

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

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

## **Planning Statement**

Revision A    22 September 2021





## Revision Record

Revision Reference	Date of Revision	Nature of Revision	Author	Checked By
A	22.09.2021	Issue to Client	LY/HL	GW

Report Author	LY, HL & GW
Report Date	September 2021
Project No.	P4272
Document Ref.	P0-SPA-RP-P4272-0007-A
Revision	A



## Contents

<b>Revision Record.....</b>	<b>2</b>
<b>1. Introduction .....</b>	<b>5</b>
<b>2. Site Context and Development Proposals .....</b>	<b>8</b>
Site Context .....	8
Development Proposals .....	15
Phasing .....	18
<b>3. Relevant Planning History and Designations .....</b>	<b>34</b>
<b>4. Stakeholder Engagement Summary .....</b>	<b>40</b>
Overview .....	40
<b>Engagement Objectives</b> .....	<b>40</b>
Engagement with the Local Planning Authority and Statutory Bodies .....	41
Environmental Impact Regulations, Screening and Scoping .....	41
Pre-application Discussions .....	42
Community Engagement and Consultation .....	45
Consultation with the Community .....	45
<b>5. Statutory Policy Context and Other Relevant Policies .....</b>	<b>47</b>
Statutory Development Plan .....	47
Flintshire Unitary Development Plan .....	47
National Development Framework: Future Wales: The National Plan 2040 .....	50
Planning Policy Wales (PPW) .....	53
Technical Advice Notes (TANs) .....	57
<b>Other Relevant Policies</b> .....	<b>58</b>
Other Relevant National Policy Documents .....	58
Deeside Enterprise Zone .....	59
Deeside Plan .....	59
North Wales Growth Deal .....	60
Emerging Local Policy .....	60
Relevant Local Supplementary Planning Documents .....	63
Strategic Development Plan .....	63
<b>6. Reasoned Justification for Proposed Development .....</b>	<b>64</b>
Affording weight to planning policies .....	64
<b>Principle of Development</b> .....	<b>65</b>
Summary .....	73
<b>Design, Landscape and Cultural Heritage</b> .....	<b>75</b>
Design .....	75
Landscape .....	80
Built Heritage and Archaeology .....	87



<b>Other Material Considerations .....</b>	<b>98</b>
Highways and Transportation .....	98
Ground Conditions .....	102
Flood Risk and Drainage .....	107
Ecology and Nature Conservation .....	113
Noise .....	117
Air Quality, Odour and Dust.....	119
Lighting.....	121
Energy Carbon Reduction .....	123
Human Health.....	125
Utilities.....	126
Waste .....	129
<b>Planning Balance / Weighted Balance? .....</b>	<b>132</b>
The material issues that weigh in favour: .....	133
The material issues that cause impacts:.....	135
The Balance .....	137

## **7. Summary and Conclusions..... 138**

## I. Introduction

- I.1 Spawforths have been instructed by Industrie Cartarie Tronchetti (ICT) UK Ltd to prepare and submit a full planning application on Plot C of the Airfields site, which forms part of the Northern Gateway Strategic Mixed Use Development site allocated under Policy HSG2A in the Flintshire UDP (2011). The proposal is 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.*

- I.1.1. The applicants have taken professional advice from a development team and supplementary information has been prepared in support of the application by the following consultants.

### Consultants

- Spawforths – Environmental Statement (EIA Coordinators)
- Spawforth – Planning
- AEW Architects (Design an Access Statement and Full Drawings Package)
- SGi Consulting – Geology and Ground conditions and Civil Engineering (Cut and Fill)
- Curtins – Traffic and Transportation
- Arcadis – Water Environment (Water Quality, Flood and Drainage)
- Barry Chinn Associates (BCA) – Landscape and Visual Impact
- Ecology and Nature Conservation (Tyler Grange)
- Socio – economic (Amion Consulting)
- Cundall – Noise and Vibration
- Cundall – Air Quality, Dust and Odour
- BWB Consulting – Cultural Heritage and Archaeology
- Crookes Walker – Utilities Assessment
- Utility Connections – Utilities Assessment
- Cundall – Energy



- RPS Group – Waste Management
- Cundall – Human Health
- Cundall - Lighting
- Lexington Communications – PR and Communications (Stakeholder Engagement)

I.12. This Statement should be read in conjunction with the following reports undertaken by these consultants:

#### **Reports**

- Planning Statement (Spawforths)
- Design and Access Statement and Full Drawings Package (AEW)
- Statement of Community Involvement (Pre-application (PAC) Report) (Lexington Communications)

#### **Environmental Statement**

- Non-technical Summary (Spawforths)
- Environmental Statement Part 1 (Spawforths) (including Utilities Assessments and Light Spill Assessment)
- Environmental Statement Part 2:
  - Paper 1 Ground Conditions and Contamination (including Phase 1 Geo environmental Assessment) (SGi)
  - Paper 2 Traffic and Transportation (including Transport Assessment and Travel Plan) (Curtins)
  - Paper 3 Water Environment (Flood Risk and Drainage) (including Marine Discharge Assessment and Flood Consequences Assessment (FCA) (Arcadis)
  - Paper 4 Landscape and Visual Impact Assessment (LVIA) (BCA)
  - Paper 5 Ecology and Nature Conservation (including Badger Survey, Reptile Surveys and Water Vole/Otter Surveys) (Tyler Grange)
  - Paper 6 Socio Economic (Amion Consulting)
  - Paper 7 Noise and Vibration (including Noise Assessment) (Cundall)
  - Paper 8 Air Quality, Dust and Odour (including Air Quality Assessment and Odour Screening Assessment) (Cundall)



- Paper 9 Cultural Heritage and Archaeology (BWB Consulting)
- Paper 10 Waste (including Outline Site Waste Management Plan (OSWMP) (RPS Group)
- Paper 11 Energy (including Energy and Sustainability Statement) (Cundall)
- Paper 12 Human Health (including Health Impact Assessment) (Cundall)

## 2. Site Context and Development Proposals

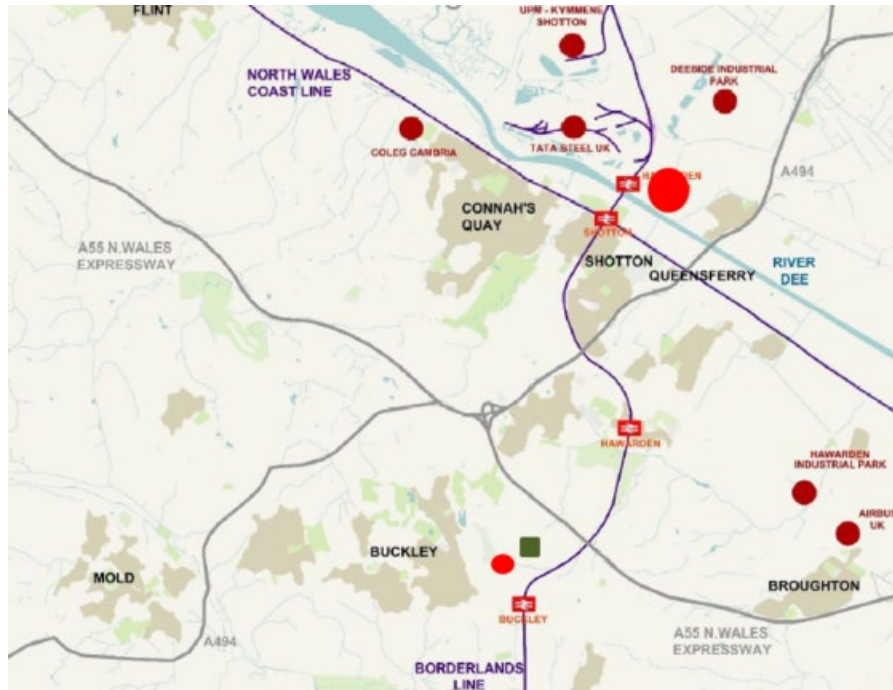
### Site Context

- 2.1. 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.
- 2.2. 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.
- 2.3. The Site is part of, and integral to, the larger Deeside Enterprise Zone (EZ) designated by the Welsh Government in September 2011.



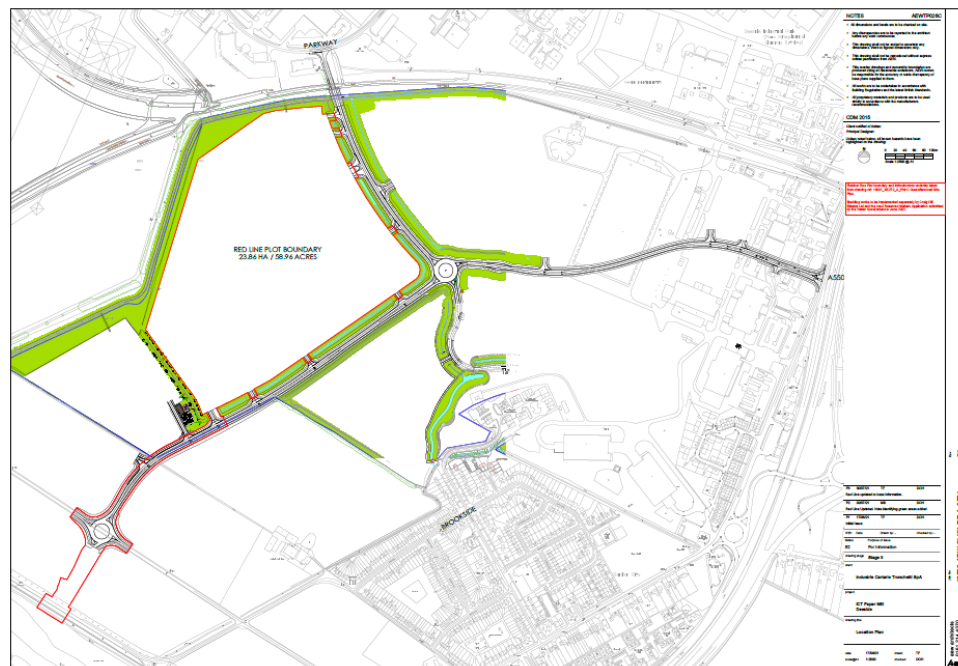
Figure 2.1: National Context Plan





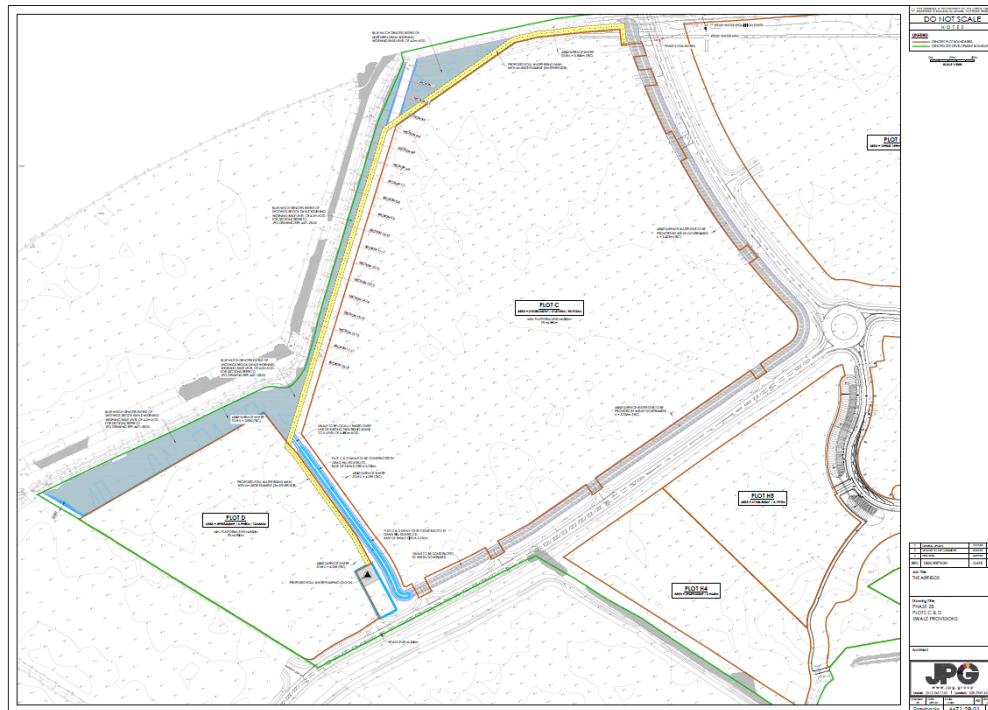
**Figure 2.2 Regional Context Plan**

- 2.4. The Application Site Boundary relates to an area of land of approximately 23.86 hectares (58.96 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). Outline planning permission (ref: 049320) was granted 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 Site spans across an area identified in The Airfields Design Statement (July 2013) as Plot C submitted to discharge condition 6 of the outline planning permission (ref: 049320). See Plan extracted from The Airfields Design Statement and Redline Application Site Plan below.



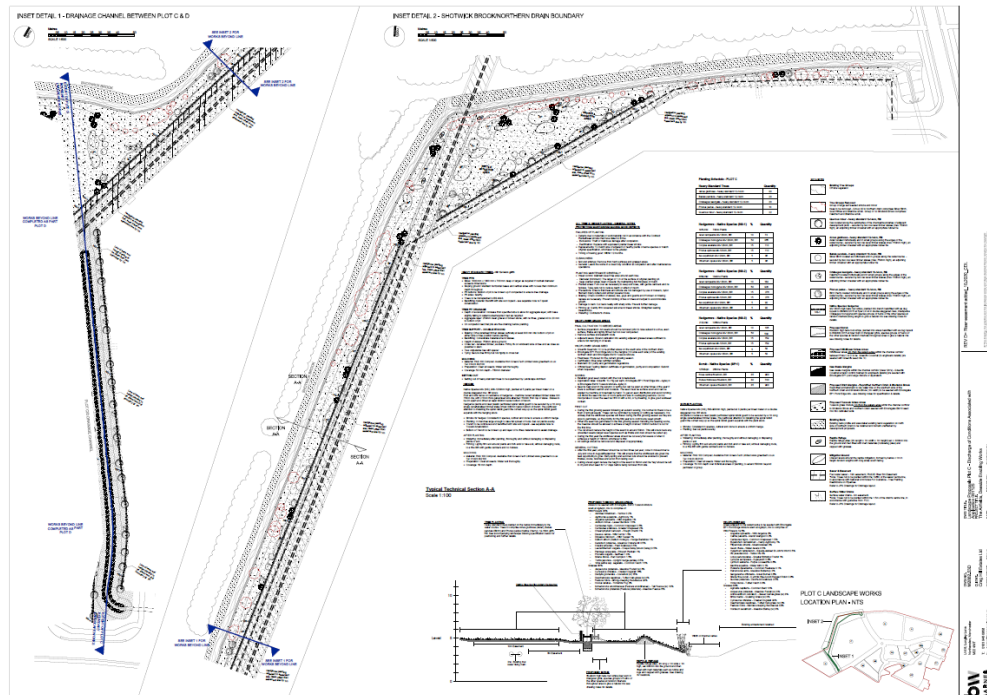
2.5. The Application Site occupies the north western part of the Airfields site.

- 2.6. The Site currently comprises managed grassland. It does not have any of the former RAF Camp building bases and site roads that were removed in the phase 1 enabling works associated with the Airfields site. The Site is flat. 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.
- 2.7. Beyond the northern boundary of the Application site is the Northern Drain which will be widened and the banks reprofiled as part of enabling works to facilitate Plot C to be delivered separately by the landowner CHEL. These works will be granted approval as part of an application to discharge planning conditions (Ref: 061986) on the outline planning permission (Ref: 058990). The north and western perimeter of the Application Site abuts the existing disused rail corridor which now incorporates an important cycling and walking route. This route has been developed by Sustrans and is known as the Chester Millennium Greenway, Chester to Connah's Quay Railway Path. Linking Fairfield Road in Chester approximately 4.5 miles to the east with Hawarden Bridge, this route uses the alignment of the former Mickle Trafford Freight line and forms part of the National Cycle Network Route 5. Beyond the National Cycle Route is the Deeside Industrial Park (DIP).
- 2.8. 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.
- 2.9. Parts of the Brook in this location will be re-profiled to improve flood capacity. A new surface water swale will also be provided between Plots C and D, connecting southwards to a new proposed new swale to the south of the Application Site (Plot C) which will be constructed as part of the Welsh Government Commercial Spine Road phases 2 and 3. This is illustrated on **Figure 2.5** below.



**Figure 2.5: Plot C Enabling Works – Re-profiled Brook and new surface water swale**

- 2.10. There is also hedgerow beyond the western boundary of the Application Site which separates the CHEL owned land from the adjoining land owned by PGNGL which forms part of the former Corus Garden City site which also forms part of the Northern Gateway Strategic Mixed Use Development site allocated under Policy HSG2A in the Flintshire UDP (2011).
- 2.11. Beyond the Application Site boundary landowners CHEL are to undertake landscaping works as part of enabling works to facilitate the redevelopment of Plot C. These works have been granted approval as part of the application to discharge planning conditions (Ref: 061986) on the outline planning permission (Ref: 058990) and will include landscaping works which will include removal of self-seeded trees to provide slope stability, replacement trees, and aquatic ecological habitats. This will include provision of a reptile mitigation area at the northern end of the Application Site (Plot C) and a grassland ecological mitigation area at the north western corner of Plot D. The reptile mitigation will include refuges and mounds and the grassland mitigation area will have a meadow mix grass seeding over existing grass sward. This is illustrated on **Figure 2.6** below:



**Figure 2.6: Plot C Enabling Works Landscaping Detail**

- 2.12. Beyond the eastern and southern boundaries of the Application Site will be the Welsh Government's proposed Commercial Spine Road Phases 2 and 3. Separating the Application Site and the Commercial Spine Road are proposed drainage swales, which will also connect into the proposed new swale between the Application Site and Plot D. The proposed Commercial Spine Road is now the subject of reserved matters applications submitted to Flintshire County Council (FCC) in June 2021 (Application ref: 063191 and 063187) and once determined will provide highways access into Plot C.
- 2.13. This new road which will connect into the completed Road 1 constructed by Welsh Government which takes access from Welsh Road will provide a public transport link into the Deeside Industry Park and link the Airfield site with the adjacent former Corus Garden City site delivering a comprehensive mixed use development which will meet with the policy objectives of the Northern Gateway Strategic Mixed Use Development site allocated under Policy HSG2A in the Flintshire UDP (2011).
- 2.14. Beyond Road 2 of the Commercial Spine Road is vacant land identified for employment development illustrated in the approved CHEL Design Statement and granted outline planning permission. To the South of Road 3 of the Commercial Spine Road will be residential

development comprising H3, H4, H5, H6, H7 and H8a. Plots H3, H5, H6, H7 and H8a is currently the subject of a reserved matters application (Ref: 062898) for 368 dwellings submitted jointly by Anwyl Homes and Bellway Homes.

- 2.15. Separating Plots H4 and H5 from the Commercial Spine Road is a 2.4m high earth bund and a 1.4m acoustic fence (total height of 4m) which is currently being constructed as part of a separate enabling works reserved matters approval (Ref: 061018).
- 2.16. The Application Site extends to the south onto the former Corus Garden City site owned by PGNGL and follows the alignment of the Road 2 of the Commercial Spine Road with the application boundary extending to the banks of the River Dee as the road makes provision for a below ground easement to allow the discharge of waste water from the proposed ICT Paper Mill Facility.
- 2.17. This wider land parcel referred to as the former Corus Garden City part of the Northern Gateway site proposed for a mix of employment and residential uses, currently comprises agricultural land and the Grade II Listed John Summers buildings which were previously occupied by Tata Steel. This site is contained by the River Dee to the south, Garden City and Welsh Road to the east, the Wrexham-Bidston Railway line, Harwarden Station and the Tata Steel works to the west. The River Dee is a designated nature conservation site comprising a Special Areas of Conservation (SAC), Site of Specific Scientific Interest (SSSI) and local wildlife site. Garden City to the east was originally developed to house the workers of the Shotton Steelworks and comprises a mix of semi-detached and terraced housing. Garden City has some local facilities which include a pharmacy, church, post office, public houses and primary school.
- 2.18. The Site is currently designated for mixed use development within the adopted Flintshire UDP (2011) and Proposals Map and forms part of a wider area identified as the Northern Gateway Strategic Mixed Use Allocation under Policy HSG2A. The Site is therefore identified for B1, B2 B8 employment development.



## Development Proposals

- 2.19. Whilst the Site is identified for B1, B2 B8 employment development as part of its allocation under Policy HSG2A in the Flintshire UDP (2011) for mixed use development and has outline planning permission (ref: 049320) for an employment led mixed use development granted in January 2013 and subsequently varied (ref: 061125) in April 2021, ICT UK Ltd's bespoke operational requirements are such that they need a building on Site that would exceed building height parameters approved within the extant planning permission which are currently set at 30m for this plot and requires land outside the redline application boundary granted outline planning permission.
- 2.20. The planning application therefore seeks full planning permission for this development which is 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.*

2.21. The table below provides a summary of the planning application proposals, broken down into the Phases in which it will be delivered on Site:

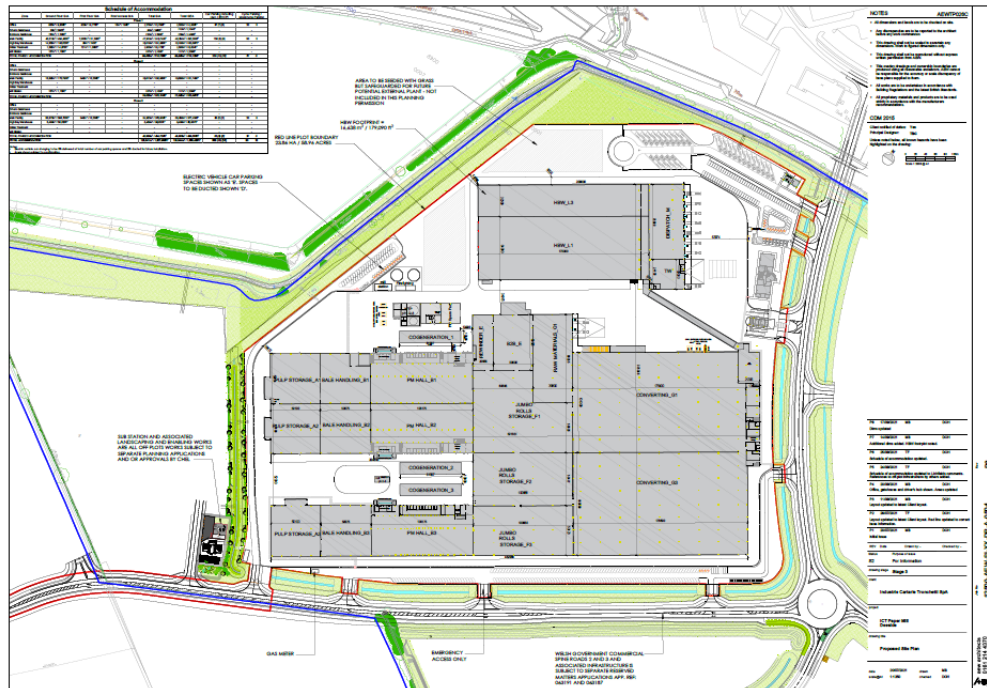
Phase	Use / Use Class	Size of Floor space (m <sup>2</sup> )	Finished Floor Level (FFL)	Building heights	Maximum car parking spaces
Phase 1	B2, ancillary Uses B8, B1a	66,809m <sup>2</sup> (includes office, water treatment building, boiler room, mill station entrance gatehouse and drivers gatehouse)	Main 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 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>



Phase	Use / Use Class	Size of Floor space (m <sup>2</sup> )	Finished Floor Level (FFL)	Building heights	Maximum car parking spaces
Car Parking will be in accordance with Flintshire County Council maximum car parking standards					

**Table 2.1: Schedule of Accommodation****Comprehensive Development**

- 2.22. 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.
- 2.23. 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 south west to north east across the Site, however this will be built in three separate phases. The main section of the building, comprising the pulp warehouse, paper mill and converting hall is 243.17 wide from north to south and extends to 375.35 including the automated finished product High Bay Warehouse. Buildings which remain detached from the Mill Facility include the main offices, water treatment plant and mill station, which includes the incoming electrical power to generate the Facility and the High Bay Warehouse (HBW), which is linked to the converting hall by a bridge containing conveyor which will move finish product pallets to the HBW. See Proposed Layout Plans below showing building departments and elevations. Larger scale plans accompany this planning application and can be viewed separately. The scale and functions of these buildings, including the landscape, car parking and vehicle circulation proposals are outlined in this section in detail, in the respective phases that they are delivered.



