

Hotspur Press, Manchester

Volume 3: Environmental Management Plan

December 2023

Turley

This document provides a summary of all the mitigation committed to within **Volume 1, Technical Chapters 6 – 14** to manage the environmental effects during the construction and operational stages of the Proposed Scheme and to establish a suitable mechanism to link to planning conditions, thereby delivering and securing mitigation.

This Environmental Management Plan (EMP) has been produced as a separate ‘clearly-marked’ document. However, this document should be read in conjunction with **Volume 1: Main Text and Figures, Volume 2: Technical Appendices** and **Volume 4: Non-Technical Summary**.

As set out within **Volume 1, Chapter 2: Approach to EIA**, the EIA has considered primary, secondary and tertiary mitigation in line with Institute of Environmental Management & Assessment’s (IEMA) Environmental Impact Assessment Guide to Delivering Quality Development (2016).

Each of the **Technical Chapters 7 – 14**, in **Volume 1** have considered primary and tertiary mitigation prior to undertaking the assessment of likely significant effects. Following the conclusion of effects based on the Proposed Scheme, any further mitigation measures or monitoring arrangements (i.e. secondary mitigation) have been detailed.

The three types of mitigation considered are defined as:

- **Primary** – modifications to the location or design of the Proposed Scheme made during the pre-application stage that are an inherent part of the project;
- **Secondary** – actions that will require further activity in order to achieve the anticipated outcome; and
- **Tertiary** – actions that would occur with or without input from the EIA feeding into the design process. These include actions that will be undertaken to meet other existing legislation requirements, or actions that are considered to be standard practices used to manage commonly occurring environmental effects.

All primary, secondary and tertiary mitigation referenced throughout the Environmental Statement (ES) has been collated and are summarised in the EMP (**Table 1**).

It should be noted that, given the definition of primary mitigation and the fact that the measures are inherent to the Proposed Scheme, all primary mitigation is to be secured through approval of plans submitted for approval referred to in **Volume 1, Chapter 4: Development Specification** and any associated design strategies / principles referenced in **Volume 1, Chapter 4: Development Specification** that are submitted in support of the ES or the Application. This includes **Plans, Sections and Elevations**.

Therefore within the EMP (**Table 1**) there is a summary of primary mitigation measures used to inform **Volume 1, Technical Chapters: 7 – 14**; as well as other mitigation relied upon to ‘scope out’ environmental topics in **Volume 1, Chapter 6: Topics which are Not Significant**.

In most cases it is assumed that secondary mitigation will be subject to planning conditions and when preparing such conditions Manchester City Council (MCC) should give due consideration to the long-term effectiveness of the mitigation proposed. Therefore, there will be a requirements for long-term monitoring of mitigation measures identified in the EMP

(**Table 1**) to ensure the mitigation committed to, is implemented and the EMP remains fit for purpose during the lifespan of its implementation.

Table 1: Environmental Management Plan

Ref.	Primary Mitigation
	All forms of primary mitigation are based on the description of the Proposed Scheme set out in Volume 1, Chapter 4: Development Specification and the plans as set out in Volume 1, Figures 4.1 – 4.35 , which the Proposed Scheme will be delivered in accordance with.
Building Heights	
P1	Restricted heights of proposed buildings which are set at a maximum of 36 storeys to restrict long distance views of the Proposed Scheme.
Building Materials	
P2	The brick façade of Hotspur Press will be retained. With the retention of the façade, there is no proposed loading of the existing structure for the taller tower element, to minimise adverse side effects of loading on the existing retained façade. The proposed tower will generally be constructed using concrete to create the superstructure and provide the necessary structural stability of the building. The external façade of the tower will comprise complimentary brick peers with infill glazed panels of anodised aluminium.
P3	The Proposed Scheme has high quality architectural design with a coherent language that considers the existing site context and wider urban form, creating a well-considered and legible addition to the skyline. The preservation of the original facade creates an aesthetic which is of its place and maintains a unique identity.
Landscape / Amenity Space Strategy	
P4	A new public square and public realm will be provided in the north of the Site. The new public square, ‘Hotspur Yard’, will connect First Street through to Cambridge Road enhancing pedestrian movement through this part of the city. The floorscape of the square will be a high quality natural stone to stitch into the adjoining public realm. Street furniture will provide external amenity and flexibility for internal amenity space at ground level to spill out into Hotspur Yard. The proposals will increase tree cover to provide shade and a green outlook.
P5	The landscaping proposals will seek to maximise the ecological value of the Site through the provision of native and/or wildlife friendly landscape planting. This will provide a public space within the Site and will subsequently provide new and enhanced opportunities for faunal species. This will include the selection of climate change tolerant species as part of the projects’ biodiversity strategy. Tree planting is proposed to soften close-range views of the Proposed Scheme.

