

# Paper Mill Facility, Plot C, Airfields, Northern Gateway

Industrie Cartarie Tronchetti (ICT) UK Ltd and Crag Hill Estates Ltd (CHEL)



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Report Date ..... August 2021  
Project Number ..... P4272  
Document Reference ..... P0-TP-SPA-RP-P4272-0003-A

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# Introduction

This is the non-technical summary for an Environmental Statement (ES) which has been prepared on behalf of Industrie Cartarie Tronchetti (ICT) UK Ltd (referred to as ICT) and Crag Hill Estates Ltd (referred to as CHEL). The ES accompanies a full planning application for the erection of a Paper Processing Mill to produce and manufacture tissue paper (B2, B8 use class) with ancillary B1a office space and associated servicing and infrastructure at the Application Site, referred to as, Plot C, Airfields, Northern Gateway.

This document is a summary of the ES that has been submitted as part of the full planning application, having regard to the Town and Country Planning (Environmental Impact Assessment) Regulations (Wales) 2017. This report describes the physical characteristics of the development, its

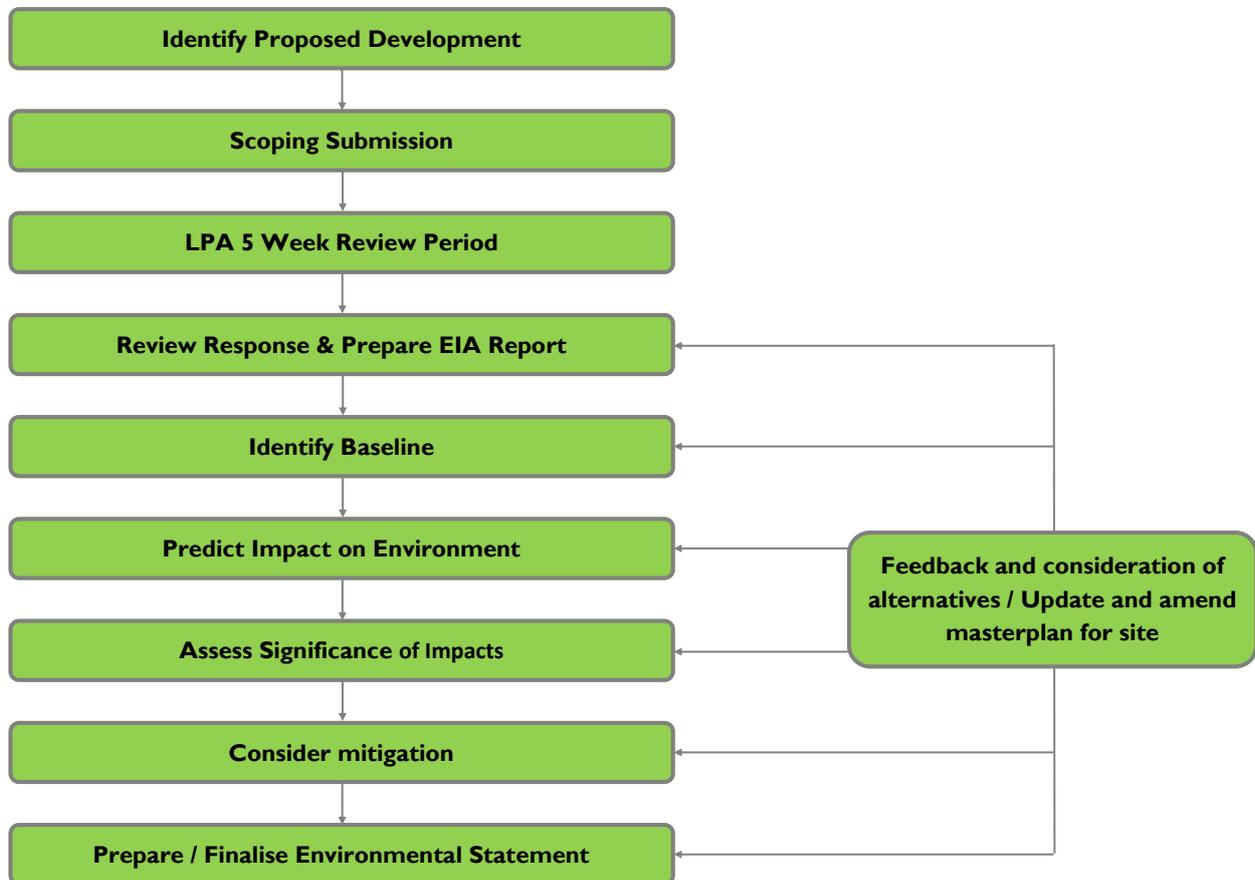
land use requirements, an outline of the main alternatives considered, and a description of the effects on the environment likely to be effected by the development.

These include:

- Direct, indirect or secondary effects
- Cumulative effects
- Short, medium, or long term effects
- Permanent or temporary effects
- Positive or negative effects

The report also identifies any measures required to mitigate potential adverse impacts of the proposals within and around the Application Site. Full details can be found within the Environmental Statement.

## EIA Process



# Site Description

The Site is located in North Wales, within the local authority area of Flintshire. The Site is located on the western edge of Garden City, a village within the Sealand area of Flintshire. The nearest town centre is Queensferry, which is approximately 1 mile to the south of the Site. The town of Mold is 8 miles to the south west and the city of Chester is 6 miles to the east.

The Site is part of, and integral to, the larger Deeside Enterprise Zone (EZ) designated by the Welsh Government in September 2011.

The Site occupies a strategic location, not only within Flintshire, but also in a sub-regional and national spatial context. Located next to Deeside Industrial Park, a major centre for employment, the Site lies strategically within the wider Deeside area, and is well served by the local trunk road network with access from Welsh Road (B5441). To the east of the B5441 Welsh Road lies the A494 Trunk Road. The A494 is a dual carriageway that connects the M56 Motorway to the A55 and it is a strategic transport route which connects North Wales to North West England, providing links to Liverpool, Cheshire and Greater Manchester.

The Application Site Boundary relates to an area of land of approximately 23.74 hectares (58.67 acres) in extent and forms part of the former RAF Sealand 'South Camp' site, now referred to as the Airfields, which forms part of the Northern Gateway Strategic Mixed Use Development site allocated under Policy HSG2A in the Flintshire UDP (2011).

The Application Site occupies the north western part of the Airfields site, and has been cleared of former RAF buildings and roads. The Site currently comprises a flat area of managed grassland. To the north western boundary of the Site is the Shotwick Brook. Public Right of Way Footpath No. 3 runs parallel with a section of the western banks of Shotwick Brook on land owned by PGNGL. There is a group of trees along the north western boundary on the bank of the Shotwick Brook and a hedge along the western boundary.

Beyond the northern boundary of the Application site is the Northern Drain, which will be widened and the banks re-profiled as part of a separate scheme of works. The north and western perimeter of the Application Site abuts the existing disused rail corridor which now incorporates the Chester Millennium Greenway, an important cycling and walking route that also forms part of National Cycle Network Route 5.

Deeside Industrial Estate lies immediately to the north beyond the Millennium Greenway, with Deeside Industrial Park located to the north. The residential area of Garden City lies to the south-east of the Site. The Tata Steel Shotton Works lies nearby to the west. The Grade II Listed John Summers steelworks buildings are located nearby to the south-west of the Site.

The River Dee runs to the south of the Site, and is a designated nature conservation site comprising a Special Areas of Conservation (SAC), Site of Specific Scientific Interest (SSSI) and local wildlife site.



# Development Description

This application will be a full planning application as described below:

*Full Planning Application for erection of Paper Processing Mill to produce and manufacture tissue paper (B2, B8 use class) with ancillary B1a office space; associated servicing and infrastructure including car parking, HGV parking and vehicle and pedestrian circulation; noise mitigation features; earthworks to create development platforms; creation of drainage features including a new outfall to the River Dee; water treatment plant; and landscaping.*

The floorspace of the Paper Mill and associated buildings subject of the full planning application is 124,344m<sup>2</sup> when complete and is 501.85m in length and extends from east to west across the Site. The Paper Mill Facility will be developed in three phases, comprising employment floorspace including manufacturing and production area (B2 use class), ancillary offices (B1a use class), and a warehouse section (B8 use class) with car parking and HGV parking.

There are various component parts to the Mill which comprise a number of activities which are designed to process and mill the pulp to manufacture and produce tissue paper products. These include the pulp warehouse, paper mill, jumbo reels storage warehouse building, converting hall, dispatch area, workshop and staff social area and automated 10 level finished product high bay warehouse. The main section of the building comprises the pulp warehouse, paper mill and converting hall along with the automated finished product high bay warehouse.

The main offices, water treatment plant and mill station (which comprises the electrical generators 11kV) are detached buildings in the north eastern corner of the Site.

## Phasing

The comprehensive Paper Mill Facility will come forward in three phases of development after the initial phase of site enabling and infrastructure works. The Environmental Impact Assessment (EIA) has been tested based on the following phasing programme and timescales:

- Planning Submission: 2021 (Q4)
- Planning Determination: 2022 (Q1)
- Initial Site Enabling and Infrastructure Works: 2022 (Q3) - 2022 (Q4) (Including cut and fill and creation of development platform)
- Phase 1 of the Paper Mill Facility: 2022 (Q3) - 2024 (Q1)
- Phase 2 of the Paper Mill Facility: 2024 (Q4) - 2026 (Q2)

- Phase 3 of the Paper Mill Facility: 2034 (Q1) - 2035 (Q3)

The detail of these phases is set out in greater detail in the following sections.

## Enabling Works

A number of enabling works are already approved for Plot C and fall outside the scope of this application, including the creation of the development platform for the Plot. These works have been granted approval as part of the application to discharge planning conditions (Ref: 061986) on the outline planning permission for the wider Airfields site (Ref: 058990), and are being delivered separately by CHEL, the landowner.

However, raising of the development platforms and modifying ground levels will be undertaken by ICT as part of this full planning application. The Environmental Impact Assessment has therefore been tested based on a programme that includes the enabling works phase prior to the development of the Mill Facility buildings.

## Phase 1

Phase 1 of the Mill Facility comprises the following components (from west to east) pulp warehouse, paper mill, jumbo reels storage warehouse building, converting hall, dispatch area, workshop and staff social area and automated 10 level finished product high bay warehouse. The water treatment plant and mill station (which comprises the electrical generators 11kV) are detached buildings in the north eastern corner of the Site.

Phase 1 of the Mill Facility extends the length of the Site and is 501.85m in length from east to west across the Site and is 375.35m wide from north to south across the Site (including the finished product high bay warehouse). A total floorspace of 66,809m<sup>2</sup> is proposed as part of Phase 1. Building heights generally range from 10m to 21.25m. The building heights of future phases will not exceed those of Phase 1.

The high bay storage warehouse has a maximum height of 39.65m and a footprint of 11,169m<sup>2</sup>. This is the most advanced warehouse system of its kind available on the market., and without it the production facility is not able to operate efficiently. A standard warehouse with the same capacity would require a significantly larger footprint of 40,000m<sup>2</sup> and would create inefficiencies in the production output.

## Phase 2

Phase 2 of the Mill will be built as tissue paper production output on the Site increases and will follow six to twelve months after completion of Phase 1.

# Development Description continued

Phase 2 will provide a second paper mill machine with an additional pulp warehouse and jumbo reels storage warehouse, in order to maximize output on the Site. These Phase 2 buildings will adjoin the Phase 1 buildings and maintain the linear shape of the Facility.

It will increase the Facility in width by a further 41.47m with the jumbo reels storage warehouse Phase 2 building projecting forward beyond the building line of the proposed Phase 1 section of the Paper Mill. The footprint of the Phase 2 buildings increase by 17,002m<sup>2</sup>. The floorspace of Phase 1 and 2 combined, totals 83,811m<sup>2</sup> which is 67% of the total build out once all phases are complete.

## Phase 3

Phase 3 of the Mill will be built as tissue paper production output on the Site needs to increase as a result of market demand for the finished product, and will maximize production and output on the Site.

Phase 3 will provide an additional pulp warehouse, paper mill, boiler room, jumbo reels storage warehouse, converting hall and an extension to the proposed automated finished product high bay warehouse, These Phase 3 buildings will adjoin the Phase 2 buildings. It will increase the Facility in width by a further 50.12m with the extension of the high bay warehouse by 32m in width.

## Landscaping

In addition to proposed landscaping treatment (blue and green infrastructure) proposed as part of enabling works to be implemented by CHEL, the Application Proposals will also seek to provide hedgerows planted on the southern and south western boundary facing the Commercial Spine Road 3 and further tree planting on the northern and north western boundaries adjacent to the Millennium Greenway Sustrans cycleway. Security fencing will also be provided around the perimeter of the Site.

Any strategic landscaping on the boundaries of the Site will be implemented during the construction and the operational phases of Phase 1 and Phase 3 of the Paper Mill Facility.

## Materials

The external building materials will typically consist of profile colour coated cladding, with appropriate colour banding to

the lower sections to break up the height of the proposed tall buildings on the site. These external building material remain consistent across all phases of the development.

## Infrastructure Arrangements

The Proposed Services Arrangements to meet the Site's utility demands include the extension of gas, electricity, telecommunications, and potable and non-potable water networks. Once new utility infrastructure is established, and final energization is undertaken, the facility will have the following service capacities:

- Electricity – 11MVA, 33kV
- Gas - 110,000kW/hr at minimum 2bar
- Potable water - 2.47l/s at minimum 1 bar
- Non potable water - 5,184m<sup>3</sup>/day at minimum 1 bar
- Telecommunications - 50/50mb fibre connection

## Access

Vehicular access into the Application Site will be served from Welsh Government's proposed Commercial Spine Road 2 and 3. The proposed Commercial Spine Road is now the subject of a reserved matters application submitted by Arcadis to Flintshire County Council (FCC) in June 2021 and once determined and constructed will provide highways access into Plot C. This 7.3m wide carriageway will also provide the opportunity to connect the CHEL and PGNGL elements of the Northern Gateway site with the local highway network.