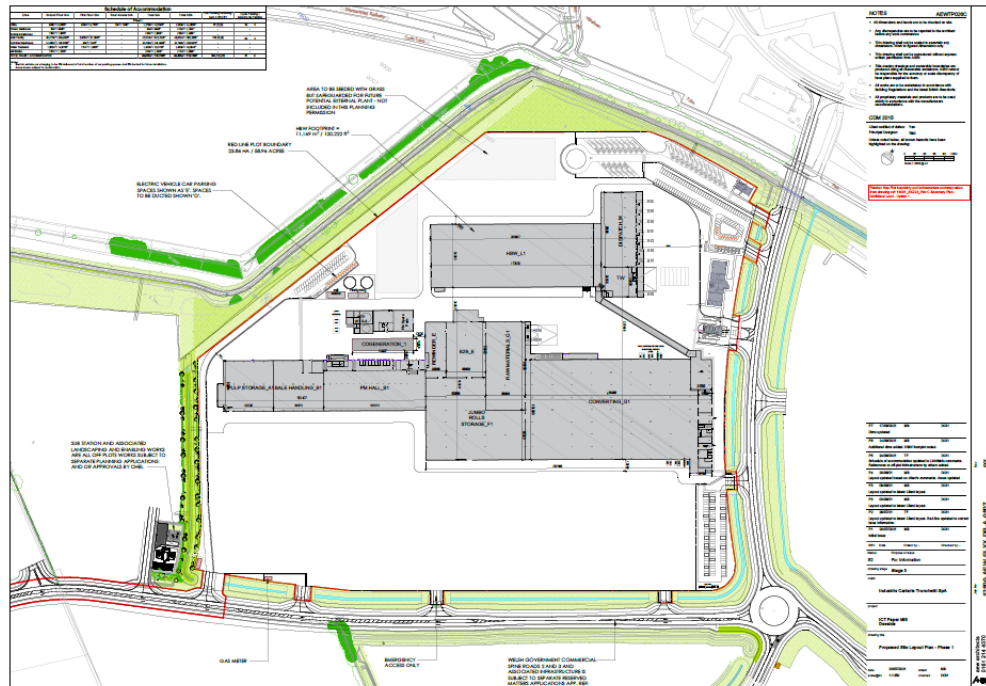
### Phase I of the Mill Facility

Use Class	Total Floorspace	Building Heights
B2, B8 and ancillary B1a Uses	66,808m <sup>2</sup> (includes office, water treatment building, boiler room, mill station entrance gatehouse and drivers gatehouse)	Building heights range from 10m to 21.25 from FFL to parapet across the main section of Phase I of the mill facility and 40m from FFL to the automated high bay warehouse.

**Table 2.3: Phase I Schedule**

2.25. Phase I 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 375.35 wide from north to south across the Site (including the finished product high bay warehouse and dispatch). The Mill 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.

The two storey office building is in a prominent location to the north east of the Site adjacent to junction 4 of Road 2 of the Commercial Spine Road. See Proposed Phase I layout in figure below showing building components.



**Figure 2.8: Proposed Layout Plan (Phase I)**

### **Production Cycle and Manufacturing Process**

2.26. 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. The separate Project Description contained in the Environmental Statement Part I Report provides a detailed description of how each phase of the Paper Mill Facility functions, including the production and manufacturing cycle for tissue paper, outlining the process of each stage of the production cycle that is undertaken within each component part of the Facility.

2.27. This section provides a general overview of how Phase I of the Paper Mill Facility functions, outlining the production process cycle that is undertaken within each component part of the Facility in order to manufacture tissue,

2.28. The facility's production can be classified in the category of "tissue papers" for hygienic-sanitary use. The production cycle can be summarised in the following stages and take place within the pulp warehouse, paper mill and rewinder sections of the Paper Mill Facility:

- Raw materials storage
- Pulp preparation
- Web formation

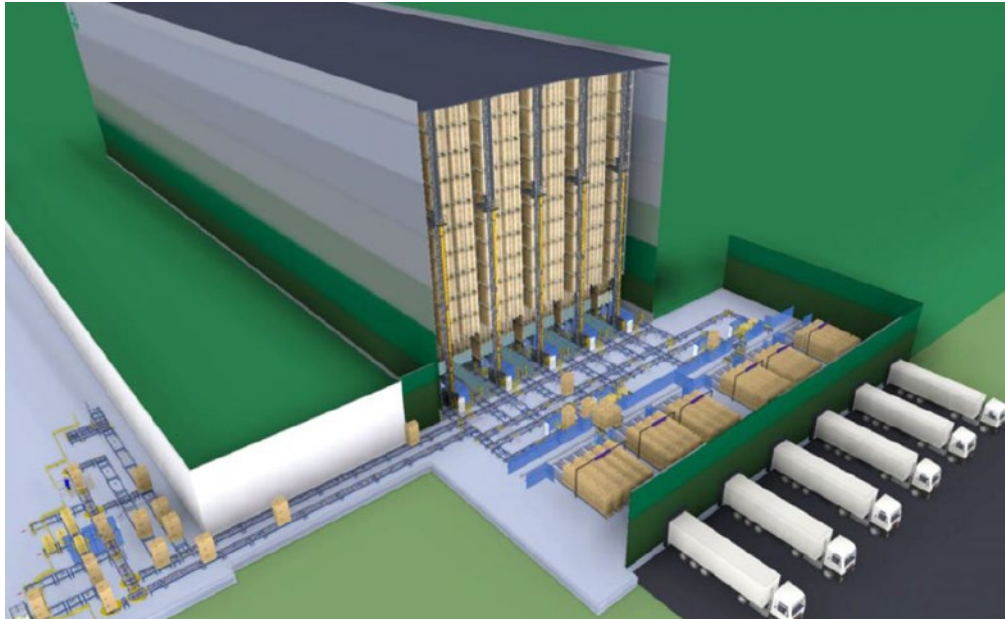


- Web drying
- Winding the web into reels
- Wrapping
- Rewinding
- Converting
- Automated Finished Product High Bay Warehouse and Dispatch

The jumbo reels storage warehouse collects all jumbo reels produced by the paper machine. The reels of tissue paper obtained from the tissue machine are transferred from the jumbo reels storage warehouse to the converting machines, or to a machine called a rewinder.

The section of the building that manufactures the tissue products is called the converting facility. This production process takes the reels of paper produced in the paper mill and converts these, through converting lines, into tissue products comprising, toilet rolls, kitchen towels, napkins, handkerchiefs, facial tissues and industrial rolls.

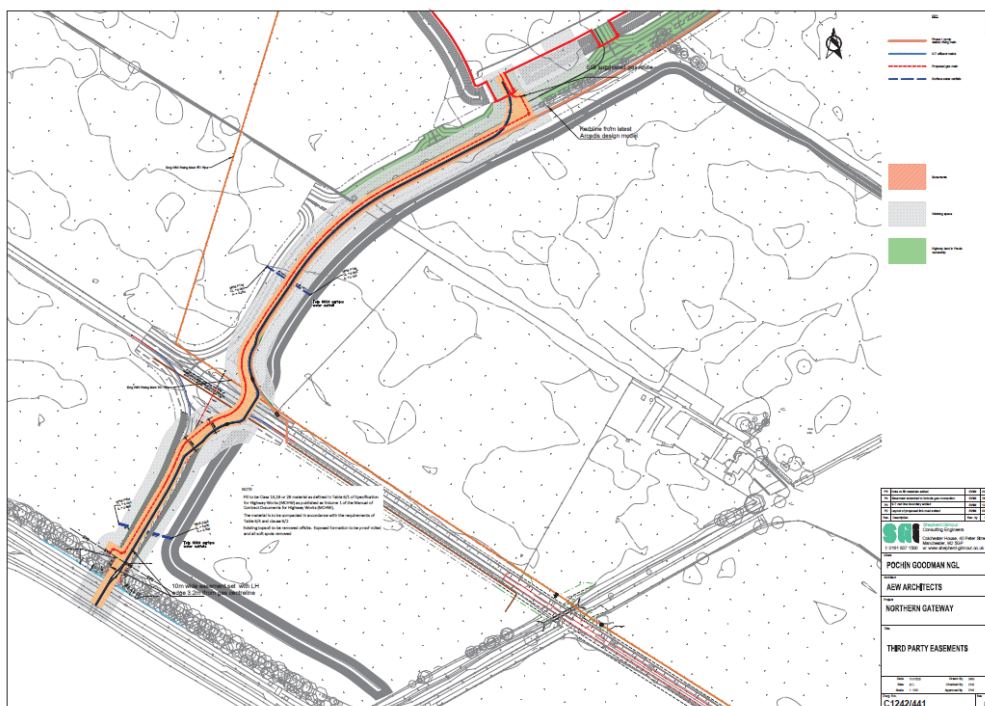
- 2.29. The Automated Finished Product High Bay Warehouse (HBW) located to the north of the Application site is designed for double deep storage and has 10 levels to maximise efficiency. Each stacker crane can fill two HGV's full of finished products. Pallets are transported via conveyor system through a bridge structure (which extends to a height of 12m high from FFL and 6m to the underside of the structure) to the shipping and dispatch area to load onto HGV's from a total of seven dock bays. The height of the HBW is 40m from FFL. See typical illustration of a HBW in figure below.



**Figure 2.9: High Bay Warehouse Automated Stacking System**

- 2.30. A cogeneration system or combined heat and power (CHP) system is proposed for each phase of the Paper Mill. To optimise the process, the plant is equipped with a heat recovery system through heat exchanger dedicated to heating the combustion air and makeup air of the drying system. A heat recovery system will be installed as part of the cogeneration system. The recovered heat will be used for the paper machine hall ventilation system as well as converting hall and warehouses heating.
- 2.31. The chimney stacks associated with Cogeneration Systems for Phase 1, 2 and 3 are 30m in height from FFL. The cogeneration systems over all three phases of development will produce a total of 24 MW of on-site generated electricity.
- 2.32. The Waste Water Treatment Plant forms part of the Phase I works and occupies a building detached from the main Facility. Waste water from the paper machine is discharged by pumps through a screen and to the homogenizing tank. The homogenizing tank will pump water to the flotation equipment.
- 2.33. The water is then treated to remove fine solids present in waste water. These solids are anticipated to be basically composed of small fibres from the production process.

- 2.34. The clarified effluent is discharged by gravity into the treated water tank, or filtered if necessary, and will then be discharged to the River Dee via pipework that will be constructed with an agreed easement under the Welsh Government designed Road 3 extending to an outfall and headwall constructed on the banks of the River, in accordance with the conditions set out in a bespoke consent to discharge, issued by Natural Resources Wales (NRW) under the Environmental Permitting Regulations 2016. This planning application seeks to secure planning permission for the outfall and headwall. Details of this easement and location of the headwall are illustrated in **Figures 2.10** below.



**Figure 2.10: Details of easement and location outfall and headwall**

- 2.35. The conditions of the consent will be informed by the findings of a H1 Water Quality Assessment submitted to accompany the Environmental Statement (ES), undertaken to ensure sufficient treatment of the effluent, such that there would be no detriment to the water or environmental quality of the River.

#### **Finished Floor Levels (FFL) and Building Heights**

- 2.36. Finished Floor Levels (FFL) reflect the cut and fill exercise that create a development platform for construction of buildings on the Site. This is illustrated on a finished levels contour plan submitted with the planning application, with main buildings at a FFL of 5.25m AOD and

internal circulation roads and main car park areas ranging from a 4.90m to 5.45m AOD across the Site. The proposed offices to the eastern boundary will be set at 6.15m AOD and associated car parking will range from 5.20m AOD 5.45m AOD.

Building heights within Phase I generally range from 10m to 21.25m above FFL to parapet across the main section of the mill. The pulp warehouse building located closest to the western boundary of the Site is 10m in height (to parapet) above FFL.

- 2.37. As the building extends from west to east, the heights of the building rise with the paper mill section at a height of 21.25m (to parapet) above FFL, the jumbo reels storage unit at a height of 12m (to parapet) above FFL, the converting hall at a height of 12.55m (to parapet) above FFL and the dispatch area at a height of 13.25m (to parapet) above FFL. The height of these sections of the building is broadly consistent with the height parameters approved with the extant outline planning permission for mixed use development on this Site, which agreed building heights of up to 30m high. This broadly covers all buildings occupied by phase 1, 2 and 3, other than the High Bay Warehouse.
- 2.38. There are a number of flues, hoods and chimney stacks that project above the roof line of sections of Phase I of the Paper Mill Facility. The tallest of these chimney stacks and gas burners project 8.75m above the tallest section of the paper mill hall section of the building, which is 21.25m from FFL.
- 2.39. The 10 level automated finished product high bay warehouse and dispatch building extends to a maximum of 40m in height above FFL and is 105.63m in depth (north to south). This 39.65m finished product high bay warehouse is an integral component of the production facility, consistent with the Applicants other facilities currently operational within Europe.
- 2.40. The finished product high bay warehouse allows ICT UK Ltd to supply significant quantities of final product to meet market need and demand. Phase I of the warehouse has a footprint of 11,169 m<sup>2</sup> and 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.



2.41. A number of design and layout options for this finished product High Bay Warehouse on this site have been explored that reflect the functional requirements of the Paper Mill process but which seek to reduce the impact of this building in its local setting and its proximity to the adjacent Chester Millennium Greenway Sustrans route. This results in a layout which meets the functional and operational requirements of ICT UK Ltd and is respectful to the buildings setting and lessens the visual impact of the scale and massing of this tall warehouse relative to the surrounding footpaths, nearby residential receptors and heritage assets, including the John Summers Grade II Listed Building.

2.42. Notwithstanding the orientation of the warehouse, any impact caused by the height of taller buildings, should be considered in the historic context of this site, which was occupied by military buildings and the vast rolling mills and production sheds of the nearby Shotton Steelworks.

**Materials**

2.43. 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 will remain consistent across all phases of the development.

**Parking and Vehicle Circulation**

2.44. The Proposed Development makes provision for service yards and circulation space within the Site, to allow for the loading of HGV's with finished products from the dispatch area and docking bays. The Proposed Development comprises an individual car park for a total of 26 HGV's, in the northern part of the Site adjacent to the automated finished product high bay warehouse. Car parking areas for staff delivered as part of Phase I are located at the southern eastern entrance into the site (102 spaces) accessed from junction 1 of Road 2 and adjacent to the office building (97 spaces), accessed from junction 4 of Road 2 and a further car parking (56 spaces) to the rear of the Phase I Paper Mill building on the north western boundary of the Site, which will be accessed from junction 4 on to Road 3 of the Commercial Spine Road. These parking areas provide a total of 338 car spaces (including 15 disabled spaces) and 16 motorcycle spaces. A total of 255 car spaces will be delivered and operational following Phase I. It should be noted that the 102 space car park in the south eastern part of the Site accessed from junction 1 of Road 2 will be removed in order to deliver Phase 3. Phase 3 will provide a further 113 additional car parking spaces to the south of the site, which will also replace the 102 spaces which will be removed. These spaces are parallel with Road 3 of the Commercial

Spine Road and will be accessed from junctions 1, 2 and 3 which provide one way entry and exit points into the site. These spaces will be operational following completion of Phase 3 in 2035 (Q3).

2.45. The Finished Floor Levels (FFL) of the main HGV car park to the north and vehicle circulation areas will range between 5.00m and 5.35m AOD. The car park associated with the office building will range between 5.20m and 5.45m AOD.

2.46. Outside of those areas proposed for servicing and parking there remains areas of the Site which will remain undeveloped and will be safeguarded to facilitate construction and development of the second and third phases of the Mill Facility. These areas comprise land to the south of the Site, between the Phase 1 development and the southern boundary.

2.47. The access arrangement and highway works are described in further detail in later sections.

**Green Infrastructure and Landscaping**

2.48. Strategic landscaping will be provided around sections of the boundary of the Site as part of the separate landscaping work to be undertaken by the landowners CHEL as part of the enabling works to facilitate the redevelopment of Plot C. These works have been granted approval as part of the application to discharge planning conditions (Ref: 061986) on the outline planning permission (Ref: 058990) and will include landscaping works which will include removal of self-seeded trees to provide slope stability, replacement trees, and aquatic ecological habitats. This will include provision of a reptile mitigation area at the northern end of the Application Site (Plot C) and a grassland ecological mitigation area at the north western corner of Plot D. The reptile mitigation will include refuges and mounds and the grassland mitigation area will have a meadow mix grass seeding over existing grass sward.

2.49. Beyond the eastern and southern boundaries of the Application Site will be the Welsh Government's proposed Commercial Spine Road 2 and 3. Separating the Application Site and the Commercial Spine Road are proposed drainage swales, which will also connect into the proposed new swale between the Application Site and Plot D. Whilst these swales are for drainage purposes they provide a green and blue infrastructure buffer and off-set and separation from the road and adjacent land proposed for housing to the south of the Commercial Spine Road. This housing land immediately to the south of the Commercial Spine Road is referred to as Plots H4 and H5 of the Airfields site will be separated from the road by a 2.4m high earth bund and a 1.4m acoustic fence (total height of 4m). The bund is currently



being constructed and will provide an appropriate landscaped buffer which will help screen the ICT Paper Mill Facility from the proposed residential development.

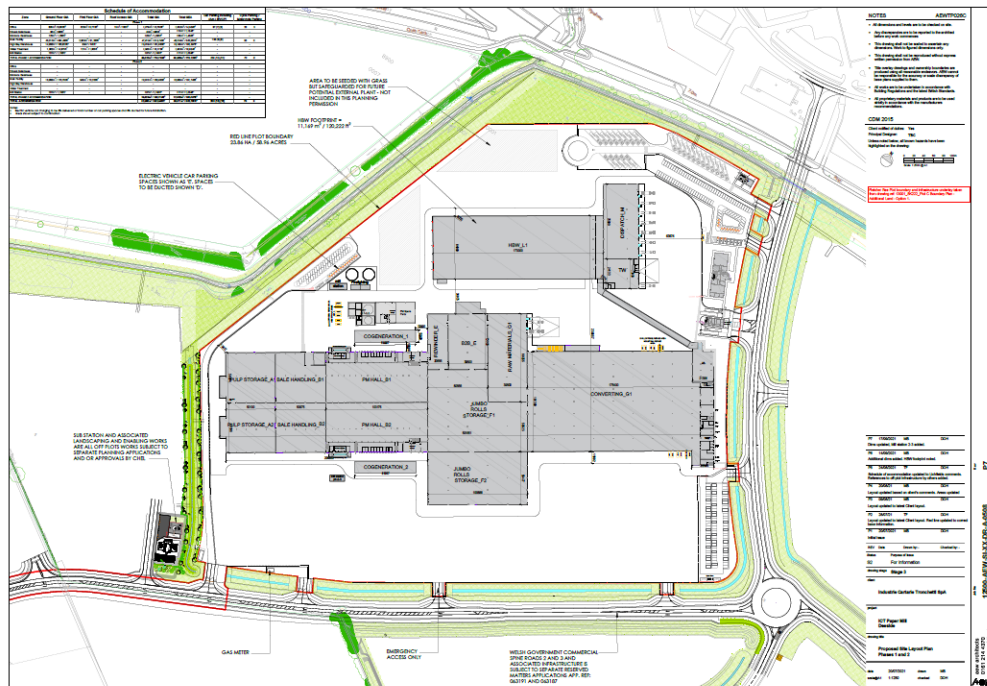
- 2.50. A further parcel of land to the south east of the Application Site (Plot C) beyond junctions 3 and 4 of the Commercial Spine Road 3, on PGNGL owned land is also proposed for housing, however this land will be separated from the Application Site by a large stand-off and buffer created by the proposed Commercial Spine Road and swales on both sides of the 7.3m wide carriageway. Whilst a reserved matters application is yet to be submitted for this parcel of land, there is an expectation that the boundary of this residential land will be screened along its boundary with the proposed Commercial Spine Road 3 and the ICT Paper Mill Facility by a 2.5m high acoustic fence illustrated on the approved Green Infrastructure Plan (Drawings No. B3888\_P005N) granted outline permission recently varied under PGNGL's S73 application ref 059635.
- 2.51. 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.
- 2.52. The majority of the screen planting around the boundaries is proposed to be carried out as part of Phase 1 so will develop, thereafter to provide some screening and softening of the elevations particularly for views from the Sustrans Route 5 around the north of the Site.
- 2.53. During construction of Phase 1 and 2 top soil generated during the cut and fill exercise will be spread across land that will be occupied by Phase 3, until such time that Phase 3 construction work commences. This top soil will be not exceed the proposed minium platform level of 4.83m AOD set within Weetwood's approved FCA Addendum Final Report v1.0 (October 2020) and will be planted with grass seed.
- 2.54. Three Proposed Landscape Concept Plans have been prepared illustrating the planting proposed as part of the Phase 1, Phase 2 and following completion of Phase 3. These Plans accompany the planning application.

