MOD Donnington
Option Site

Environmental Statement
Volume 3: Non-Technical Summary

January 2014

Telford & Wrekin Council Regeneration &
Investment

Telford & Wrekin Council
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1 Introduction

Telford and Wrekin Council (TWC) is seeking outline planning permission for three new buildings, (an administrative office and two warehouses, associated parking and associated infrastructure (the proposed development) on an agricultural land (hereafter the ‘Site’) within the administrative boundary of TWC. The proposed development is intended for the Ministry of Defence (MOD) to consolidate its logistics operations and to create a centre of excellence for logistics and commodity services. The location and context of the Site is attached in Appendix A (Drawing MMD-322676-DON-0000-0101).

The Site is located to the north-west of an existing Ministry of Defence (MOD) base in Donnington, Telford. Donnington has been one of the MOD’s main logistics base for many years, providing a 24 hour service when required to support armed forces worldwide. The MOD is a key investor in the local economy which has suffered from a diminishing manufacturing industry. MOD Donnington currently employs over 700 staff and this development provides a major opportunity to safeguard and increase local employment opportunities. TWC is committed to supporting the MOD operations at Donnington and ensure that the MOD continues its operation of the logistics centre within this locality.

The proposed development requires an Environmental Impact Assessment (EIA) to be undertaken to support the submission of an outline planning application. EIA is a process used to inform decision makers on the potential beneficial and adverse impacts of development proposals. It identifies and assesses environmental impacts that are likely to arise from the proposed development and determines whether they are significant, proposes appropriate mitigation measures to address any significant adverse impacts, and identifies any potential significant residual effects.

The EIA for the proposed development was undertaken by a team of specialists independent of the TWC, and the findings of the assessment are reported in an Environmental Statement (ES). The EIA has considered the potential environmental impacts of the proposed development and the necessary mitigation measures to address any potentially significant impacts. The results of the assessment will assist TWC in the determination of the outline planning application for the proposed development. The EIA has been prepared in accordance with requirements of current legislation, Government policies and regulations, good practice, relevant professional institutes’ guidance and industry requirements.

This Non-Technical Summary describes the main aspects of the proposed development.

1.1 The proposed development

The layout of proposed development is shown in Appendix A (Drawing F003-001 Rev F). The key elements of the proposed development consist of the following:

- A new three storey office building (approximately 2787m$^2$) located in the south-eastern corner of the Site, this is intended to be the main administration building for the proposed development;
- A warehouse (approximately 18,580m$^2$) measuring approximately 184m in length by 101m in width by 18m in height and offices (approximately 1160 sq. m) located to the eastern part of the Site;
- In the centre of the Site, a much taller building with heights varying between 18m, 25m and 35m with a floor space of approximately 62,654 sq m, for a single warehouse and 1810m$^2$ for offices. The total building area affords flexibility to adopt either a non-automated or fully automated warehouse system.
Therefore for the purposes of the Environmental Assessment, the combined maximum area needed to accommodate either option has been assessed;

- Car parking will be located in three separate areas of the Site:
  - 91 spaces to the south of the main administrative building at the south-eastern corner of the Site;
  - 215 spaces to the south of the warehouses/offices at the eastern part of the Site;
  - 500 spaces to the south of the larger warehouse/offices building at the centre of the Site;
- Lorry parking will be located in two separate areas within the Site; one to the west of the warehouse/office building at the eastern part of the Site, and the other to the west of the larger building located in the centre of the Site;
- A balancing pond, approximately 6000m$^2$ m will be located in the north-west corner of the Site; and
- A small bunded flammable store (approximately 30m$^2$) for the transit of chemicals.

In addition, there would also be landscaping, two gatehouses and an internal access road with an appropriate turning circle for lorries within the Site.

1.2 Construction

Construction is estimated to last approximately 18 months. For the purpose of the ES, it is assumed that there will be an intensive construction period of 18 months, which will result in a ‘worst case’ for the number of vehicle trips (heavy goods vehicle - HGV and private car) generated.

The proposed development will require the creation of two large flat plateaus with extensive foundations to support the new warehouses (minimum 18m in height). A ‘cut and fill’ method will be implemented to enable the reusing of as much as possible the materials excavated; however the transport of materials (approximately 25,000m$^3$ to 30,000 m$^3$) off Site will be required.

Construction hours are assumed to be restricted between 07:00 and 17:00 Monday to Friday with full time employees. It is anticipated that a more developed construction programme will be prepared as the project progresses to detailed design phase.