This road will create eight points of access and junctions into the Application Site. Four junctions will be created into the Application Site from Road 3 of the Commercial Spine Road and four junctions into the Application Site from the east from Road 2.

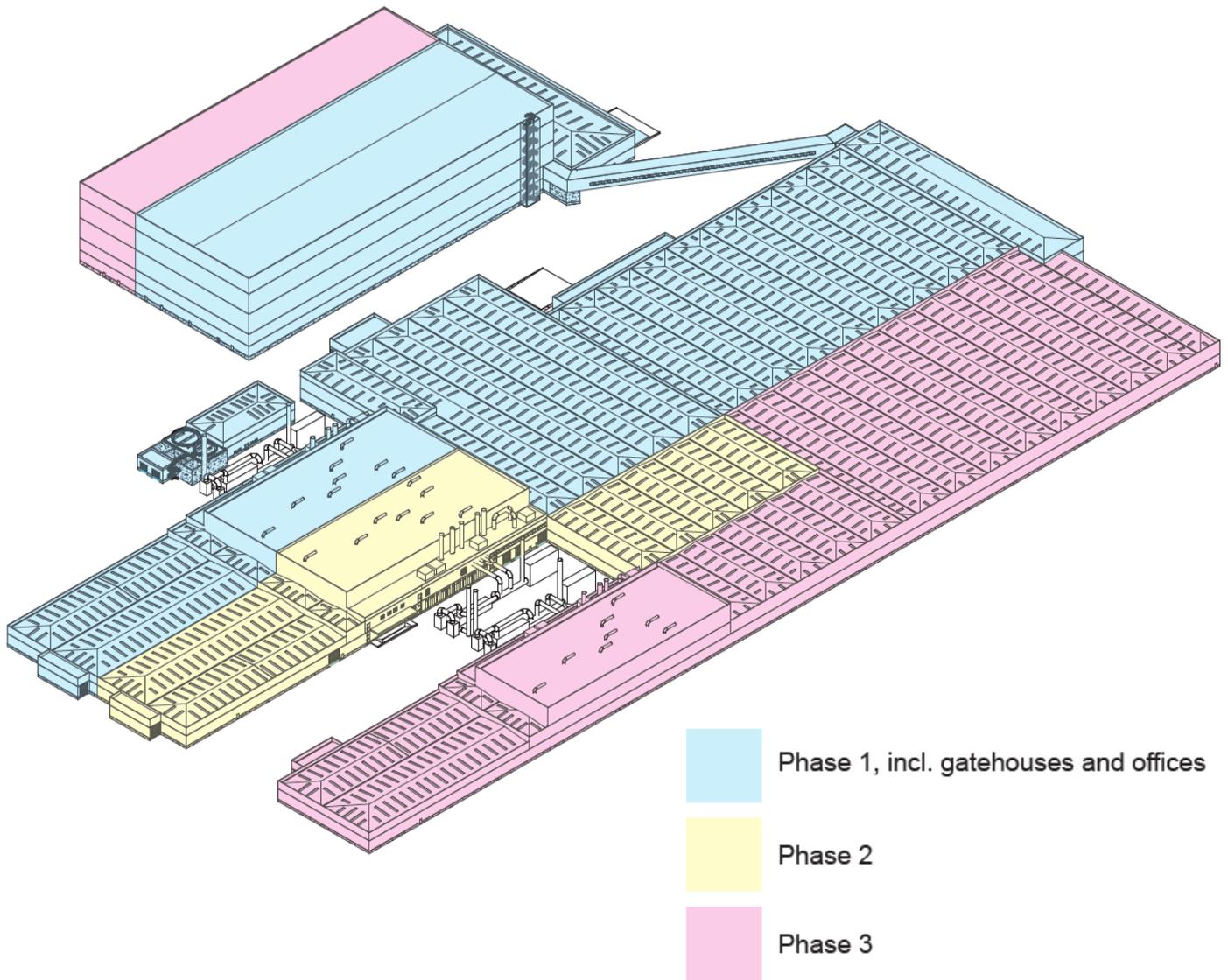
The proposed Commercial Spine Road and connecting completed Road 1 and Corus road are all designed to allow bus penetration into the Site and provide linkages through the wider Northern Gateway Site and into Deeside Industrial Park.

# Development Description continued

## SCHEDULE OF ACCOMMODATION

Phase	Use Class	Size of Floor space (m <sup>2</sup> )	Finished Floor Level (FFL)	Building heights	Maximum car parking spaces
Phase 1	B2, B8, ancillary B1a Uses	66,809m <sup>2</sup> (includes office, water treatment building, boiler room, mill station entrance gatehouse and drivers gatehouse)	Main Process Buildings at 5.25 m AOD The office building at 6.15m AOD High Bay Warehouse (HBW) at 4.60m AOD Dispatch Area building at 6.35m AOD. Internal circulation roads and main car park areas ranging from a 4.90m to 5.45m AOD across the Site.	10m – 39.65m above FFL to parapet level	26 HGV spaces and a total of up to 255 car spaces (including 13 electric vehicle charging points, 15 disabled spaces, 8 motorcycle spaces and 70 cycle spaces)
Phase 2	B2, B8 uses	17,002m <sup>2</sup>	Main Process Buildings at 5.25m AOD.	10m – 21.25m above FFL to parapet level	-
Phase 3	B2, B8 uses	40,533m <sup>2</sup>	Main Process Buildings at 5.25m AOD. High Bay Warehouse (HBW) at 4.60m AOD Internal circulation roads and main car park areas ranging from a 4.90m to 5.45m AOD across the Site.	10m – 39.65m above FFL to parapet level	A total of 83 car spaces (including (including 2 electric vehicle charging points, 8 motorcycle spaces and 20 cycle spaces)
<b>TOTAL</b>	-	<b>124,344 m<sup>2</sup> (GEA)</b>	-	-	<b>26 HGV spaces and a total of up to 338 car space (including 15 disabled spaces, 15 electric charging vehicle points, 16 motorcycle spaces and 90 cycle spaces</b>

# Development Description continued



Isometric plan showing phasing of development

# Construction

Construction hours will be between 0800 hours and 1800 hours on Mondays to Fridays, and 0800 hours to 1500 hours on Saturdays with no working on Sundays or Bank Holidays, unless first agreed with the Local Planning Authority.

Initial phases of work will be Enabling Works across the Site. This work will include raising of land levels and a development platform.

During construction, drainage features and flood prevention measures will be installed in the early phases of development. These will be required to limit the surface water run-off from the Site and provide flood storage areas with any required flow control measures to manage the storm water. Any required infrastructure for foul water including pumping stations, rising mains and offsite works will also be required for implementation prior to plot works occurring.

The construction site office and laydown areas will be within the Site and outside any landscape and ecological mitigation areas. All deliveries will be within the construction working hours, unless first agreed with the Local Planning Authority.

It is anticipated that construction access will be gained via Welsh Road from the Road 1 Spine Road, with construction of a temporary haul road. Once the new section of the Commercial Spine Road is constructed, this will be utilised by construction traffic to develop the rest of the Site. Regard will be given to the routes taken by the vehicles, to non-working days and the hours of activity in order that any potential nuisance can be mitigated.

No existing contamination is anticipated within the Site. Control measures will be put in place to avoid any new

contaminants being introduced to the Site during construction, so that no new contamination that represents a risk either to Site users or the wider environment is present.

The existing site topography is flat with little variance across the Site. The proposed strategy is to achieve a FFL of the main buildings set at 5.25m AOD with all external works set at a level ranging between 4.90m and 5.45m AOD. The proposed offices to the eastern boundary will be set at 6.15m AOD and associated car parking will range between 5.20m and 5.45m AOD.

The cut and fill model identifies a cut volume of 9168.180m<sup>3</sup>, a fill volume of 47,949.566m<sup>3</sup> and net fill / importation of 38,781.386m<sup>3</sup> material, to create the development platform as part of the enabling works phase of the development. A further 35,000m<sup>3</sup> of material will be won on site as a result of material excavated to form the foundations and drainage, which provides a net figure of only 3,781m<sup>3</sup> that will need to be imported to achieve a balanced earthwork scheme.

A Construction Environmental Management Plan (CEMP) will be produced to ensure measures are taken to reduce the effects of the construction phase, particularly in respect of noise, vibration, dust, site lighting, ecology and habitats, trees, drainage and flood risk. For example, run off of silts / clays etc. into the Shotwick Brook; good construction practice to mitigate spillages / leaks from plant and egress of dust into the wider environment; control measures to prevent the introduction of new contaminants to the Site; tree protection measures; and appropriate mitigation for flora and fauna.

# Planning Policy Context

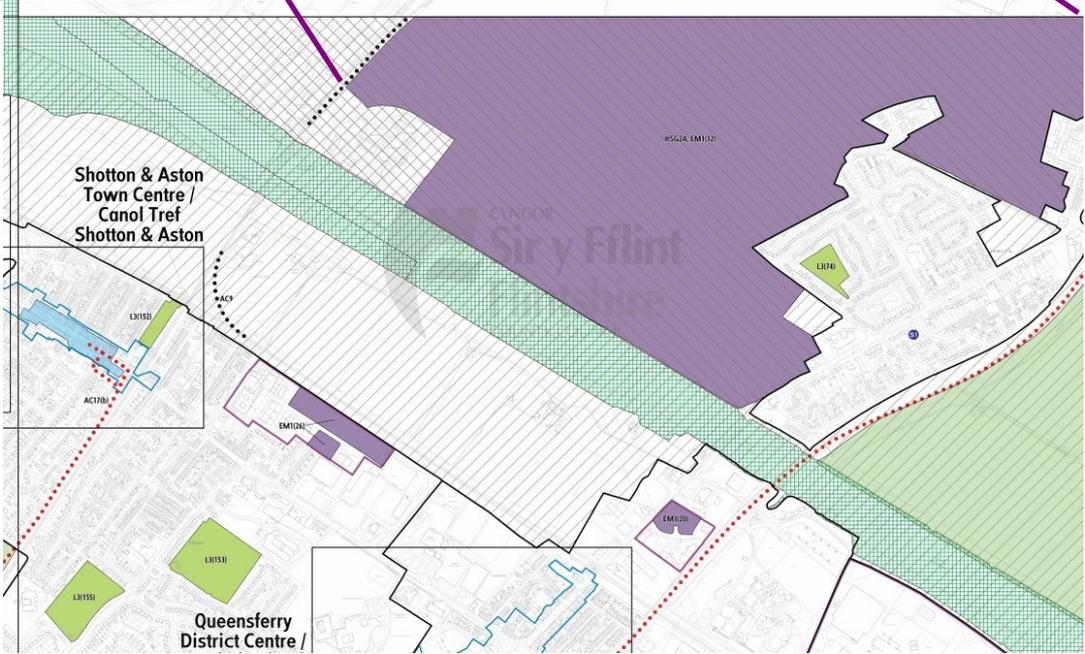
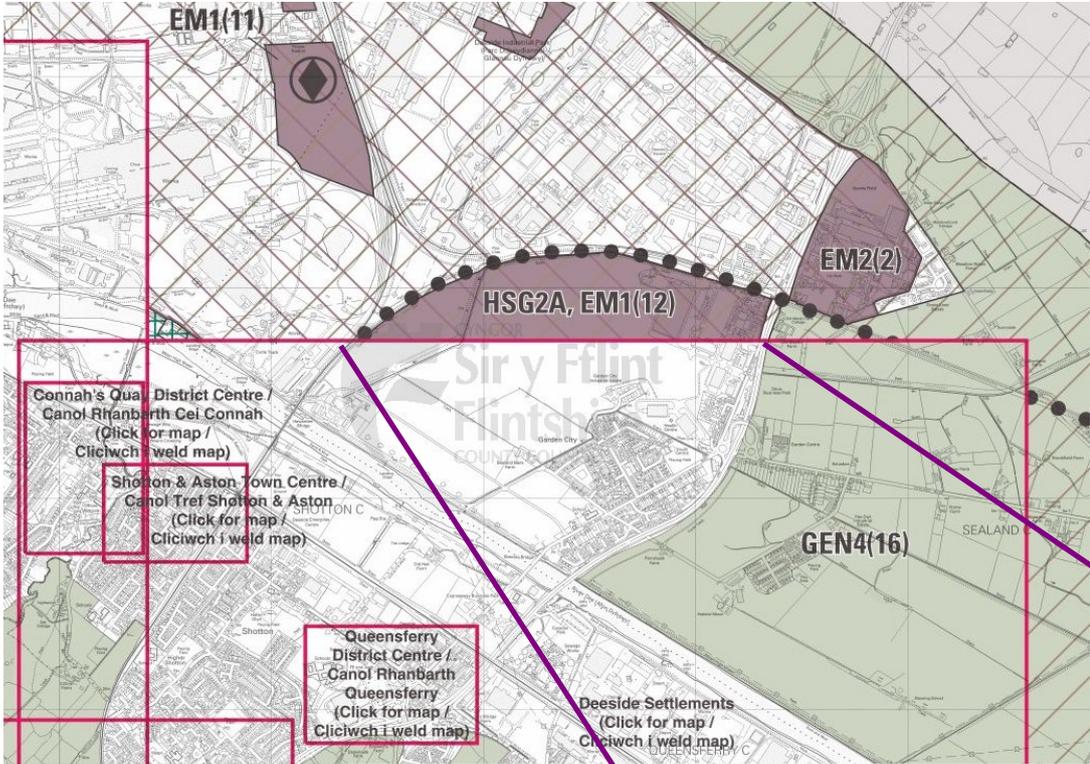
The Statutory Development Plan for Flintshire comprises the Flintshire Unitary Development Plan, adopted in 2011. The Site is allocated as part of the Strategic Mixed Use Development: Land North West of Garden City (Policy HSG2A). This allocation seeks the development of 98 hectares of employment land across the strategic site, predominantly for B8 uses supported by B1 and B2 uses, along with supporting infrastructure.