### Phase 2 of the Mill Facility

Use Class	Total Floorspace	Building Heights
B2, B8 and ancillary B1a Uses	Additional 17,002m <sup>2</sup> (Combined Phase 1 and 2 = 83,811m <sup>2</sup> )	Building heights range from 10m to 21.25m from FFL to parapet across the main section of Phase 2 of the mill

**Table 2.5: Phase 2 Schedule**

2.55. Phase 2 of the Mill will be built as tissue paper production output on the Site increases and will follow six - twelve months after completion of Phase 1. This will provide an additional pulp warehouse, paper mill and jumbo reels storage warehouse, 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 41.47 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.



**Figure 2.11: Proposed Layout Plan (Phase 1 and 2)**

- 2.56. The production cycle and manufacturing process undertaken within these Phase 2 sections of the Facility remain consistent with the process and function of the Phase 1 pulp warehouse, paper mill and jumbo reels storage warehouse. Phase 2 will also be built with two additional gas burners. The Phase 2 extension is purely to increase and maximize output within the Facility with the introduction of a second paper mill machine.

#### **Finished Floor Levels (FFL) and Building Heights**

- 2.57. Finished Floor Levels (FFL) on Phase 2 will reflect the cut and fill exercise that will create a development platform for construction of buildings on the site. This will be illustrated on a finished levels contour plan (**See Appendix 12**) with all main process buildings at a FFL of 5.25m AOD. The Phase 2 extension to the pulp warehouse building located closest to the western boundary of the Site will remain consistent with the Phase 1 building and will be 10m in height (to parapet) above FFL and the paper mill section will remain consistent with the Phase 1 buildings they adjoin and will be 21.25m in height (to parapet) above FFL.

- 2.58. There are a number of flues, hoods and chimney stacks that project above the roof line of sections of Phase 2 of the Paper Mill Facility. The tallest of these chimney stacks and gas burners project 8.75m above the tallest section of the paper mill hall section of the building, which is 21.25m from FFL.

#### **Materials**

- 2.59. 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.

#### **Phase 3 of the Mill Facility**

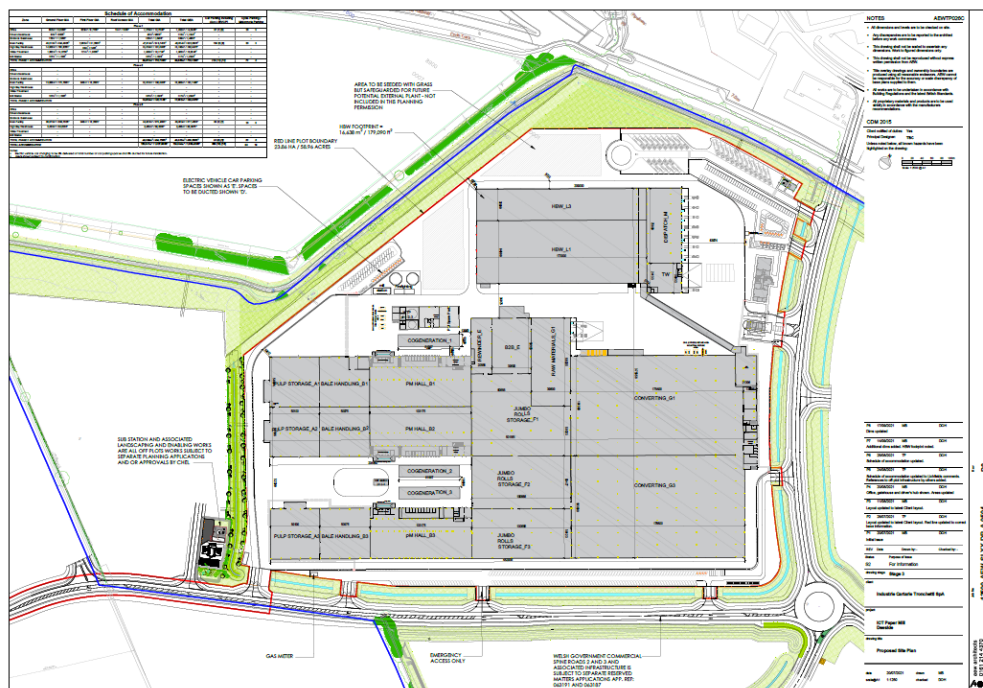
Use Class	Total Floorspace	Building Heights
B2, B8 and ancillary B1a Uses	Additional 40,533m <sup>2</sup> (Combined Phase 1, 2 and 3 = 124,344 m <sup>2</sup> )	Building heights range from 10m to 21.25m from FFL to parapet across the main section of Phase 3 of the mill and 39.65m from FFL to parapet for the automated finished product high bay warehouse.

**Table 2.6: Phase 3 Schedule**

- 2.60. 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. This will provide an additional pulp

warehouse, paper mill, boiler room and jumbo reels storage warehouse, converting hall and an extension to the proposed automated finished product high bay warehouse, to maximize production and output on the Site. 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.

- 2.61. The production cycle and manufacturing process undertaken within these Phase 3 sections of the Facility remain consistent with the process and function of the Phase 1 pulp warehouse, paper mill, jumbo reels storage warehouse, converting hall and automated finished product high bay warehouse. Phase 3 will also be built with two additional gas burners. The Phase 3 extension is purely to increase and maximize output within the Facility to meet market demand in the finished product.



**Figure 2.12: Proposed Layout Plan (Phase 1, 2 and 3)**

### Finished Floor Levels (FFL) and Building Heights

- 2.62. Finished Floor Levels (FFL) on Phase 3 will reflect the cut and fill exercise that will create a development platform for construction of buildings on the Site. This is illustrated on a finished levels contour plan with all main process buildings at a FFL of 5.25m AOD and the HBW set at 4.60m AOD. To ensure that the HBW is protected from flooding over the development

lifetime, a retaining wall will be constructed to completely surround the HBW foundation slab. The retaining wall will be 1.0 m high and will therefore result in a level of protection of approximately 5.6m AOD which is higher than the minimum agreed FFL for development on Plot C.

- 2.63. The third phase extension of the pulp warehouse building located closest to the eastern boundary of the Site remains at 10m in height (to parapet) above FFL consistent with Phases 1 and 2 and the paper mill section will be 21.25m in height (to parapet) above FFL, consistent with Phases 1 and 2.
- 2.64. There are a number of flues, hoods and chimney stacks that project above the roof line of sections of Phase 3 of the Paper Mill Facility. The tallest of these chimney stacks and gas burners project 8.75m above the tallest section of the paper mill hall section of the building, which is 21.25m from FFL.

#### **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.

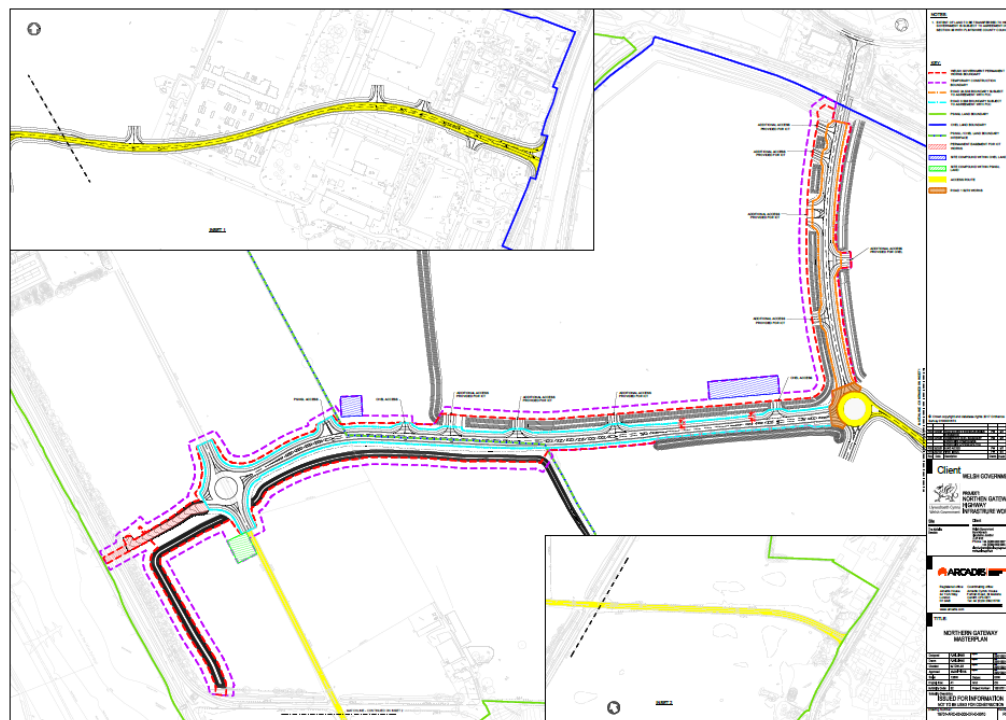
#### **Proposed Access and Commercial Spine Road**

- 2.65. Vehicular access into the Application Site (Plot C) 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.
- 2.66. 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.
- 2.67. Phase 1 and 2 of the Proposed Development will be served from access points referenced as junctions 1, 3, 4 and 5 of Road 2. Junction 1 will be used to provide access into a proposed car parking area utilised by staff in Phases 1 and 2 of the Proposed Development. Junction 3

will be the primary entrance for HGV's to enter and exit the Site, once loaded and full of finished products. Junction 4 will be used to provide access to a car parking area for staff and visitors and is located in close proximity to the proposed office building. Junction 5 will be used to provide access to a HGV parking area, used as an area to hold these vehicles ready to enter Junction 3 and enter the dispatch area ready for loading of finished products.

- 2.68. Junction 4 of the proposed access from Road 3, which is at the south western end of the Site provides access to a car parking area within the Site, which will be used by staff members operating the Paper Mill section of the Facility. Junction 1, 2 and 3 into the Site from Road 3 will be utilised once Phase 3 is completed and will provide more car parking spaces for staff and operatives. All junction points into the Site will have a gated access to control security during operational hours. Junction 3 of Road 2 into the Site will also have an entrance building and gatehouse.

See Proposed Road 2 and 3 layout in **Figure 2.13**.



**Figure 2.13 Commercial Spine Road 2 and 3**

- 2.69. The proposed Commercial Spine Road 3 will connect via a roundabout into the completed Road 1 to the east constructed by Welsh Government which takes access from Welsh Road





which is constructed as a priority junction in accordance with the Welsh Government application 054488 (approved 01/03/2016). The junction arrangement includes right turn restrictions for general traffic egressing from the development site onto Welsh Road with a bus right turn only proposed. Road 3 will also connect into the Corus access road on the PGNGL owned land via a proposed roundabout which connects onto Welsh Road at a priority junction. Road 2 of the Commercial Spine Road will also provide a public transport link into the Deeside Industry Park. Linking the Airfield site with the adjacent former Corus Garden City site will aid comprehensive delivery of this mixed use development which will meet with the policy objectives of the Northern Gateway Strategic Mixed Use Development site allocated under Policy HSG2A in the Flintshire UDP (2011).

#### **Public Transport**

- 2.70. 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. A Bus Hub / Interchange is also proposed on land within the former Corus Garden City part of the Northern Gateway site immediately adjacent to the junction on to Welsh Road. This will be constructed and delivered by Flintshire CC and will improve public transport connections through the Northern Gateway site.

### 3. Relevant Planning History and Designations

3.1. The relevant and most recent planning applications have been identified below:

Application Ref.	Description of Development	Site Address	Decision
047834	Application for prior notification of proposed demolition	RAF Sealand, South Camp, Welsh Road	Permitted Development 20.08.2010
049320	Outline application for the redevelopment of a strategic brownfield site for an employment led mixed use development with new accesses and associated infrastructure including flood defenses and landscaping.	RAF Sealand, South Camp, Welsh Road	Approved 07.01.2013
050730	Engineering works to provide flood defence strengthening along 1.5km of the River Dee embankment to include sheet piling to a maximum depth below ground of 12m and a minimum height of 7.2m AOD and a proposed temporary access route and site compound.	RAF Sealand, South Camp, Welsh Road	Approved 25.06.2013
051139	Discharge of condition no 24 (Framework Ecological Mitigation and Enhancement Strategy) attached to planning ref. 049320.	RAF Sealand, South Camp, Welsh Road	Approved 25.09.2013
051025	Discharge of condition no 6 (submission of a Development Brief for the site comprising an illustrative landuse Master Plan, green infrastructure plan and flood mitigation plan for built development and a Design Statement) to outline planning ref. 049320.	RAF Sealand, South Camp, Welsh Road	Approved 11.11.2013



051282	Application for variation of condition 42 of planning permission 049320 to amend the timing for the submission of the land contamination information from 'Prior to the commencement of development' to 'Prior to the commencement of each phase being occupied'.	RAF Sealand, South Camp, Welsh Road	Approved 17.12.2013
051214	Partial discharge of condition no 41 parts (i) and (ii) (preliminary risk assessment) attached to planning ref. 049320.	RAF Sealand, South Camp, Welsh Road	Partly Permitted 24.12.2013
052278	Application for the approval of details reserved by condition 35 (full Travel Plan) attached to planning ref. 049320.	RAF Sealand, South Camp, Welsh Road	Withdrawn 31.07.2014
0052261	Application for discharge of condition 46 (archaeological watching brief) attached to permission 049320.	RAF Sealand, South Camp, Welsh Road	Partially Discharged 26.03.2015
054488	Reserved matters application for Phase I of the highway works and associated infrastructure works following outline approval 049320 for a mixed use development and associated infrastructure	RAF Sealand, South Camp, Welsh Road	Approved 01.03.2016
057404	Application for approval of reserved matters following outline approval 049320 for phase one enabling works comprising an access road, surface water drainage, landscaping and engineering works to create development platforms.	RAF Sealand, South Camp, Welsh Road	Approved 09.03.2018
057547	Application for the approval of details reserved by condition no 5 (phasing scheme), 6 (development brief), 30 (highway works/ transport implementation strategy), 34 (framework travel plan) and 38 (scheme for the layout, design and timetable for implementation of works) attached to planning ref. 049320.	RAF Sealand, South Camp, Welsh Road	Withdrawn 21.05.2018

057621	Applications for approval of details reserved by condition no 46 (archaeological investigations) attached to planning ref. 049320.	RAF Sealand, South Camp, Welsh Road	Partially Discharged 29.05.2018
058531	Application for the approval of details reserved by condition no 27 (construction management plan) attached to planning ref. 049320.	RAF Sealand, South Camp, Welsh Road	Partially Discharged 02.08.2018
058514	Application for the approval of details reserved by condition 5 (phasing scheme), 6 (development brief), 30 (highway works/ transportation implementation strategy), 34 (framework travel plan) and 38 (scheme for the layout, design and timetable of implementation of works) attached to planning ref. 049320.	RAF Sealand, South Camp, Welsh Road	Approved 24.08.2018
058990	Application for removal or variation of a condition following grant of planning permission.	RAF Sealand, South Camp, Welsh Road	Approved 25.10.2018
052262	Application for discharge of condition 30 (schedule of highway works/ transport implementation strategy) and 38 (scheme for the layout, design and timetable for implementation of works) attached to planning ref. 049320.	RAF Sealand, South Camp, Welsh Road	Approved 20.12.2018
052467	Application for approval of details reserved by condition 34 (Framework Travel Plan) attached to planning ref. 049320.	RAF Sealand, South Camp, Welsh Road	Approved 20.12.2018
058950	Application for approval of reserved matters phase I informal landscaping and POS following outline approval.	RAF Sealand, South Camp, Welsh Road	Approved 13.03.2019
059637	Application for the approval of details reserved by condition nos. 37 (contaminated land) and 38 (verification report) attached to planning permission ref. 058990	RAF Sealand, South Camp, Welsh Road	Partially Discharged 07.05.2019



059938	Application for the approval of details reserved by condition no 7 (sustainable drainage scheme), 15 (landscaping) and 19 (construction environmental management plan) attached to planning ref 058990.	RAF Sealand, South Camp, Welsh Road	Partially Discharged 13.08.2019
059514	Application for approval of reserved matters following outline approval for the erection of 283 no. dwellings	RAF Sealand, South Camp, Welsh Road	Approved 25.09.2019
060222	Application for approval of reserved matters following outline approval ref. 058990.	RAF Sealand, South Camp, Welsh Road	Approved 08.01.2020
060575	Application for approval of details reserved by condition no 3 (Flood Consequence Assessment) attached to planning permission ref. 057404.	RAF Sealand, South Camp, Welsh Road	Approved 24.01.2020
060505	Application for approval of details reserved by condition no. 37 (contamination) and 38 (Verification Report) attached to planning ref. 058990	RAF Sealand, South Camp, Welsh Road	Approved 18.02.2020
060311	Application for approval of reserved matters in relation to Phase 2 Enabling Works on Plots H6 and H7 following grant of permission ref. 058990.	RAF Sealand, South Camp, Welsh Road	Approved 24.02.2020
061018	Application for approval of reserved matters in relation to Phase 3 enabling works to Plots H3 and H5 following outline approval (ref. 058990)	RAF Sealand, South Camp, Welsh Road	Approved 01.06.2020
061986	Application for approval of details reserved by condition no 7 (sustainable drainage scheme), 9 (foul drainage connections), 15 (landscaping treatments), 17 (tree retention & protection), 19 (construction environmental management plan) attached to planning ref. 058990.	RAF Sealand, South Camp, Welsh Road	Approved 22.12.2020

061125	Application for removal of conditions 26, 28, 30m 34 and 44 and variation of condition 13 following grant of planning permission (ref. 058990)	RAF Sealand, South Camp, Welsh Road	Approved 26.04.2021
062898	Application for the approval of access, appearance, landscaping, layout and scale for the erection of 368 dwellings on land parcels H3, H5, H6, H7 and H8a, public open space including play facilities, and associated works.	RAF Sealand, South Camp, Welsh Road	Decision Pending
060899	Application for the approval of details reserved by condition no 28 (schedule of highway works) attached to planning ref. 058990.	RAF Sealand, South Camp, Welsh Road	Approved 26.04.2021
062057	Application for approval of reserved matters following outline approval ref. 058990 for the construction of a foul water sewer including two cross culverts and a temporary earth cover bund between Commercial Plots B & C.	RAF Sealand, South Camp, Welsh Road	Approved 26.04.2021
063035	Application for approval of reserved matters for design, layout, landscaping and means of access for the construction of an Electrical Primary Sub-station following outline approval (061125)	RAF Sealand, South Camp, Welsh Road	Approved 21.10.21
063191 and 063187	Application for approval of Highway Works and Associated Infrastructure Works (Welsh Government's proposed Commercial Spine Road Phases 2 and 3)	RAF Sealand, South Camp and Former Corus Garden City site, Welsh Road	Decision Pending

3.2. This section identifies the relevant planning considerations connected to the site:

Planning Designations / Considerations	Site Address / Proximity to the Site
Conservation Areas	The Site is not in or adjacent to a Conservation Area
Listed Buildings	There are no Listed Buildings on the Application Site.



Planning Designations / Considerations	Site Address / Proximity to the Site
Locally Listed Buildings	There are no Locally Listed Buildings on the Application Site.
Tree Preservation Orders	There are no Tree Preservation Orders on the Site
AONB or Landscape Designation	None
SSIs/SSSIs	The adjacent River Dee is a Site of Specific Scientific Interest (SSSI)
Ecological Designations	The River Dee is a designated nature conservation site comprising a Special Areas of Conservation (SAC), and local wildlife site.
Flood Risk Zone	Planning Policy Wales Technical Advice Note 15 – Development and Flood Risk (TAN15) (WG, 2004) Development Advice Map 2009 classifies the site as being located within Flood Zone C1. Flood Zone C1 is defined as, “Areas of the floodplain which are developed and served by significant infrastructure, including flood defences”.
Air Quality Management Area (AQMA)	There are no AQMA's.
Rights of Way (including PROW, bridleways etc.)	<p>PROW Footpath No. 3 is outside the Application Site but runs parallel with Shotwick Brook.</p> <p>The Chester Millennium Greenway, Route 5 of the National Cycle Network borders the northern boundary of the site.</p>



## 4. Stakeholder Engagement Summary

### Overview

- 4.1. This section sets out the statutory and non-statutory consultation undertaken, including consultation with the local community, local stakeholders and pre-application discussions with the local authority. This section is known as the Statement of Community Involvement document.
- 4.2. The Planning Policy Wales, Edition 11 2021 (the PPW) sets out the Government's approach to engagement with stakeholders. This is echoed further within the Development Management Manual (The Manual) May 2017. It states that The Planning (Wales) Act 2015 requires developers, prior to submitting an application for major development, to publicise a draft of the application, carry out consultation with the community and write a report about the pre-application undertaken.
- 4.3. Developers are also required to undertake pre-application consultation with 'community consultees' and 'specialist consultees'. Community Consultees comprise each community council in whose area the Proposed Development would be situated and each county borough councillor representing an electoral ward in which the Proposed Development would be situated. A list of specialist consultees can be found in Schedule 4 of the DMPWO.
- 4.4. The Manual goes on to explain in paragraph 6.4.24 that "community consultation provides an opportunity for developers to promote the benefits of their scheme, and respond to any public concerns. This process can reduce conflict at the planning application stage, facilitating quicker decision making".

### Engagement Objectives

- 5.7. The following engagement objectives were identified by Spawforths:

*To undertake early engagement with the Local Planning Authority*

*To provide an opportunity for the Local Planning Authority to feedback on emerging proposals for the site to address any matters prior to submission*



*To provide an opportunity for members of the local community to feedback on emerging proposals for the site*

## Engagement with the Local Planning Authority and Statutory Bodies

- 4.5. This section provides a summary of the consultation with the local planning authority and a record of the issues discussed with the Council at pre-application stage.

