

Urban&Civic



Wintringham

St Neots

Huntingdonshire
District Council
Local Plan
Matter 6 Statement

Examination in Public

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ON BEHALF OF URBAN&CIVIC

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Town Planning and Urban Design



Huntingdonshire District Local Plan Examination in Public

Hearing Statement on behalf of Urban&Civic plc. (Consultee 992844)

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Matter 6: Proposed site allocations – Huntingdon Spatial Planning Area

SEL1.1 Former Alconbury Airfield and Grange Farm

Question 1

What is the background to the site allocation? How was it identified and which options were considered?

1. As illustrated in detail in Appendix 1, there is a long-established principle to deliver significant growth at the Former Alconbury Airfield and Grange Farm site.
2. The timeline in Appendix 1 also clearly illustrates the long-standing recognition – in every iteration of the draft Local Plan since 2012 – that the Former Alconbury Airfield and Grange Farm has potential for delivery of additional homes beyond 5,000.

Question 2

What is the scale and type/mix of uses proposed?

3. Outline Planning Permission was granted in October 2014 for the following scale and mix of uses:
 - up to 5,000 dwellings including sheltered/extra care accommodation;
 - up to 290,000 sqm of employment floorspace;
 - hub and neighbourhood facilities featuring retail, commercial, leisure, health and community uses;
 - non-residential institutions including primary schools, nurseries and a secondary school together with land reserved for post 16 education provision;
 - open spaces, woodlands and a sports provision;
 - a heritage area and retention of listed buildings;

- new vehicular access points from Ermine Street and the A141 with other non-vehicular access points;
 - associated facilities and infrastructure;
 - a reserve site for a railway station and ancillary uses; and
 - associated demolition and groundworks.
4. The Outline Planning Application was subject to extensive engagement with local communities which resulted in minimal objection to the development proposals.

Question 3

What is the basis for this and is it justified?

5. The scale and type of uses proposed is based upon:
- growth scenario testing undertaken as part of the District Councils Issues and Options Scoping exercise in 2011
 - masterplanning and design work undertaken to provide a well-designed and cohesive development, delivering regeneration of the airfield / brownfield section of the site, whilst at the same time connecting into the existing town via Grange Farm;
 - the designation of the site as an Enterprise Zone in 2011
 - a consideration of supporting infrastructure (e.g. transport linkages)
6. It is crucial to note that the provision of 5,000 homes does not reflect the full potential of the site as a whole to provide capacity for additional sustainable and well-designed growth.

Question 4

What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?

7. The planning approach to the Former Alconbury Airfield and Grange Farm site was purposefully structured to enable flexible, coordinated and efficient delivery on site (see Appendix 2).
8. The structure has been specifically designed to enable both development quality and accelerated on-site delivery by:
- Shortening the period between consent being granted and first construction
 - De-risking issues at the earliest opportunity
 - Enabling multiple points of sale to enhance absorption
 - Securing the right level of information at the right scale
 - Providing certainty for reserved matters requirements including design
 - Ensuring consistency in expectations between applicants and the Planning Authority

- Minimising objections through structured engagement

9. The Outline Planning Permission approved the broad quantum and disposition of land uses across the site. Key Phase 1 Definition and Framework was approved in March 2015 for the delivery of 879 dwellings, 79,716sqm of employment floorspace, open space and community and retail provision. This included a Key Phase Design Code to ensure a cohesive approach to the design and layout of buildings. Within Key Phase 1 more detailed reserved matters applications have been submitted to deliver housing, commercial floorspace, and infrastructure requirements.

10. Appendix 3 sets out the full history of planning applications. The table below sets out the current overarching status of delivery (June 2018) as a result of these applications. There is a clear record of delivery reflective of the comprehensive approach to development that has been undertaken, with supporting and early infrastructure – including extensive open space and a primary school – provided alongside new employment space and new homes.

Use	Permissions	Under construction	Completions
Residential	631 units	506 units	128 units
Retail (A1 – A5 use class)	709 sqm	599 sqm	110 sqm
Commercial (B use class)	104,418 sqm	9,494 sqm	94,924 sqm
Education and Community (D1 use class)	4400sqm	900sqm	3500sqm

11. The positive approach to engagement for the Outline has continued through Key Phase and reserved matter submissions, resulting in efficient approvals with minimal objections.