Ref. **Primary Mitigation**

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P6 A post works enhancement strategy will be undertaken to include for a brown or green roof to provide and enhance habitat for black redstart. Additional enhancements will be provided via the installation of integrated bird boxes to ensure long term breeding habitat within the Proposed Scheme.

P7 Key features of the landscape proposals include:

- Proposed tree planting to new public space;
- Flexible space adjacent to internal building uses;
- External covered seating area;
- Footpath improvements to Cambridge Street;
- Biodiversity rood to Level 4;
- In-ground paving detailing / artwork;
- Lighting columns with Gobo projection;
- Paving detail referencing historic workshops;
- Fixed timber seating elements; and
- Flexible furniture.

P8 Specifically to control wind effects, the following measures are included within the public realm:

- Semi-mature trees, of around 6 to 8m height and comprising a deciduous species with substantial retained solidity in winter

Ref. Primary Mitigation

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(i.e. significant canopies with numerous branches), distributed across the Public Square within the Site;

- A 1.1m high solid wall extending from the northwest corner of the proposed building, along the Site boundary, towards the neighbouring First Street North development; and
- A 1.1m high glazed balustrade around the perimeter of the ground floor terrace overhanging the river.

Access and Movement Strategy

P9 There will be no vehicular access to the Site (save for emergency services, loading bays and disabled parking). Appropriate loading and unloading space will be provided adjacent to Cambridge Street, which will also serve refuse collection.

P10 The Applicant will implement a management plan in place on these days to help control the movement of vehicles around the area to minimise the potential for any disruption to the operation of the highway.

P11 The Proposed Scheme does not include any vehicular parking provisions. However, there will be one disabled bay and one loading bay.

P12 The Proposed Scheme include cycle parking within the basement level, with spaces for up to 124 cycles.

Lighting Strategy

P13 Artificial lighting will largely be contained to the areas of public realm and the interior of the building, as it is assumed that existing lighting on the surrounding road network will be retained.

P14 Lighting within the public realm will comprise amenity/ architectural lighting, designed to accentuate the architectural value of the structure, including the retained Hotspur Press Signage, and the elements of the public realm (details of which can be found in the Design and Access Statement, submitted with the Application). This will be achieved through various lighting elements, including ambient lighting, task lighting, accent lighting and decorative lighting elements. In addition, illuminated advertisements/signage associated with non-residual uses are likely.

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- P15 Where lighting is proposed it will be designed and installed in line with relevant industry best practice and guidance, including:
- CIE 150: 2017 – Guide on the Limitation of the Effects of Obtrusive Light from Outdoor Lighting Installations, 2nd Edition¹;
 - ILP GN01 - Guidance Notes for the Reduction of Obtrusive Light 2021²;
 - ILP PLG05: The Brightness of Illuminated Advertisements³;
 - ILP PLG08: Guidance on the Application of Adaptive Lighting within the Public Realm⁴;
 - ILP Lighting Landscapes⁵;
 - BS 5489-1 : 2020 – Code of Practice for the Design of Road Lighting⁶;
 - BS EN 13201-2:2015 – Road Lighting – Part 2: Performance Requirements⁷;
 - BS EN 12464 – 2 2014 – Outdoor Work Spaces;
 - SLL Guide to Limiting Obtrusive Light 2012⁸;
 - SLL Lighting Handbook 2009⁹;
 - LG 6 (CIBSE) – The Exterior Environment 2016¹⁰; and
 - ILP Guidance Note 08/18 Bats and Artificial Lighting in the UK¹¹.
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Ref. **Primary Mitigation**

All forms of primary mitigation are based on the description of the Proposed Scheme set out in **Volume 1, Chapter 4: Development Specification** and the plans as set out in **Volume 1, Figures 4.1 – 4.35**, which the Proposed Scheme will be delivered in accordance with.