## Environmental Impact Regulations, Screening and Scoping

- 4.6. The proposals do not fall within Schedule 1 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (Wales) (hereafter referred to as “the EIA Regulations”) where an Environmental Statement (ES) is mandatory. However, the proposals do fall within Schedule 2 (8) of the EIA Regulations as “Textile, leather, wood and paper industries” in excess of 0.5 hectares.
- 4.7. Nevertheless, an Environmental Impact Assessment is not needed for every Schedule 2 project. The EIA Regulations are clear that an Environmental Impact Assessment (EIA) is required for Schedule 2 projects only if they are likely to give rise to “significant effects on the environment by virtue of factors such as its nature, size or location”.
- 4.8. It has been agreed with Flintshire County Council that this development and its cumulative effects have the potential for significant effects on the environment and as such is considered to be EIA Development requiring an ES to be prepared as part of the EIA process.
- 4.9. In the case of this application we have not undertaken a detailed Screening or Scoping Opinion Request to the Council.
- 4.10. On this basis, we have sought to confirm with the Council by letter the information to be provided in the Environmental Statement, in accordance with Part 4 (13) of the EIA Regulations, to ensure the scope of the technical chapters and the methodology for assessing the significance of effects is robust. To enable the Council to consider this we enclosed the following plans and information:

- A Location Plan identifying “The Land”;
- A description of the nature and purpose of the development including a Character Area Plan;
- Topic/Technical Chapters of the ES based on the issues to be assessed; Methodology for the Assessment of Significant Effects in accordance with EIA Regulations;
- The cumulative impacts to be considered.

4.11. The Council subsequently confirmed that they accepted this approach and methodology including the range of environmental issues against which the proposals should be assessed as part of the Environmental Impact Assessment process. A copy of this letter is appended to the Environmental Statement Part I Report.

### **Pre-application Discussions**

4.12. There have also been meetings and close liaison with the Planning Team at Flintshire County Council (FCC), including the Chief Officer (Planning, Environment and Economy) Andrew Farrow dating back to April 2018 to discuss ICT’s proposals and the principle of this Paper Mill Facility on the Northern Gateway site.

4.13. The consultant team has continued to liaise with the Council and other key consultees during the evolution of the proposals and through the process of environmental assessment and where relevant, have continued to discuss and agree the scope of the Environmental Statement through these discussions. Reference to these discussions are included within Section 3 of each of the ES Technical Papers contained within Part 2 of the ES submitted with this planning application.

4.14. The Applicants consultant team also had a pre-application meeting with Planning Officers, including a number of key consultees on the 9<sup>th</sup> August 2021 to discuss the Application Proposals and the Environmental Impact Assessment and the scope of each of the Technical Papers.

4.15. In terms of the water environment (including flood risk, drainage and water quality) the Council Officers agreed with the terms and scope of the FCA, which will be based broadly in line with the principles previously approved Weetwood’s FCA submitted to secure approval of Plot C enabling works. Officers at FCA queried the impact of phosphates and water quality in the River Dee. It was confirmed that phosphorous was one of the determinands included

in the HI screening assessments for the paper mill process effluent discharge to the River Dee and it was screened out.

- 4.16. The scope of the LVIA has been agreed with FCC Officers, with agreement reached on the representative view points and photomontage views (rendered and wire frames) would be prepared showing the three phases of the Proposed Development (completion of Phase 1), Year 5 (completion of Phase 2) and year 15 (completion of Phase 3 and residual effect with planting grown), to demonstrate how the landscape treatment would develop over these three phases.
- 4.17. In respect of ecology and nature conservation, the scope of the assessments was agreed. It was acknowledged that most of the ecological mitigation works are being undertaken as part of the CHEL enabling works for Plot C, including reptiles and water vole mitigation on the Northern Drain and Shotwick Brook, however this is still a requirement to undertake a Habitats Regulations Assessment (HRA) on the River Dee and Dee Estuary to assess any impacts.
- 4.18. In respect of noise, the scope has been agreed with the Council's Environmental Health Officer (EHO) including noise sensitive receptors. Through consultation it was agreed that noise survey data from previous surveys at the Site would be considered acceptable in establishing existing baseline conditions at the Site, including 2019 Baseline Noise Survey's and a further 2019 Validation Noise Survey undertaken on the PGNGL Former Corus Garden City site.
- 4.19. It has also been agreed that there are no significant sources of vibration associated with the operation of the paper mill and therefore vibration will not be included as part of the assessment.
- 4.20. Construction noise will be assessed using the guidance of BS 5228-1:2009. Daytime and night time commercial and industrial noise (both fixed plant and moving HGV sources) will be calculated via a 3D noise model and assessed in accordance with BS 4142:2014 for relevant daytime and night-time assessment periods. The noise impact associated with additional vehicle movements on the road network will also be assessed following the guidelines of the Design Manual for Roads and Bridges.
- 4.21. It was also assumed that the noise model would include a minimum 2.5m tall acoustic barrier along the section of the Welsh Government Spine Commercial Spine Road adjacent to the

proposed residential plot of land on the former Corus Garden City Northern Gateway site as the 2013 Outline Planning Permission for the site had been approved subject to the need for this barrier.

- 4.22. In respect of Air Quality and Dust, the scope of the assessment has been agreed with the Council's Environmental Health Officer. This includes undertaking a screening assessment of road links supplied by the Transport Consultant using DMRB HA207/07 Methodology and emission factors obtained from Defra Emission Factor Toolkit V9.0, with sensitivity modelling undertaken using the Air Quality Consultants CURED emission factors. Combined road traffic impacts for all three phases of the Proposed Development have been evaluated for the agreed scenario year. Transport emission factors have been used for the relevant years being assessed. A construction dust risk assessment following the latest IAQM Construction Dust guidance has been undertaken to assess the combined impacts from all three phases to assess worst-case construction phase impacts.
- 4.23. Based on the information provided by ICT UK Ltd, it is understood that there are unlikely to be any odour emissions from the wastewater treatment plant. However, a Qualitative risk-based Source-Pathway-Receptor assessment for odour has been undertaken in accordance with IAQM guidance. This is presented and discussed within the Technical Paper.
- 4.24. In terms of highways and transportation, it was agreed with Flintshire County Council Highways that the approved traffic envelope for the wider Northern Gateway Site, for which the Proposed Development forms a part of, is the base position and that the ICT UK Ltd Proposed Development has been established and accepted by Highways Officers as part of the outline planning permission already granted.
- 4.25. The impact of approved development has already been agreed and approved with outline planning permissions, this assessment has been undertaken on the basis that the traffic associated with the proposed CHEL Airfields Site and the former Corus Garden City site is already committed and therefore part of the base scenario. On this basis, it is not considered any further assessment of the local highway network is required.
- 4.26. FCC Highways have confirmed that they accepted that the ICT Paper Mill Facility should result in a net traffic benefit when compared to the outline planning permission and the Transport Assessment will demonstrate this. See Appendix 2.1 of the Traffic and Transportation Technical Paper 2 which forms part of the ES Part 2.

- 4.27. As the ICT scheme is unique in operational terms, it was agreed that the standard form of predicting future traffic generation is not appropriate. Curtins confirmed that a first principles approach will be developed based on staff patterns and HGV figures provided by ICT. FCC agreed to this approach and Curtins confirmed that information would be submitted for agreement within the Transport Assessment appended to the Traffic and Transportation Technical Paper 2 in Part 2 of the ES.
- 4.28. Consultation has also been undertaken with a range of statutory and non-statutory bodies including paid pre-application discussions with National Resources Wales (NRW) to discuss the principles of the Flood Consequences Assessment (FCA). This response received on the 13<sup>th</sup> August confirmed that the FCA should be prepared based on previous work undertaken for the wider Airfields site by Weetwood's in their FCA Addendum (October, 2020) and proposals for flood mitigation should align with those already agreed.

## Community Engagement and Consultation

- 4.29. The Applicant have corresponded with a range of stakeholders including [INSERT LIST OF STAKEHOLDERS AND CONSULTEES FOLLOWING COMPLETION OF PRE-APPLICATION CONSULTATION STAGE] to discuss the proposals in advance of the submission of this planning application.

## Consultation with the Community

- 4.30. This section identifies the community consultation undertaken. A more detailed summary of the Community Engagement undertaken is provided within the Statement of Community Involvement Report prepared by Lexington Communications otherwise known as a Pre-application Consultation (PAC) Report which supports this Application. Submission of a PAC Report is a requirement of the Planning (Wales) Act 2015.
- 4.31. The statutory requirement to consult is now imposed by section 61Z of the Town and Country Planning Act 1990, with further guidance provided by the Welsh Government in the 'New development management procedures' letter issued in February 2016.
- 4.32. These documents set out a number of consultation activities that need to be undertaken by the developer before they can submit the planning application. In summary, they include:
- Making draft planning application documents available to view;

- Notifying the right consultees of the consultation;
- Providing a 28 consultation period; and
- Reporting how the pre-application consultation was undertaken and how people's views were considered in a 'Pre-Application Consultation Report' submitted as part of the application.

4.33. Lexington Communications have coordinated and managed these activities consistent with the statutory requirement, including the 28 day consultation period.

4.34. The planning application community and stakeholder consultation engagement runs for a period of four weeks from Thursday, 23<sup>rd</sup> September to Thursday, 21<sup>st</sup> October 2021. This allowed time for ICT UK Ltd to engage with a range of stakeholders and seek their feedback, whilst complying with the pre-application consultation requirements in the Planning (Wales) Act 2015.

4.35. Residents and stakeholders have been provided with a leaflet advising of the launch of the consultation and ways to view the proposals and provide feedback. This included a dedicated project website available at: [www.ictflintshire.co.uk](http://www.ictflintshire.co.uk) with information made available to view by the public on a website. The project website, included a platform to provide feedback, a virtual exhibition and contact details for the development team. The virtual exhibition was be available for one week during the consultation period.

4.36. A site notice 28 days prior to submission will also displayed in accordance with Welsh guidance.

4.37. As part of the statutory pre-application requirements, ICT UK Ltd also consulted with adjoining owners and occupier/residents to the site, local Councillors and specialist consultees, including relevant statutory bodies and organisations.

4.38. **[INSERT SUMMARY OF FEEDBACK FOLLOWING COMPLETION OF PRE-APPLICATION CONSULTATION STAGE]**

4.39. A more detailed summary of the Community Engagement undertaken will be provided within the Pre-application Consultation (PAC) Report included with the planning submission.



## 5. Statutory Policy Context and Other Relevant Policies

- 5.1. Section 38 of the Planning and Compulsory Purchase Act 2004, states that applications should be determined in accordance with the development plan unless material considerations indicate otherwise.
- 5.2. This section identifies the planning policies and other material considerations which are relevant to this proposal.

### Statutory Development Plan

- 5.3. The statutory Development Plan for the consideration of this application comprises:

Flintshire Unitary Development Plan (September 2011)

- Written Statement
- Proposals Map

National Development Framework: Future Wales: The National Plan 2040 (February 2021)

### Flintshire Unitary Development Plan

- 5.4. The Flintshire Unitary Development Plan was adopted in September 2011. The Application Site is allocated in the UDP as part of the Strategic Mixed Use Development: Land North West of Garden City (ref: HSG2A).
- 5.5. Policy HSG2A states the following:

*Land to the North West of Garden City, as shown on the Proposals Map, is allocated as a Strategic Mixed Use Development site. Development will be phased over the Plan period and should comprise the following key elements:*

- 20-25 hectares of housing land (at least 650 dwellings), 30% of which will be sought as affordable housing;*
- 98 hectares of employment land predominantly for B8 uses, supported by B1 and B2 uses;*
- The provision of enhanced and/or new school facilities, health facilities, a community building, convenience retail provision, civic space and other related community requirements;*

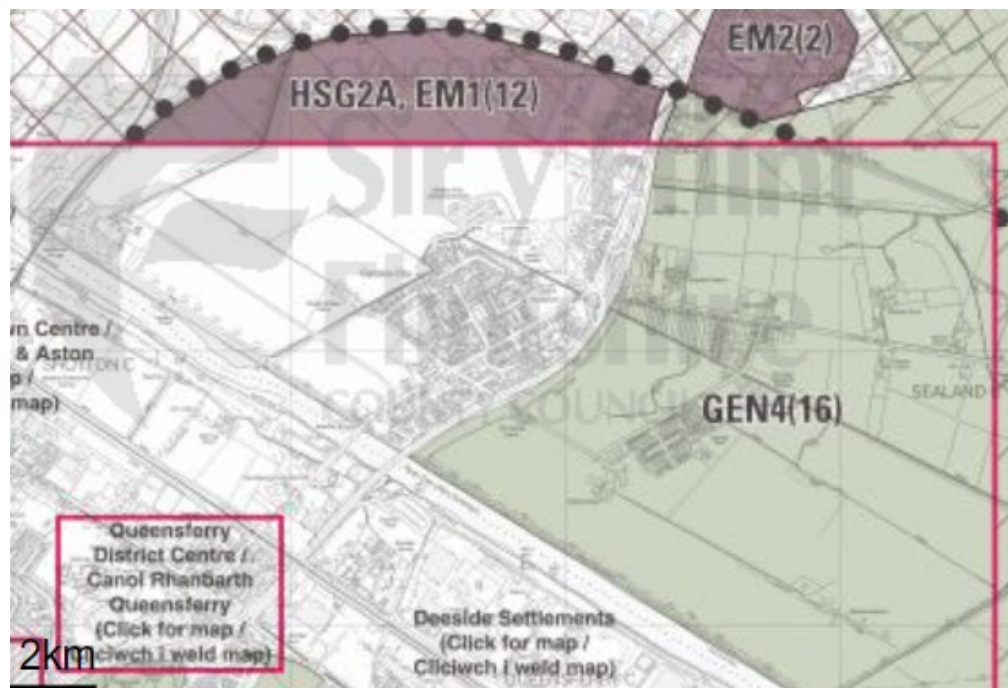
- iv. 40 hectares of parkland area comprising informal, formal and equipped public open space with appropriate pedestrian and cycle linkages to the housing, employment and surrounding areas;
- v. Improved points of access to the site including the potential upgrading of the Drome Corner interchange to provide a full grade separated interchange;
- vi. Other improvements necessary to the highway infrastructure and local highway network to accommodate the likely traffic generated by the development;
- vii. Incorporation of a SUDS drainage system and improvements necessary to existing drainage infrastructure to accommodate the development;
- viii. Enhanced public transport provision and linkages to the site.

Detailed proposals will need to demonstrate that the proposed development incorporates appropriate and acceptable flood risk mitigation measures, in accordance with the development solution identified and agreed with the Environment Agency Wales in the flood consequences assessment carried out to support the allocation of this site.

A detailed development brief will need to be produced and agreed, which will contain a master plan for the overall development, a design statement, and a schedule identifying the phasing of development and associated infrastructure improvements required at each stage.

Detailed development proposals will be required to demonstrate that the proposed development will not have a significant adverse effect on water resources through the submission of a water abstraction/ resources assessment.

5.6. The extracts below show that the whole site falls under allocation HSG2A.





Figures 5.1 and 5.2 – Extracts of Proposals Map of the Site Allocation

5.7. The policies of the Flintshire Unitary Development Plan relevant to this application are as follows:

Policy	
STR 1	New Development
STR 2	Transport and Communications
STR 3	Employment
STR 8	Built Environment
STR 9	Welsh Language and Culture
STR 10	Resources
GEN 1	General Requirements for Development
GEN 2	Development Inside Settlement Boundaries
GEN 5	Environmental Assessment
GEN 6	Welsh Language and Culture
D 1	Design Quality, Location and Layout
D 2	Design
D 3	Landscaping
D 4	Outdoor Lighting
WB 2	Sites of International Importance

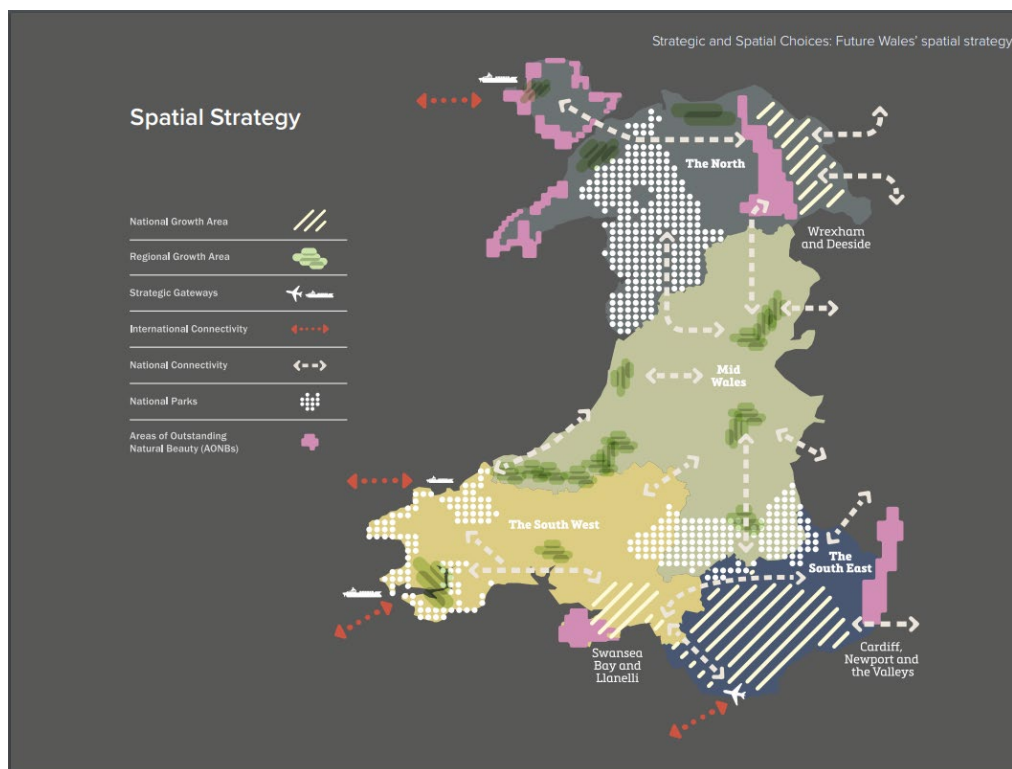
HE 2	Development affecting Listed Buildings and their Settings
AC 1	Facilities for the Disabled
AC 4	Travel Plans for Major Traffic Generating Development
AC 13	Access and Traffic Impact
AC 16	Road Improvements / New Roads Design
AC 18	Parking Provision and New Development
HSG 2A	Strategic Mixed Use Development: Land North West of Garden City
EM 1	General Employment Land Allocations
EM 3	Development Zones and Principle Employment Areas
SR 8	The Dee Estuary Corridor
CF 6	Service Provision
EWP 2	Energy Efficiency in New Development
EWP 3	Renewable Energy in New Development
EWP 9	New Development and Waste Management Facilities
EWP 10	Reusing Development Waste
EWP 12	Pollution
EWP 13	Nuisance
EWP 16	Water Resources
EWP 17	Flood Risk
IMP 1	Planning Conditions and Planning Obligations

## National Development Framework: Future Wales: The National Plan 2040

- 5.8. Future Wales forms the National Development Framework for Wales and establishes a 20 year land use framework for Wales. This should be read alongside Planning Policy Wales (PPW) and forms part of the statutory development plan and provides the starting point for regional Strategic Development Plans. Future Wales will guide public and private investment. It was published in February 2021 and replaces the Wales Spatial Plan. The following policies are relevant to the Application Site:

Policy	
Policy 1	Where Wales will grow
Policy 2	Shaping Urban Growth and Regeneration – Strategic Placemaking

Policy 3	Supporting Urban Growth and Regeneration – Public Sector Leadership
Policy 8	Flooding
Policy 9	Resilient Ecological Networks and Green Infrastructure
Policy 11	National Connectivity
Policy 12	Regional Connectivity
Policy 16	Heat Networks
Policy 19	Strategic Policies for Regional Planning
Policy 20	National Growth Area – Wrexham and Deeside

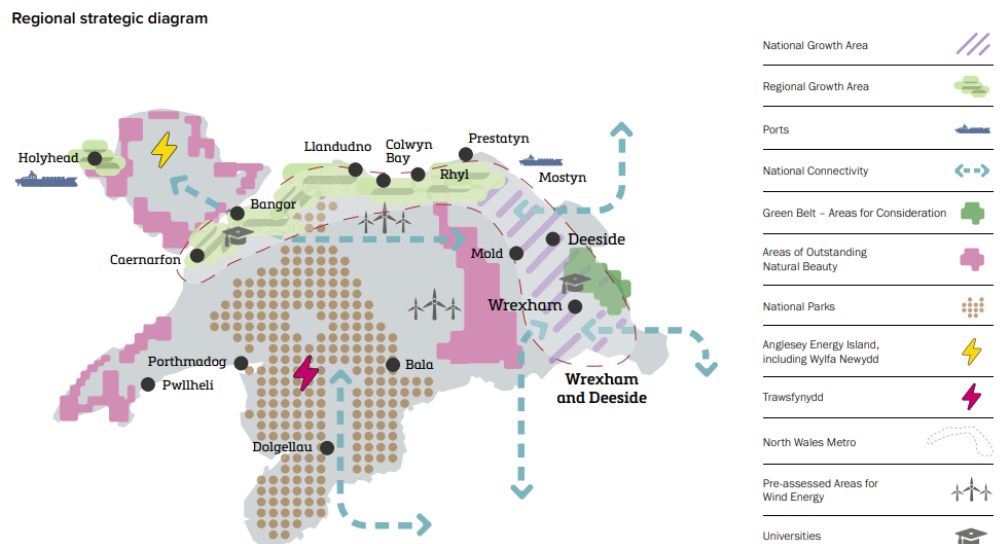


**Figure 5.3 Future Wales: Spatial Strategy**

- 5.9. Future Wales Policy 1 supports sustainable growth within Wales, it identifies three National Growth Areas where there will be growth in employment and housing opportunities and investment in infrastructure. Significantly, Wrexham and Deeside is one of the National Growth Areas alongside Cardiff, Newport and the Valleys, and Swansea Bay and Llanelli. They are considered to be internationally and nationally significant places and Future Wales

promotes their continued growth and regeneration, and they are identified as the focus for large scale employment opportunities and housing growth.

- 5.10. Future Wales Policy 19 sets out the strategic policy context for Regional Planning, and requires the delivery of Strategic Development Plans to come forward. These are expected to establish a clear strategic policy framework and provide direction for decision makers. Future Wales policies provide a regional framework in the absence of Strategic Development Plans. Future Wales is clear that “the Welsh Government will ensure decisions taken by the planning system support the delivery of these policies” and that “the development management process will need to demonstrate how Future Wales’ regional policies have been taken into account and demonstrate how they conform with Future Wales and Planning Policy Wales”.



