorily mitigated against.

Further Information

- 6.2 If you require further information on the Environmental Statement, please contact either:
 - Richard Newsome, GVA Grimley 020 7911 2304; or
 - Jennie Daly, Harrow Estates Plc 01928 797900.