- P16 Lighting is assumed to be operational 24 hours a day to provide a safe place for pedestrians, members of the public and future users of the Site (i.e. reduction in crime measures) as well as to ground the Proposed Scheme within the context of the surrounding urban realm. All external lighting will be controlled by photocell overrides whereby luminaires are held off while natural daylight is sufficient.
- P17 Implementation of a bat friendly lighting scheme following guidance outlined in The Institution of Lighting Professionals (ILP) Guidance Note 08/23¹². The lighting strategy will focus on minimising splay over the river corridor from the Proposed Scheme onto adjacent ecological receptors via lighting design measures, such as sensitive site configuration, light spectrum and lumen specification.

Building Safety Strategy

- P18 The final building management company will have in place the required emergency producers/practices (i.e. Fire Emergency Evacuation Plan (FEPP)) or apparatus/instruments (i.e. smoke detectors/sprinklers) required by law for these uses. In addition, the buildings will be designed, in line with Building Regulations Approved Document D: Fire Safety, with appropriate fire preventative measures (i.e. fire doors, extinguishers etc.) and all external façades and materials will meet the necessary fire resistance standards set out within Building Regulations and by law.
- P19 The design of the Proposed Scheme will be informed by ‘Secure by Design’ principles and appropriate design and site management measures (including appropriate lighting and digital entry systems at each building). The Proposed Scheme will have on-Site security staff, with staff present 24 hours a day. Whilst the majority of the Site has been purposely developed to be publicly accessible, there will be areas where controlled access is required (i.e. entry to the accommodation blocks), and this will be controlled through means of managed control such as intercom, fob, bollards, or a keypad locking system (to be agreed).
- P20 Plant rooms and equipment will be designed to contain any spills through bunds and prevent infiltration into ground.

Surface Water Drainage Strategy

- P21 The proposed surface water drainage will not increase the runoff rate and will include an allowance for climate change in accordance with relevant guidance¹³.

Ref. **Primary Mitigation**

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P22 The proposed drainage system will be designed in accordance with BS EN 752:2017 and Sustainable Drainage Systems (SuDS) will be incorporated into the surface water drainage network as rain gardens and permeable surfacing, in accordance with CIRIA 753 – The SuDS Manual¹⁴ where practical.

P23 The Drainage Strategy (**Appendix 14.1**) allows for a reduction in the surface water runoff rate through the provision of storm water attenuation storage and SuDS features. Storage volumes have been determined to restrict peak surface water runoff rates from impermeable areas of the Proposed Scheme.

P24 The proposed discharge rate aims to reduce this to a maximum discharge rate of 18.9l/s (50% reduction) for all storms up to the 1:100 + climate change allowance event.

P25 The finished floor levels (FFL) of the proposed residential units will be set a minimum level equivalent to the 1 in 200 year plus climate change level plus an additional 600mm. All commercial units will have the FFL set at a minimum of the equivalent to the 1 in 200 year plus climate change level plus an additional 300mm.

Foul Water Strategy

P26 The proposed drainage system will be designed in accordance with BS EN 752:2017, Building Regulation Approved Document Part H.

P27 The proposed connections to the public sewer system will be subject to agreement with United Utilities under the Section 106 Agreement.

Potable Water Strategy

P28 Measures to reduce water consumption, including the provision of water efficient fixtures and fittings, i.e. low flow taps and low water use WCs will be implemented

Energy Strategy

P29 The Proposed Scheme will conform to the requirements set out in Parts L2A (Conservation of Fuel & Power) of the Building Regulations 2021 and Manchester Councils key Local and Core Strategy policies.

Ref.	Primary Mitigation
	All forms of primary mitigation are based on the description of the Proposed Scheme set out in Volume 1, Chapter 4: Development Specification and the plans as set out in Volume 1, Figures 4.1 – 4.35 , which the Proposed Scheme will be delivered in accordance with.
P30	The new build elements of the Proposed Scheme will take a fabric first ^a strategy approach to reduce the buildings energy demands.
P31	The Proposed Scheme is all-electric and combustion-free (with the exception of emergency generators). It is therefore in a position to decarbonise as the electricity grid decarbonises in the future.
P32	The proposed new build elements will aim to achieve greater than the following reductions in CO₂ emissions over current Building Regulations based on the following the Energy hierarchy: • Energy Efficiency (to achieve at least a further 10% reduction); • Centralised Energy (e.g. energy centre, connection to district heat network); and • Low or Zero Carbon Technologies (e.g. ASHP, solar PV).
P33	The key sustainability principals will be: • Air Source Heat Pump for efficient generation of hot water feeding an Energy Centre; • Air Source Heat Pumps for heating and cooling to amenity spaces; • Low use water equipment; • LED lighting throughout;

^a A 'fabric first' approach involves maximising the performance of the components and materials that make up the building fabric itself to reduce capital and operational costs, improve energy efficiency and reduce carbon emissions Key considerations are: Maximising air-tightness; increased levels of insulation; optimising solar gain through the provision of openings and shading; optimising natural ventilation; and using the thermal mass of the building fabric.