**Figure 5.4 Future Wales: Regional Strategic Diagram – the North**

- 5.11. Policy 20 reiterates that the Welsh Government supports Wrexham and Deeside as the primary focus for regional growth and investment. The National Growth Area includes: Wrexham, Wrexham Industrial Estate, Broughton, Buckley, Deeside, and the Deeside Industrial Park. The role of Wrexham and Deeside within the north region and wider cross border areas of Cheshire West and Chester, and Liverpool City Region should be understood, and ensure that the areas operate as a whole and do not compete against each other. The location should be the focus for strategic housing, economic growth, essential services and facilities, advanced manufacturing, and transport infrastructure. It is stated that the Welsh Government will work to ensure key investment decisions support Wrexham and Deeside

and the wider region and to promote and enhance the strategic role of Wrexham and Deeside. Future Wales states that the Strategic Development Plan should seek to maximize opportunities arising from investment in high value manufacturing sectors.

### Planning Policy Wales (PPW)

- 5.12. National policy and guidance is provided in Planning Policy Wales (PPW) Edition 11 and is supplemented by a series of Technical Advice Notes (TAN's). PPW sets out the key land use planning policies of the Welsh Assembly Government. The document is a strategic framework to guide the future of both development and policy interventions in Wales.
- 5.13. The document is separated into subject areas and chapters. The following subject areas and chapters considered to be relevant to the proposed development are:
- People and Places: Achieving Well-being Through Place making;
  - Good Design Making Better Places;
  - Sustainable Management of Natural Resources;
  - Environmental Sustainability;
  - Moving within and between places: Transport;
  - Productive and Enterprising Places: Economic Development; and
  - Distinctive and Natural Places.
- 5.14. The primary objective of the PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales. PPW promotes action at all levels of the planning process which is conducive to maximizing its contribution to the well-being of Wales and its communities.
- 5.15. Paragraph 1.18 states that “*legislation secures a presumption in favour of sustainable development in accordance with the development plan unless material considerations indicate otherwise to ensure that the social, economic, cultural, and environmental issues are balanced and integrated*”. Paragraph 1.19 outlines that “*the planning system should be efficient, effective and simple in operation*”.
- 5.16. In relation to decision making, Paragraph 1.20 of the PPW states that “*the planning authority must clearly state the reasons for the decision. Those proposing development also have a responsibility to provide sufficient information to enable the decision maker to make an informed judgement on*



*whether the proposed development is sustainable (i.e. Contributes to social, economic, environmental and cultural well-being)”.*

- 5.17. In determining applications, paragraph 1.22 requires that *“planning applications must be determined in accordance with the adopted plan, unless material considerations indicate otherwise”.*
- 5.18. PPW Figure 4: Key Planning Principles relates to achieving the right development in the right place and growing the economy in a sustainable manner. It goes on to say that the planning system should enable development which contributes to long term economic well-being.
- 5.19. Paragraph 2.27 goes on to say that planning authorities should ensure that social, economic, environmental and cultural benefits are considered in the decision making process and assessed in accordance with the five ways of working to ensure a balanced assessment is carried out to implement the Well-being of Future Generations Act and the Sustainable Development Principle. PPW states that *“there may be occasions when one benefit of a development proposal or site allocation outweighs others”.*
- 5.20. Key factors in the assessment process include social considerations, economic considerations, cultural considerations and environmental considerations.
- 5.21. Social considerations include:
- Who are the interested and affected people and communities;
  - How does the proposal change a persons way of life which can include – how people live, how they get around and access services; how people work- access to adequate employment; how people socialise, for example access to recreation activities; how people interact with one another on a daily basis;
  - Who will benefit and suffer any impacts from the proposal;
  - What are the short and long-term consequences of the proposal on a community, including composition cohesion, character, how it functions and sense of place; and
  - How does the proposal support development of more equal and more cohesive communities.

5.22. Economic considerations include:

- The numbers and types of long term jobs expected to be created or retained;
- Whether, and how far, the development will help redress economic disadvantage or support regeneration priorities, for example by enhancing local employment opportunities or upgrading the environment;
- The contribution the development would make to achieving wider strategies, for example the growth or regeneration of certain areas;
- The contribution this economic activity will have to wider policy goals; and
- How the proposal would support the achievement of a more prosperous, low carbon, innovative and resource efficient Wales.

5.23. Cultural Considerations include:

- How far the proposal supports the conditions that allow for the use of the Welsh language;
- Whether or not the development protects areas and assets of cultural and historic significance;
- Have cultural considerations and their relationships with the tourism industry been appropriately maximised;
- If the proposal protects areas known for their cultural value in terms of music, literature, sport and arts; and
- Vibrant cultural experiences.

5.24. Environmental Considerations include:

- Will important features of the natural and built environment be protected and enhanced;

- Are the environmental impacts of development on health and amenity limited to acceptable levels and the resilience of ecosystems improved;
- Is environmental protection for people and natural resources, property and infrastructure maximised and environmental risks prevented or appropriately managed;
- Will high standards of restoration, remediation, decommissioning and beneficial after uses be achieved;
- Will the depletion of non-renewable resources be minimised, waste prevented and the efficient and most appropriate use of materials made and re-use and recycling promoted;
- Will the causes and impacts of climate change be fully taken into account through location, design, build, operation, decommissioning and restoration; and
- Does it support decarbonisation and the transition to a low carbon economy.

- 5.25. Section Three of PPW addresses the design requirements of placemaking including Access and Inclusivity, Environmental Sustainability, Community Safety, Character and Movement and the need to appraise context and produce Design and Access Statements.
- 5.26. Paragraph 4.1.11 states that *‘development proposals must seek to maximize accessibility by walking, cycling and public transport. By prioritizing the provision of appropriate on site infrastructure and, where necessary mitigating transport impacts through the provision of off-site measures’*
- 5.27. Section 5 of PPW focuses on Productive and Enterprising Places and well-being. It details how economic components of placemaking together with active and social, Distinctive and Natural themes contribute to sustainable placemaking and the seven goals of the Well Being of Future Generations Act. Paragraph 5.4.1 is clear that the *“planning system should ensure that the growth of output and employment in Wales as a whole is not constrained by a shortage of land for economic uses”*.
- 5.28. Significantly paragraph 5.4.4 states *“wherever possible, planning authorities should encourage and support developments which generate economic prosperity and regeneration.”*

- 5.29. With regards to the historic environment PPW reiterates that The Ancient Monument and Archaeological Areas Act 1979, Planning (Listed Buildings and Conservation Areas) 1990 Act and Historic Environment Act (Wales) Act 2016 provide the legislative framework for the protection and management of the historic environment in Wales. Paragraph 6.1.5 states that the *‘Planning system must take into account the Welsh Governments objectives to protect, conserve, promote and enhance the historic environment as a resource for the general well-being of present and future generations.’* And that there is a need to base decision on understanding of the impact a proposal may have on the significance of an historic asset.
- 5.30. PAW considers the impact of both statutory and non-statutory designations in relation to biodiversity and ecology. Paragraph 6.4.14 states *“statutory designation of a sites does not necessarily prohibit development, but proposals must be carefully assessed to ensure that the effect on those nature conservation interests which the designation is intended to protect are clearly understood; development should be refused where there are impacts on the features for which a site has been designated.”*. In relation to SSSI’s PAW (paragraph 6.4.17) *“there is a presumption against development likely to damage a SSSI and this presumption should be reflected in development plans and development management decisions”*. PAW is clear in relation to non-statutory designations that *“such designations do not preclude appropriate development, where there are no adverse impacts on the features for which a site is designated”*(paragraph 6.4.20).
- 5.31. Section 6.6 considers impact on Water resources, including water quality and flood risk. Paragraph 6.6.8 is clear that new development should *“minimise adverse impacts on water resources, including the ecology of rivers, wetlands and groundwater and thereby contributing towards ecological resilience”*. Paragraph 6.6.25 states that *“Development should reduce and must not increase, flood risk arising from river and /or coastal flooding on and off the development site itself.”*

## Technical Advice Notes (TANs)

- 5.32. A series of TAN’S provide additional national planning guidance alongside PPW. We have had regard to the following policies and TAN’S, which we believe are relevant to the proposed development;
- TAN4: Retail and Commercial Development (2016)
  - TAN11: Noise (1997) and 2015 Updates

- TAN12: Design (2016)
- TAN15: Development and Flood Risk (2004)
- TAN18: Transport (2007)
- TAN23: Economic Development (2014)
- TAN 24: The Historic Environment (2017)

## **Other Relevant Policies**

### **Other Relevant National Policy Documents**

#### **Well-being of Future Generations (Wales) Act 2015**

5.33. Included in The Planning Framework is a local/regional study, Well Being Plans: 2018, this report/study details the 7 well-being goals that have been put in place to improve the social, economic, environmental, and cultural well-being of Wales. They are contained in law under the Well-being of Future Generations (Wales) Act 2015. The goals are as follows:

- A prosperous Wales
- A resilient Wales
- A healthier Wales
- A more equal Wales
- A Wales of cohesive communities
- A Wales of thriving culture and Welsh language
- A globally responsible Wales

### **Development Management Manual**

- 5.34. An additional document that contributes to the Planning Framework is The Development Management Manual ('the Manual'). It focuses on the procedural aspects of Development Management describing the minimum requirements set out in law. As a procedural guide, the Manual does not contain policy or guidance about what form or distribution of development is necessary to achieve the sustainable development of Wales. This continues to be set out in PPG and TANs.

### **Deeside Enterprise Zone**

- 5.35. The proposed development forms part of the larger Deeside Enterprise Zone (EZ), which was designated by the Welsh Assembly Government in September 2011. The EZ will create a Growth Zone at Deeside which incorporates over 200 hectares of employment land at Northern Gateway, Deeside Industrial Park and Hawarden Business Park. The Deeside Growth Zone aims to be an engine for growth for the North Wales economy and is of national, regional and local importance. The aim is to deliver sustainable growth and regeneration which transforms communities and attracts inward investment, and provides a catalyst for generating new skilled jobs whilst safeguarding existing jobs.

### **Deeside Plan**

- 5.36. The Deeside Plan sets out a vision for the growth of Deeside for 2015-2020 and beyond. It identifies the key strengths and weaknesses of Deeside and core areas of improvement: Economic, transport, housing, skills and employment, as well as environment.
- 5.37. Objective 1 of the plan relates to Economic growth, and seeks to raise competitiveness and productivity, support large – scale investment opportunities through flexible policy frameworks and targeted delivery and investment plans, reinforce the areas role as a major economic driver of the Northern Powerhouse, Attract investment.
- 5.38. The Northern gateway development site is stated to be crucial to the economic growth ambitions of the region. Combined with Warren Hall is stated to have the potential to deliver up to 10,000 new jobs and 1,500 new homes. Stating that owners, developers and the public sector have a shared interest in maximizing the economic impact of the site, the quality and range of jobs created and the quality and value of development secured.

- 5.39. Planning is seen as key to delivering the objectives of the Deeside Plan, and emphasises the need for growth and development to take place whilst the LDP is progressed to adoption. The objective is to gain momentum in delivering growth and set the scene for subsequent periods.

### **North Wales Growth Deal**

- 5.40. The North Wales Growth Deal was signed on 17<sup>th</sup> December 2020. The Growth Bid is intended to support the Growth Vision for the Economy of the North of Wales (2016). It establishes a vision for economic and employment growth in the Region. The Region seeks to become a hub of innovation and technology excellence and a leader in developing digital business clusters. There is a desire to support and retain young people within the Region, reducing outward migration, and to increase employment levels, reducing inactivity and the number of workless households across the regions. It aims to achieve “inclusive growth” and equality of access – connecting the labour market and localities to jobs and opportunities for business growth – through improved transport access and skills initiatives. The bid also highlights that North Wales will improve transport infrastructure, specifically road and rail, to facilitate economic growth and the movement of people, goods and services. The Bid identifies a number of strategic policies and schemes including the delivery of the forward work programme for Trunk Roads, identified in Moving North Wales Forward, including the Deeside Corridor.

### **Emerging Local Policy**

- 5.41. The Council are currently preparing a Local Development Plan (LDP). The LDP process gives the opportunity for engagement with a variety of stakeholders from early on in the process, in order that they have the opportunity to influence the Plan as it progresses. The policies contained within will guide decisions on planning applications and seek to protect and enhance the natural and built and environment. It will also include proposals for the development of housing, retail, employment and other land uses. The deposit LDP was consulted on from September to November 2019, with Examination hearing sessions held in April/May 2021, with an additional session held on 8<sup>th</sup> September 2021. Adoption is anticipated in early 2022.
- 5.42. The Northern Gateway site continues to be allocated as a strategic Mixed Use site STR3A for employment, housing, commercial and community facilities comprising:

- i. Approximately 1,325 new homes, including affordable



- ii. Approximately 72.4 hectares of B2/B8 employment land
- iii. Commercial development hub adjacent to A550
- iv. District Centre(s) to serve local convenience needs
- iv. Strengthened and raised River Dee flood defences
- v. Provision of internal road infrastructure
- vi. Provision of land and a contribution to extending Sealand CP School
- vii. Sustainable drainage/flood management solution
- ix. Provision of green infrastructure network
- x. Sensitive re-use of John Summers Listed buildings and grounds

5.43. Emerging policies that are relevant to this site are as follows:

Policy STR1	Strategic Growth
Policy STR2	The Location of Development
Policy STR3	Strategic Sites
Policy STR4	Principles of Sustainable Development, Design and Placemaking
Policy STR5	Transport and Accessibility
Policy STR6	Services, Facilities and Infrastructure.
Policy STR7	Economic Development, Enterprise and Employment
Policy STR8	Employment Land Provision
Policy STR13	Natural and Built Environment, Green Networks and Infrastructure
Policy STR14	Climate Change and Environmental Protection
Policy PC2	General Requirements for Development

Policy PC3	Design
Policy PC4	Sustainability and Resilience of New Development
Policy PC5	Transport and Accessibility
Policy PC6	Active Travel
Policy PE1	General Employment Land Allocations
Policy EN2	Green Infrastructure
Policy EN3	Undeveloped Coast and Dee Estuary Corridor
Policy EN4	Landscape Character
Policy EN6	Site of Biodiversity Importance
Policy EN7	Development Affecting Trees, Woodland and Hedgerows
Policy EN8	Built Historic Environment and Listed Buildings
Policy EN10	Buildings of local interest
Policy EN 14	Flood Risk
Policy EN15	Water Resources

### Relevant Local Supplementary Planning Documents

5.44. The Adopted Supplementary Planning Guidance notes are as follows:-

- SPGN No3 – Landscaping (Adopted January 2017)
- SPGN No.4 – Trees and Development (Adopted January 2017)
- SPGN No.6 – Listed Buildings (Adopted January 2017)
- SPGN No.21 – Environmental Impact Assessments (Adopted January 2017)

### Strategic Development Plan

5.45. The Planning Act provides a legal framework for the preparation of Strategic Development Plans to be prepared on a regional basis, reflecting functional areas, addressing regional housing markets, travel to work patterns and economic opportunity areas. Strategic Development Plans enable the consideration of opportunities and challenges in a planned, integrated and comprehensive way. The Strategic Development Plan must be in conformity with the Future Wales. Guidance on the designation of Strategic Plan Areas was issued in March 2019. A Strategic Development Plan will be required for North Wales.

5.46. The Welsh Governments Economic Action Plan also outlined the basis for a regional approach to economic development across Wales. Regional Economic Frameworks are intended to be an integral component to a regionally focused economic development, and as identified within Future Wales the Regional Economic Frameworks, alongside growth deals, mentioned earlier, will inform Strategic Development Plans. Progress on the preparation of Regional Economic Frameworks is understood to have been impacted upon by Covid-19 Pandemic.

## 6. Reasoned Justification for Proposed Development

- 6.1. The application proposes the erection of a Paper Processing Mill to produce and manufacture tissue paper (B2, B8 use class) with ancillary B1a office space with associated servicing and infrastructure on part of the Northern Gateway site, Deeside.
- 6.2. The following section considers the proposed scheme in the context of the development plan, national planning policy and guidance and all other relevant material planning considerations.
- 6.3. This section evaluates the application proposals against the following issues:

- Principle of Development – Economic Growth and Employment, Regeneration Benefits.
- Design. Landscape and Heritage
- Other Material Considerations
- Planning Obligations
- Conformity with the Development Plan / The Planning Balance / Weighted Balance

### Affording weight to planning policies

- 6.4. Section 38 of the Planning and Compulsory Purchase Act 2004, states that applications should be determined in accordance with the development plan unless material considerations indicate otherwise. The Flintshire Unitary Development Plan (2000-2015) was adopted in 2011. It remains the adopted Development Plan for the county. Future Wales was published in February 2021, and forms part of the statutory Development Plan. To determine the weight to be afforded to the policies within the Development Plan regard will be given to the compliance with up-to-date Welsh Government Guidance, including Planning Policy Wales (PPW), and Technical Advice Notes (TANs). The emerging Flintshire Local Plan has been submitted for Examination and weight, having regard to the nature of any outstanding objections, can therefore be afforded to the policies contained within the emerging Plan.

## Principle of Development

- 6.5. The Application is made in the context of the strong local planning policy framework which allocates the Northern Gateway Site as an employment led mixed use development site in the Council's adopted UDP and emerging Local Development Plan. This is underpinned by a raft of national, regional and local economic evidence referenced in Section 5 of this Report.
- 6.6. The Proposed Development forms approximately 23.86 hectares and is for B2, B8 use with ancillary B1a office spaces. It occupies Plot C of the Airfields site (formerly referred to as the former RAF Sealand 'South Camp' site) which forms part of the 170 hectare allocation of Land North West of Garden City (Policy HSG2A). The 'Northern Gateway' is a strategic mixed use allocation in the Unitary Development Plan (2011). The site is the largest allocation within the Plan, and comprises 98 Hectares of employment land for predominantly B8, uses supported by B1 and B2 uses (Policy HSG2A and EM1(12). EM1(12) identifies the Site reference 12 for B1, B2 and B8 employment uses, unless otherwise stated. Future Wales forms part of the Development Plan and identifies Deeside and Wrexham as one of three National Growth Areas. Policy 20 identifies the location as the strategic focus for economic growth. The principle of economic development at this location is established within the Development Plan, furthermore economic growth at this location is highlighted to be of national importance. The proposed development for B2, B8 and ancillary B1a uses is therefore consistent with the principles established within the Development Plan.
- 6.7. Subsequent to the allocation of HSG2A, outline permission (reference 049320 for employment led mixed use development was granted in January 2013 including B1, B2 and B8 uses. The proposed development is broadly consistent with the approved parameters and design principles in terms of the use of the site. ICT UK Ltd have specific operational requirements which require a building on site that exceeds the height parameters within the extant planning permission, which are currently set at 30m (eaves) for the Airfields site and hence this full application.
- 6.8. 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.

- 6.9. 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 a mixed use allocation which proposes circa 1300 dwellings. All these attributes are key drivers for manufacturing operators when making decisions on locations for new employment space.
- 6.10. The Proposed Development forms part of the larger Deeside Enterprise Zone, which was designated by the Welsh Assembly Government in September 2011. The Enterprise Zone will create a 2000 hectare Growth Zone at Deeside, comprising 90 hectares of land at the Northern Gateway, Deeside Industrial Park, Hawarden Business Park, Renewable Energy Park, Sandycroft Industrial Park, and Toyota Lean Manufacturing Centre. The Deeside Growth Zone aims to be an engine for growth in the North Wales economy and is of national, regional, and local importance. The aim is to deliver sustainable growth and regeneration which transforms communities and attracts inward investment, and provides a catalyst for generating new skilled jobs whilst safeguarding existing jobs. The area benefits from a cluster of manufacturers and advanced manufacturing across a range of sectors, with a skilled labourforce. A range of incentives, including enhanced Capital Allowances, reduced rate loans, and skills support are available to support investment within the Enterprise Zone. The Northern Gateway site within which the Proposed Development is located is considered to be one of the largest private sector-led developments in North Wales and North West of England. The Proposed Development will maximise the locational advantages provided by the Site due to its Enterprise Zone Status, and build on the investment in the area by Amazon, which was expected to create 50 permanent jobs and support 300 delivery drivers. The Proposed Development will therefore help kick start the growth of employment uses on this employment led mixed use site and make a significant contribution to the regeneration and investment ambitions for the area. Its contribution to regeneration and employment growth are summarised within the following two sub sections.
- 6.11. Consistent with the Deeside Plan, Enterprise Zone Status, and the Development Plans allocations for employment development and focus for economic growth, the Welsh Assembly Government have also committed investment to transport infrastructure improvements in the area, including the delivery of the access road serving the Proposed Development. This investment demonstrates the importance of delivering economic growth at this location.

6.12. It follows that the emerging Flintshire Local Plan, is consistent with Future Wales, and allocates land subject to the Proposed Development for B2/B8 development, as part of the wider allocation STR3A, which seeks to deliver 72.4 hectares of employment land at this location.

6.13. The Proposed Development for B2, B8 and ancillary B1a uses is consistent with the Development Plan and the emerging Flintshire Local Plan. It is also broadly consistent with the extant outline application. The principle of employment development at this location is established. Indeed the location is of strategic importance. The Proposed Development represents a significant opportunity to kick start the delivery of the Northern Gateway and brings significant investment and employment opportunities to the region.

#### **Economic Growth and Employment Land**

6.14. PPW states that the planning system should ensure that the growth of output and employment in Wales as a whole is not constrained by a shortage of land for economic uses. Economic land uses include the traditional employment land uses (offices, research and development, industry and warehousing), as well as uses such as retail, tourism, and public services.

6.15. The PPW in paragraph 5.4.4 goes on to say that planning authorities, wherever possible, should encourage and support development which generate economic prosperity and regeneration.

6.16. Flintshire lies in a strategic location at the gateway to North Wales and North West England. Flintshire therefore has an important role to play in the regional economy for North Wales and the North West, where it provides for example high-value manufacturing at Deeside Industrial Park. Flintshire's economy is therefore relatively strong with above average employment and below average unemployment figures. However, there are still pockets of deprivation with Flintshire being within the 20 percent most deprived local authorities in Wales. Deeside reflects many of the economic strengths of the County but also has six wards within the Welsh Index of Multiple Deprivation that are within the 20 percent most deprived in Wales, which includes the Sealand ward, with Sealand I identified as being within 20% most deprived neighbourhoods. The Environmental Statement (ES) Socio-Economic Technical Paper 6 which forms part of the Part 2 of the ES that accompanies this planning application explains this in more detail.

6.17. The importance of the region and of Deeside and Wrexham is recognised through within Future Wales, which identifies the area as one of three national growth areas, and a focus for

economic growth. This reflects the Growth Deal, Deeside Plan, and Enterprise Zone status of the area, discussed in earlier sections of this report.