There is extensive site history in relation to the Strategic Mixed Use Development site which has already been set out in Section 3 of this report. As this allocation site is being delivered in phases, the north-western most corner has already been developed and is operational.

The Application is made in the context of the strong local planning policy framework which allocates the Northern Gateway Site as the largest employment led mixed use development site (100 ha of B2/B8 employment land) in the Council's adopted UDP and emerging Local Development Plan, which is underpinned by a raft of national, regional and local economic evidence including the following:

- A Winning Wales, National Economic Development Strategy (2002)
- Economic Renewal: A New Direction (July 2010)
- One Wales: One Planet – The Sustainable Development Scheme of the Welsh Assembly Government (May 2009)
- Rural Development Plan for Wales (2007- 2013)
- Planning Policy Wales (Edition 11, 2021) (Welsh Government)
- Technical Advice Note (TAN) 23 Economic Development (Welsh Government 2013)
- North Wales Local Authorities – Economic Ambition, A Strategy for Change 2012
- NE Wales / West Cheshire Sub-Regional Spatial Strategy 2004 – 2021 (2006)
- Flintshire County Council Employment Land Review (2015)
- Employment and Housing Advice Report (BE Group on behalf of Flintshire County Council) (April 2019)
- Regional Employment Land Strategy for North Wales Strategy Document (June 2014)
- The Deeside Plan (2017)
- The Wales Infrastructure Investment Plan for Growth

# Planning Policy Context continued



UDP Proposals Map extracts showing Allocation HSG2A (partly covered by inset map)

# Development Need

The Application Site forms part of the Northern Gateway site, understood to be the largest, private sector-led development site in north Wales. The need for the development of the Site can be categorised into development needs, regeneration needs and delivery needs. Together these needs justify the Sites' redevelopment as an employment development.

## Delivery Need

There is a significant need for new employment to be delivered in Wales, and the relevant economic plans, policy documents and strategies listed in the previous section all recognise that development of the Northern Gateway site is crucial to realise economic growth ambitions on a local, regional and national level.

There is a clear need for this development, which is supported within the allocation of this as a strategic site in the UDP.

The need for employment on this Site and its importance to economic growth and job creation is cemented by its designation within the wider Deeside Enterprise Zone (DEZ). The purpose of the DEZ is to create an engine for growth of the North Wales economy with the intention of delivering sustainable growth and regeneration which transforms communities and attracts inward investment, and provides a catalyst for generating new skilled jobs, in particular in the manufacturing sector.

The Regional Employment Land Strategy for North Wales Strategy Document (2014) confirms the strategic importance of the Northern Gateway strategic site and importance of this Site to growth. The Strategy confirms that North Wales has a large pool of skilled workers in the advanced material and manufacturing sector and the priority is to support growth in this sector on the Northern Gateway site, therefore there is a significant need for manufacturing floorspace in this location.

The proposals for the erection of this Paper Mill Manufacturing facility with 124,344m<sup>2</sup> of B2/B8 employment floorspace on this Site will create jobs in the manufacturing sector and deliver over 20 ha of this strategic employment allocation which forms an integral part of the Council's employment land supply.

Without this critical mass of employment development, the Site will not be able to deliver the scale of development and infrastructure to realise the economic potential and inward investment expected in this Enterprise Zone.

The employment growth scenarios assessments forecasts for employment land in Flintshire now represents a step change that assumes that a concerted, aggressive approach is taken to the growth and development of the strategic sites at Deeside Enterprise Zone, including Northern Gateway. The proposals for a Paper Mill on the Northern Gateway site will help deliver this aggressive employment growth strategy over the emerging Local Development Plan period of the next 10 years.

The UK tissue market is the second largest in Europe, after Germany. The annual consumption of Tissue is approximately 1.2 million tons. To compete and operate in this UK consumer market ICT UK Ltd need to operate their own paper mill and serve their customers all over the UK.

The Application Site meets with the locational and site requirements for this manufacturing operator. These locational characteristics and site requirements cannot currently be fully met at any other location within the region. The site is flat and expansive with no topographic constraints. It is accessible to the supporting supply chain and it will be close to an established employment area and an area of population growth, given it forms part of mixed use allocation which propose circa 1300 dwellings. All these attributes are key drivers for manufacturing operators when making decisions on locations for new employment space.

## Regeneration Need

The delivery of this Site as a strategic employment site is a fundamental element of the Council's and Welsh Government's regeneration programme. Plans for economic growth set out in the Council's economic strategy and UDP which identifies the specific locational advantages of this Site in terms of its size and close proximity to the strategic road network. Delivery of manufacturing floorspace on this Site will act as a catalyst for urban regeneration and will aid delivery of the wider Northern Gateway Site, creating a well-balanced community by generating significant long term employment. The Application Proposals will help to support the regeneration of the adjacent neighbourhoods, providing a range of accessible jobs and working with Flintshire County Council, will help to ensure that the uptake of employment by economically inactive residents can be optimised.

## Delivery Need

There is also a wider regeneration need for the Borough. The Application proposals will help deliver the Council's regeneration ambitions and stimulate economic growth in the

# Development Need continued

local and sub-regional economy and complement development elsewhere, helping to attract additional investment and business.

It has been estimated that Proposed Development will involve up to £280 million of expenditure relating to the delivery of site servicing infrastructure, the construction of new commercial accommodation and procurement and installation of plant and machinery. This expenditure will support a range of temporary employment opportunities in the local economy. The construction phase of the Proposed Development is estimated to generate 154 full time equivalent jobs during this period of the development.

In addition, the redevelopment proposals will lead to induced effects through construction employee spend on goods and services within Flintshire, the wider impact area and Wales as a whole. During the Construction Phase, ICT UK Ltd will also engage with organisations such as Flintshire Council, Flintshire Chamber of Commerce and Flintshire Connects to provide local training and apprenticeship opportunities. Overall, it is estimated that the Proposed Development would generate a net additional GVA of around £90 million over the duration of the construction period.

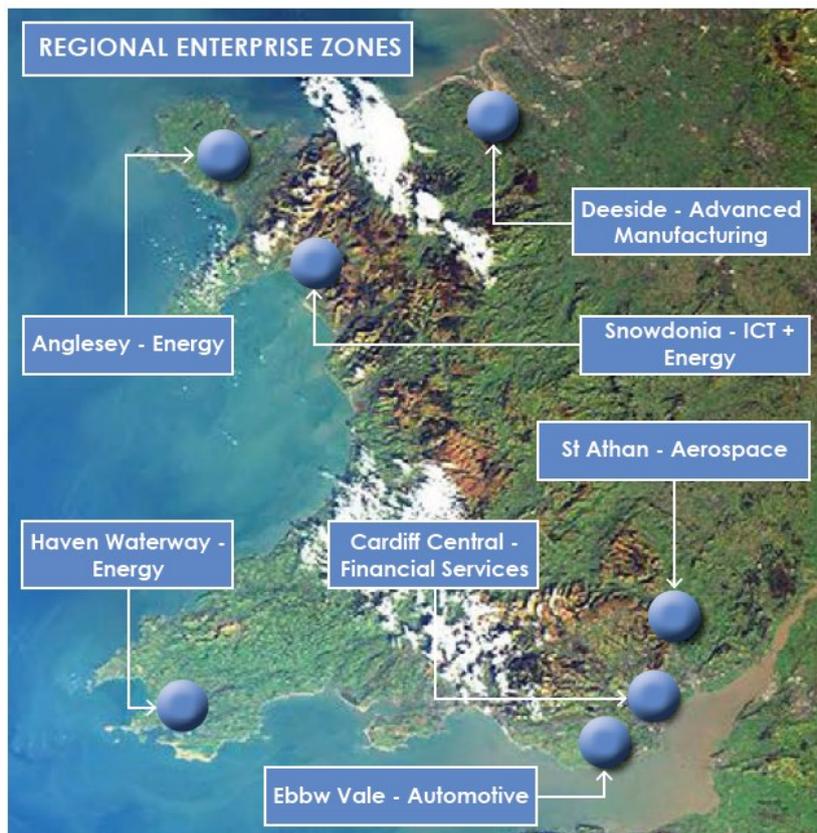
Once the Proposed Development is fully operational and all phases of the development are completed the Paper Mill will generate up to 463 full time equivalent jobs, which will

include production staff, involved directly in the manufacture and packing of new stock, management positions, alongside office roles and technicians involved in sales and the maintenance and development of key systems.

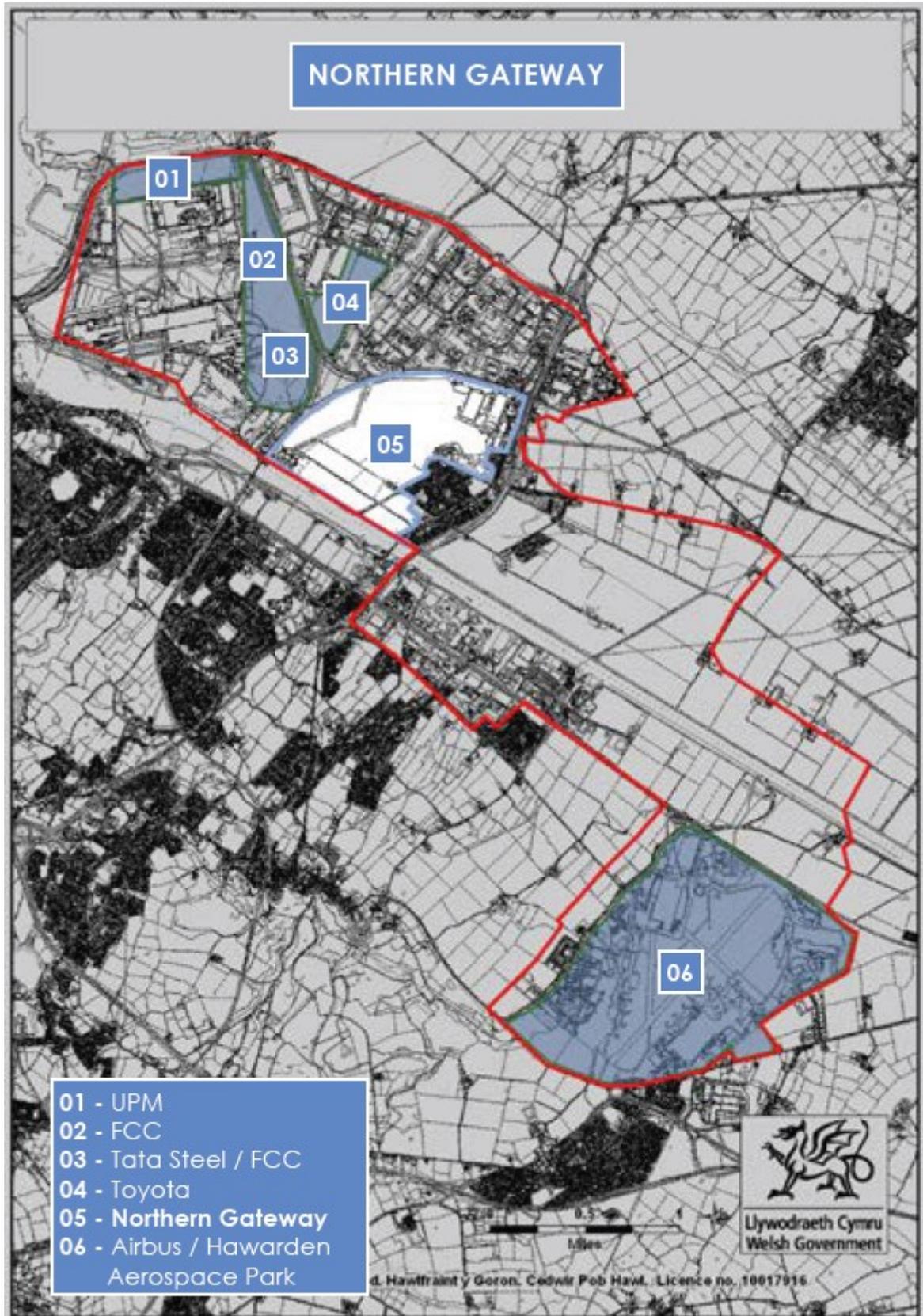
In total, it is estimated that the Operational Phase of the Proposed Development would generate net additional GVA of around £26.7 million per annum within the wider impact area of Flintshire, Cheshire West and Chester, Wrexham and Wirral which will represent an important boost to the local economy.

The Proposed Development will also serve to further reinforce perceptions of growth within Flintshire and particularly the Deeside Enterprise Zone as a flagship initiative. The phased redevelopment of the Application Site, in combination with other nationally significant investments within Enterprise Zone, has the potential to be transformational, building upon existing advanced manufacturing assets to firmly establish Deeside and Flintshire as a focus for high quality, knowledge intensive manufacturing activity. It is envisaged that this will help to stimulate further investment, including within related sectors, creating further opportunities for local residents.