Ref. **Primary Mitigation**

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- Mechanical Ventilation Heat Recovery (MVHR) on ventilation systems; and
- Photovoltaic panels for electricity generation

P34 A BREEAM rating of “Excellent” is being targeted.

P35 To effectively manage the risk of overheating, suitable glazing ratios, shading, and solar control glazing will be specified for the Proposed Scheme alongside appropriate ventilation levels and minimisation of internal heat gains.

Operational Waste Strategy

P36 The Proposed Scheme has been designed in order to take account of appropriate provision for waste storage and handling facilities/areas, inclusive of areas for segregation of waste and recycling. In addition, all waste storage/handling facilities have been designed in accordance with British Standard (BS) 5906:2005 Waste Management in Building – Code of Practice.

Resilience to Climate Change

P37 The Building Regulations¹⁵ will be met in relation to the impact of ground movement in foundation design.

P38 Incorporation of landscaping proposals to maximise ecological value which will include the selection of climate change tolerant species.

P39 The proposals will integrate habitat for Black Red Start at Level 04.

P40 The proposals seeks to enhance the River Medlock corridor adjacent to the Site through a clean up and marginal planting to increase biodiversity and wellbeing of residents in the building.

P41 In accordance with national guidance the mitigation proposed in the Flood Risk Assessment will take into account the potential effects of climate change to minimise risk of flooding. This will include consideration of climate change effects on river levels and the design of the surface water drainage system which will take into account the 1 in 100 year storm event and required climate change allowances.

Ref.	Primary Mitigation
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P42 An overheating analysis of the Proposed Scheme will be undertaken. Where measures are required to reduce the risk of overheating this will be done in accordance with the cooling hierarchy^b.

P43 Provision of water efficient fixtures and fittings, i.e. low flow taps and low water use WCs.

Noise Strategy

P44 Best practice measures in the form of plant selection, screening and attenuation built into the design of the system ensuring the requirements of MCC are achieved. MCC guidance is based on that laid out in British Standard 4142:2014+A1:2019; *'Methods for rating and assessing industrial and commercial sound'* (BS4142).

P45 A high performance (circa 42dBR_w (-5C_{tr})) acoustic double glazing will be required to facades directly overlooking the road and rail to appropriately control external to internal noise levels.

Appropriate high performance acoustic trickle ventilation or ducted ventilation will be required.

External walls will require a moderately high acoustic performance of 52dBR'_w.

Ref.	Tertiary mitigation
	Tertiary mitigation presented below has been collated from Chapter 4: Development Specification and Technical Chapters 6 – 14 .

Construction Environmental Management Plan (CEMP)

^b The cooling hierarchy is as follows: 1. minimise internal heat generation through energy efficient design; 2. reduce the amount of heat entering a building in summer through orientation, shading, albedo, fenestration, insulation and green roofs and walls; 3. manage the heat within the building through exposed internal thermal mass and high ceilings; 4. passive ventilation; 5. mechanical ventilation; and 6. active cooling systems (ensuring they are the lowest carbon options).

Ref. Tertiary mitigation

Tertiary mitigation presented below has been collated from **Chapter 4: Development Specification** and **Technical Chapters 6 – 14**.

- T1 A detailed CEMP will be prepared by the appointed contractor in advance of commencing demolition and construction works. The document will provide detailed measures / controls to avoid and manage potential adverse effects upon the environment during the construction stage. Measures will include:

General measures

- T2 Securing the Site will be achieved through a combination of secure fencing, barriers and hoarding, depending on the exact requirements and proximity to specific works. In addition, the principal contractor will be responsible for the provision of construction staff at key interfaces if appropriate
- T3 During construction, either a central compound and/or a number of satellite compounds will be required for the contractor and appointed subcontractors. The exact location of the construction compound(s) is unknown at this time, but it will be within the Site curtilage.
- T4 Any utilities requiring diversion, stopping up or temporary relocation will be undertaken in line with an agreed strategy with the relevant network operators.
- T5 Construction working hours¹⁶ (noisy work) will be 07:30 to 18:00 Monday to Friday; 08:30 to 14:00 on Saturday; and no noisy work on Sundays and Bank Holidays. Operations outside of these hours will be agreed with MCC.
- T6 The site security arrangements for the Proposed Scheme during the construction stage will be in line with the requirements set out in the Construction (Design and Management) Regulations 2015 and appropriate levels of security (personnel / CCTV) will be provided.
- T7 UK legislation and guidance issued by the Health and Safety Executive (including the Health and Safety at Work Act 1974) will be adhered to.
- T8 Measures to reduce overheating risks such as the provision of shaded areas, potable water supplies and suitable PPE.
- T9 All measures will accord with best practice in accordance with the Considerate Contractors Scheme and Site handbook for the construction of SUDS (CIRIA C698)¹⁷

Air quality / Dust management

Ref. **Tertiary mitigation**

Tertiary mitigation presented below has been collated from **Chapter 4: Development Specification** and **Technical Chapters 6 – 14**.

- T10 The CEMP will be informed by the Institute of Air Quality Management (IAQM) guidance¹⁸ and would include prevention measures, such as screening stockpiles of materials, deployment of windbreak netting and dampening exposed soils as appropriate, and set out requirements for ongoing monitoring and liaison with the local community, and MCC.

Ground works / Contamination

- T11 Prior to and during any earthworks the recommendations of the **Written Scheme of Investigations (WSI) for an Historic Building Survey and Evaluation**¹⁹ will be followed to ensure any potential below ground remains are evaluated and recorded through archive in accordance with current Historic England guidelines, and current ClfA guidance²⁰.
- T12 The remediation will be confirmed following the site investigation and risk assessment. The general remediation approach will comprise typical 'urban renewal' type remediation measures which have been implemented successfully on countless sites with similar contamination histories (such as gas protection membranes, clean cover soils, removal off-site, etc).
- T13 Foundation design will be undertaken in accordance with relevant industry guidance, including but not limited to CIRIA Report C572: Treated ground engineering properties and performance, British Research Establishment document FB75: Building on Fill - Geotechnical Aspects and British Standard 6031:2009: Code of Practice for Earthworks.
- T14 Piling activities will be undertaken in line with guidance, such as the Environment Agency's Piling and penetrative ground improvement methods on land affected by contamination: guidance on pollution prevention. This will be led by the contractor(s). Where required a piling risk assessment will be completed to understand the risk of piling activities associated with impacted soils and receptors.
- T15 All works would be undertaken following current UK regulations, guidance and industry best practice *inter alia* National Planning Policy Framework (NPPF)²¹, BS10175²², Land Contamination Risk Management (LCRM)²³, etc.
- T16 Asbestos will be identified, removed, handled and disposed of in line with appropriate guidance and Regulations, including The Hazardous Waste (England and Wales) Regulations 2005²⁴, Control of Asbestos Regulations 2012²⁵ and CIRIA C733²⁶. Programmed removal of the identified asbestos materials will be undertaken at the outset of the enabling works under an Asbestos Management Plan.
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Ref. **Tertiary mitigation**

Tertiary mitigation presented below has been collated from **Chapter 4: Development Specification** and **Technical Chapters 6 – 14**.

T17 All contractors appointed will be appropriately licensed and experienced, working within the requirements of the Construction (Design and Management) Regulations 2015 and CIRIA C741²⁷, Pollution Prevention Guidance, CIRIA C532²⁸, CIRIA C750²⁹ and the Confined Space Regulations³⁰.

T18 The CEMP will also include measures, such as:

- Use of suitable Personal Protective Equipment (PPE);
- Provision of on-site washing facilities;
- Good house-keeping practices.
- Provision of emergency spill kits;
- Use of wheel wash facilities;
- Earth movements will be controlled to reduce the risk of silt combining with run-off and implementation of protection measures to minimise silts and construction arisings;
- Regular cleaning to remove loose sediments and prevent build-up of dust and mud;
- Use of sediment traps and bunded storage;
- Use of impermeable materials to prevent ingress into the ground;
- Washing down / equipment cleaning associated with concrete or cementing processes and provision of facilities to remove sediment prior to disposal; and

Ref. **Tertiary mitigation**

Tertiary mitigation presented below has been collated from **Chapter 4: Development Specification** and **Technical Chapters 6 – 14**.