The final construction phase, known as the ‘fit out’ stage, will include constructing the internal roads within the Site, landscaping and the construction of the car parks. It is expected that there will be the largest amount of workforce on site (approximately 180) during the seventeenth month (at the fitting out stage).

A Construction Environmental Management Plan (CEMP) will be implemented during the construction phase to manage the environmental mitigation measures that have been developed during the environmental assessment process.

1.3 The need for development

At present the MOD Logistics and Commodity Services provides logistic services for the Armed Forces from two sites: MOD Donnington and Bicester. Since 2005, the MOD has identified the need to improve the delivery and efficiency of the logistics services.
The driver for this project stems from the need to provide a large facility that can cater for the improved efficiency gained by putting together all the high throughput elements of the MOD stock range. The MOD’s total stock storage currently extends to approximately 55,700m\(^2\) (6 million ft\(^2\)) and the proposed development would hold 10-15% of the overall stock volume. Additional storage warehousing would allow the MOD to consolidate more stock at Donnington, particularly in the light of the re-location of stock from Germany and against plans of the Defence Infrastructure Organisations regarding the disposal of its existing portfolio.

The loading/unloading areas of the new warehouse will need to handle a maximum daily input/output of approximately 12,500m\(^2\). The height of the loading areas is driven by the requirement for processing areas above to accommodate packaging goods.

The MOD has defined the requirements for a ‘consolidated’ facility to include the following:
- Warehouse buildings with a maximum total of 81,235m\(^2\) (875,000 ft\(^2\)) of storage, distribution space and associated welfare facilities;
- Approximately 2,787m\(^2\) (30,000ft\(^2\)) Head Quarters office building for use by the MOD;
- Car parking;
- Container storage; and
- HGV loading space.

A non-automated warehouse system will require a building footprint of approximately 300m by 200m and a building height of approximately 18m. An automated warehouse system will require a smaller overall building footprint but a larger (taller) building. In order to accommodate an automated central ‘racking’ and storage system, the central roof height of the building will need to be increased to up to 35m, which is the optimum height for automated storage and retrieval.

In addition to the MOD’s requirements, the principle drivers for the proposed development are to support the retention of employment within the area as well as a catalyst for further job creation and the potential for additional economic activity.

1.4 The consideration of alternatives

A desk study has been undertaken to identify possible alternative sites. A review of the Telford and Wrekin Council ‘Employment Land Review 2012 – Interim Report’ confirms that there are no viable sites on previously-developed land currently within the development boundary to accommodate the scale of development proposed. The largest allocated site is in Shawbirch and comprises 18.52ha, which is below that required by MOD to consolidate logistics services at Donnington. Therefore, the proposed development can only be accommodated within open land outside the development boundary.

To enable operational efficiency, any expansion of logistics facilities should be situated close to the existing operational site. Therefore, the ‘area of search’ for the purposes of the assessment of alternative sites was identified as land within a 2km search area of the existing MOD Donnington Site. A total of four alternative sites have been identified within the area of search (see Figure 1.1). The ‘area of search’ has
not identified any available sites of the size required within the development boundary; this included a number of possible sites within the Hortonwood Industrial Estate.

The four alternative sites (Figure 1.1) identified include:

- Site 1 – Land to the north west of the existing MOD Donnington site (The Site);
- Site 2 – Land to the north of the existing MOD Donnington site;
- Site 3 – Land to the north east of the existing MOD Donnington site; and
- Site 4 – Land to the east of the existing MOD Donnington site.

Figure 1.1: Alternative site locations within the ‘area of search’

Source: Alliance Planning

The desk based study assessed each of the sites on the key operational requirements based on factors such as size of the site, proximity to the MOD Donnington site, land take and location to the strategy highway network. The findings of the assessment conclude that Site 1 (i.e. the Site) is in the most suitable location compared to the other three alternative sites. The Site (Site 1) is located outside the built up area of Telford and comprises approximately 22 hectares of undeveloped land that could be available for development. Site 1 adjoins the boundary of the MOD base in Donnington which would allow for the new facility to be better integrated with the existing functions within MOD Donnington. Site 1 is also located outside of the floodplain, located away from groups of residential properties, and can be easily accessed through the existing MOD Donnington site. Although development on Site 1 would result in the loss of agricultural land which is considered of Grade 3a/3b (i.e. ‘Good to Moderate’) quality, development on the alternative sites would result in a more significant loss of Grade 2 (i.e. ‘Very Good’ quality) agricultural land.
As part of the design evolution of the proposed development, two possible layouts had been considered by the Project Team and the Applicant.