Question 5

What are the benefits that the proposed development would bring?

12. The key benefits of development at the Former Alconbury Airfield and Grange Farm are as follows:

Delivering in an established growth location

13. The approach to the proposed development responds directly to the established need for new jobs and homes and the benefits that co-location will achieve. The site is in single ownership, is of significant scale, and is strategically located, in terms of national infrastructure and close proximity to Huntingdon and is therefore in a unique position to deliver sustainable growth.

Transformational jobs growth

14. The Alconbury Enterprise Zone will enable the delivery of up to 8,000 new jobs. This will:
- support identified key target sectors for national growth and attract inward investment;
 - deliver local economic aspirations and meet identified needs in supporting the growth of indigenous business and increasing the value of local employment; and
 - secure a positive programme of skills development in combination with local providers to improve local employment opportunities.

A sustainable community

15. The site will deliver sustainable development aspirations of the NPPF, including:
- new homes, including a proportion of affordable homes to meet local need, support new businesses, and enable delivery of the full scope of Enterprise Zone ambitions;
 - a range of community facilities and open spaces to meet local needs;
 - support for the ongoing regeneration of Huntingdon Town Centre due to proximity of the site, investment in public transport, and the targeted provision of retail and services on site.

Regeneration and re-use

16. The site will enable the effective reuse of brownfield land for a mixed-use development, including:
- the sustainable re-use of up to 410 ha of previously developed land directly in line with NPPF aspirations;
 - Maximise the opportunities presented by legacy and historic infrastructure in terms of both sustainability and community uses; and
 - Re-open a site that has been closed to the public for many years.

Positive transport outcomes

17. The proposed development has taken a highly sustainable and responsive approach to transport provision including:
- the co-location of jobs and homes to reduce the need to travel;
 - significant investment in public transport, including a bus priority route; and
 - investment in footpaths, cycleways and bridleways that will link the site to surrounding communities; and
 - a package of off-site transport investments including to the local highway network.

Conserving and enhancing the natural environments

18. The development will:
- dramatically improve the quantity and quality of publicly accessible open and natural green space;

- provide a range of formal and informal open space to deliver against known local needs;
- result in the planting of over half a million new trees which will link sensitively with the surrounding landscape; and
- protect and where possible enhance important habitats and wildlife.

Enhancing the historic environment

19. The importance of the heritage of the former Airfield is a core component of the proposed development. The site has:
- a comprehensive Heritage Strategy developed with relevant stakeholders that places heritage at the heart of proposals;
 - secured the protection of the listed buildings on site through the identification of a Heritage Area; and
 - secured a full record of all heritage assets on the site with a commitment to display this information on site for future generations;
 - committed to the future protection and enhancement of key assets such as Prestley Wood Scheduled Ancient Monument.

Benefits of delivery to date

20. Delivery on site has already secured the following benefits:
- 128 new homes including affordable homes;
 - delivery of nearly 95,000sqm of commercial floorspace within the Enterprise Zone;
 - new further education provision in the form of IMET;
 - establishment of EDGE as a unique partnership which brings together local businesses, training providers, schools and jobseekers;
 - community provision both on and off site including engagement of a community development worker and opening of the first primary school and on-site community buildings;
 - 6.6 km of new roads including new main boulevard access, residential and commercial accesses;
 - 11km of foul water drainage and 15km of surface water drainage;
 - nearly 26 hectares of open space and play facilities, provision of allotments for local community use; and planting of over 3,000 trees; and
 - sponsorship of local events and working with the Huntingdon Town Partnership Board to support Town Centre improvements.

Question 6

What are the potential adverse impacts of developing the site? How could they be mitigated?

21. Any potential adverse impacts of the development were fully assessed, and mitigation outlined where relevant as part of the environmental assessment process, prior to the grant of Outline Planning Permission in 2014. As a result of early implementation, a number of mitigation elements have already been delivered, including foul and surface water drainage, remediation and new landscape and ecological corridors. These are described further in Question 8 below.

Question 7

How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?