- Cut-off ditches and / or geotextile silt-fences will be installed around excavations and exposed ground, stockpiles to prevent the uncontrolled release of sediments.

T19 Clean cover layers will be validated for chemical quality prior to re-use / use on-site and these will prevent direct contact from landscaped areas within the Proposed Scheme.

T20 All material brought on-site and re-used will also be tested in accordance with relevant guidance / standards, such as Waste Classification: Guidance on the classification and assessment of waste. The appointed contractor(s) will take responsibility for inspecting and classifying all waste materials generated by the works and obtaining any necessary permits, licenses or notices.

T21 All contractors appointed will be appropriately licensed and experienced, working within the requirements of the Construction (Design and Management) Regulations 2015 CL: AIRE Development Industry Code of Practice^c as well as Guidelines for Pollution Prevention and best practices measures as detailed above.

Lighting

T22 Best practice measures to be implemented in line with lighting industry standards and guidance including the CIE publication 'Technical Report Document 129^d and BS EN 12464-2:2014^e.

T23 The following measures are proposed in order to control Light Spill, Glare and Sky Glow effects and thus manage light pollution:

- Where practicable, construction lighting in the Site would be designed to comply with Environmental Zone E4 in accordance with the ILP Guidance Note GN01^f;
- Illuminance levels arising from temporary lighting to be designed in accordance with BS EN 12464-2: 2014 and CIE 129;

^c CL: AIRE (2011) Development Industry Code of Practice.

^d CIE - Technical Report Document 129 (1998) Guide for Lighting Exterior Work Areas.

^e British Standards (2014) BS EN 12464-2 – Lighting of Work Places – Part 2: Outdoor Work Places.

^f Institute of Lighting Professionals (ILP) (2021) Guidance Notes for the Reduction of Obtrusive Light (GN01).

Ref. Tertiary mitigation

Tertiary mitigation presented below has been collated from **Chapter 4: Development Specification** and **Technical Chapters 6 – 14**.

- Placement of temporary lighting required to ensure safe working conditions and to maintain security, to have due regard of sensitive receptors (i.e. occupied residential premises);
- Lighting to be directed so as avoid unnecessary Light Spill outside of construction areas and to ensure that the light distribution is toward the task area;
- Lighting to be switched off when not required for safe working conditions and Site security;
- Use of light shields/baffles to control upward light to within the maximum 15% set out in the ILP Guidance Note GN01, where possible;
- Lighting to be kept at 0° tilt to avoid Sky Glow, where practicable; and
- Light dimming and automatic switch off would be used (where appropriate).

Habitat / Species Management

T24 Any bat roosts present on Site will be closed under a A13 licence from Natural England, supported by a robust mitigation strategy focussing on timings of the licensable works to minimise disturbance, providing mid-term roosting provision for bats within the immediate landscape and long term in-situ roost provision within the final structure.

T25 The CEMP will also be informed by the Chartered Institute of Ecology and Environmental Management³¹ guidance.

T26 Presence/ likely absence surveys will be undertaken to inform a proportionate mitigation strategy along with undertaking the works outside the breeding bird season (March to September inclusive) in line with the Wildlife and Countryside Act 1981 (as amended). If construction works cannot take place outside of the bird breeding season the CEMP will include for a pre-works inspection survey.

Noise and Vibration

T27 CEMP measures to control noise and vibration are considered as secondary mitigation (see below).

Ref. **Tertiary mitigation**

Tertiary mitigation presented below has been collated from **Chapter 4: Development Specification** and **Technical Chapters 6 – 14**.

Traffic

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| T28 | A Construction Traffic Management Plan (CTMP) will be prepared by the principal contractor (when appointed) which will set out the proposed routing of construction traffic and measures to enforce such routing (i.e. signage). This will be agreed with MCC Highways |
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Water