Option 1 concerned a single warehouse building with a floor space of approximately 93,000m$^2$ (1,000,000 ft$^2$). The building would occupy the majority of the site and would be close to residential properties. This option was not considered suitable mainly due to the proximity to residential properties and inadequate space for a headquarter office.

Option 2 is considered the best design response for the development in light of the location and characteristics of the Application Site. As an alternative to Option 1, the proposed development comprises two warehouse buildings and a separate headquarter office building. The change in layout has reduced the overall floorspace by locating the buildings further away from the residential properties at the northern part of the Site. Option 2 will also provide opportunities within the Site to address any potentially significant adverse environmental effects, which include: landscape (planting) proposals, creation of a balancing pond area to attenuate surface water run-offs.
2 Potential Environmental Effects

2.1 The site and surroundings

The Site is located to the north of the Hortonwood Industrial Estate and is adjacent to the MOD base in Donnington, Telford. The Site occupies 22.5 hectares of arable fields in agricultural use, with isolated mature trees and a public right of way access crossing the Site.

Vehicular access to the Site will be via the existing access to the MOD Donnington site off the A518, which provides access to Telford, the M6, M5, M42 and M1 motorways.

A small drain (Crow Brook) is located on the western boundary. There is a small pond to the north-east of the Site. To the east and north of the Site is the open countryside of Telford and Wrekin.

Although located outside of the settlement boundary as defined by the Wrekin Local Plan, the Site does not fall within TWC’s Green Network allocation; it does not include any ecological or landscape designations. There are no National Parks within or close to the Site; however Shropshire Hills Area of Outstanding Natural Beauty (AONB) is located approximately 6km south-west of the Site boundary.

2.2 Land use and land take

The Site covers 55.7 acres (22.5 hectares) and comprises existing undeveloped land in agricultural use located outside of the built up area of Telford as defined by the Wrekin Local Plan as open countryside. The land has a history of agricultural use. The majority of the Site, 17.8ha, is considered as ‘best and most versatile’ agricultural land (Grade 3a) with the remaining area, 4.7ha, being considered as poor agricultural quality (Grade 3b).

The loss of the two agricultural fields from production or other use by Hoo Farm is not considered to adversely impact of the operational viability of the farm holding to which they belong. No significant effects are predicted on the viability of the farm holding.

The proposed development has been designed to minimise the extent of ‘land take’ of the development and the area of ‘best and most versatile agricultural land’ lost to development. Based on mitigation measures it is considered that the proposals represent only minor adverse impacts due to the loss of agricultural land and associated soils, this is not considered to be a significant effect.

2.3 Air quality and dust

During the 18-month construction period (assumed to be the ‘worst case’ in terms of increased traffic intensity), HGV movements are only predicted to exceed 200 per day in two months, i.e. 217 daily movements in the first month and 276 movements in the third month. Construction HGV moments are predicted to be less than 120 per day at all times outside these two months. In view of this small number of construction HGV movements (i.e. less than 200 movements per day for a period of a year or more), the effect on air quality is not considered to be significant during construction. As such no mitigation measures are considered necessary.
The proposed works are considered to have ‘medium’ potential to cause dust nuisance, largely as a result of groundworks. Application of the general mitigation measures (which could be included in a CEMP) is expected to address any potentially adverse effects of fugitive dust. The residual effect following the adoption of appropriate dust mitigation would be ‘low’.

During the operational phase, as there would be ‘imperceptible’ changes to the concentrations of air pollutant, the overall effect on air quality is assessed to be of ‘negligible’ significance. As such, no mitigation measure is considered necessary.

2.4 Historic environment

An assessment on the historic environment has taken place as a part of the overall EIA for the proposed development. The assessment was based on a desk study and an additional walkover survey.

Due to the lack of archaeological finds within the study area, the Site is considered to have a low potential for prehistoric and Roman remains. There is low evidence for medieval or post-medieval potential within the Site boundary. Modern aerial photographs show remains of ridge and furrow earthworks (of limited archaeological value) in the north-western corner of the Site, which have been mainly levelled out by modern ploughing.