22. A full Flood Risk Assessment was completed as part of the Outline Planning Permission.
23. The probability of fluvial flooding is low due to the location of the site outside any known floodplain, within Flood Zone 1. Therefore, no specific mitigation measures are necessary in respect of fluvial flood risk.
24. The Outline Surface Water Drainage Strategy outlines the measures to mitigate the impact of any surface water flooding on or from the site through the use of sustainable urban drainage features, attenuation basins, wetland features etc. This is supported by more detailed Key Phase Water Management Strategies agreed with stakeholders. Mitigation for Key Phase 1 of the development has been implemented.

Question 8

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

25. All infrastructure requirements and costs have been fully assessed as part of the planning process, through the completion of a Transport Assessment, Green Infrastructure Statement, Utilities Report, and Energy Waste and Water Strategy, submitted and approved within the Outline Planning Application.
26. A comprehensive S106 Agreement (2014), ensures the phased delivery of infrastructure and facilities, including early provision of education facilities, open space, and access routes.
27. Key Phase 1 of the development has been fully infrastructured through early investment (including Homes England Funding) to enable accelerated delivery including:
 - foul and surface water drainage;

- three new accesses into the site to serve homes, employment and construction traffic;
 - demolition of existing buildings and some taxiway hard standing;
 - remediation and de-contamination of the whole Key Phase area; and
 - new power in the form of new electricity sub stations.
28. In addition, two reserved matters applications will be submitted in 2018 to open a new southern access from the A141. These applications will benefit from HCA funding and will enable a bus priority route (as part of the Cambridge to Peterborough busway) from the A141 to the permitted reserved site for the railway station and additionally connect into developing and new residential parcels.

Question 9

In particular what is the situation with waste water treatment capacity and how would any issues be resolved?

29. Waste water treatment capacity was full assessed at outline stage within the site-wide Energy, Waste and Water Strategy, and delivered as follows:
- two foul water pumping stations on site as part of initial infrastructure works to enable efficient management of waste water;
 - current capacity within the Anglian Water Alconbury Waste Water Treatment Works (via Mill Road discharge point) for 350 dwellings and a primary school;
 - construction of strategic foul (and potable) water main on site, enabling strategic connection to Huntingdon Water Recycling Centre (via existing Anglian Water infrastructure in Washingley Road) to serve both existing and intermediate delivery on site; and
 - two option areas also have been identified for the location of on-site waste water treatment works, to support longer term delivery on the site.

Question 10

Is the site realistically viable and deliverable?

30. The development proposals were subject to full viability assessment with review mechanisms built in. The site has already demonstrated its viability and deliverability following the grant of Outline Planning Permission (2014) through the completion of infrastructure, employment floorspace and homes.

Question 11

What is the expected timescale and rate of development and is this realistic?

31. The Letwin Review¹ fully recognises the important contribution of large scale brownfield sites such as the Former Alconbury Airfield and Grange Farm make to housing delivery, whilst acknowledging the up-front costs that can result from such developments.
32. As set out in Question 8 above, there has been considerable investment in remediation and infrastructure installation at the Former Alconbury Airfield and Grange Farm to enable delivery to come forward (see Appendix 3). This has also benefited from considerable levels of public sector funding specifically targeted at enabling the delivery of new homes and jobs.
33. As a result of this investment, the entirety of Key Phase 1 is now infrastructured and development ready and Urban&Civic are well placed to accelerate delivery. As set out in the response to Question 4 above, the site has already delivered 128 residential units (as of 22nd June 2018), despite still being at a relatively early stage of delivery. This is anticipated to increase significantly in subsequent years as:
- multiple delivery fronts are opened up across the full breadth of the site;
 - additional residential parcels with a variety of housing products come on stream; and
 - additional supporting infrastructure is provided, including the currently proposed southern access at the A141.
34. Indeed, whilst homes and jobs have been delivered alongside infrastructure, accelerated rates of delivery are already being seen with the first quarter of 2018/19 bringing forward the highest number of completions on site to date.
35. In order to capitalise on this and maintain this enhanced momentum, an extension to the current Key Phase 1 and the potential to bring forward a further Key Phase 2 is being actively explored. In the context of the structured approach to the Outline Planning Permission set out in Appendix 2 this will enable the introduction of a further point of outlet. Taken with continued delivery in Key Phase 1, these additional elements will enable ongoing and accelerated delivery maximising the benefits of infrastructure investment.
36. The expected timescale and rate of development is set out in the table below²:

	17/18	18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	Total
	48	102	220	260	260	245	250	250	250	250	250	300	300	300	300	300	300	285	280	5000

¹ Independent Review of Built Out: draft analysis; Ministry of Homes, Communities & Local Government (2018)

² Annual Monitoring Report; Huntingdonshire District Council (2017)

37. The trajectory reflects an average projected development rate of 250 dwellings per annum over the 20-year period, peaking at 300 dwellings per annum. This is a realistic rate of development given the following combination of factors:
- the size of the site as a whole – at 575 hectares and 3 miles in length – to accommodate a high volume of housing delivery;
 - the potential for multiple housing providers to exist at different locations on site and not within direct conflict with other housing providers;
 - the potential for a high absorption rate, as a result of wide range of types, sizes, design, context, tenure and price, and physical location of housing;
 - the strength of existing demand for housing on site;
 - the continued delivery of commercial floorspace and jobs within the Enterprise Zone to support housing growth;
 - the delivery of the first primary school on site (open 2016) and other social and community uses;
 - the provision of internal roads, utilities, drainage, landscaping etc on site which enables the efficient delivery of residential units; and
 - the absence of constraints as identified by the Letwin Review³, including in relation to lack of transport infrastructure, difficulties of land remediation, delayed installations by utility companies, constrained site logistics, limited availability of capital, limited supplies of building materials, and limited availability of skilled labour.
38. A number of the above factors are corroborated by the Nathaniel Lichfield & Partners research paper ‘start to finish’⁴ which highlighted the key influencing factors of local market strength, number of sales outlets and tenure mix.
39. As evidenced by analysis set out within the Letwin Review⁵, large sites are a fundamental part of housing supply with rapid house building a consequence of variety within those sites. Significantly, research contained within the Letwin Review⁶ highlights that the median percentage of the site built each year averages at 6.5%. This would equate to 325 dwellings per year at the Former Alconbury Airfield and Grange Farm site, above any of the suggested rates in the AMR.
40. Whilst it is accepted that all development sites have unique circumstances regarding delivery, the figure below provides a comparison to other large sites that have delivered (or are still

³ Independent Review of Built Out: draft analysis; Ministry of Homes, Communities & Local Government (2018)

⁴ Start to Finish – How quickly do large scale housing sites deliver; Nathaniel Lichfield & Partners (2016)

⁵ Independent Review of Built Out: draft analysis; Ministry of Homes, Communities & Local Government (2018)

⁶ Independent Review of Built Out: draft analysis; Ministry of Homes, Communities & Local Government (2018)

delivering) a large volume of residential units. The selected sites have all achieved a higher peak number of dwellings within a single year than is currently projected for the Former Alconbury Airfield and Grange Farm site. Two of the selected sites have also achieved an average number of dwellings per annum that greater than currently projected for the Former Alconbury Airfield and Grange Farm site.

Site Name	Local Authority	Total dwellings delivered	Completions			
			Years of completions	Peak Dwellings per annum	Average dwellings per annum	Dwellings in first full year
Hamptons	Peterborough	5439	21	548	259	
Cambourne	South Cambs	4198	19	620	221	
Cranbrook	East Devon	1476	5	419	295	
<i>Projection</i>						
Former Alconbury Airfield and Grange Farm	Huntingdonshire	5000	20	300	250	

Source - DLA research based on public AMRs

41. The potential for further homes is identified within the Alconbury Airfield and Grange Farm allocation subject to capacity. Whilst this is not specified, the latest Huntingdonshire Strategic Transport Study⁷ assessed intensification of Alconbury Weald for an additional 1,500 homes and states:

'it is possible to confirm that this increase in dwellings at Alconbury Weald does not lead to the triggering of significant new highway infrastructure and therefore the level of mitigation required is likely to be in scale with the level of development proposed and therefore the revised development scenario is deliverable in terms of the local plan.'

42. Urban&Civic support the Councils view that there is potential capacity for additional homes within the Alconbury Airfield and Grange Farm site.

Question 12

Is the boundary of the site appropriate? Is there any justification for amending the boundary?