The Proposed Development will therefore have a significant beneficial impact on the local labour market, and have regeneration benefits.



# Development Need continued



# Consideration of Alternatives

There is an identified need for this development, fully supported by planning policy. The Application Site forms part of the Northern Gateway strategic site under Policy HSG2A (Strategic Mixed Use Development: Land North West of Garden City), and is allocated for employment uses.

As such, the consideration of alternative development options for the preferred site are limited, although a number of options were explored. The following development options have however been considered in formulating the proposals for the Application Site:

- Alternative Location
- Do Nothing
- Preferred Option: Compliance with the Development Plan
- Preferred Option: Design Evolution

## Alternative Location

ICT UK Ltd identified a number of alternative sites in the UK which had the potential to meet with their locational and operational requirements for their first UK Paper Mill, including the Application Site.

After further site assessments and due diligence by ICT UK Ltd in respect of all these sites, this Application Site was chosen as their preferred location that met with all their site requirements in respect of its locational characteristics relative to their market needs, available employment land to accommodate growth of the Mill over three phases and available power and utilities supply necessary for this Paper Mill.

The Application Site is therefore the most suitable site and location for the ICT UK Ltd's first tissue manufacturing and production facility in the UK.

## Do Nothing

The Application Site is allocated as part Policy HSG2A, which seeks housing and employment land including B1, B2 and B8 uses. A clear need for the level and mix of development in this location was clearly set out in the adopted Flintshire UDP which resulted in the allocation of this site in the UDP. Subsequent to its allocation, the former former RAF Sealand 'South Camp' site part of the strategic allocation was granted planning permission (ref: 049320) for an employment led mixed use development in January 2013 and subsequently varied with the last Section 73 application approved in April 2021 (ref: 061125).

The Proposed Development for the ICT Paper Mill on Plot C of the Airfields site is consistent with the strategic allocation

of the site for employment uses in the UDP and the principle of employment uses established by the outline planning permission.

The Do Nothing scenario would not meet the significant need for new employment in this locality which is contrary to government guidance in the form of Planning Policy Wales (PPW), the aspirations of the Flintshire UDP allocation and the emerging Flintshire Local Development Plan and its evidence base, which continues to identify this as a strategic mixed use site to meet a significant part of its employment land requirements. It would be a missed opportunity in terms of generating new skilled jobs and attracting inward investment which will stimulate further market interest in the wider site and regeneration of the local area, which could otherwise remain vacant for a further period of time. It will also realise the opportunities and benefits presented by the Deeside Enterprise Zone and Deeside Growth Zone status which recognises that the Site is of strategic economic importance, within the sub region and is of national and international significance.

It has been estimated that Proposed Development will involve up to £280 million of expenditure relating to the delivery of site servicing infrastructure, the construction of new commercial accommodation and procurement and installation of plant and machinery. This expenditure will support a range of temporary employment opportunities in the local economy.

Alongside directly supporting employment through the design and delivery of construction works and installation of plant and equipment, the Construction Phase will also result in supply side (indirect) benefits, including through, for example, the purchase of construction equipment and supplies.

Once the Proposed Development is fully operational and all phases of the development are completed the Paper Mill will generate up to 463 full time equivalent jobs, which will include production staff, involved directly in the manufacture and packing of new stock, management positions, alongside office roles and technicians involved in sales and the maintenance and development of key systems.

In total, it is estimated that the Operational Phase of the Proposed Development would generate net additional GVA of around £26.7 million per annum within the wider impact area of Flintshire, Cheshire West and Chester, Wrexham and Wirral which will represent an important boost to the local economy.

In a "doing nothing" scenario, none of these benefits to the local economy will be realised.

## Consideration of Alternatives continued...

### Preferred Option: Compliance with the Development Plan

The Planning justification is set out in full within the Planning Statement and only summarized here to provide context as to the Proposed Development's compliance with the Development Plan and other material planning considerations.

The Planning Statement assesses the proposals in the context of the Development Plan. With regards to compliance with the Development Plan, the starting point is the consideration of the Development Proposals in the context of relevant local and national policy. The Application Site is allocated as part Policy HSG2A, which seeks housing and employment land including B1, B2 and B8 uses. The Application Proposals for this manufacturing use comprising B2 and B8 employment uses are therefore consistent with the UDP allocation of and

other relevant UDP policies.

Many of the proposed buildings are broadly in accordance with the height parameters agreed with in the approved The Airfields Design Statement. Whilst the proposed High Bay Warehouse (HBW) is in excess of height parameters previously approved, an interactive design process has resulted in siting of this HBW to the rear of the Site to reduce the scale and massing of this warehouse and its visual impact, relative to surrounding buildings and sensitive views.

When these impacts are weighed in the planning balance, alongside the socio economic benefits and inward investment and jobs associated with this production facility, these represent a substantial public benefit.

In summary, the Planning Statement concludes that the Proposed Development is in accordance with national and local guidance.



Aerial photograph of the Site at present

# Preferred Option—Design Evolution

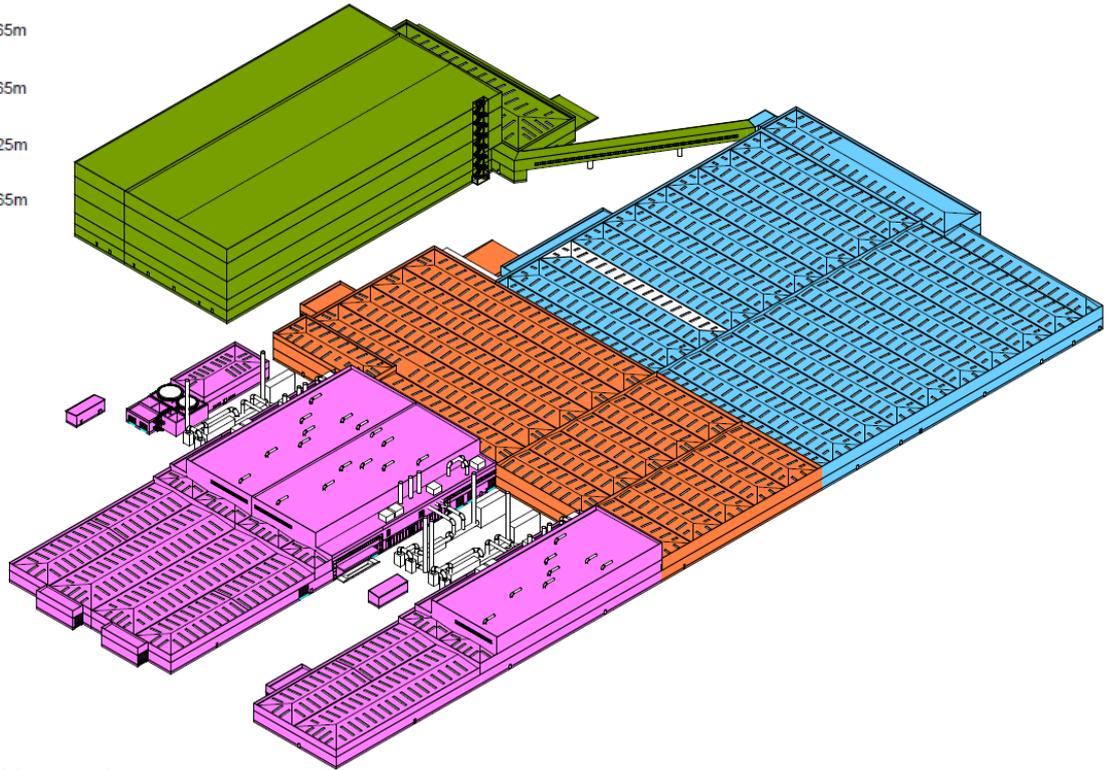
Following confirmation from ICT UK Ltd that the Airfields site was their preferred site, the proposals have evolved, with consideration of the technical constraints and environmental impacts being key to the design evolution. This has been heavily influenced by the Environmental Assessment process as well stakeholder engagement.

The evolution of the design has taken account of the following to ensure the environmental impacts and their effects are managed and reduced as far as possible:

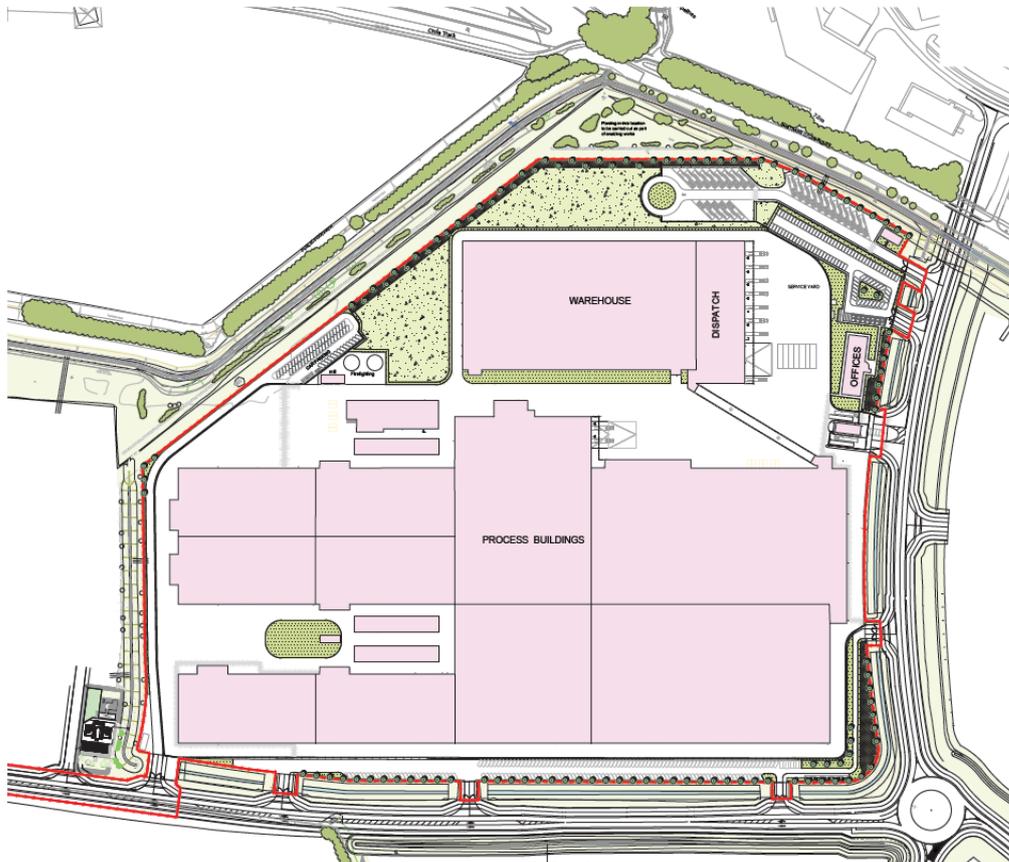
- A 39.65m high 10 level automated finished product High Bay Warehouse is an integral component of the production facility, consistent with the Applicants other facilities currently operational within Europe. The warehouse has a huge production capacity that allows pallets to be assembled in bulk and loaded for dispatch which guarantees maximum efficiency. This is the most advanced warehouse system of its kind available on the market. Without this 39.65m high bay warehouse the production facility is not able to operate efficiently. A standard warehouse, with the same capacity of the high bay warehouse would require a significantly larger building footprint of 40,000m<sup>2</sup> which would create inefficiencies in the production output at the Facility.
- The 39.65m high building is located away from the River Dee and its key views along the riverside and is also to the rear of the Site at the furthest point from the proposed and existing residential areas. This will now reduce the visual impact of the scale and massing of this tall warehouse relative to the sensitive receptors.
- To reduce any impact on the sensitive receptors and key views into the Site the design, style and materials have carefully been considered to limit any adverse impact on any receptors and assimilate the building into its surrounding environs. The proposed elevational treatment of the Proposed Development seeks to address the vertical scale of the HBW through the gradation of colour so that its height diminishes visually. Horizontal banding carves up the mass of the building without accentuating its scale and a colour palette has then been selected as a reflection of the environment and as such, seeks to soften the visual impact of the building on the existing landscape. This approach has proved successful to ICT's existing facilities across Europe.
- The Development Proposals have embraced the concept of maximizing material for re-use on Site. Whilst material still needs to be imported onto the Site to create the appropriate development platform, the Proposed Development has included developing a 'cut and fill' model that allows for 100 % of suitable materials to be re-used on the Site.
- All services are to be installed within an agreed services corridor and installed underground within soft verge where possible, taking in to account any existing natural environment and habitats within the Site.

# Preferred Option—Design Evolution continued

- Zone 1 - Max. Parapet Height - 11.65m
- Zone 2 - Max. Parapet Height - 11.65m
- Zone 3 - Max. Parapet Height - 21.25m
- Zone 4 - Max. Parapet Height - 39.65m



Isometric plan showing building height zones



Proposed final landscaping layout phases 1,2 and 3)

# Geology and Ground Conditions

This Technical Chapter has assessed the environmental impact of geology and ground conditions which included the synergetic impacts with flood risk and drainage on controlled waters. In reaching these conclusions evidence has been reviewed which has given certainty with respect to anticipated ground conditions at the site and effects on identified receptors.

The Proposed Development site has been assessed through the completion of a Phase I Geoenvironmental Site Assessment, though no intrusive site investigation has been completed to date. The Phase I report has been completed in accordance with Environment Agency Land Contamination: Risk Management (LCRM) (2020) which is the UK's accepted approach to assessing land contamination.

The Phase I Report has identified that the Site is located within a sensitive location with respect to surface water due to the presence Shotwick which is currently located at the western boundary. The underlying drift strata are an unclassified aquifer due to their likely low permeability while the underlying solid strata are classified as a Secondary A aquifer.