The assessment found that there are six listed buildings (recognition of a building’s special architectural and historic interest) within 1km from the Site boundary, including:

- Grade I listed building;
  - Preston Hospital, Preston-Upon-the-Weald Moors
- Grade II* listed building;
  - Hoo Hall, Preston-Upon-the-Weald Moors
- Grade II listed buildings;
  - Church of St Lawrence, Preston-Upon-the-Weald Moors
  - Lodges at south-eastern entrance of Preston Hospital, Preston-Upon-the-Weald Moors
  - Preston Hall, Preston-Upon-the-Weald Moors
  - Village Farmhouse, Preston-Upon-the-Weald Moors

There is the potential for the proposed development to change the relationship between the surrounding agricultural setting and listed buildings; particularly Hoo Hall and the hamlet of Hoo.

Recommended mitigation measures, including low level lighting columns and landscaping planting, will make the development less visible within the landscape. However, due to the height and prominence of the new large warehouse building, it is anticipated that the proposed development will have an adverse effect on the setting of historic assets within the study area.
2.5 **Ecology and nature conservation**

There are no statutory designated sites within 2km of the proposed development. Within 3km from the south-eastern corner of the Site are the statutorily designated Muxton Marsh Site of Special Scientific Interest (SSSI) and Granville Country Park Local Nature Reserve (LNR). As the distance of this SSI and LNR from the Site is significantly beyond the Zone of interest for the proposed development, no ecological and nature conservation impact from the proposed development is expected.

Detailed ecological surveys have been conducted on the Site. The majority of the land use is arable land, in the form of two extensive fields. Other habitats are species-poor hedgerow with trees, ponds and broad-leaved semi-natural woodland, which is situated on the western, southern and part of the eastern boundary of the Site.

There are twelve water-bodies within 250m of the Site, three of which are located on Site. One could not be surveyed, due to lack of access. All eleven ponds surveyed were identified as having a suitable habitat for great crested newts.

The following protected and notable species were recorded within the vicinity of the Site requiring further consideration are:

- Broad-leaved semi-natural woodland
- Bats
- Great crested newts

Development of the Site would result in a loss of habitat for broad-leaved semi-natural woodland. This may disrupt the commuting and foraging routes bats, and have the potential to cause death or injury to an individual newt, along with the loss of its terrestrial habitat.

A number of possible mitigation measures have been outlined in the CEMP and include: timing vegetation clearance, directional artificial lighting pointing away from the hedgerow or woodland to protect bat foraging paths, and installation of temporary great crested newt prior to the construction works.

The proposed development is expected to have impacts on broad-leaved woodland, foraging bats and great crested newts. However, following the implantation of the mitigation measures, it is not anticipated that the proposed development will have a significant ecological effect.

2.6 **Landscape and visual**

There are no National Parks within or close to the Site; however, Shropshire Hills ANOB is located approximately 6km southwest of the Site boundary.

Impacts of the site on existing landscape character have been identified both during construction and operation due to the prominence of the proposed development in a flat rural landscape. Equally, the large
scale of the proposed buildings will make these highly visible from dwellings close to the site as well as a noticeable feature in the views from more distant dwellings and viewpoints.

Mitigation measures are proposed, in order to reduce significant construction effects on the landscape and visual amenity. These would include: appropriately designed lighting to minimise the impact of light pollution at night; noise monitoring during construction; grass seeding and planting areas as soon as practical within the construction phase in order to minimise any negative visual impacts; planting of screening woodland on the raised areas around the proposed development to encourage early integration to its surroundings.

However, during operation due to the proposed scale of the development, significant adverse effects on the quality and value of the local landscape and views from dwellings close to the Site have been identified.

2.7 Noise and vibration

As part of the noise and vibration assessment, the background noise measurements of 11 locations within Site boundary were taken. The noise sensitive receptors identified are located to the north (at Hoo Farm and Hoo Hall) and to the west of the Site on Horton Lane.

For the noise assessment, it is assumed that automated machinery will be used within the larger warehouse/offices building.

During construction, there will be a potential for noise/vibration on the sensitive receptors identified, mainly arising from: clearance/construction activities, movements of mobile plant, and traffic-related noise from the HGV and construction staff vehicles. The adoption of appropriate measures (which could be included in the CEMP) could control/mitigate against any potentially significant adverse noise effects on the residential properties. These measures could include: control of construction hours, carrying out noise monitoring during construction, use of ‘quiet’ tools where possible, adherence to defined noise limits.

During operation, any potential for noise/vibration effects will be related to the moving of delivery of items and the loading and unloading of any ‘racking’ within the warehouse. Appropriate mitigations would include: using/operating machinery that adheres to the appropriate noise threshold levels, installation of noise barriers (screening) on site, and provision of appropriate noise insulation measures at detailed design stage. The adoption of a Route Strategy for HGV and Travel Plan should be able to control the effects of traffic related noise on sensitive receptors.