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| T29 | The Principal Contractor will be responsible for managing storm water run-off and foul water effluent generated during the temporary construction stage (including water arising from excavations, rainfall and staff welfare). Management of this water may include the ongoing use of the existing channels, gullies and outlets, construction in part of the final development drainage system or by providing temporary connections into the existing public sewer network. |
| T30 | Drainage routing measures to ensure that surface water does not flow out of the Site boundary and onto neighbouring sites. |
| T31 | Planning of works to ensure that major earthworks are carried out during dry periods where surface water can be better managed and contained. |
| T32 | All connections will require approval from MCC and United Utilities prior to implementation. |
| T33 | A Surface Water Management Plan (in accordance with best practice guidance such as The SuDS Manual (C753) ³² and BS8582:2013 Code of practice for surface water management for development sites ³³) will be required to be established on Site by the contractor to control and manage surface water run-off. This will include the installation of a temporary drainage system to collect and contain run-off including any discharge agreements with the local sewer authority. It may also be necessary to introduce perimeter cut off drains to prevent overland run-off and additional interceptors for pollution and debris collection. |
| T34 | Management of construction works so as to comply with the necessary standards and consent conditions as identified by the Environment Agency (EA) and MCC. |
| T35 | All construction workers will be briefed on the importance of the water quality, location of the surface water features off-site and the location and use of the accidental spill kits as part of the site induction. |

Ref. Tertiary mitigation

Tertiary mitigation presented below has been collated from **Chapter 4: Development Specification** and **Technical Chapters 6 – 14**.

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| T36 | To prevent drains becoming blocked by cement or other solid waste debris the exposure of bare earth and storage of materials in stockpiles will be minimised. Good housekeeping practices will be applied, concrete will not be allowed to enter drains and lightweight materials will be covered or weighted down. |
| T37 | Any areas where there is increased risk of hydrocarbon/chemical spillage and hazardous substance stores additional precautions will be taken in accordance with best practice (such as spill kits and bunded containers / areas). |
| T38 | All plant and machinery will be maintained in a good condition and any maintenance required will be undertaken within safe areas. |
| T39 | Stockpiling of materials to be kept to a minimum and space will be provided between stockpiles to minimise the impact on overland flow. |

Waste Management

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| T40 | Contaminated waste will be handled, processed and removed from Site by suitability qualified contractors, all being undertaken in line with The Hazardous Waste (England and Wales) Regulations 2005. |
| T41 | The CEMP will be informed by the waste provisions of the Environmental Protection Act 1990 ³⁴ and the Environmental Protection (Duty of Care) Regulations 1991 ³⁵ and will set out the principles and legal requirements relating to waste, including any hazardous waste that is encountered and required to be exported off-site for disposal. |
| T42 | The CEMP will also describe how materials will be managed efficiently and disposed of legally during construction. It will also outline the aims, objectives and on-going management responsibilities, including management practices, to be implemented during the construction stage, and will set targets for the reduction, diversion from landfill and reuse of waste. |

Remediation Strategy

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| T43 | <p>A detailed Remediation Strategy will be submitted prior to commencement of works on site and secured by way of a suitably worded planning condition based on results of the survey and assessment works to be submitted.</p> <p>It will include appropriate protocols for the identification and management of unforeseen contamination. On the completion of any remediation, a validation report would be produced to ensure that the remedial concentrations set out in the remediation strategy have been achieved</p> |
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Ref. **Tertiary mitigation**

Tertiary mitigation presented below has been collated from **Chapter 4: Development Specification** and **Technical Chapters 6 – 14**.

Operational Vibration Strategy

T44 Any vibration will comply with the limits stated within Table 1 of British Standard 64721: 2008; *‘Guide to evaluation of human exposure to vibration in buildings – Vibration sources other than blasting’* (BS6472) for residential properties.

Ref **Secondary Mitigation**

Full detail is outlined in **Technical Chapters 7 – 17**. These are broadly in topic order, as presented in **Volume 1** of the ES.

Built Heritage – Conservation Implementation Strategy

S1 The ‘Conservation Implementation Strategy’ will frame the specifications, future conservation and ongoing maintenance of the retained historic components of the Hotspur Press building. It includes the following: Brickwork repairs, windows repairs and replacement, the façade repair, support and ongoing maintenance, and its internal fabric conservation and repair.

The approach taken in the ‘Conservation Implementation Strategy’ is one of minimum intervention in repair and this accords with best conservation practice, as set out by the Society for the Protection of Ancient Buildings, Historic England and others. The intention is not to restore the building to an ‘as new’ condition, rather it is to retain the patina of age of the retained fabric whilst cleaning, removing damaging interventions, and repairing damaged components of the structure. Where such components have been damaged beyond repair, replacement is proposed on a like for like basis using the closest available match to the original materials.