Historical map research has identified that the site has not been subject to any significant development with agricultural uses shown since the first map edition. In the absence of any development there is not considered likely to be any potentially significant on-site source of contamination with limited potential for the presence of anthropogenic material.

The site is recorded as being in area that is potentially affected by radon and due to the presence of alluvial tidal flat deposits and possible organic clays associated with the Shotwick Brook channel, potential sources of ground gas may also be present.

The interaction between the underlying strata and identified receptors has been considered in two phases: construction; and operational. The development is likely to require the installation of a deep piled foundations. As there are not

considered to be any potentially significant sources of contamination, these phases of works will have a negligible effect on site operatives and controlled waters.

An outcome of the proposed enabling works will be the requirement to store fuel for plant and to store soil arisings from excavations. The storage of fuels and soil arisings may pose a risk to surface water through spillages or rain induced surface run-off. This activity is likely to have a short term high adverse effect on Shotwick Brook and Garden City Drain. These risks can be mitigated through carefully planning in the CEMP and locating fuel storage and stockpiles away from watercourses in bunded, secure facilities.

At the operational phase ground conditions are likely to have a negligible effect upon site operatives as the scheme will be surfaced with hardstanding, thus preventing any direct exposure. Conversely, the presence of hardstand will prevent infiltration of any site derived contamination. The specification for hardstanding and bunding of chemical/waste storage facilities as well as their inspection and maintenance will be a requirement the site's environmental permit that will be issued by NRW.

The natural strata beneath the site have been identified as a potential source of radon and ground gas which could result a minor adverse impact to site operatives if they migrate and accumulate within the proposed building. The risks are mitigated to large extent by the requirement to treat shallow soils as part of the enabling works and to engineer the building structures to a high standard to site the proposed plant and machinery. Should a ground gas risk still be present then these can be mitigated through the installation of additional protection measures (membranes and sub-floor ventilation) in accordance with the current British Standards.

This assessment has concluded that any negative impacts are likely to minor and transient being restricted to the construction phase. This assessment goes on to conclude that there will be an overall negligible affect once the development reaches its operational phase.

# Traffic and Transportation

The environmental impacts of traffic attracted by the Proposed Development have been assessed in the context of industry standard guidance and prudent professional judgement. These impacts may relate to driver delays, pedestrian delay and amenity, fear and intimidation, severance, road safety and impacts on public transport users. Consideration has been given to potential temporary impacts relating to construction traffic and to permanent effects relating to traffic once the Paper Mill becomes operational.

Given the unique nature of the Development Proposals, it is considered that the standard methodology of predicting future level of traffic demand such as TRICS would not be appropriate in this instance. A 'first principles' approach has therefore been adopted to determine future traffic demand.

The future traffic demand which has been calculated includes a breakdown of cars and HGVs on the highway network, which requires consideration of possible effects upon the capacity and operation of the local links and junctions.

Whilst the Proposed Development is being built, there will be a number of construction vehicles arriving to the site each day. The potential traffic impacts during the construction phase would not trigger mitigation measures for highway reasons in the immediate vicinity of the proposed development site. Notwithstanding this, a strategy will be submitted to and agreed with the Local Authority prior to the first phase of construction, namely a Construction Environmental Management Plan (CEMP), which will establish the numbers, routing and times of delivery vehicles.

Capacity assessments for various junctions in the surrounding area were previously undertaken as part of the approved Airfields application (Ref: 058990), and a number of infrastructure improvements identified in order to mitigate the traffic impact of the outline scheme.

The mitigation works identified as part of this outline scheme have either been delivered or are currently being delivered and therefore no further offsite highway works required to facilitate the Proposed Development.

The Proposed Development has been designed to encourage sustainable forms of transport and integration with the existing community. To achieve this, physical measures will be incorporated into the Proposed Development, such as making the site permeable to pedestrians and cyclists and connecting the Site to the proposed shared footway/cycleway along the internal spine road.

In addition, a Travel Plan would be implemented to influence travel choices. This is effectively a management tool which ensures that all of the travel opportunities, location advantages and sustainable initiatives are disseminated amongst residents, staff and visitors of the Proposed Development. The Travel Plan will include targets that are monitored on an annual basis with a report being provided to the Local Authority.

Measures contained within the Travel Plan would include promotion of existing sustainable transport links including the excellent local cycling provision, as well as updated details of the public transport service available.

The principal aim of the Travel Plan would be to reduce the number of trips to the Site made by single occupancy car journeys and promote the use of walking, cycling and public transport to access the wider Northern Gateway Site and Garden City.

Whilst the proposals are considered to be appropriate for the Site, it is accepted that the development will have an impact on the environment both in the context of the Site and the wider areas.

The assessment of the impacts has shown that no higher significance of effects than a minor adverse impact was shown.

These impacts can be both positive and negative and for the latter forms it has been demonstrated they can be suitably mitigated against in order to keep residual impacts to a minor adverse or negligible level.

# Water Environment

An assessment has been undertaken of the potential effects of the Proposed Development on the Water Environment. Baseline data has been collated for water resources located within a 1km radius of the Site and on a catchment-wide scale for flood risk and land drainage. For water quality, baseline data has been collated for all surface waterbodies that flow through, receive land drainage or operational discharges from the Proposed Development.

The following surface water features have been identified: River Dee, Shotwick Brook, Northern Drain, Garden City Drain and Manor Drain.

Consultation with relevant bodies, notably Natural Resources Wales (NRW) and Flintshire County Council, have also shaped and informed the assessment, which is supported by a Flood Consequences Assessment and Marine Discharges Assessment.

Several considerations have influenced the evolution of the Proposed Development, and the alternatives considered, which are relevant to the Water Environment, have been summarised. These include setting of Finished Floor Levels (FFLs) for the Paper Mill Facility and the temperature of the Paper Mill's effluent discharge.

The potential environmental effects during the construction phase include the contamination of waterbodies located in the vicinity of the works from construction activities such as: earthworks to create development platforms, excavations for foundations and utilities infrastructure and transportation of materials. As construction progresses, currently permeable land, will be converted to built surface, changing the current land drainage regime. Increased rates and volumes of rainfall runoff will be generated, with potential to increase loadings on existing sewerage infrastructure and local watercourses. Under baseline conditions the Proposed Development site has also been identified as being vulnerable to flooding from local watercourses under tide locked conditions, and due to breach of the River Dee flood defences.

The construction phase impacts on the land drainage regime, and on flood risk from rivers and the tides, are applicable to the operational phase of the development. Albeit, once the construction phases of the Proposed Development are complete, the risk of pollution of local watercourses with silt and construction materials will markedly reduce. Other

potential operational effects on water quality include pollution of watercourses from receipt of polluted highway runoff and pollution of the River Dee with wastewater discharges from the Paper Mill Facility.

The majority of the potential construction effects on water quality will be mitigated through implementation of good working practices and pollution prevention techniques that are routinely adopted at construction sites. Measures are embedded within the development design and layout to mitigate the potential for tidal and fluvial flood risk impacts and effects on the land drainage regime/surface water flood risk, for example, permeable paving in car parking areas and a network of swales.

The Drainage Strategy will also mitigate the predicted impacts on water quality associated with receipt of rainfall runoff during the operational phase. A Waster Water Treatment Plant has been embedded in the design of the Proposed Development to mitigate the potential impacts on the River Dee from the wastewater discharge. The wastewater will be discharged in accordance with the conditions of a bespoke Installation Permit, granted by NRW.

Post-mitigation, the residual impacts of construction and operation of the Proposed Development on the Water Environment are considered to be Negligible/Minor Adverse, and therefore Not Significant in terms of the EIA Regulations. The flood risk mitigation strategy brings forward beneficial effects for the wider community, with regard to reducing the tidal flood risk through raising and strengthening of the Dee tidal flood defence as well as managing the fluvial and surface water flood risk through works to Shotwick Brook and Northern Drain, altering ground levels and constructing SuDS.

An assessment of the cumulative effects associated with the Airfields and Former Corus Garden City developments has also been completed. This assessment concludes that, subject to the implementation of best practice construction methods and an affective CEMP, in addition to a suite of flood risk measures and a suitable drainage strategy for surface and foul water, cumulative effects on the water environment are unlikely to be greater than that determined for the individual developments. For the majority of receptors cumulative impacts are Negligible.

# Landscape and Visual Impact

A Landscape and Visual Impact Assessment has been prepared as part of an overall Environmental Statement for the proposed Paper Mill Facility at Plot C, Airfields, Northern Gateway, Deeside.

The assessment has been carried with reference to the Guidelines for Landscape and Visual Impact Assessment Third edition (GLVIA3), published in 2013 by the Landscape Institute and the Institute of Environmental Management and Assessment (IEMA).

The baseline assessment included a desktop review of available published landscape planning policy and landscape character documents and visits to assess the site and viewpoints from potentially sensitive locations. Representative photo viewpoint locations were selected and agreed through discussion with officers from Flintshire County Council.

The development will impact on the landscape of the site during construction by changes to the landform and drainage works in association with the plateau formation. There will also be the removal of 16no. trees (7no. poplar and 9no. alder) on the River Dee embankment for creation of a new drainage easement and outfall, for the Paper Mill Facility, into the river. Once completed the open landscape will be removed and replaced with a built development which will result in a major change to the landscape character of the site. Buildings are generally between 10m and 21.5m tall with the exception of the High Bay Warehouse in the northern part of the site which is 39.65m tall. The visual impact of these proposals will be most significant from the footpaths and cycle routes around the northern and western boundaries and also from the River Dee embankment. The closest residential areas to the site are in Garden City to the south-east. Additional residential plots are also being developed on both the Airfields site and the former Corus Garden City Northern Gateway opposite the south-east boundary of the site.

A number of primary mitigation measures have been included in the proposals that have included:

- Siting of the high bay warehouse back into the site to the north-west away from the existing and proposed residential areas;
- Introduction of graduated horizontal colour banding to the cladding on the building in muted colours to blend better with the landscape;
- Tree, shrub and hedge planting where possible to site boundaries.

Generally the impact of the Proposed Development on the landscape has been identified as minor to moderate adverse on the landscape character of the site due to the change from an open field to a developed built landscape.

The most noteworthy residual visual effects, of the Proposed Development, are from viewpoints in close proximity to the site (within 1km) and as a result of the high bay warehouse. This is principally views from the Sustrans Cycle Route around the southern boundary and from the River Dee embankment where there are currently open unobstructed views towards and across the site. A number of other viewpoints will experience some adverse impacts but these are less significant where either a smaller proportion of the development would be visible or where distance from the site reduces the extent of change in the view.

Planting carried out along site boundaries adjacent to footpath and cycle routes will develop to provide low level screening and reduce the overall visual impact but from the more distant locations to the south-west the high bay warehouse will be a new permanent element in the views. However it will be seen in the context of existing urban development and Deeside Industrial Park and the Tata Steelworks further to the north and west.

The Plot C site is part of the Northern Gateway mixed use development zone and is located towards the northern part of the Airfields Site that is being developed by Crag Hill Estates Ltd. Plots zoned for housing are being developed to the south-east of the site with further commercial and industrial development to the north-east and south-west. In addition to the Airfields development the former Corus Garden City Northern Gateway development area extends to the south and south-west of the site with residential plots directly to the south and industrial development to the west. Both of these sites are likely to be developed over a similar timescale to the Proposed Development. Whilst there will be additional cumulative impacts during the construction phase these developments are only considered to have a minor greater cumulative operational impact than the development of the single site once the proposed landscape infrastructure areas and planting become established.

Over time the landscape planting will mature to mitigate some of the visual impacts of the Proposed Development but the scale of the high bay warehouse particularly in close proximity to the recreational cycle routes and footpaths will mean that the landscape and visual effect of this element will remain as significant.

## Landscape and Visual Impact continued



Visual impact CGI image showing the development with landscape mitigation measures proposed

# Ecology and Nature Conservation

Deeside and Buckley Newt Sites SAC, Connah's Quay Ponds and Woodlands SSSI and Shotton Lagoons and Reedbeds SSSI are considered to be sufficiently distant from the Proposed Development to avoid any adverse impacts as a result of the proposed works. Similarly, Engineer Park 1 and 2 (Local Wildlife Sites), Wepre Wood and Shotton Steelworks were all considered to be sufficiently distant from the Proposed Development to avoid any adverse impacts as a result of the proposed works.

Potential construction phase impacts on these sites would be mitigated through the implementation of a robust Construction and Environmental Management Plan (CEMP) and operational phase impacts (most notably discharge into the River Dee SAC/SSSI) would be controlled through the mitigation required as part of the Environmental Permit for the scheme, to be informed by an Appropriate Assessment.

A phase I habitat survey identified that the site consists of the following habitat types:

- Arable;
- Bare ground;
- Grassland (amenity);
- Hedgerow (intact species poor);
- Marginal vegetation;
- Tall ruderal vegetation;
- Watercourse (River Dee, Shotwick Brook and Northern Drain adjacent to site); and
- Woodland (broadleaved plantation)

Of the above; the hedgerow, watercourse (Shotwick Brook/ Northern Drain) and woodland were identified as being habitats of local ecological importance and have therefore been retained and protected within the proposed development design, where possible, or their loss has been compensated. There would be a net gain in the amount of hedgerow, watercourse and trees within the site through the proposals.

An outfall is proposed into the River Dee as a result of this development – this receptor is important at the international level and therefore robust mitigation will need to be secured as part of an Environmental Permit and Appropriate Assessment, in accordance with the Habitats Regulations.