- 6.18. The Flintshire Unitary Development Plan accordingly identifies a need for between 207 and 328 hectares of employment land, and establishes a requirement for 300 hectares of land over the Plan period, and allocated 341 hectares to ensure that the need across the Plan period could be met. 98 hectares of which were identified at the Northern Gateway Site Policy HSG2A/EMI(12) Land North West of Garden City. The emerging Flintshire Local Plan establishes a number of objectives focused on supporting economic growth, including the objective to facilitate growth and diversification of the local economy, and the objective of supporting development that positions Flintshire as an economically competitive places and an economic driver for the sub region. The emerging Plan seeks to maintain a portfolio of 139.67 hectares of employment land, with the aim of enabling 8 - 10,000 jobs to be created (Policy STR 1: Strategic Growth), focusing growth on sustainable employment locations, including principal employment areas. STR 3 goes on to consider that the majority of new development will be focused at two strategic sites including STR3(A), within which the application site is located, the site is therefore a fundamental component of the emerging Plan. STR3(A), reallocates the northern gateway site, identifying the site as a mixed use allocation, including 72.4 hectares of B2/B8 employment land. A slightly different mix and quantum to the existing Unitary Development Plan allocation, reflecting the changes in market demand.
- 6.19. The Proposed Development serves to meet the identified need for employment land established within the Development Plan, which is confirmed with the strategic allocation of the Site. Making a significant contribution towards the delivery of 98 hectares of employment generating uses at HSG2A, and is consistent with Future Wales. The Proposed Development makes a significant contribution towards the delivery emerging requirement for employment land and forms a substantial component of the 72.4 hectares of B2/B8 employment land at emerging allocation STR3A. This approach is entirely in accordance with the strategic approach for Northern Gateway and national and local policy, in particular Policy HSG2A of the Flintshire Unitary Development Plan, and Policy 20 of Future Wales. The delivery of employment land is consistent with the emerging Flintshire Local Plan (Policy STR1, STR 2, STR3(A), STR7, STR8, PE1). Indeed the site is one of only two strategic allocations within the emerging plan, thus securing delivery of the Proposed Development is fundamental to delivery of the emerging Plan, and meeting the objectives of the Plan and of Future Wales. The site is



key to enhancing the wider sustainability of the location which will also be a focus for housing growth.

- 6.20. Paragraph 11.39 of the adopted Plan explains that the relative balance of employment uses should be established as part of the masterplanning process and will take into account factors including economic aspirations for the site, market demand and compatibility with other uses. The disposition of uses is in accordance with UDP Policy HSG2A and is informed by technical constraints and market demand.

**Regeneration Benefits**

- 6.21. As indicated above the delivery of the Proposed Development at this location delivers on the objectives of the Development Plan (Flintshire UDP, and Future Wales), and the emerging Flintshire Local Plan in terms of delivering employment land. However, the Proposed Development is located within an area, and near to neighbourhoods that the Welsh Indices of Multiple Deprivation (2019) identifies as one of the most deprived neighbourhoods in Flintshire. The Council Plan, the Flintshire Economic Regeneration Strategy 2009-2020, reflect on the economic uncertainty following the recession, and the need to make the most of the county's employment land, address worklessness through employment and training opportunities, to tackle poverty and social exclusion through access to work, and job creation. The Deeside Plan identifies the need to address challenges and stubborn pockets of severe deprivation through supporting enterprise and boosting local skills. The need to address regeneration is reflected through the objectives and allocations within the Emerging Local Plan, which includes the Strategic Allocation STR3(A). The need for regeneration and investment in the area is reflected by the wider area's Enterprise Zone Status. The Proposed Development will build on the significant investment in infrastructure on the wider site by the Welsh Government, including food defence works and the construction of the Phase 1 Spine Road and pending reserved matters application for Roads 2 and 3 and investment by Amazon, and will make a significant contribution to the regeneration of the area and will contribute to the achievement of Sustainable Development and the seven well-being goals including a Prosperous Wales, a Resilient Wales, a Healthier Wales, a More Equal Wales, and a Wales of Cohesive Communities.

- 6.22. The delivery of this site as a strategic employment site is a fundamental element of the Council's and Welsh Governments regeneration programme and 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 strategic site, creating a well-balanced community by generating significant long term employment. The Application Proposals will also 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.

- 6.23. Amion Consulting have prepared the ES Socio Economic Technical Paper 6, which considers the socio and economic impacts of the Proposed Development. The impacts are considered during the construction phase and the operational phase of the Proposed Development. The key impacts are summarised below:

**Construction Phase**

- 6.24. The Gross construction employment is anticipated to be around 1,539 person years. This is equivalent to **154 Full Time Equivalents (FTE's)(gross)**. Phase 1 is anticipated to generate 790 person years, Phase 2 deliver a further 309 person years, Phase 3 440 person years.
- 6.25. The Proposed Development will have supply side benefits, and induced effect through spend on goods and services within Flintshire, the wider impact area and Wales as a whole. However, it is important to consider the impact leakage, displacement and deadweight. The Proposed Development is expected to generate 508 net additional construction employment (person years) over the construction period within Flintshire; 945 net additional construction employment (person years) within the wider impact area; 794 net additional construction employment (person years) within Wales.
- 6.26. The Construction Phase of the Proposed Development is estimated to generate **a net additional GVA of around £90million** over the construction period within the wider impact area (92.6m Flintshire, £98.4m Wales).
- 6.27. The Construction Phase will also support 35 new trainees over the three year construction period for phase 1, further 28 trainees supported over Phase 2 and 3. Overall **63 new trainee opportunities** could be created.
- 6.28. It is anticipated that a Construction Environmental Management Plan (CEMP) secured by condition on any subsequent planning permission will set out measures to limit effects of construction on noise, air pollution, traffic and anti-social behavior. A Framework CEMP has

been submitted as an Appendix to the ES Part I Report and identifies the typical measures which will be required to control and mitigate construction phase impacts. The increase in economic activity is anticipated to create potential for local unemployed people to access new job opportunities, improve business and investor confidence and external perceptions of Flintshire. The local area will also benefit from supply chain opportunities and spending of construction works in local shops cafes and restaurants.

- 6.29. The ES Socio-Economic Technical Paper 6 reveals that within Flintshire there are a larger proportion of people in skilled and elementary occupations, and that a higher proportion of people within Flintshire do not have any formal qualifications, and that there are a higher proportion of people qualified to NVQ level 1 and 2 or equivalents than average for England and Wales. The baseline data also notes the pockets of deprivation within which the site is located, and the neighbourhoods that are some of the most deprived in Wales, and in England that lie within close proximity to the site. The creation of employment and training opportunities, that are genuinely accessible by nature of the skills match and location, will play a role in addressing the regeneration need, within Flintshire and in particular within Deeside. It will support the objectives in addressing worklessness, poverty, and skills, in turn impacting on the wider health and well-being of the population.

#### **Operational Phase**

- 6.30. Is estimated that **Phase 1 will directly support 228 FTE's (gross)** and this will increase to **463 FTE's (gross)** following the delivery of Phases 2 and 3. A range of employment opportunities will be created in addition to the more process-based and elementary occupations, including managerial, professional, and skilled engineering roles. The ES Socio-Economic Technical Paper 6 provides a detailed breakdown of the anticipated job creation at the ICT Paper Mill. This indicates a good alignment between the skills base of the resident population, with a higher proportion of people in elementary and skilled occupations, and the jobs to be created. Circa 70% of jobs are expected to be at NVQ level 2 or lower, aligning with the qualification profile of the local labour force and the skills profile of the unemployed within the area of impact, as demonstrated within the ES Socio-Economic Technical Paper 6, table 6.27.
- 6.31. The Proposed Development will generate additional economic activity in the wider economy, including generating new additional employment through the supply chain (indirect effects). Direct and indirect effects of new investment also generates additional employee spend on local goods and services, and supports further job creation (induced effects). The Gross direct

and indirect/induced job creation is anticipated to amount to 557 FTE's in Flintshire, 648 FTE's in the wider impact area, and 625 FTE's within Wales.

- 6.32. In addition to considering the direct and indirect effects on employment generation, Amion Consulting have considered leakage, displacement and deadweight in order to determine the net additional employment creation as a result of the Proposed Development. It is estimated that the **net additional employment amounts to 211 FTE's in Flintshire**, 299 FTE's in the wider impact area and 311 FTE's in Wales.
- 6.33. The net additional GVA is anticipated to be **£26.7 million per annum** within the wider impact area of Flintshire, Cheshire West and Chester, Wrexham and Wirral.
- 6.34. The Proposed Development will generate around **£2.9 million in business rates revenue**. Phase I will generate a business rates revenue of £1.5million. This will be retained in full at the local level given the Enterprise Zone status.
- 6.35. It is expected that training and apprenticeship opportunities will be created by during the operational phase, as a result of the Proposed Development. The Applicants are committed to working with key local agencies and providers to: support the provision of training and apprenticeship opportunities; ensure that any training/skills gaps are identified and support those outside the labour market to gain the necessary skills; ensure that local people are aware of employment opportunities; and match local people to the right jobs. ICT UK Ltd will also work with the Advanced Manufacturing Research Institute (under construction), to explore opportunities to enhance productivity through enhancing the skills base of the workforce and within the supply chain. This commitment can be secured through planning condition requiring details of a local employment strategy.
- 6.36. The Proposed Development is estimated to create 299 net additional FTE jobs within the wider impact area, which as indicated earlier includes significant pockets of deprivation, in an area where the Plan, Deeside Plan and Regeneration Strategy, identify objectives to address the area of deprivation, worklessness and poverty, with one of the actions to address access to employment. The skills mix of the jobs typically associated with the identified occupation profile match with the skills profile of the unemployed residents within the wider area as confirmed within the ES Socio-Economic Technical Paper 6, table 6.27. Amion Consulting also highlight that the average salaries within the paper manufacturing sector are above the national average. This would be a boost to the wider economy and serve to address the

regeneration ambitions of the County, and Deeside Plan area, supporting the achievement of a more prosperous Wales, a more equal Wales.

- 6.37. The Proposed Development will provide an important source of local employment in an Authority where there is a net outflow of workers, supporting more sustainable travel to work patterns, important in terms of achieving a more resilient Wales. Amion Consulting estimate the 85% of employees at the Proposed Development will be from either Flintshire, Wrexham, Cheshire West and Chester or Wirral. Therefore, they do not expect a significant impact on local services and facilities such as GP surgeries.
- 6.38. Amion Consulting consider that the Proposed Development will generate a range of important wider socio-economic benefits that are suspected to be sustained for a number of years. It will reinforce perceptions of growth, and stimulate further investment. The Proposed Development will help respond to the significant shortfall in domestic production of tissue paper products, circa 30% of demand being met from suppliers outside the UK.

### Summary

- 6.39. The Proposed Development is located in an area which has been identified as the focus for economic growth, it is a location of sub regional, regional and national importance. The will not only have a significant role in meeting the established employment needs, delivering on long term employment allocation, creating of 945 net person years of construction employment, and 299 net FTE's within the wider impact area during the operation of the development and deliver a long term employment allocation, it will also play a significant role in the wider sustainability of the area. The immediate locality is relatively deprived both overall and within the employment domain. The operational phase of the development will bring forward significant employment development that will contribute towards addressing the identified regeneration needs of the locality and wider impact area. This will also meet the key objectives of the UDP, emerging Plan, PPW, Future Wales, as well as the Economic Regeneration Strategy and Deeside Plan which all set out the requirement to address regeneration needs. The delivery of employment land at this location will therefore serve to improve access to employment, through the provision of jobs that align with the skills profile of the labour force and the unemployed, and through the provision of training and apprenticeship opportunities during both construction and operational phases.

6.40. Furthermore, the development will play a significant role in responding to a substantial shortfall in the domestic production of tissue paper product, currently estimated to be circa 340,000 tons per annum. With domestic manufacturing meeting around 72% of UK demand. The facility is of importance in building resilience in the UK supply, particularly when considered against the context of Brexit, which has highlighted the importance of onshoring for business continuity and resilience. This contributing to wider sustainability of the area and towards meeting the well-being goals. The Proposed Development will contribute to:

- A Prosperous Wales - delivering increased economic activity, and significant employment and training opportunities;
- A Resilient Wales - supporting the provision of employment in a location close to where people live and making effective use of underutilised land, delivering economical improvements; and ensuring continuity of supply of tissue paper products to serve domestically generated needs.
- A more equal Wales - through securing additional employment and training opportunities, that match the skills base of the local population, and are therefore genuinely accessible to the local population in a deprived neighbourhood, as ranked in the Welsh Indices of Multiple Deprivation 2019;
- A cohesive community, development will be well connected with the surrounding area, and recently constructed and proposed residential development, in turn supporting greater opportunities for active travel, and providing genuinely accessible employment and training opportunities.
- A Healthier Wales, provided through opportunities to increase active travel to work, supporting sustainable commuting patterns and the opportunity for employment which has a significant effect on the health and well-being of residents, alleviating poverty, addressing worklessness and income and employment deprivation, by access to employment with above average levels of income; and
- A more Globally responsible Wales through: supporting more sustainable travel to work patterns, addressing the net outflow of commuters, meeting a greater proportion the domestically generated needs for tissue paper within the UK in a location that makes efficient use of underutilised land.

- 6.41. The principle of development is therefore in accordance with the Development Plan (Flintshire UDP and Future Wales), consistent with the provisions within PPW, and the emerging Local Plan, and key local strategies including the Deeside Plan and Economic Regeneration Strategy. The Proposed Development makes beneficial and effective use of an underutilised site, consistent with the current and emerging allocations, delivering employment that will secure a number of regeneration objectives, improving access to employment, supporting ambitions to address worklessness and the pockets of deprivation present within the locality.

## Design, Landscape and Cultural Heritage

- 6.42. This section identifies the case for the development in the context of the relevant design and heritage policies. Due consideration should also be given to the design justification and rationale contained in the accompanying design and access statement. This section is subdivided into the following topics:

- Design;
- Landscape; and
- Cultural Heritage; and

- 6.43. The principles and parameters of for the design have been established within the Design and Access Statement prepared separately by AEW Architects which accompanies the planning application

## Design

- 6.44. The proposed design is described in detail within the Design and Access Statement The statement has been prepared in accordance with Welsh Government Guidance provided within 'Design and Access Statements Wales – Why, What and How' (April 2017) prepared by the Design Commission for Wales.
- 6.45. PPW promotes sustainability through good design, stating *“Good design is fundamental to creating sustainable places where people want to live, work, and socialise. Design is not just about the architecture of a building but the relationship between all elements of the natural and built environment and between people and places”*. Importantly PPW notes that to achieve sustainable development, design must go beyond aesthetics and include the social, economic,

environmental, cultural aspects of the development. PPW identifies five aspects/objectives of good design: Access, Character, Community Safety, Environmental Sustainability and Movement.

- 6.46. PPW states that “*good design promotes environmental sustainability and contributes to the achievement of the well being goals. Development should seek to maximize energy efficiency and the efficient use of other resources (including land), maximise sustainable movement and minimise the use of non renewable resources, encourage decarbonisation and prevent generation of waste and pollution*”. In order to contribute to the delivery of resilient development the PPW considers that an integrated and flexible approach to design, including early decisions regarding location, density, layout, built form, the choice of materials, adaptability of buildings is appropriate.
- 6.47. The Design and Access Statement sets out the approach to the development of the Site in relation to the assessment of key site characteristics, constraints, and in particular how the design, siting, orientation, and use of materials has evolved in response to early engagement dating back to 2018, operational needs, landscape and heritage matters. Landscape and heritage matters are considered further in the subsequent sections of this Statement.
- 6.48. The statement demonstrates that the development is broadly in accordance with the parameters established under the outline application reference: 049320, and subsequently application references 051025 and 061125, the masterplan establishes the height parameters, identifying a maximum eaves height of 30 meters.
- 6.49. The majority of the proposed buildings are within the height parameters established through the outline planning permission. However, ICT UK Ltd have specific operational requirements in order to ensure that the whole manufacturing, warehousing and distribution process is efficient and effective, and this impacts on the design requirements for the Proposed Development. The operational requirements are detailed within the description of development contained herein, and within the Design and Access Statement. The High Bay Warehouse (HBW) is required to be 39.65m high from Finished Floor Level (FFL) to top of the parapet which is dictated by the fully automated racking system and the operational requirements required to support ICT’s Manufacturing process and distribution programme. The 39.65m high 10 level automated finished product High Bay Warehouse forms an integral component of the 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. The height and form of the High Bay Warehouse is driven by a specialised automated racking system at a capacity to support the storage and distribution operations of the facility. 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 Design and Access Statement notes that rack clad buildings are essential operating as a dark space and do not incorporate fenestration.

6.50. The Design and Access Statement considers the siting of the elements of the buildings which exceed the previously established height parameters. Regard has been given to the operator requirements, the need to make efficient use of land and the sites location and context. The design has evolved and responded to the location of sensitive receptors, the landscape and visual impact and nearby listed buildings architectural merit and early engagement, alongside measures that respond to other constraints, including flooding and ecology.

6.51. In summary these include:

- The 39.65m High Bay Warehouse 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 Development and existing residential areas, facing existing industrial uses. 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 been carefully considered to limit any adverse impact on any receptors, and assimilate the building into the surrounding environs. The proposed elevational treatment of the Proposed Development seeks to address the vertical scale of the High Bay Warehouse through the graduation 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 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 been developed with the consultancy team following engagement with Flintshire County Council, and has proved successful to ICT's existing facilities across Europe.

- The orientation and location of loading bay. Service yards have been considered to minimize noise impact at residential sensitive receptors.

- 6.52. From the South, the Design and Access Statement demonstrates that the perimeter planning helps to screen the lower levels, with the lighter cladding colours helping to soften the impact of the higher building elements. From the opposite side of the River Dee, the existing planting screens the lower levels of the High Bay Warehouse, the office building is completely hidden from view. The lighter cladding of higher levels softens the impact of the taller building elements. The Design and Access Statement also considers views from the south west of the site at Castle Hill, noting that darker cladding elements are hidden by the busy nature of the eyeline, surrounding context and planting, but notes that the High Bay Warehouse is visible against the darker backdrop. A further assessment of the landscape and visual impacts is provided in later sections and the supporting Landscape and Visual Impact Assessment (LVIA), which is Technical Paper 4 in the ES Part 2.
- 6.53. The proposals include a main office building to be located facing the eastern boundary to oversee the operations and administration of the Paper Mill and accommodate both ICT employees and visitors. The design of the two storey office building is informed by ICT's existing developments throughout Europe.
- 6.54. The elevational treatment generally features polyester powder coated (PPC) 'cassette' or 'composite' wall cladding systems in metallic silver and PPC aluminium framed doors and windows with look-a-like spandrels. A full height, faceted section of PPC aluminium framed curtain walling to the front elevation creates a curved feature entrance with access framed at low level to give a human scale and provide shelter. At roof level, a tapered overhang accentuates the form and clean lines of the office building. The specification of materials will be appropriate for the lifetime of the development to be durable and resilient.
- 6.55. PPW notes that design is a broad concept and incorporates energy, ecology, biodiversity, socio economic aspects of development. The Design and Access Statement considers these aspects and implications for design and therefore complies with the Development Plan and PPW, alongside emerging policies PC3.
- 6.56. The Landscaping strategy described in further detail in the next section will help to ensure an attractive and appropriate development, and help integrate the scheme into the existing landscape. This will be complemented by landscaping works being implemented as part of

enabling works to facilitate the redevelopment of Plot C. These works already granted approval will comprise landscaping works which will include removal of self-seeded trees to provide slope stability, replacement trees, and aquatic ecological habitats. This will include provision of a reptile mitigation area at the northern end of the Application Site (Plot C) and a grassland ecological mitigation area at the north western corner of Plot D of the Airfields site. The reptile mitigation will include refuges and mounds and the grassland mitigation area will have a meadow mix grass seeding over existing grass sward.

- 6.57. Separating the Application Site and the proposed Commercial Spine Road to the south of the site will be drainage swales. Whilst these swales are for drainage purposes they provide a landscape and drainage corridor and buffer which helps separate the Proposed Development and adjacent land proposed for housing to the south of the Commercial Spine Road. This housing land to the south of the spine road will be separated from the road by a 2.4m high earth bund and a 1.4m acoustic fence (total height of 4m). The bund is currently being constructed and will provide an appropriate landscaped buffer which will help screen the ICT Paper Mill Facility from the proposed residential development.
- 6.58. On the Application Site, the proposals include new tree and thicket planting to the north and north western boundary, and tree planting along the southern boundary, these will serve to filter views to the development. Tree and thicket planting will take places along the road infrastructure delivered by Welsh Government. The planting once established will provide low level screening and serve to reduce the impact of the Proposed Development from surrounding viewpoints.
- 6.59. Suitable access will be taken from the Welsh Road and Welsh Government Infrastructure to serve the parking areas and service yards, which will be separated to ensure operational safety. In total the scheme provides 338 car parking spaces, 15 of which will be accessible and 15 will be for electric vehicle charging. Active travel will be encouraged through the provision of 90 covered cycle parking spaces, and enabling infrastructure which will deliver wide roads and footpaths (at least 2m). Level thresholds and appropriate gradients of no more than 1 in 20, in areas where there will be pedestrian and wheelchair movements, will be achieved to support inclusive access into the site and premises.

- 6.60. The Sustainability section of the Design and Access Statement identifies the schemes compliance with PPW and the development plan in relation to wider sustainability and indicates that where possible the BRE Green Guide to Specification will be followed for the selection of materials, including consideration of their embodied energy, with local sourcing where possible. Materials will be selected for their quality and durability to enable the building to maximise its lifetime. 5% of parking spaces are proposed to be electric (15 spaces), with a further 5% ducted for future installation.
- 6.61. The ecology and Nature Conservation section identify the measures to be adopted in relation to biodiversity and ecology and the benefits secured through the enabling development and the Proposed Development and notes the long term benefits to ecology and biodiversity resultant from the Proposed Development.
- 6.62. Flood Risk and Drainage section of this Report confirms that flood mitigation measures have been embedded into the scheme design. The Noise section also demonstrates that development will be designed in a way that limits the impacts of noise and vibration during construction and operation.
- 6.63. All of which are components of good design, identified within PPW, D1 and D2 of the Unitary Development Plan, and principles set out within emerging local plan PC3. The Design and Access Statement therefore accords with the design policies of the Development Plan and emerging Plan. The design and approach to design is consistent with the principles of PPW and the design evolution has adopted a flexible approach to design, siting, orientation and use and colour of materials.