The ‘Conservation Implementation Strategy’ will frame the more detailed, construction-specific ‘Construction Environmental Methodology and Programme’. This will include the protective air quality and noise and vibration measures that will be put in place to ensure any potential adverse impacts of the demolition and construction stage will be minimised. The latter will include recommended measures specific to the riverside location and will include the following:

- Use of high quality hoardings;
- Dust management;
- Vibration monitoring;

Ref	Secondary Mitigation
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	Full detail is outlined in Technical Chapters 7 – 17 . These are broadly in topic order, as presented in Volume 1 of the ES.
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| | <ul style="list-style-type: none">• Regular cleaning of roads and the public realm surrounding the Site;• Edge protection to be affixed whilst concreting operations are in place;• Implementation of a traffic management plan; and• Vibration monitoring. |
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Climate Change	
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S2	Construction stage secondary mitigation:
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| | <ul style="list-style-type: none">• Fit-out measures: specification of low-impact floor covering and carpets, low VOC paint/ adhesives/sealants/coatings, low-impact furnishings, preference for fittings with high recycled content, consideration given to sourcing materials from a 'manufacturer with a take-back scheme' and procuring products/fittings as a service (e.g. lighting);• Specification of materials with Environmental Product Declarations (EPDs) with a view to further reducing embodied carbon emissions;• A pre-demolition audit to be undertaken by the demolition contractor prior to commencement of any demolition to cover all existing structures and hard surfaces being considered for demolition to identify and maximise the recovery of material for subsequent high grade or value applications;• Use of energy-efficient construction plant and machinery;• Preference for local suppliers (within the MCC administrative area) to shorten the supply chain and reduce its associated environmental footprint coupled with prioritisation of responsibly sourced goods and services where feasible whilst maximising the proportion of recycled content within materials used in construction; and |
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Ref	Secondary Mitigation
	Full detail is outlined in Technical Chapters 7 – 17. These are broadly in topic order, as presented in Volume 1 of the ES. • Main contractor to monitor energy, water and waste data during the construction stage to encourage transparency and accountability.
S3	Operational stage secondary mitigation: • Installation of smart meters and/or sub-meters to monitor operational consumption more accurately; • Energy efficient equipment to be procured for the Proposed Scheme and supplied throughout its lifecycle including Energy Star rated products for all small power, plug-in equipment (e.g. supplementary electric heating); • Selection of 100% renewable electricity contracts, where possible; and • ‘Smart’ technology to be incorporated in the Proposed Scheme as appropriate including intelligent street lights to optimise the management and performance of the site infrastructure thereby further reducing emissions.
Noise and Vibration – Construction Environmental Management Plan	
S4	Adoption of best practice measures during the construction stage as set out within BS 5228-1 & 2 2009+A1:2014 Code of Practice for Noise and Vibration Control on Open Construction Sites.
S5	A typical mitigation measure for construction noise would be screening from site perimeter hoarding, which could help limit noise impact from low level activities. However, in this instance, as the nearest residential receivers to the Site are located in multi storey buildings, perimeter hoarding will offer little to no noise attenuation for works occurring above the height of the hoarding. Other elements of mitigation could include: • Careful selection of demolition/construction methods and plant to be used; • Restriction of drop heights onto lorries;

Ref	Secondary Mitigation
	Full detail is outlined in Technical Chapters 7 – 17. These are broadly in topic order, as presented in Volume 1 of the ES. • Regular maintenance and servicing of vehicles, equipment and plan in accordance with the manufacturers recommendations; • Use of temporary acoustic barriers where appropriate and other noise containment measures such as screens, sheeting and acoustic hoardings at the construction site boundary to minimise noise breakout and reduce noise levels at the potentially affected receptors; and • Locating Site generators and other stationary equipment away from residential receivers where possible.
S6	Any adopted best practice measures or mitigation identified above would form part of a Construction Environmental Management Plan (CEMP), which would be subject to planning condition.
S7	Additional potential measures that could be explored that go beyond standard best practice (but may not be feasible) are: • Significant noise barriers or screening (these would be much taller than normal, include overhangs or be located on tall framework); and • Significant noise enclosures for any stationary plant (this would be specifically designed enclosures for individual works and could, for example, include a lid over the enclosure.
S8	To reduce vibration piling will be undertaken using either CFA (controlled flight auger) or Rotary methods.
Flood Risk and Drainage – Drainage Strategy	
S9	The connection of the new drainage to the existing public sewer system would be undertaken over a short, isolated period of time. These works should be undertaken during a dry period to mitigate the impact

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