43. The site boundary is appropriate – it reflects the area bounded by the Outline Planning Permission and includes the former Alconbury Airfield together with land at Grange Farm between the airfield and the north-western extent of Huntingdon. This enables connection with the A141 at the southern part of the site (contiguous with the northern extent of Huntingdon), together with access from Ermine Street to the west.

⁷ Huntingdon Spatial Transport Strategy Addendum, Cambridgeshire County Council (2017)

Question 13

Are the detailed policy requirements effective, justified and consistent with national policy?

44. The detailed policy requirements align with the Outline Planning Permission and are reflective of a long-established evolution of policy. They are considered to be effective, justified and consistent with national policy.

Appendix 1: Background to site allocation

1995	Cambridgeshire Structure Plan	Policy SP16/4 highlighted that: <i>The proposed release of land at RAF Alconbury will provide an opportunity for a mixed development particularly for distribution and transport related uses during and beyond the plan period.</i>
1996	Ministry of Defence decided to dispose of the site.	
2003	Cambridgeshire and Peterborough Structure Plan	Policy P2/3 identified land at Alconbury Airfield as a strategic employment site for a mixed employment development during and beyond the plan period.
2009	Huntingdonshire Core Strategy	Identified that: <i>“the existing (warehouse) commitment is not likely to be implemented and the future potential of Alconbury Airfield (together with Wyton Airfield) will need to be considered in the longer term as part of the next review of the Regional Spatial Strategy. That review will need to take into account wider strategic issues for the region and the range of sustainable options available”</i>
2011	Alconbury Airfield (part) designated by Government as an Enterprise Zone	
2012	Planning permission granted for enabling works (demolition of existing buildings, access routes, landscaping) for early delivery of development within the Enterprise Zone	
2012	Huntingdonshire Local Plan: Scoping and Initial Issues and Options	Alconbury Weald features in each of the three growth scenarios as one of the key strategic development sites accommodating between 3,610 and 7,020 homes
2012	Outline planning application submitted for 5,000 new homes and up to 290,000 sqm of employment floorspace	
2012	Huntingdonshire Local Plan: Strategy and Policy Consultation	Identifies Alconbury Weald together with the Enterprise Zone as a potential major growth area within the Huntingdon Spatial Planning Area
2013	Huntingdonshire Local Plan	Allocates Alconbury Weald as a Strategic Expansion Location with potential for 5,000 homes (with potential for more in longer term) and 150 ha of employment land

2014		Outline planning permission granted for 5,000 new homes and up to 290,000 sqm of employment floorspace
2015	Huntingdonshire Local Plan Targeted Consultation	Allocates as a Strategic Expansion Location with potential for approximately 5,000 homes with potential for more beyond the plan period, and at least 290,00 150 ha of employment land
2017	Huntingdonshire Local Plan Consultation Draft	Allocates as a Strategic Expansion Location comprising the permitted scheme for 5,000 homes (with potential for more homes subject to capacity) with at least 290,000 sqm of business floorspace on the designated 150 ha Enterprise Zone
2017	Huntingdonshire Strategic Transport Study (and addendum)	Highlighted that the most sustainable development scenario in transport terms for delivering the homes required included Alconbury Weald and its proposed intensification of 1500 dwellings (which was assessed to not lead to the triggering of significant new highway infrastructure)
2018	Huntingdonshire Local Plan Submission Draft	Allocates as a Strategic Expansion Location comprising the permitted scheme for 5,000 homes with potential for more homes to be supported subject to capacity, with at least 290,000sqm of business floorspace on the designated 150 ha Enterprise Zone.