The remaining habitats were deemed either to be of negligible ecological importance.

The following surveys were undertaken throughout 2021 to update those previously undertaken as part of the Outline Application and Section 73 Applications on the Airfields site.

Effects relating to protected/notable species from development of the Application Site comprise, potential disturbance to commuting / foraging routes for bats and (depending on timing of works) damage, disturbance to nesting birds. A CEMP will detail measures for the protection of these species during construction works.

During operation of the Proposed Development, implementation of the EcMP will ensure habitats for protected species are maintained.

In summary, it has been assessed that overall, in the short-medium term there would be negligible impacts on all habitats and protected/notable species; all potential impacts on Natural 2000 sites (and consequently their SSSI components). Any potential impacts would be mitigated and controlled through appropriate mitigation measures.

In the long term, the site and wider development parcels would result in minor beneficial impacts for a range of protected species overall once habitats have matured and Ecological Management Plans implemented.

# Air Quality, Dust and Odour

The potential air quality, odour and dust effects of the Proposed Development have been assessed by Cundall.

The baseline air quality conditions at the Application Site and surroundings were assessed via a desktop review; the potential for any significant environmental effects were assessed using qualitative and quantitative methodology; and mitigation measures required to prevent, reduce, or offset any significant adverse effects were identified.

A qualitative assessment of the construction phase dust impacts has been undertaken following guidance published by the IAQM. Following the implementation of recommended mitigation measures, no significant effects are expected

The mitigation of construction phase pollutant and dust emissions will be addressed by an appropriate Construction Environmental Management Plan, developed by the main contractor. A number of Best Practicable Means (BPM) construction dust emissions mitigation measures have been provided.

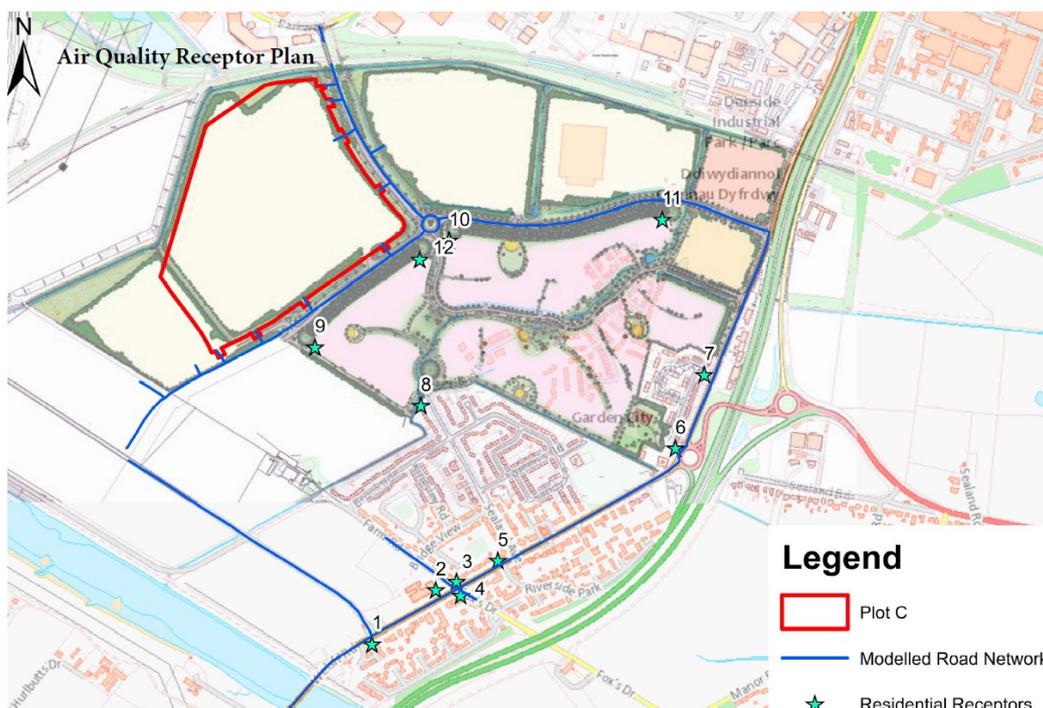
It is predicted that there will be negligible impact on sensitive human receptors from traffic impacts during the operation of the development. No exceedances of air quality objectives resulting from the operation of the development are predicted at any receptors.

Dispersion modelling of on-site combustion plant indicates that there will be a negligible impact at all of the ecological

receptors and all but one of the human receptors. Modelling the flue heights of the gas turbines at 30m resulted in a negligible impact at the nearest receptor and has therefore been recommended as embedded mitigation.

Outline mitigation measures have been set out for the control of air quality, odour and dust impacts during the development's operational phase. These include the submission of a Travel Plan, measures to encourage uptake of low emission vehicles e.g. electric vehicle charging points, increasing the gas turbine flues to 30m and incorporating odour abatement measures into the waste-water treatment works, such as carbon filtration.

Cumulative impacts have been considered in relation to the two consented Northern Gateway proposals (Airfields and Former Corus Garden City Site). Data used in the assessment already included the contribution from committed development traffic flow. Overall, the impact of the Proposed Development is considered Negligible with regards to cumulative emissions of NO<sub>2</sub> and particulate matter and the overall effect is considered not significant.



Air quality receptor plan

# Cultural Heritage and Archaeology

BWB Consulting were appointed to assess the impact that their proposals will have on Cultural Heritage. The proposals include full Planning Application for erection of Paper Processing Mill to produce and manufacture tissue paper (B2, B8 use class) with ancillary B1a office space; associated servicing and infrastructure including car parking, HGV parking and vehicle and pedestrian circulation; noise mitigation features; earthworks to create development platforms; creation of drainage features including a new outfall to the River Dee; water treatment plant; and landscaping.

The potential effects of the Proposed Development (with mitigation) on the identified cultural heritage resource are considered with respect to legislation, guidance documents and existing planning policies. Mitigation measures have been recommended where appropriate in order to minimise the effect on sensitive receptors during the construction and operational phases of the Proposed Development.

The Clywd-Powys Historic Environment Record (HER) has identified a number of archaeological sites and findspots within the area. These have either been recorded through aerial photographs, evaluation/mitigation or through chance discoveries or from historic records including Ordnance Survey maps and published and unpublished secondary source.

No currently recorded designated historic assets fall within the site extent. Within the Study Area 10 designated assets are recorded. These include, to the south west of the site, the Grade II listed John Summers Headquarters Building – Former Corus Offices (**85247**) and later Former Office Buildings, Shotton Steelworks (**87629**). The former gardens of the Headquarters (PGW (C) 77(FLT), **120865**) are included on the Cadw/ICOMOS Register of Landscapes, Parks and Gardens of Special Interest. A number of designated assets are identified at the edge of the Study Area. These include Ferry Bank Farm (**85249**), a Grade II listed building at the edge of the Study Area to the south east of the site and A494 and the North Pair of Aircraft Hangers (**24541**) to the north east. The latter forms part of an associated group of 3 pairs of First World War aircraft hangers (**24540**, **24539**). These assets are included within the assessment set out below.

Other designated assets falling outside of the Study Area are located within the built-up area of Shotton to the south east. No development effects, given distancing and intervening built and landscape form, upon these assets are assessed.

It has been determined that there are a number of potential archaeological assets within the study area, some of which

are recorded within the Site boundary. Those within the Site boundary relate to earlier findspots dating back to the Roman era. The level of impact on any potential assets will be reduced through appropriate survey, evaluation and mitigation (if required).

The three pillboxes located to the north, west and immediate south of the Site have some value and are representative of the former military landscape that has now largely been lost. These pillboxes form part of the defence of RAF Sealand and constitute a defended landscape that has been heavily eroded in the past few decades. Impact on the setting of these assets should be mitigated by landscaping. No further recording is anticipated as these assets have been subject to detailed building recording.

With mitigation measures in place the residual impacts to RAF Sealand Pillbox V (**123655**) and Shotwick Embankment III (**34234**) are considered to be Minor Adverse. The residual impact to the more distant RAF Sealand Embankment Pillbox (**123657**) is considered to be Negligible.

With mitigation measures in place the residual impacts upon the archaeological resource are considered to be Negligible.

With regard to built historic assets residual impacts of Minor Adverse are assessed upon the former office buildings to the Shotton Steelworks (**85247** and **87629**) and the associated Headquarters Buildings Garden and Forecourt (**120865**) to the south of the Site. These impacts will relate to minor impacts upon the openness to the Shotton Point buildings and the visual impact of the development.

No other significant effects are identified in respect to other built historic assets.

The Proposed Development will not impact, through physical interaction, upon the retained significance held within the fabric of the identified built historic assets identified. It will retain significant elements within setting which contribute positively to significance, including the immediate setting of the buildings defined by the associated Registered Garden land and key views onto the principal façade of the John Summers office building. Mitigation, through design and landscape treatment will minimise the extent and degree of adverse impacts.

# Waste

The Waste Technical Paper considers the likely significant effects of the Proposed Development in terms of waste generation and management during the construction and operation of the Site. The Technical Paper has been prepared using desk-based information and the available design information as provided in the Project Description contained in the Environmental Statement Part I Report.

The Waste (England and Wales) Regulations 2011 (as amended) is the key driver for waste management legislation in the UK. It requires waste to be managed according to the waste hierarchy – a five priority order of management methods starting with the least damaging to the environment and human health. Targets and policies were also set within the Towards Zero Waste (the waste strategy for Wales) and the supporting Construction and Demolition Sector Plan. A summary of national and local waste strategies and policies provides the context for how waste from the Proposed Development would be managed.

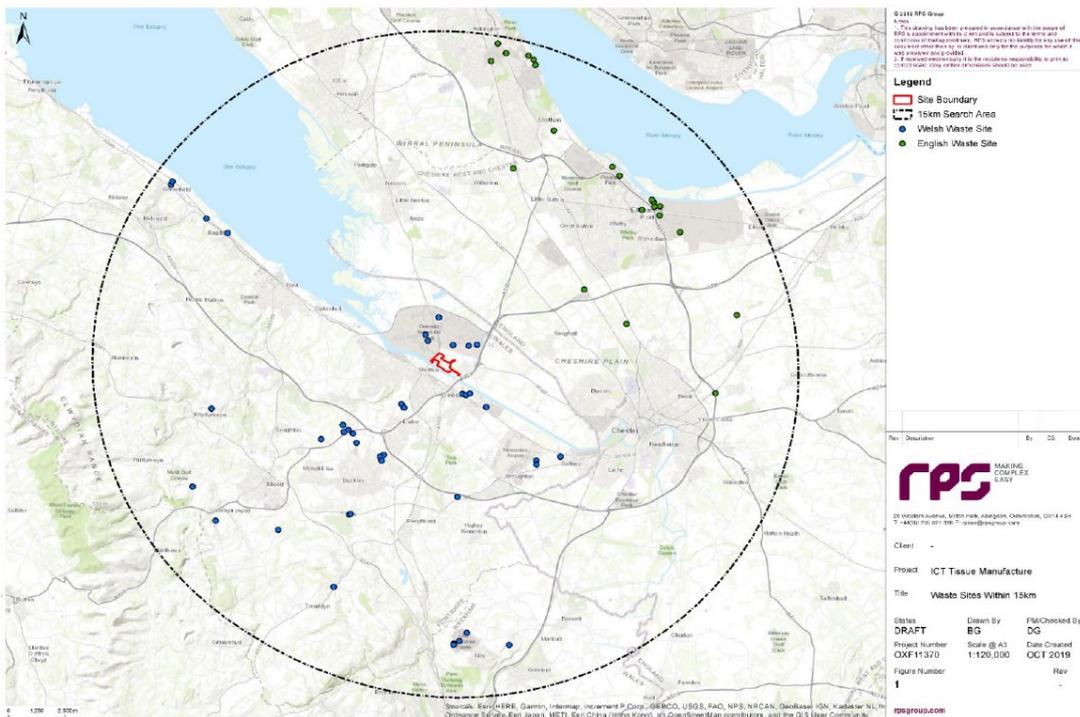
Estimates of the types and volumes of waste likely to be generated are based on the available design information. These estimates will be refined as the detailed design progresses, however for the purpose of the assessment a worst case has been assumed.

The key impacts of waste from the Proposed Development are: the volumes of waste generated in terms of the capacity of existing and proposed waste management infrastructure;

the treatability of waste generated; and how the management of the waste conforms with waste policy and targets. Mitigation measures include:

- Minimising waste generation through design and construction techniques, and procurement procedures;
- Preparing a Materials Management Plan to facilitate the re-use of site won materials;
- Diverting waste from landfill by transferring the waste to an appropriate waste management facility;
- Implementing a source segregation system and procure recyclable materials;
- Pre-treating non-hazardous waste and ensure no mixing of hazardous waste;
- Agree landfill diversion targets for key waste materials and implement waste management measures through a Site Waste Management Plan (SWMP) and an Operational Waste Management Plan (OWMP).

An Outline SWMP accompanies the application that will be updated during the detailed design stage. The OWMP will be prepared post consent, With the implementation of mitigation, the residual significance of effects are considered to be negligible to minor adverse during construction and operation.



Waste receptor plan

# Energy

The potential energy effects of the Proposed Development have been assessed by Cundall and the results presented in ES Technical Paper 11 – Energy.

The Paper examines the anticipated energy demands and subsequent carbon emissions for the operational site and the proposals approach toward meeting the energy and sustainability targets, as set out by Flintshire County Council (FCC).

The assessment takes into consideration the type of buildings proposed and subsequent energy demand and carbon emissions.