### **Landscape**

- 6.64. Barry Chinn Associates (BCA) have undertaken a Landscape Visual Impact Assessment that forms part of the ES, in respect of the Proposed Development. The ES Technical Paper 4 provides a description of the existing landscape and visual conditions, and the impact of the Proposed Development including the impacts at construction and operational phases, potential mitigation, the residual landscape and visual impacts following mitigation. The assessment methodology is consistent with the Landscape Institute Guidelines, and viewpoints have been identified through engagement with the Council, consistent with PPW.
- 6.65. The Technical Paper sets out the national and local policy context in relation to landscape matters. Policy Wales (PPW) makes many references to landscape and emphasises its

importance in sustainable placemaking and particularly in the section in the document entitled Natural and Distinctive Places. It also refers to the importance of “...both protecting and enhancing landscapes, habitats, biodiversity, geodiversity and the historic environment in their own right as well as other components of the natural world.” (Page 122). In paragraph 6.3.3 PPW refers to: “ensuring that the value of all landscapes for their distinctive character and special qualities is protected”. Paragraph 6.4.24 of PPW refers to the importance for biodiversity of “Trees, woodlands, copses and hedgerows” and also goes on to refer to the fact that trees “make a valuable wider contribution to landscape character, sense of place, air quality, recreation and local climate moderation.”

- 6.66. In addition to the Planning Policy Wales document the Welsh Government publish a number of Technical Advice Notes (TANs) which provide detailed planning advice. Local planning authorities take them into account when they are preparing development plans.

TAN12 (dated 31 March 2016) provides guidance on design. It makes many references to the importance of the landscape and landscape design in development and planning and discusses the need for “a new development will work with the site and its landscape context. Including key features and qualities such as pattern, form, grain, appearance, colours and elements to also meet the objective of sustaining character and reinforcing legibility.”

- 6.67. TAN 12 also states the following (Para. 5.5.2) “...good design will almost always be dependent on working within the natural constraints and the historic character of the landscape and this should be the starting point from which the design of development evolves. The aim should be to achieve good design solutions which maximise the natural landscape assets and minimise environmental impact on the landscape.

- 6.68. Development Plan policies STR7 the Natural Environment, STR8 Built Environment, STR11 parts f and g, GEN 1 (General Development, D1 (Design, Quality, Location and Layout), D3 Landscaping, TWH1 (development affecting trees and woodland), L1 (Landscape Character), HE2 (development affecting Listed buildings and their settings), AC2 (Access and Communications), EM1 (General Employment Land Allocations) and SR8 The Dee Estuary Corridor, along with SPGN No.3 Landscaping are also of relevance to the landscape considerations relative to the Proposed Development.

- 6.69. The assessment notes that the site currently comparatively featureless and heavily influenced by the surrounding industrial and residential development. It consists of managed grassland,

formerly part of the airfield, and forming part of a broad plateau of low lying land north east of the River Dee, that includes Tata Steel Works, The Deeside Industrial Park, and former RAF Sealand camps. Residential development is currently being developed to the south east and to the south west of the site. The site to the west is allocated for employment use. It is noted that the Sustrans cycle route is on an embankment, 1m higher than levels on the site. Shotwick Brook outside the western boundary of the site is bounded by a landscape bund between 2.5 and 3 m high, and well vegetated with blocks of scrub. Further to the North East land rises towards Shotwick, and to the south west ground levels rise steeply to a ridgeline 3 km west (circa 90 m AOD).

- 6.70. There are no trees within the site, but there are blocks of trees and scrub along the former railway line/ Sustrans Cycle Route, this wraps the northern boundary of the Site. There are additional trees to the north and east of the site along the former railway line, and significant trees around the former Shotton Steelworks offices and car park area, and an avenue of alders and Lombardy poplars between the steel works and Garden City Drain. This is circa 600 m in length, and forms a prominent feature in the landscape some 495 meters from the site boundary. Beyond this Wepre Wood, situated 2 km to the south west of the site forms the most substantial vegetation.
- 6.71. The LVIA ES Technical Paper 4 confirms that whilst there are no landscape or heritage designations within the site, there are a number of designations within close proximity to the site. The ES Technical Paper 4 also confirms that there are no public rights of way within the site, however that there is a network of public rights of way surrounding the site. This includes Footpath Sealand 3, Sealand 1, West Saltney 8, West Saldney 12. Furthermore, there are no cycle routes within the site but a number of important routes close to the site including: National Route No. 5, National Route No. 563, and National Route no 568.
- 6.72. As a result, a number of potentially sensitive receptors have been identified, including the network of footpaths, cycle routes in close proximity to the site, the residential areas to the south, and south west, and the setting of the former Shotton Steelworks offices, and Registered Garden. 16 viewpoints were assessed, and consideration is given to mitigation measures.
- 6.73. The Proposed Development includes primary mitigation measures, including the proposed colour banding to the building cladding, which are embedded into the scheme design and help to reduce the potential visual effects particularly of the High Bay Warehouse. This will be in

bands graded up the elevation in order to reduce the mass of the building and better blend with the existing colours within the surrounding landscape. The tallest buildings (the High Bay Warehouse) has also been located on the part of the Site that are furthest away from adjacent residential development.

- 6.74. Other mitigation such as the landscape and tree planting to boundaries proposed within this application and proposed landscape bunding which is being carried out as part of the enabling works permitted through a separate application, described earlier in this Report will be effective, primarily on the views from points in close proximity to the site. The enabling works include hedge and tree planting to the northern and western boundaries.
- 6.75. The landscape strategy has been developed in conjunction with the requirements for ecology and the impacts predicted in the Landscape and Visual Impact Assessment. It concentrates on the perimeter areas with the intention to provide landscape screening and buffer planting, particularly around the northern and western boundaries. Planting will consist of thicket mix planting with trees. To the northern and western boundaries within the Site a 5m wide planted strip is included consisting of native shrub species and individual trees to provide screening and softening of the impact of the buildings from views outside these boundaries. Inside this area wildflower seeding species rich grassland will be included around the building perimeter where space allows.
- 6.76. To the southern boundary within Phase 3 this area will be planted with native thicket planting and trees with a native hedge extending along the southern boundary facing the Site spine road. This planting will provide low level screening of the car park areas and soften the views of the main factory building from the south-east. In addition to this on plot landscape treatment, the boundary to the housing plots to the south being developed by Crag Hill Estates Ltd (CHEL) includes an acoustic fence along a landscape bund to a height of 4m which will screen the development from the residential areas to the south-east of the Site
- 6.77. The layout has been adjusted to ensure that perimeter landscape treatments of trees and hedgerows could be included, particularly opposite the National Cycle Route to allow for screening of the development from the more sensitive viewpoints.
- 6.78. No mitigation or replacement tree planting is possible where the drainage easement outfall is taken through the River Dee embankment, and will create a gap in the line of trees that screen views across the former Corus Garden City Northern Gateway site.

6.79. The Landscape Concept Plans submitted with the planning application outline the landscaping proposed as part of each phase of the Proposed Development. It is intended that landscape planting to the northern and western boundaries will be carried out as part of the Phase 1 and 2 construction works. This planting, which will consist of principally native species, bare root stock will be carried out in the first planting season after the completion of the works which will be at the end of the Phase 1 construction period. Grass and wildflower seeding works will similarly be carried out once the construction of roads and car park areas have been completed. Phase 1 of the Paper Mill Facility is due to be completed (subject to securing planning permission) at the start of 2024 and planting will be carried out in at the end of this year. This will include the majority of the planting around the High Bay Warehouse to the north-west and the hedge and tree planting to the south-west and south -east boundaries..

6.80. Phase 2 of the Paper Mill Facility is due to be completed in the second quarter of 2026. The planting carried out as part of Phase 1 will have become established. Phase 3 of the Paper Mill Facility is anticipated to be completed in the third quarter of 2035 and planting of landscape mitigation will be carried out in the fourth quarter of this year. Phase 3 includes the extension of the building towards the south-east and also an extension of the High Bay Warehouse to the north-west. The proposed completion of Phase 3 will be over 10 years after the completion of Phase 1 soft landscape works. The planting carried out as part of the enabling works and the Phase 1 development will have therefore become established in this time and be providing some low-level screening of the buildings and ground level activities particularly from the views from the north-west.

6.81. In total, the landscape concept strategy plans provides for a total of:

- 111 no. new trees extra heavy standard and heavy standard size;
- 1,400 lin.m. native species hedgerow;
- 2,585m<sup>2</sup> native thicket planting on a 1m grid;
- 10,820m<sup>2</sup> species rich grassland/wildflower seeded areas and
- 7,577m<sup>2</sup> mown grass areas.

6.82.



- 6.83. The Construction Phase of the development will result in a change to the character of the site from an open field to construction site, and will change the landform and site topography. The assessment also indicates that there will be impacts upon construction activities on the setting of the former Steelworks and Listed Buildings and Registered Garden and Impact on the removal of trees on the River Dee embankment for the creation of the drainage outfall. None of the impacts are assessed to be higher than minor/moderate adverse. The impact of tree removal is considered to have a minor adverse impact, with changes to the landform anticipated to have a negligible/minor adverse impact.
- 6.84. The Construction Phase is expected to result in residual visual impacts due to the presence of a crane and high level building operations, which will not be screened by hoarding or other mitigation measures. The main impacts will be experienced by the receptors close to the site, with views from the National Cycle Routes 5 and 568 along the north east and south west of the site will be the most significant, with the impact on National Cycle route 5 from VP4 and 6 considered to be high/substantial adverse, and where the route crosses the bridge over A494 is assessed to be moderate/high adverse. Moderate adverse effects are expected on the viewpoints 5, 7, and 10 from footpaths Sealand 3 and Sealand 1. Minor/Moderate adverse effects are anticipated from viewpoint 8 from the footpath/cycle route on the opposite side of the River Dee. It is noted that there is limited visibility from the residential areas in Garden City and therefore only negligible/minor adverse impacts are anticipated. The residual impact on national cycle route 568 north of the site is assessed to be negligible.
- 6.85. The Operational Phase following mitigation planting to the boundaries, is expected to result in minor/moderate adverse effects on landscape character of the site and as result of removal of trees at the outfall into the River Dee. A minor adverse on the setting of Listed Buildings and Registered Garden; a negligible/minor adverse effect on the topography. The assessment also considers that there will be a minor benefit as a result of the establishment of new planting.
- 6.86. In terms of visual impacts resultant from the Operational Phase of development, moderate/high or high/substantial adverse impacts are expected on five of the 16 viewpoints including: viewpoint VP3, VP4 and VP6 from National Cycle Route 5; viewpoint 10 from Sealand S1; and VP5 Sealand footpath 3, to the north of the site;. . A minor adverse effect is anticipated on five of the 16 viewpoints: including viewpoint VPI from Sealand Avenue; VP7 from Sealand 3, viewpoint VPII from the footway on Jubilee Bridge, VPI3 from PROW H19

on Castle Hill, and VPI4 from the recreation area in Wepre Park. The latter two viewpoints are at least 2.8 km from the site.

- 6.87. Negligible/minor adverse effects are anticipated from three viewpoints:, VP2 from Welsh Road, VP8 from footpaths WS8 and WS12 south of the River Dee, VPI2 from the footway on Crosstree Lane in Hawarden, some 3.5 km from the site. Neutral effects are anticipated on three of the 16 viewpoints including VP9 from the footbridge over the railway, VPI5 from the restricted byway south of Shotwick, and VPI6 from national cycle route 568.
- 6.88. The effects from viewpoints on the Sustrans National Cycle Routes in close proximity to the site, and as a result of the 39.65m High Bay Warehouse are indicated to be the most noteworthy effects. Mitigation planning proposed along the boundaries will once established provide some low level screening but the High Bay Warehouse and some of the chimney / flues, projecting above the parapet of some of the buildings would still be a prominent feature in a number of views, which will obscure and change views currently available of the wider rural landscape.
- 6.89. The LVIA concludes that the High Bay Warehouse will be visible from distant views to the south of the site. From viewpoint VPI2 and VPI3 the High Bay Warehouse is seen in the context of Deeside Industrial park, and large scale industrial buildings. The LVIA considers that there will be visual intrusion in the landscape in the viewpoint from VPI4 in Wepre Park.
- 6.90. From the nearby residential areas of Garden City (VPI and VP2) the High Bay Warehouse will be visible above rooftops from a number of vantage points, From Shotton and Queensferry, there will be no visibility of the Proposed Development. With regards to the new housing currently under construction, and the proposed development, these developments will benefit from the acoustic and visual screening, but the upper parts of some the proposed buildings and particularly the High Bay Warehouse will still be visible from within these areas.
- 6.91. The landscape and visual impacts of the Proposed Development need to be weighed against the wider benefits of the scheme. The heights of different sections of the proposed buildings which range from 10m to 21.25m from FFL and the proposed HBW at 39.65m high also needs to be considered in the context of existing features which surround and help screen parts of the site. This includes the poplars along the embankment to the River Dee are between 22m and 27m tall, the top of the tower on the Former Shotton Steelworks office building is

approximately 23m high; the blue building on TATA steelworks, on the opposite side of the Sustrans route 5 is approximately 20m tall and the ridge height of existing Amazon building, adjacent to the site is 13.5m.

- 6.92. It is also important to recognize that to deliver this strategic mixed use employment led site, the cumulative impact of all development secured outline planning permission across both the Airfields and Former Corus Garden City sites will result in a complete change to the landscape character of this area from agricultural and open fields to employment and residential uses.
- 6.93. These 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”, whereby industrial development sat cheek by jowl with residential development. Landscaping treatments introduced overtime in conjunction with the delivery of each plot on the strategic site will become more established, mitigating any overall impact of the built form and provide screening of individual developments. The presence of surrounding development to the Application Site and particularly the employment plots to the south and north-east will also reduce the visibility of the Proposed Development and help to assimilate it better into the overall site which will become more urban in character.

### **Built Heritage and Archaeology**

- 6.94. BWB Consulting has undertaken a Cultural Heritage and Archaeology ES Technical Paper, which forms part of the ES. This has been prepared in the context of the legislative framework, provided through provisions contained within: the Ancient Monuments and Archaeological Areas Act 1979, Planning (Listed Buildings and Conservation Areas) Act 1990 and Historic Environment (Wales) Act 2016, and the Policy Context provided by Planning Policy Wales (PPW) and supplementary guidance within Technical Advice Note 24 The Historic Environment, alongside best practice guidance prepared by Cadw.
- 6.95. PPW is clear that that the objectives for the historic environment are:
- *Protect the Outstanding Universal Value of the World Heritage Sites;*
  - *Conserve archaeological remains , both for their own sake and for their role in education, leisure and the economy;*

- *Safeguard the character of historic buildings and manage change so that their special architectural and historic interest is preserved;*
- *Preserve and enhance the character or appearance of conservation areas, whilst the same time helping them remain vibrant and prosperous;*
- *Preserve the special interest of sites on the register of historic parks and gardens; and*
- *Protect area on the register of historic landscapes Wales.*

6.96. Whilst the PPW is clear that the planning system should look to protect, conserve and enhance the significance of historic assets, it is accepted that there can be change, but that the impacts of any change upon the historic asset or its setting need to be managed in a sensitive and sustainable manner. PPW seeks to ensure that decisions “*fully consider the impact on the historic environment, and on the significance and heritage values of historic assets and their contribution to the character of place.*”

6.97. TAN 24 states that “*For any development within the setting of a historic asset some of the factors to consider and weigh in the assessment include:*

- *The significance of the asset and the contribution the setting makes to that significance the prominence of the historic asset*
- *the expected lifespan of the Proposed Development*
- *the extent of tree cover and its likely longevity*
- *non-visual factors affecting the setting of the historic asset such as noise*

6.98. Other factors which may affect the setting of a historic asset include: inter-visibility with other historic or natural features, tranquility, noise or other potentially polluting development though it may have little visual impact.

6.99. A corpus of work has been undertaken to understand the cultural heritage context of the site, including the historical built form. The Cultural Heritage and Archaeology ES Technical Paper 9 by BWB has also been informed by a Heritage Statement for Shotton Point prepared by Peter De Figueredo (2012 and 2017), and through engagement with Clwyd-Powys

Archaeological Trust (CPAT), CPAT development control archaeologist; and Historic Environment Service (Cadw).

- 6.100. The Cultural Heritage and Archaeology ES Technical Paper, states there are 10 Heritage assets within close proximity to the Application Site. These included the Grade II John Summers Headquarters Building- Former Corus Offices (85247) and later Former Office Buildings, Shotton Steelworks (87629); the former gardens of the Headquarters which are registered (120865). Heritage Assets located at the edge of the Study Area include Ferry Bank Farm (85249), and the North Pair of Aircraft Hangers (24541), the latter being part of an associated group of 3 pairs of First World War aircraft hangers (24540, 24539).
- 6.101. Other designated assets were noted outside the study area, within the built up area of Shotton to the south east. The assessment does not anticipate any development effects upon these assets given the distance and intervening build and landscape form.
- 6.102. A number of non-designated historic assets have been identified within the Application site and in close proximity to it. These include the park/flying field for RFC South Shotwick and subsequently RAF Sealand (121040). A damaged embankment for flood defence constructed in 1833 (34234), lies to the north western boundary, a Roman Broach, coin and mount were found in the eastern corner of the site. To the south of the Site at Queensferry is an undated earthworks interpreted as the remains of a possible Roman fort, although a modern origin is thought to be more likely. Setteoement activity continued in the wider area in the Roman period, with evidence of a sequence of Roman buildings at Pentre Farm Flint, 7km from the Site.
- 6.103. Within the 1km study area, there are 121 sites and 14 archaeological events. These are identified within Table 9.6 and 9.7 of the Cultural Heritage ES Technical Paper.
- 6.104. The ES Technical Paper notes that there are no Scheduled Monument (SM) within the search area, The presence of three SM's to the south of the site is noted, however it is concluded that there are no impacts on the identified scheduled Monuments.
- 6.105. The ES Technical Paper goes on to describe the historic assets and their significance, and considers the impacts of the development both during construction and operation.

- 6.106. The Construction Phase of the Proposed Development is anticipated to have the following impacts:

#### **Archaeology**

- 6.107. The assessment has determined that there are a number of potential archaeological assets within the study area, some of which have been recorded within the Site boundary. The assets within the Site relate findspots dating back to the Roman era.
- 6.108. In order to determine the potential for any Roman artefacts a geophysical survey will be undertaken prior to determination of the application.
- 6.109. It is noted that there are further archaeological assets within the surrounding countryside, however the Construction Phase of the development is not expected to have any direct impact upon them.
- 6.110. The assessment determines that there will be no impact upon the former RAF Sealand aircraft railway crossing to the north west of the site, the remnants of tarmac and crossing remains will be retained.
- 6.111. The Pillbox close to the southern boundary, will not be physically impacted upon by the Proposed Development, however the introduction of new industrial build is considered to compromise the open semi-rural setting across the fields to the north and northwest toward the Sealand embankment.
- 6.112. The RAF Sealand, Sealand embankment Pill box, will not be physically impacted by the Proposed Development but will be subject to an indirect adverse effect as a result of the change to its setting.
- 6.113. The complex defence structure/pillbox to the west will not be directly impacted upon by the development, however the semi-rural setting and spatial visual relationship between the assets will be compromised by intervening development.

#### **Built Heritage**

- 6.114. The assessment considers that the construction phase of development is likely to have an impact upon the following historic assets:

- John Summers Headquarters building – Former Corus Offices –
- Linked offices to the north west of John Summers Head Quarters buildings
- Headquarters Buildings Garden and Fore Court
- Hawarden Bridge
- Office and Laboratory Building (Building of Local Interest)
- Garage and Laboratory Building (Building of Local Interest)

6.115. The assessment concludes that adverse impacts are not anticipated during the construction phase on: Queensferry Bascule Bridge, the three associated, Grade II listed Aircraft Hangers, Ferry Bank Farm and Old Marsh Farm.

6.116. With regards to the Registered Historic Park and Garden associated with the John Summers Headquarters immediately to the south of the application site. The significance of the asset has been the subject of much discussion. Its inclusion on the Cadw/ICOMOS Register of Landscapes, Parks and Gardens of Special Historic Interest in Wales suggests that was designed, in part by the landscape designer Sylvia Crowe. However, work by Peter de Figueiredo demonstrates that the recreational garden is unlikely to have been designed by Sylvia Crowe or Brenda Colvin. This reduces the value attributed to the asset. It is noted that this is completely overgrown and bears little reflection to its previous use which is due to its dilapidated and over grown nature. The technical paper concludes that the garden has historic value as part of the recreational spaces provided for workers although it does not appear to have been laid out in conjunction with the office buildings.

6.117. With regards to the Grade II listed, Former John Summers Headquarters. The Technical Paper describes the significance and value of the building. The heritage values are considered to remain high. The ES Technical Paper concludes that the visual inter-relationship between the listed building with the later Steelworks office building to the east is of lower significance and is not obvious in external views into the site. The visual relationship with Hawarden Bridge to the west is of high significance and illustrates the historic relationship of the buildings. It is noted that the poor condition and vacancy of the building, poor aesthetic condition of the car

parking areas and forecourts along with and extensive security fencing detract from heritage value. It is noted that the building is relatively prominent in approaches along the north and south banks of the River Dee, with the tower being a notable landmark in longer distance views. The views are regarded as significant in illustrating the historic relationship of the building to the Dee corridor. The visual interrelationship of the listed buildings with the later Shotton Steelworks office building to the east is of lower significance and not obvious in external views towards the site.

- 6.118. With regards to the setting it is noted that whilst of historic interest the poor condition of garden and forecourt areas detract from the value of the buildings setting and significance. The woodland boundary enclosure are noted to provide a positive backdrop to the building in views from the south.
- 6.119. Some of the buildings are in a poor state, although it is noted that a charitable organisation, and local enterprise group ENbarr Foundation has taken on the building with plans to reuse and renovate the Grade II listed John Summers Building.
- 6.120. Peter De Figueiriedo's Heritage Statement explains that '*It should be appreciated that the juxtaposition of large and small scale buildings has always been a feature of the Shotton Steelworks, and Historic photographs show that the offices were designed to be close to , and seen in the conjunction with the vast rolling mills and production sheds.*'
- 6.121. The later office buildings are enclosed by the associated buildings and woodland, the setting being derived from the associative relationship with the John Summers headquarters building, and the former office laboratory, garage and boiler house buildings. It is stated that the inter-relationships are not part of a formally planned site but due to incremental change. Again the poor condition of the garden and forecourt serves to detract from the value of the buildings setting. The technical paper notes that the buildings themselves have limited visibility from the riverside or from the north due to the woodland enclosure.
- 6.122. The Harwarden Bridge is stated to hold historic value in its relationship to the infrastructure for the Iron Works and Steel Works Sites. And Architectural value is illustrated through the engineering of the structure. It is noted to be a prominent crossing point over the River Dee. The a strong positive visual inter-relationship with the 1907 steelworks office and with Queensferry Bascule Bridge is noted.