Appendix 2 – Alconbury Weald - Tiered Approach to Planning Delivery



Appendix 3 - List of Planning Applications

Type	Planning Ref	Application summary	Permission Date	Status
Infrastructure	11/02094/FUL	Enabling works for the Alconbury Enterprise Zone including provision of highways accesses, and landscaping and associated works	28/02/12	Built
Commercial	12/01363/FUL	Business Incubator Unit comprising B1 and B2 uses and associated works	28/09/12	Built
OUTLINE	12/01158OUT	Up to 290,00sqm of employment floorspace, up to 5,000 dwellings, mixed use hub and mixed-use neighbourhood facilities, non-residential institutions including primary schools, nurseries, a secondary school, open spaces, woodlands and sports provision, new vehicular access points from Ermine Street and the A141, associated works etc	01/10/14	Under construction
Infrastructure	14/01300/FUL	New road infrastructure to support the delivery of the Alconbury Enterprise Zone	16/10/14	Built
Key Phase 1	14/08220/CON D	Key Phase 1 Definition (submitted under Condition 9 of the Outline)	08/12/14	n/a
	14/08285/CON D	Key Phase 1 Framework including Design Code (submitted under Condition 10 of the Outline)	26/03/15	n/a
Education and Community	H/5000/15/CC	Erection of a primary school and nursery, soft and hard paly areas, sports pitches, parking, landscaping	26/03/15	Built
Infrastructure	14/01979/REM	New highways, new junction to Ermine Street, hard and soft landscaping, utilities, SUDs, to support delivery of Primary School	31/03/15	Built
Commercial	15/00259/REM	Enterprise Zone Club Building comprising B1, D1, D2, and A3 uses and associated works	06/05/15	Built
Infrastructure	15/00540/REM	New highways, landscaping, SUDs infrastructure and associated works	26/06/15	Built
Infrastructure	15/00542/REM	New landscaping, land remodelling and associated works	26/06/15	Built
Residential	15/01117/REM	128 dwellings, pocket park, associated highways, landscaping and ancillary works	11/12/15	Under construction
Commercial	15/01847/REM	31,893m ² of mixed B1(a), B1(b), B2 & ancillary B8 floorspace and associated works	27/01/16	Built
Infrastructure	15/02380/REM	New highways, landscaping and ancillary works	11/02/16	Built
Infrastructure	15/02254/REM	SUDs Infrastructure including foul water pumping station	03/03/16	Built
Commercial	15/02331/REM	Mid-Tech Building comprising B1(a), B1(b), B1(c) and ancillary B8 uses, and associated works.	22/06/16	Under construction
Commercial	16/00752/REM	Mixed-use building including office, research and development and a training facility (Use Class B1(a)/B1(b))	29/06/16	Built
Infrastructure	16/01047/REM	New highways including associated highways landscaping and ancillary works	17/08/16	Built
Commercial	16/01066/REM	43,846.5m ² mixed B1(a), B1(b), B2 and ancillary B8 floorspace and associated highways, landscaping and ancillary works.	02/09/16	Built
Infrastructure	16/01148/REM	Strategic foul & potable water main, water pressure boost pump, foul water pumping station and pedestrian and cycleway	15/09/16	Built
Commercial	16/01546/FUL	13,287sqm building comprising B1(A), B1(B), B1(C) and B8 uses. highway works, landscaping, and associated works.	14/10/16	Built
Residential	16/01329/REM	165 dwellings, pocket park, associated highways, landscaping and works	25/10/16	Under construction
Infrastructure	16/01445/REM	Primary electrical substation, and ancillary works	09/12/16	Not yet implemented
Education and Community	16/01851/REM	New community park, including allotments, MUGA, NEAP, skate park, amenity open space, landscaping, car parking	16/02/17	Built

Residential	16/02013/REM	200 dwellings, two pocket parks, a linear park, associate highways, landscaping and ancillary works.	24/02/17	Under construction
Commercial	16/02663/REM	Business incubator unit comprising 1,710m ² B1 use and associated works.	20/03/17	Under construction
Infrastructure	16/02262/REM	New cricket park, watchtower green area, the boulevard and SUDS infrastructure	04/04/17	Under construction
Education and Community	16/02553/REM	New community building and allotment building and associated ancillary works	28/04/17	Part Built
Residential & Commercial	17/00079/REM	101 dwellings, 1179m ² of A1, A3, & D1 floorspace, 5082m ² of b1a/b1b/b1c floorspace, and all associated works.	23/05/17	Under construction
Commercial / Community	17/00434/FUL	Change of use of the former airfield watch office to community use (d1) and office use (b1a)	12/06/17	Under construction
Residential	17/00802/REM	31 flats, 6 townhouses and all associated engineering and earth works, including ground remodelling, hard and soft landscaping and ancillary works.	09/08/17	Under construction