The principal objective is to reduce the site's contribution to the cause of climate change by minimising the emissions of CO<sub>2</sub>, by reducing the site's needs for energy and by providing some of the requirement by renewable/sustainable means.

The Paper confirms that the baseline carbon emissions for the development have been calculated through the simulation of the Part L2A model, created in IES-VE 2021.

The baseline section of the Paper and alternatives section identifies strategies and measures which can be incorporated into the design to create an energy efficient building and minimise its impact over the environment, while meeting all the targets as set out by the Flintshire County Council.

This confirms that the Proposed Development could demonstrate a 10.5% area-weighted improvement over the Tenant's Energy Review (TER), achieved via energy efficient equipment and PVs, thus complying with Policy EWP3 of

Flintshire's Unitary Development Plan.

The Energy Paper assesses the construction phase environmental impacts as a result of increased energy use to the demand of construction activities, increased carbon emission associated with energy use and increased air pollutants to be emitted via construction and vehicles which all reported as negligible to minor adverse impacts.

During the operational phase there are negligible to minor adverse impacts associated with increased energy demand, carbon emissions and noise generated from the Proposed Development.

Mitigation measures have been set out in the Technical Paper to mitigate construction impacts, including use of local materials, control measures to be put in place through a Site Waste Management Plan. Measures proposed during the operational phase include measures to conserve water, a detailed SUD's strategy, efficient waste management system and the design and installation of a highly efficient mechanical and electrical services systems as well as the renewable measures outlined in the baseline section of the Technical Paper, resulting in a negligible to minor adverse residual impact.

Cumulative impacts have been considered and the Paper confirms there is no in combination cumulative impacts.

In conclusion the Paper confirms there will be negligible to minor adverse residual impacts following mitigation and all cumulative development is not expected to present any significant cumulative impacts.

# Human Health

The Human Health Technical Paper has considers the likely effects of the Proposed Development during the construction and operational phases on Human Health. Consultation has been undertaken with the Betsi Cadwaladr University Health Board in relation to the Health Impact Assessment (HIA) which forms part of the wider assessment and will be submitted with the planning application. The HIA considers how the Proposed Development will have an effect on the key factors that can influence people's health and wellbeing and suggests potential mitigation and enhancement.

A desk-top review of the Local and County wide available data to establish the baseline for the assessment, using sources such as the Office for National Statistics (ONS), Public Health Wales (PHW) data and Census records. This has allowed the health, social and economic profile of the affected population(s) to be established as well as vulnerable groups and sensitive community resources affected by the development to be identified.

A review of scientific literature to support an association between changes that are likely to occur due to the Proposed Development and changes to health outcomes has also been undertaken.

An assessment of the likely human health impacts of the Proposed Development during the construction and operation phases, based on sensitivity value of receptor and magnitude of effect have been undertaken. This was informed by the determinants set out in the consultation draft

document named "Addressing Human Health in Environmental Impact Assessment" by Cave et al in 2019.

The assessment took into consideration the relevant assessment of physical environmental effects included in the following ES Technical Papers are also included in this Technical Paper: Geology and Ground Conditions (Paper 1), Traffic and Transportation (Paper 2), Ecology and Nature Conservation (Paper 5), Socio Economic (Paper 6), Noise and Vibration (Paper 7), Air Quality, Odour and Dust (Paper 8). The impacts without mitigation described in these Technical Papers has been reviewed as part of the assessment.

Where the assessment found the Proposed Developments construction and/or operation would have adverse impacts on human health determinants mitigation measures have been recommended. These include the proposed mitigation included in the relevant ES Technical Papers. This has allowed the residual effects following implementation of mitigation measures to be identified.

Furthermore, the Proposed Development was assessed in relation to other schemes within the local area to allow any significant cumulative effects that may arise to be anticipated.

The Technical Paper concludes that as a result of the mitigation measures proposed it is considered that the Proposed Development's construction and operational phases would, at worst, have a Negligible significance of effect on human health determinants with Negligible environmental impact.

# Synergistic Effects (Interaction of Effects)

## Synergistic Effects (In Combination / Interaction of Effects)

For the purposes of this ES we define the cumulative and the interaction of effects as:

*‘Those that result from additive impacts (cumulative) caused by other existing and/or approved projects together with the project itself and the synergistic effects (in-combination) which arise from the reaction between impacts of the project on different aspects of the environment.’*

Synergistic effects have been considered throughout the evolution of the development proposals across all the technical areas and scheme design. These will be minimised and managed through the implementation of mitigation, much of which is multi-functional to address synergistic effects. There are two key areas of interactions which are likely to occur, these being:

- Interaction of construction effects – related impacts in terms of ground, water resources, ecology and agricultural land and soils (including peat); air, noise and traffic; landscape, ecology and drainage; and cultural heritage and landscape.
- Interaction of operational impacts – related impacts associated with those arising from the proposed land uses for the site focusing upon traffic and consequential noise and air implications; landscape, ecology and drainage.

The different types of receptors are categorised as follows:

- Humans- (a) long term human receptors- residents, business users; and (b) transient human receptors, including pedestrians, cyclists, drivers and public transport users, construction workers.
- Property- residencies and business uses.
- Ecological- habitats, including protected sites or

species.

- Historic Environment– heritage assets
- Landscape - character areas
- Controlled waters- surface waters like water courses or groundwater (aquifers).
- The economy
- Local waste infrastructure i.e. landfills, recycle and recovery facilities

Synergistic effects have been considered throughout the evolution of the development proposals across all the technical areas and scheme design. These will be minimised and managed through the implementation of mitigation, much of which is multi-functional to address synergistic effects.

The adverse interaction of impacts in and around the Site will occur at their greatest during the short term period (construction). It is however considered that the mitigation proposed during both the construction and operational phases as part of the Environmental Assessment (summarised in Section 8) is sufficient to deal with these impacts which will be controlled by way of planning conditions and as necessary and as such the majority of impacts will be no worse than minor adverse and negligible and some being beneficial, including socio economic with any substantial / high adverse impacts limited to the visual impact of the 39.65m high bay warehouse which will remain visible above existing and proposed planting.

The tables that follow summarise the worst residual outcome for each of the technical assessments in respect of each of the receptor categories for both the construction phase and operational phase of the development. “A” refers to Adverse, “B” to Beneficial, and “N” refers to Neutral / Negligible impacts shown as follows:

## Synergistic Effects (Interaction of Effects) continued

A	Adverse effects
N	Neutral / Negligible effects
B	Beneficial effects

Receptor Category	Geology and Ground Conditions	Traffic and Transport	Water Environment	Landscape and Visual Impact	Ecology and Nature Conservation	Socio Economic	Noise and Vibration	Air Quality Dust and Odour	Cultural Heritage and Archaeology	Waste	Energy	Human Health	Synergistic Effect
Humans	N	N	N	A	-	B	N/A	A	-	-	A	N/B	Yes
Property	-	-	N	A	-	-	-	-	-	-	-	-	Yes
Ecology	N	-	N	-	N/B	-	-	-	-	-	-	-	No
Historic Environment	-	-	-	A	-	-	-	-	N/A	-	-	-	Yes
Landscape	-	-	-	A	-	-	-	-	-	-	-	-	No
Controlled Water	N	-	N	-	-	-	-	-	-	-	-	-	No
Economy	-	-	-	-	-	B	-	-	-	-	-	-	No
Local Waste Infrastructure	-	-	-	-	-	-	-	-	-	A	-	-	No

Possible Synergistic Effects during Construction

## Synergistic Effects (Interaction of Effects) continued

A	Adverse effects
N	Neutral / Negligible effects
B	Beneficial effects

Receptor Category	Geology and Ground Conditions	Traffic and Transport	Water Environment	Landscape and Visual Impact	Ecology and Nature Conservation	Socio Economic	Noise and Vibration	Air Quality Dust and Odour	Cultural Heritage and Archaeology	Waste	Energy	Human Health	Synergistic Effect
Humans	N	N	B	A	-	B	N/A	N/A	-	-	A	N/B	Yes
Property	-	-	B	A	-	B	-	-	-	-	A	-	Yes
Ecology	N	-	-	-	N	-	-	N	-	-	-	-	No
Historic Environment	-	-	-	A	-	-	-	-	A	-	-	-	Yes
Landscape	-	-	-	A	-	-	-	-	-	-	-	-	Yes
Controlled Water	N	-	N/B	-	-	N	-	-	-	-	-	-	No
Economy	-	-	-	-	-	B	-	-	-	-	-	-	No
Local Waste Infrastructure	-	-	-	-	-	-	-	-	-	N/A	-	-	No

Possible Synergistic Effects during Operation

## Synergistic Effects (Interaction of Effects) continued

### Synergistic Effects: Construction

The greatest perceived interaction of effects are construction phase activities including the enabling works such as the earth works and development platforms, as well as the physical activities associated with the construction of buildings and parking areas. The human, property and historic environment receptors are most likely to be subject to synergistic effects during the construction phase. However, the construction phases of development are considered to be short term and the effects temporary.

The controlled water receptors are also vulnerable to synergistic effects, but as the assessment for the Proposed Development identified these effects as being no greater than negligible, it can be concluded that there will be no significant synergistic effects.

In respect of human health and socio economic, the effects associated with job creation during the construction phase, increased GVA and training and apprenticeship opportunities have been assessed as being beneficial and the effects of traffic and transportation associated with the increased construction traffic movement are negligible.

In respect of ground conditions and contamination and air quality and dust, the effects associated with inhalation or ingestion of dust by site workers or adjacent residents have been assessed as being negligible. Noise associated with construction traffic and vibration from construction activities and dust arising from construction activities is assessed as having a neutral to minor adverse effect on residential receptors and site workers.

These effects are therefore not considered to be significant when considered on their own and are unlikely to combine with other effects to become significant due to their negligible or neutral impacts.

The visual impact in respect of residential receptors and from PROW routes are considered to be adverse during construction, due to the change and disturbance that will occur to the landscape during this time.

There are a number of physical measures that will be in place as part of the inherent mitigation (such as the landscaping at an early stage in the construction) and a commitment to other mitigation such as the implication of a CEMP to manage construction activities and help mitigate the effects of the construction phase. These will all help to manage and mitigate the impact on receptors as far as is possible,

especially those effects that can combine to have a greater overall effect.

There are still however potential for adverse synergistic effects on some receptors in respect of visual, earthworks and construction traffic. The greatest effect will be on the nearest residential receptors who are likely to be affected by all or some of these impacts at some point during the construction phase.

Grass land areas within the Site will be replaced by site construction operations and the creation of a single cleared level plateau with only boundary vegetation retained. Although the construction impacts are only short term, the residual impact this permanent loss of grass land has on the landscape character of the Site after construction mitigation will be minor to moderate adverse.

The landscape treatments and particularly perimeter tree and hedgerow planting carried out as part of the Phase 1 and 2 works in the Proposed Development would be expected to be established in parallel with completion with construction of Phase 3 of the Paper Mill building, with existing trees and vegetation on the boundaries of the Site and hoardings providing low level screening during initial phases of construction so the view of development from existing residential receptors and future residential phases would be slightly reduced. Nevertheless the impacts will remain adverse, ranging from minor to moderate adverse (with exception of VP5 and VP7 which would be high/substantial adverse) across most of the agreed viewpoints assessed and illustrated at Appendix 4.2 of the ES Part 2 - Landscape and Visual ES Technical Paper 5.

The construction phase is temporary and different parts of the Site will be worked at different times, which aids the management of the combination of the likely impact on any one receptor.

Whilst some of these impacts are extensive (as would be expected for a development of this scale), the majority will, except for transport movement and use of tower cranes that may be visible from certain receptors within the wider landscape, be restricted to areas within and in close proximity to the Site and will be short term impacts.

For the human and property receptors at closer range to the Site, such as residential properties at Garden City, the in-combination effects have the potential to be significant, but will be managed as identified above to minimise the effects so

## Synergistic Effects (Interaction of Effects) continued

they are no greater than those assessed individually within the ES.

In respect of the historic environment receptors, the likely in-combination effects are associated with visual impacts and impacts on the heritage assets, which in this case are indirect on the setting of the assets which sit outside the Site boundary.

However, as identified above for the human and property receptors, mitigation will be put in place to manage and limit the individual and synergistic effects on these receptors through activities such as the creation of early landscape planting and with the implementation of a CEMP to control and manage the construction activities and their impact on receptors. The synergistic effects on the heritage receptors are therefore not considered to be any greater than those assessed individually within the ES.

### **Synergistic Effects: Operation**

For the operation phase, the human, property and landscape and historic environment are the most likely to be subject to synergistic and interactive effects.

The impacts associated with flood risk and drainage are assessed as beneficial, as the drainage strategy proposed incorporates SUDs, therefore there is a benefit to the human and property receptors in respect of drainage and flood risk. As such the interaction of these effects can only be beneficial to the human and property receptors.

The effects on air quality in respect of air emissions from the Proposed Development and traffic movements are assessed as negligible and therefore not significant.

Noise and vibration associated with the operational use of the Proposed Development results in a negligible to minor adverse impact on humans and properties following mitigation associated with the fabric of the proposed building and measures to mitigate noise emissions from proposed stacks and chimneys. When noise, air quality and odour are considered together in respect of the human receptors in this location, it is not considered that there is likely to be any greater impact on the receptors than individually assessed through each technical area within the ES.

Effects in respect of socio economic are all beneficial with creation of long-term employment and effect on the labour market and an increase in GVA and training and apprenticeship opportunities. The increase in traffic and the resulting effects on driver delay and amenity and severance for pedestrians and cyclists on the local highway network is

assessed as negligible and the in-combination effects of noise on humans resulting from the increase from traffic on the local road network is assessed as negligible. Mitigation is also embedded in the detailed scheme design with the layout and positioning of noisier activities such as service areas and loading bays towards the western end of the Site, away from sensitive boundaries with residential receptors.