Following the delivery of appropriate mitigation measures, it is expected that there would be minimal residual noise and vibration effects during construction and operation.
2.8 Socio-economics

During construction, there will be an adverse effect on an existing PRoW. Although the effect on this PRoW is not considered significant as the proposed development has identified a permanent diversion around the north/western boundary of the Site. Overall there are no predicted significant adverse effects on the socio-economic or community receptors during construction of the proposed development.

During operation of the proposed development, there would be significant beneficial socio-economic effects which expected to boost wider economic activity:
- Long term employment directly related to the operation of the proposed development;
- Additional employment and economic ‘spin-offs’ as a result of job creation on site; and
- Supporting the safeguarding of existing employment at the MOD Donnington base.

2.9 Soils and geology

The impact of the proposed development on geology and soils has been assessed, including contaminated land, groundwater quality and unstable land. There is no record of Regionally Important Geological Sites (RIGS) within the Site boundary or in the surrounding area.

It is expected that construction activities will be carried out in accordance with the CEMP. To minimise impacts on the soil structure and quality, the topsoil should be stripped sequentially from the working areas. Top soil and subsoil will need to the stockpiled so that they can be reinstated in the same sequential order, in line with the surrounding soil. It is recommended that materials being reused as a part of the landscaping scheme should be covered with a 0.5mm thickness of clean topsoil.

It is unlikely that any significant soil contamination would be encountered during the construction works.

No significant residual effects on the soils and geology would be expected during the operation of the proposed development.

2.10 Traffic and transport

Vehicular access to the Site will be from within the existing MOD Donnington base. There are two main security gates that provide access to the wider highways network within the base itself. Access to the Site will be constructed from the existing internal access road. It is expected the HGVs will access the Site via the strategic highway network.

The traffic and transport assessment has been undertaken. During construction, no significant effects on traffic and transport have been identified. A CEMP will be implemented to minimise any temporary impacts that may arise, such as construction vehicle routeing and construction vehicle operating hours.

Two significant impacts have been identified during the operational phase of the development, relating to highways and pedestrian amenity/safety (on Wrekin Drive) issues. A Route Strategy is proposed as...
mitigation which will contain HGVs within the Strategic Highway Network. Furthermore, a Framework Travel Plan has been prepared to manage traffic flows to and from the Site during operation.

Following the implementation of appropriate mitigation measures, there is no significant residual transport and traffic related effects predicted.

2.11 Water resources and land drainage

The water and drainage conditions have been established by means of a Site walkover and a desk study. Sensitive receptors include Severn Trent Water surface water sewers, two Crow Brook tributaries, on-site ditches, a major aquifer on the eastern border of the Site (Bridgnorth Sandstone Formation), on-site ponds and the Humber Brook.

The likely effects on water quality of surface water and ground water during construction are not considered to be significant. Similarly, pollution impacts have also been assessed as having a low significance.

The proposed development has already included a new ‘balancing pond’ within the Site, in order to address any potential surface water run-offs issues during the operational phase. No additional mitigation measures are required during operation. During the operation phase of the proposed development there are no significant effects on water resources and land drainage predicted.

2.12 Summary

TWC is proposing to construction three new buildings (an administrative office and two warehouses) on a site that is currently used for agricultural land. The proposed development is intended for the MOD to consolidate its current logistics operations and to enable the creation of a centre of excellence for logistics and commodity services.

The proposed development is located adjacent to the existing MOD base in Donnington, Telford. It measures approximately 22.5ha in size.

The proposed development has been the subject of an environmental impact assessment which has concluded that with the incorporation of appropriate mitigation measures the following adverse environmental effects will remain:

- Landscape and visual - the scale of the proposed development will give rise to significant adverse effects on the quality and value of the local landscape and views from dwellings close to the Site; and
- Historic environment – the visibility of the proposed development within the landscape due to its scale and height is likely to cause a significant adverse effect on the historic setting of Hoo Hall and the hamlet of Hoo.

Furthermore, the assessment concludes that there will be significant social - economic benefits as a result of the proposed development which are expected to boost wider economic activity. Notably the:
- Creation of long term employment directly related to the operation of the proposed development;
- Additional employment and economic 'spin-offs' as a result of job creation; and
- Support the safeguarding of existing employment at the MOD Donnington base.
Further information on the ES documentation can be obtained via the TWC website.

Alternatively, requests for further information regarding the proposed Ministry of Defence (MOD) – Options site development can be made to:

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Appendices

Appendix A. Drawings

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Location Map


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