There is also a commitment to reduce the reliance on the private car and to reduce any negligible operational impacts of air quality through mitigation measures contained within a Travel Plan.

The visual impact of the Proposed Development in respect of residential views and from PROW routes are considered to be adverse during operation, due to the change that will occur to the landscape during this time. In particular, the Proposed Development is assessed as having a minor to substantial / high adverse impact on certain viewpoints during operation.

The Proposed Development includes some primary mitigation measures, such as the proposed colour banding to the building cladding which are embedded in the Scheme design and will help to reduce the potential visual effects particularly of the High Bay Warehouse.

Whilst the landscape impact of the Proposed Development, the industrial buildings and particularly the 39.65m high bay warehouse may reduce slightly as the boundary planting develops and filters the views of parts of the proposed buildings this is not assessed to reduce the significance of the effect on the landscape character, which will remain adverse.

Long term management of the proposed landscape planting will have a positive interactive effect with ecology, with the introduction of new habitats established at the enabling works construction phase which will have long term ecological benefits for the Site.

The effects of the Proposed Development on the setting of these heritage assets have been assessed as minor to negligible during the operational phase. The effects of the Proposed Development on the setting of these heritage assets have been assessed as minor to negligible during the operational phase. As identified above for the human and property receptors, mitigation has been embedded in the scheme design to manage and limit the individual and synergistic effects on these heritage assets, through location and orientation of the high bay warehouse relative to the Listed Buildings.

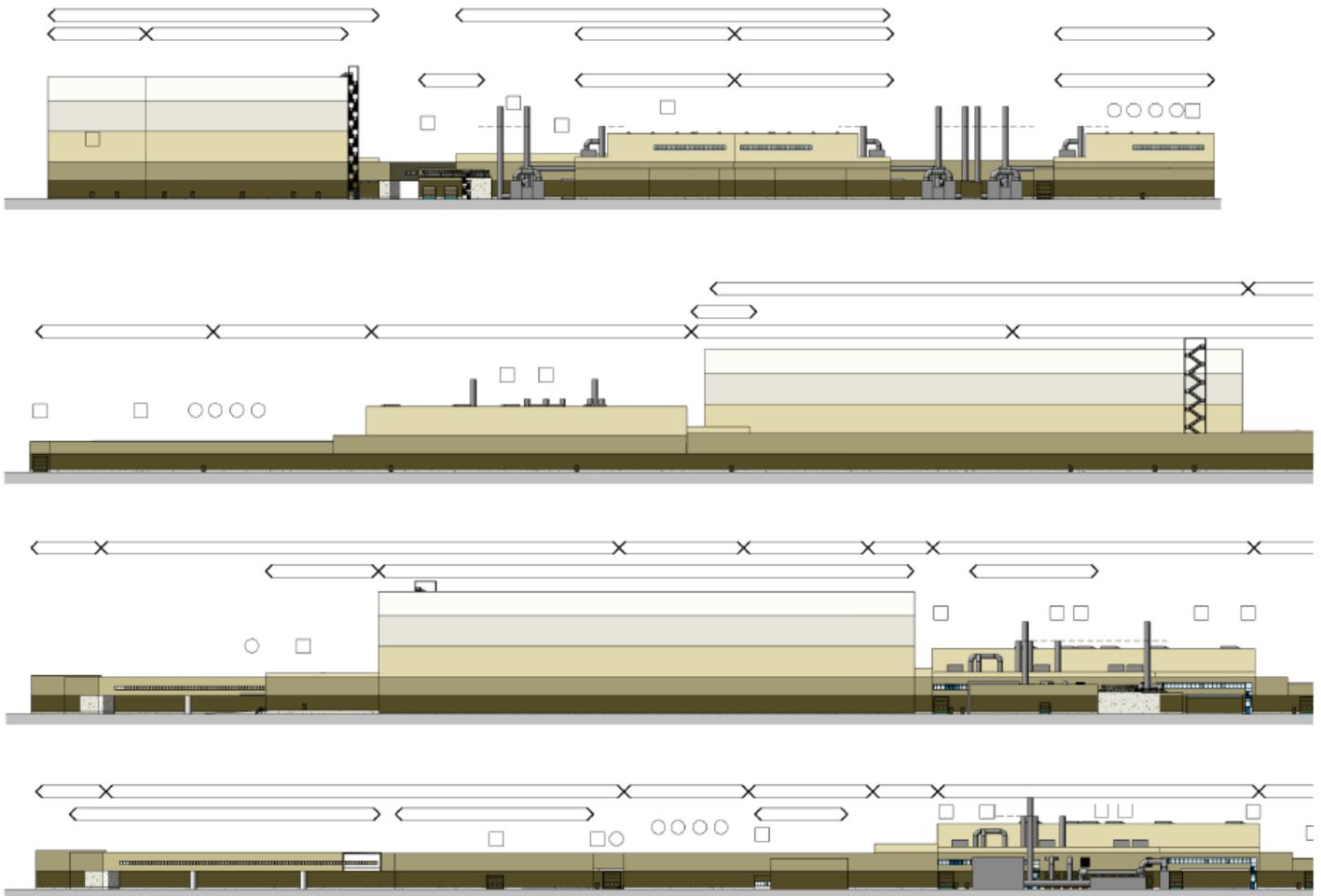
# Synergistic Effects (Interaction of Effects) continued

## Synergistic Effects: Summary

Synergistic effects have been considered throughout the evolution of the development proposals across all the technical areas and scheme design. These will be minimised and managed through the implementation of mitigation, much of which is multi-functional to address synergistic effects.

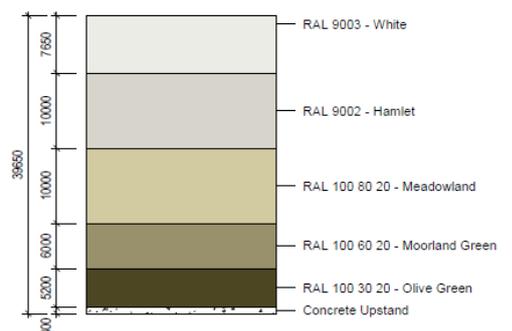
The adverse interaction of impacts in and around the Site will occur at their greatest during the short term period (construction). It is however considered that the mitigation

proposed during both the construction and operational phases as part of the Environmental Assessment is sufficient to deal with these impacts which will be controlled by way of planning conditions and as such the majority of impacts will be no worse than minor adverse and negligible and some being beneficial, including socio economic with any substantial / high adverse impacts limited to the visual impact of the 39.65m high bay warehouse which will remain visible above existing and proposed planting,



Phase 3 elevations showing how cladding will be used to as part of the mitigation strategy to reduce visual impact

### Cladding Legend



# Cumulative Effects

The overall assessment and impact of the Proposed Development Site when considered cumulatively with other cumulative sites in respect of ground and contamination, drainage and flood, cultural heritage and archaeology, air quality, noise, energy and waste are not considered to be significant, subject to mitigation being applied and implemented for the respective cumulative developments. These cumulative effects are considered to remain as assessed through the main assessment and are therefore not considered to be significant.

There will be significant socio economic cumulative benefits in terms of GVA and job creation, which will significantly boost the local economy and also the benefits of new housing being in close proximity to the jobs created by the Proposed Development which will allow for non-car borne modes to be utilized for journeys to work.

In ecological terms, it is expected that many of the created/retained/enhanced habitats across all phases of the wider Airfields site and Former Corus Garden City site would be sufficiently mature during the operational phase to provide a cumulative beneficial impact when considered in combination.

There are some adverse impacts arising as a result in the change to the landscape character of the Proposed Development and cumulative developments and the visual impact for some of the viewpoints closest to the site during the operational phases. Each development will however mitigate these impacts as far as possible with landscape

proposals to try and soften their appearance and help to screen their presence in the landscape which will mature over time, which could reduce to a minor adverse residual cumulative impact.

With regard to the cumulative visual impact from viewpoints close to the Site, the overall significance of effect is assessed to increase at completion of construction due to the extent of the development area and the proportion that will be visible in each view. However as infrastructure landscape treatments in association with the Proposed Development, the wider Airfields Site and Former Corus Garden City site become established, after 15-20 years the visual impact would be expected to reduce as boundary screening will start to become more effective.

The presence of additional employment development surrounding the proposed ICT Paper Mill Facility will also provide screening to parts of the Proposed Development which will reduce its impact on views from the east and west. However it is expected that the high bay warehouse will still be a prominent feature in these views.

The opening and operation of the Proposed Development and infrastructure, along with the development on the wider Airfields site and the Former Corus Garden City site, outlined above will have no additional impact on the identified archaeological and built heritage assets. Any long-term cumulative effect on the setting of these assets will be reduced by the maturing of the landscaping schemes.

# Cumulative Effects



## KEY - ILLUSTRATIVE LAND USES - AIRFIELD SITE

- Employment Area I**  
Plots A, B and D - Industrial and distribution uses covered by planning classifications. Covered by planning classifications B2 and B8.
- Housing Development**  
Pods H1 -H8 - Up to 725 properties comprising 2, 3 and 4 bedroom houses.
- District Centre**  
Plots 01 & 02 - Public house, hotel, food, small shops, creche and doctors surgery. Covered by planning classifications B1, B2, B8, D1, D2 & sui generis.

NOTE: All drawings to be read in conjunction with the Design Statement

- Cumulative development 'AIRFIELD' (Former RAF Sealand Site) Granted outline planning permission - Plan by Barns Walker

## KEY - FORMER CORUS GARDEN CITY SITE

- Cumulative development associated with mixed use outline planning permissions on former Corus Garden City Site
- ICT Paper Mill Site (Plot C)

# Conclusion

The Proposed Development is considered to be EIA Development and as such the application is accompanied by an Environmental Statement (ES) in line with the Town and Country Planning (Environmental Impact Assessment) Regulations (Wales) 2017.

The ES has been prepared on behalf of Industrie Cartarie Tronchetti (ICT) UK Ltd and Crag Hill Estates Ltd (CHEL) by competent experts to accompany a full planning application for the erection of a Paper Processing Mill to produce and manufacture tissue paper (B2, B8 use class) with ancillary B1a office space and associated servicing and infrastructure at the Application Site referred to as Northern Gateway.

The main purpose of the ES is to provide an objective assessment of the environmental impacts of the Proposed Development. This Non-technical summary provides a summary of the main issues identified within the ES Part 1 and ES Part 2.

These separate topic papers contain the detailed analysis of impacts and mitigation and should be referred to for the complete assessment of impact. This ES Part 1 report aims to provide an overview of the predicted effects and how it is proposed to mitigate the impacts. It should be noted that the information submitted for this planning application is extensive given the nature of the Site, however, the detailed mitigation strategies will be controlled via the use of planning conditions. A variety of mitigation measures are proposed to control, manage and reduce the effects of the Proposed Development. Further mitigation of environmental effects is also inherent in the design of the Proposals. All of the mitigation is devised to either mitigate individual effects or it is multi-functional to mitigate a number of effects.

As a whole, the majority of the potential environmental impacts and their effects (with mitigation incorporated) are assessed as neutral, negligible or minor adverse at both construction and operational phases and as such are not significant. This is in relation to geology and ground conditions, traffic and transport, ecology and nature conservation, noise and vibration, air quality dust and odour, waste, energy and human health as well as some effects associated with cultural heritage and landscape and visual impact.

There are a number of environmental impacts and their effects that are assessed as beneficial and these relate to the operational phase with the drainage and flood risk (water environment) through a managed drainage strategy. Socio economic effects are significantly beneficial in respect of job creation, GVA and the opportunities for training and apprenticeships at both construction and operational phases,

which has a benefit for the immediate locality as well as the wider Sub-region and the Borough.

There are some adverse effects on some receptors in respect of landscape and visual impact from the Proposed Development. The greatest effect will be on the nearest PROW's and residential receptors, who are likely to be affected by some of these impacts at some point during the operational phase. With the mitigation and measures in the form of landscaped planting at carefully considered locations on the boundaries of the Site it is anticipated that these effects will be reduced. Other significant effects are in respect of landscape character and visual amenity as a result of the change and disturbance that will occur with the Site's redevelopment. These will be managed as far as possible through the implementation of mitigation measures during the construction and operation phases.

The ES Part 1 also assesses the potential for the synergistic/interaction of effects and concludes that in the main these are not considered to be significant with the multi-functional mitigation that is proposed. The synergistic/interaction of effects which have the potential to be significant are as a result of the significant effects of visual impact.

Cumulative impacts are assessed and take account of the wider Airfields site and Former Corus Garden City site that form part of the Northern Gateway strategic mixed use allocation in the Council's UDP that both have outline permission and are likely to come forward in a similar timeframe to the Proposed Development. The cumulative impacts of these sites have been assessed and the impacts are not considered to be any more significant than those effects assessed as part of the main Environmental Assessment of the Proposed Development Site. The presence of additional cumulative employment development east, west and south of the proposed ICT Paper Mill Facility will actually provide further screening to parts of the Proposed Development which will reduce to a minor adverse cumulative impact.

There is therefore not considered to be any potential environmental impacts that cannot be suitably mitigated and which would prevent the proposals from being granted planning permission. Those effects that are assessed as significant in environmental terms are limited to visual impacts. These significant effects should be considered in the context of the historical industrial landscape of this Site, highly valued as a "once-great industrial site, and as a major local employer" and will also be outweighed by the significant benefits that the Proposed Development will bring to the area, particularly in respect of socio economic (job creation and GVA).



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