- 6.123. In relation to the two buildings of Local Interest that fall within the Shotton Point building group. It is stated that “both buildings have a degree of historic interest and group value, however their architectural value is of low order and poor aesthetic quality, as such the heritage value is low”. These buildings are not prominent in views from the south, and their setting is largely defined by their functional relationship to the listed office building and associated garden land. It is noted that they contribute positively to the setting of the Registered Garden and parkland, illustrating the historic role and function of recreational spaces for workers.
- 6.124. The Cultural Heritage and Archaeology ES Technical Paper identified 47 non designated heritage assets, and two buildings of local interest potentially affected by the Proposed Development including the Shotton Point former office and laboratory building constructed in the 1930's and the single storey garage and boiler houses (1930's).
- 6.125. In relation to the Queensferry Bascule bridge, the ES Technical Paper states that the Proposed Development will not adversely impact on the setting of the Bridge or its inter- relationship with the River Dee corridor and Hawarden bridge crossing.
- 6.126. With regards to the designated heritage assets located within the built up area of Shotton to the south of the site and the River, it is stated that there is a strong visual and physical buffer, and as such no impacts are identified.
- 6.127. The ES Technical Paper concludes that the construction works will not directly impact upon the identified historic assets. It states that ground level operations will be screened as a result of the intervening landscaping and woodland. The visual setting of Shotton Point buildings and garden and the Hawarden Bridge may be impacted by the presence of tower cranes, but the impact will be minimal due to the distances involved. Impact upon significant views towards Johns Summers Building and Hawarden Bridge are not anticipated to be directly affected due to the distances involved. The ES Technical Paper concludes that ‘given the distancing and in the context of the wider development of the Northern Gateway visual impact will be contained and relatively limited. A minor adverse impact is predicted upon the John Summers Building, and the associated Registered Garden. The visual impact on the Former Office Buildings, Shotton Steelworks, the locally listed buildings and Hawarden Bridge will be negligible/minor adverse. Minor adverse effects are anticipated on the Archaeological assets including the setting RAF Sealand Embankment Pillbox, the setting of RAF Sealand pillbox, Shotwick Embankment, and the Loss of unknown archaeological assets. However, with a

series of mitigation measures, including implementation of an Construction Environmental Management Plan (CEMP), landscaping treatment introduced in earlier construction phases, some of these temporary short term impacts are reduced to negligible.

- 6.128. Having identified the assets and their value, including the value of the setting, and Construction Phase Impacts, the ES Technical Paper considers the impact of Operational Phase. The key considerations and impacts of the Operational Phase are summarised below.
- 6.129. The ES Technical Paper notes that the Proposed Development will be designed to limit impacts on the historic environment, through consideration of the site layout and use and colour of material. The design considerations are discussed further within the Design and Access Statement, and summarised within the preceding section of this Planning Statement. Landscape mitigation will also be incorporated to soften any adverse impacts, where appropriate, as indicated in the preceding section of this Planning Statement and discussed in full within the ES Technical Paper 4.
- 6.130. A limited impact upon the setting of some of the designated assets is anticipated, particularly those within the former Shotton Steelworks to the south west. Landscaping will be considered to preserve aspects of setting and landscaping where practicable.
- 6.131. The Proposed Development is not anticipated to have a significant visual impact upon the setting of the three paired Aircraft Hangers, Ferry Bank Farm, Old Marsh Farm and Queensferry Bridge, due to the distancing and intervening built and landscape form.
- 6.132. The Proposed Development at the Site is considered to make a neutral contribution to the significance, within setting, of the assets at Shotton Point. It is anticipated to diminish the extent of historic openness to the assets at Shotton Point, however the new buildings will be 500m to the north west and will be viewed in the context of the wider development at the Northern Gateway, furthermore the land between the Site and Shotton Point will be developed, providing additional screening to the Proposed Development.
- 6.133. The ES Technical Paper concludes that the development will not directly impact upon the retained significance held within the fabric of the historic assets, and the immediate setting of the office buildings and associated non designated assets will remain legible. The interrelationship between Hawarden Bridge and John Summers office building will not be impacted, and views of the principal façade of the John Summers building will remain open in

aspects from the south. The visual relationship of the Bridge with the River Dee is concluded to not be significantly affected.

- 6.134. The visual impact on the setting of other buildings is anticipated to be less pronounced due to the extent of the existing enclosure. The ES Technical Paper also highlights that the Shotton Point buildings have historically been set within an industrial landscape, with a far greater extent of built form and transport infrastructure in the area and within longer distance views to the west.
- 6.135. The Proposed Development will lead to built form relatively close to the former steelworks buildings and will remove historic openness to their setting to the North and south east. The Proposed Development will not directly impact on the retained significance held within the fabric of the identified historic assets and the immediate setting of the office buildings and associated non designated heritage assets. The visual interrelationship between the Hawarden Bridge and the John Summers office building will not be impacted and views of the Principal faced of the latter will remain open from the south. The visual relationship of the bridge with the River Dee will not impacted on significantly.
- 6.136. The impact upon the Registered Garden and forecourt is anticipated to be negligible given the historic functional role of the land, and interrelationship with the building group. The Proposed Development will not impact on this interrelationship, or remove any element that contributes positively to its significance.
- 6.137. A minor adverse impact on heritage values, within setting of the John Summers Office Building, through loss of openness and minor visual impact of the new development. Impact on the Former Office Buildings, and associated Buildings of Local Interest is considered to be negligible. The impact on the Registered Headquarters Buildings Gardens and Forecourt is assessed as Minor Adverse, having regard to the historic openness of land to the north and east of the office buildings and garden area.
- 6.138. The impacts on Hawarden Bridge are considered to be minimal due to the historic and current industrial land uses within the setting. It is highlighted that the bridge remains set within a *“wider industrial landscape with views, particularly from the south-east, taking in industrial buildings, and chimneys, former wharf structures, electricity pylons and associated rail infrastructure”*. The Proposed Development is stated no to intervene into axial vies onto the bridge along the

River Dee, and the visual relationship with the Listed Office Buildings will be maintained, the impact is assessed as Negligible.

### **Archaeology**

- 6.139. In relation to the Roman findspots, there is a potential for subsurface remains in areas that have not been previously disturbed, to the south eastern part of the Site. A geophysical survey will be undertaken prior to determination of the planning application, which will understand the presence of any activity, and will inform any requirements for further investigations.
- 6.140. Archaeological sites without a statutory designation will be excavated and /or recorded to the satisfaction of the Council, in accordance with policy HE7.

### **Built Heritage**

The High Bay Warehouse (39.65m from FFL) is located away from the Grade II listed John Summers Building, and adjacent heritage assets. It is also positioned to the rear of the site at the furthest point from proposed and existing residential areas. This will reduce the visual impact of the scale massing of the High Bay Warehouse to the sensitive receptors.

- 6.141. As set out in preceding sections of this Report, in order to reduce any impact on the sensitive receptors and key views into the site the design, style and materials have been carefully considered to limit any adverse impact on any receptors, and assimilate the building into the surrounding environs. The proposed elevational treatment of the Proposed Development seeks to address the vertical scale of the High Bay Warehouse through the graduation 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 been selected as a reflection of the environment and as such, seeks to soften the visual impact of the building on the existing landscape.
- 6.142. To conclude, the residual impact upon archaeological assets during the construction phase is anticipated as follows: a moderate adverse impact on the Setting of Shotwick Embankment III, setting of RAF Sealand Pillbox V, and the loss of unknown archaeological assets. A minor adverse impact is expected upon the setting of the setting of RAF Sealand Embankment Pillbox, and on the setting of RAF Sealand aircraft railway crossing.

- 6.143. In terms of built historic assets, the construction residual impacts anticipated upon the former office buildings to the Shotton Steelworks (**85247, 87629**), the former office buildings to the Shotton Steelworks (**85247, 87629**), the impact upon the setting of buildings of local interest within the Shotton Point building group and the setting of Hawarden Bridge, the setting of buildings of local interest within the Shotton Point building group, and the setting of Hawarden Bridge, will range from negligible to minor adverse.
- 6.144. During the operational phase, the residual impacts on cultural heritage receptor are anticipated to include a Minor Adverse impact upon the setting of the Headquarters Buildings and Garden Forecourt. A minor adverse impact is anticipated upon the setting of the former John Summers Headquarters building. A minor negligible impact is anticipated on the setting of the linked office located to the north west of the John Summers Headquarters, the setting of buildings of local interest within the Shotton Point building group, and the setting of Hawarden Bridge.
- 6.145. No other significant effects are identified in respect to other built historic assets.
- 6.146. The ES Cultural Heritage and Archaeology ES Technical Paper confirms that 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.
- 6.147. In summary, ES Cultural Heritage and Archaeology ES Technical Paper confirms that PPW, chapter 6 is clear that where adverse impacts are identified, they should be considered with due weight attached to the nature, and extent of harm assessed, in the context of the wider planning benefits associated with the Proposed Development. These benefits are set out with earlier sections of the ES Socio Economic Technical Paper 6 of the ES and summarised within this Planning Statement.

## Other Material Considerations

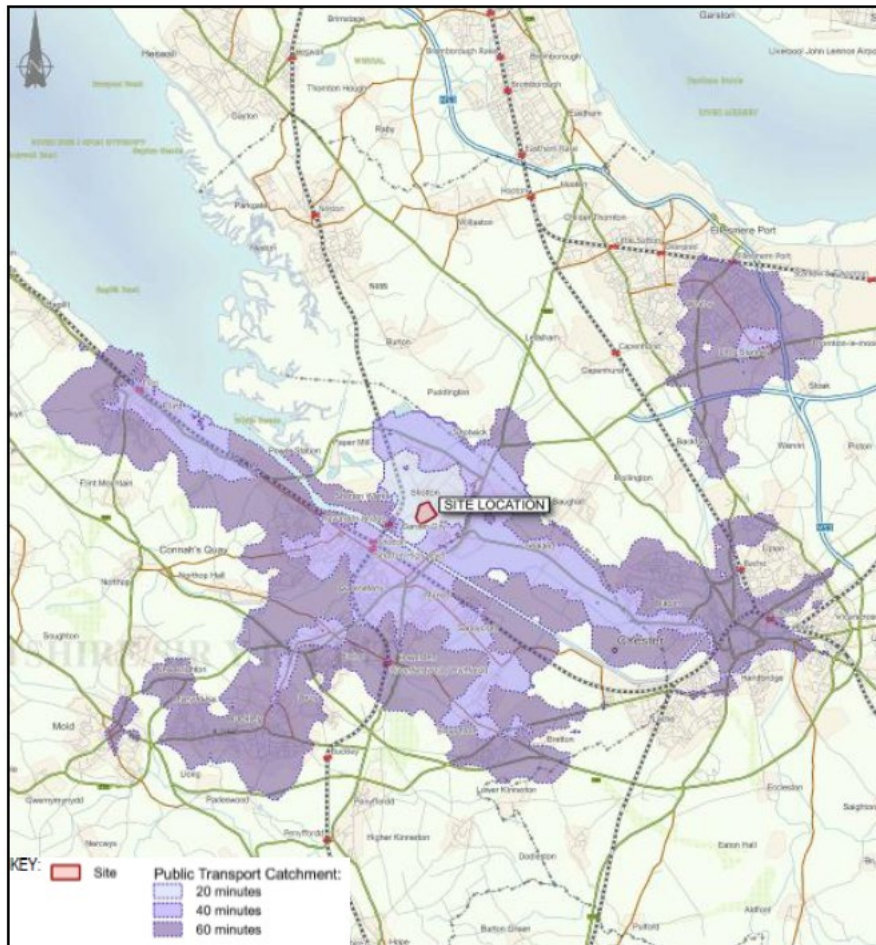
### Highways and Transportation

- 6.148. A Transport Assessment (TA) and Travel Plan (TP) have been prepared by Curtins as part of the planning application. A detailed analysis of highways and transportation issues is provided within the Environmental Statement submitted with this planning application.
- 6.149. In considering the impact of the current application proposal, Curtins have had regard to the outline planning approval for a comprehensive mixed use development under application ref: 054758 and subsequently amended under Section 73 planning application ref: 056550. Regard has been had to the likely staff numbers and shift patterns. Further consideration has been given to the applications for Approval of Reserved Matters relating to access Roads 2 and 3 of the highway works and associated infrastructure works (Application ref: 063191 and 063187) and the approval of the schedule of highway works, details reserved by condition no. 28 attached to planning application reference: 058990. Road 1 was constructed by Welsh Government as a priority junction (Application ref: 054488).
- 6.150. The Proposed Development will be served from the Welsh Governments proposed Commercial Spine Road 2 and 3, subject to a reserved matters application, June 2021. The 7.3 meter wide carriage way provide the opportunity to connect the CHEL and PGNGL elements of the Northern Gateway site with the local highway network. The Commercial Spine Road will create eight points of access and junctions into the Application Site, four of which from Road 3 along the south eastern boundary and four from Road 2 along the north eastern boundary. Phase 1 will be served from junctions 1,3,4 and 5 of Road 2, car movements and HGV movements onto the site will be separated, with Junction 1 and 4, providing access to staff and visitor car parks, and junctions 3 and 5 providing access to HGV parking and holding areas. Road 3, Junction 4 provides access to car parking for Staff operating the Paper Mill. Road 3, Junction 1, 2 and 3 will be in use from Phase 3, providing access to car parking facilities. All junctions will have gated access, with Junction 3, Road 2 having an entrance building and gatehouse.
- 6.151. In terms of wider circulation and access, Road 3 connects to Road 1, and the Corus access road on PGNGL owned land. Road 2 will also provide a public transport link into Deeside Industry Park, supporting the policy objectives of HSG2A.



- 6.152. The Commercial Spine Road and completed Road I and Corus Road have been designed to allow bus penetration into the site, and provide links through the wider Northern Gateway site and Deeside Industrial Park. Furthermore, a bus hub/interchange is proposed on land at the former Corus Garden City part of the Northern Gateway, and will serve to improve public transport connections in the area.
- 6.153. The Transport Assessment confirms that the site is located within an acceptable walking distance of the large existing residential areas of Garden City and Shotton, and within close proximity of wider services and amenities, including banking services, a supermarket, primary school and post office. The Deeside Leisure Centre to the south of the site provides opportunities for future employees. Two bus stops are located within walking distance of the development, and Hawarden Bridge Railway Station is within 1.2km walk of the Site. This serves to reduce to the need to travel by private car.
- 6.154. The ability to access the Site by sustainable means is further enhanced by the existing cycle facilities, with a shared foot/cycleway along the B5441, providing a traffic free, safe and convenient route for cyclists and pedestrians to access the Site. New Botanic Gardens, Shotwick, Capenhurst, Hawarden, Ewlow and Northhop, are all located within 8km of the Site, considered to be a reasonable cycling distance. Cycling is considered to be a highly realistic mode of travel for future employees at the Site.





**Figure 7.1 Public Transport catchment (source, Figure 4.3, Transport Assessment, Curtins)**

- 6.155. The assessment considers accessibility by Public Transport, highlighting that the site is highly accessible by Public Transport, importantly this includes locations which rank poorly in the Indices of Multiple Deprivation. There are frequent services operating within an acceptable walking distance of the Site, destinations include: Garden City, Shotton, and Queens Ferry located within 20 minutes of the site, and Showick, Shotton, Ewloe, Buckley and surround areas accessible within 40 minutes. Holywell, Mold, Birkenhead, Frith, Lache and Dunham on the hill are located within 60 minutes.
- 6.156. Hawarden Rail Station is 1.2 km from the site, regular service operate to Wrexham and Bidston, with ongoing services to Liverpool, North Wales, Chester, Manchester Piccadilly, Birmingham New Street and Hereford.



- 6.157. The area is also likely to benefit from proposed public transport improvements, including improvements to Hawarden Bridge and Shotton Stations, and new stations proposed at Deeside Parkway, and Broughton Parkway.
- 6.158. Having regard to the location, and service provision, walking, cycling and public transport use are considered to be realistic alternative modes of transport. The site is accessible from sustainable modes of travel consistent with national and local policy.
- 6.159. The Proposed Development makes provision for 331 car parking spaces, 26 HGV spaces, 13 motorcycle spaces and 70 cycle parking spaces, and the car park will be managed as part of the travel plan. The maximum level of car parking anticipated to be required by staff at any one time is 245 spaces, based on staffing levels and shift patterns/changeover periods, the proposed provision of 331 spaces exceeds this need by 86 spaces, and is considered sufficient. The provision is within the maximum requirements based on Flintshire County Councils Parking Standards. Up to 10% of parking spaces will support electric vehicle charging with 5% of parking spaces are proposed to be electric, with a further 5% ducted for future installation.
- 6.160. The Transport Assessment considers the Transport Implementation Strategy prepared by Arcadis, this assumes the full build out of consented developments across the Northern Gateway strategic allocation, including trips associated with the ICT Paper Mill Facility, It confirms that the Commercial Spine Road, the internal road junction and two priority junctions and points of access on to Welsh Road, are all forecast to operate within capacity during the AM and PM peak periods.
- 6.161. The Transport Assessment confirms that as part of the previous outline planning permissions on the Airfields and former Corus Garden City site, it was identified, through detailed traffic modelling and junction analysis, the requirement for off-site infrastructure improvements in order to mitigate the traffic impact of the approved outline schemes (including the traffic generated by the Paper Mill Facility). These package of mitigation works have already been undertaken through works triggered by other development on the Airfields site and there are no further off-site highway works to facilitate the Proposed ICT Paper Mill Facility. Details of the off-site mitigation works are detailed in the supporting Transport Assessment appended to the ES Traffic and Transportation Technical Paper 2.
- 6.162. Curtins have demonstrated in the Transport Assessment that the Proposed Development meets the aims and objectives of national and local transportation policy. The proposed

mitigation measures (already undertaken) will help to reduce the sites overall impact on the highway network. Curtis concluded from a traffic and transportation perspective there are no reasons why the planning application should not be granted. The Proposed Development is consistent with the objectives of PPW there is good access to local facilities and amenities by active travel modes and public transport. It is consistent with other national and local guidance including the Deeside Plan and the Development Plan, in particular UDP Policy AC13, and emerging policies PC5 and PC6.

### Ground Conditions

- 6.163. JPG Group have undertaken a Geoenvironmental Ground Investigation of Plots B and C of the Airfields site in December 2018 on behalf of CHEL. Prior to that a Geoenvironmental Desk Top Study was carried out in 2014. A further Geo environmental Phase I Study has been undertaken by SGI Consultants in 2021 and is appended to the Geology and Ground Conditions ES Technical Paper 1.
- 6.164. SGI consulted with Flintshire County Council, Natural Resources Wales, the Coal Authority, Public Health England, and Health and Safety Executive.
- 6.165. The Ground Investigation confirms that Plot C comprises undeveloped grassland with well-maintained low-lying vegetation. As a result the presence of asbestos containing material is not anticipated.
- 6.166. SGI has reviewed BGS records and a borehole located c. 10m southwest of the Site boundary identified 15.24m of SAND overlying 1.07m of sand and gravel. The granular soils were in turn undrained by boulder clay (with interbedded sand bands) to a depth of 46.89m bgl. A red SANDSTONE was recorded at 46.89m bgl. There are no geological faults within 500m of the Site.
- 6.167. The Phase II Geoenvironmental Site Investigation completed by JPG identified the following with respect to the ground conditions at the Site:
- Made Ground**
- 6.168. Reworked topsoil was encountered at all exploratory hole locations across the Site. The thickness of topsoil was typically less than 0.20 m. The topsoil generally comprised dark brown silty sand with abundant rootlets. Anthropogenic inclusions were generally absent from the topsoil.

- Natural Strata - Granular**
- 6.169. Natural Tidal Flat Deposits were found to underlie the reworked topsoil at all exploratory locations. The underlying natural deposits consisted of granular light greyish brown medium dense to dense sand, with frequent, disseminated shell fragments. The granular strata were encountered to a maximum depth of 15m bgl; the base of the unit was not proven.
- Natural Strata – Cohesive**
- 6.170. Clay was encountered during the investigation at eight exploratory hole locations. Generally, the cohesive natural strata were identified as lenses and thick laminations. The cohesive material comprised soft to firm, dark greyish brown, sandy clay. Clay horizons were noted within trial pits at depths of between 0.15m and 2.00m bgl and within boreholes at depths of between 7.50m and 9.00 m bgl.
- 6.171. The underlying bedrock was not encountered during the 2018 ground investigation due to a maximum drilled depth of 15.0m bgl, with all exploratory holes terminating within dense sand.
- 6.172. The investigation did not include any chemical or geotechnical analysis of soil and groundwater samples
- 6.173. The Environmental Agency (EA) indicates the Site is not located within a Groundwater Source Protection Zone or Drinking Water Safeguard Zone.
- 6.174. There are no groundwater abstraction boreholes located within 2000 m of the Site.
- 6.175. Based on the local topography and location of surface watercourses it is considered likely that shallow groundwater, if present, will flow in a southerly direction, gradient towards River Dee.
- 6.176. Based on the initial geological assessment, a review of available topographic data and pertinent mapping, SGi has undertaken a preliminary geomorphological assessment of the landform and its possible mechanism of formation.
- 6.177. The Site is predominantly underlain by Tidal Flat Deposits – they are deposited on extensive nearly horizontal marshy land in the intertidal zone that is alternately covered and uncovered by the rise and fall of the tide. They consist of unconsolidated sediment, mainly mud and/or sand. They may form the top surface of a deltaic deposit, normally a consolidated soft silty clay, with layers of sand, gravel and peat.

- 6.178. The Site is relatively flat and historically is likely to have formed part of the Deeside estuary and historic boreholes in the area record significant depths of 'sea sand' adjacent to the Site.
- 6.179. The Site is not situated in an area affected by brine pumping / extraction or rock salt mining.
- 6.180. The Site is not located within a Coal Authority 'Development High Risk' Area. Therefore, the risk from coal mining is very low and no further assessment is required. The JPG Desk Study Report also indicated that the Site is in an area unlikely to be affected by mine workings. Based on this and the investigative works carried out to date, the risk to the Site from instability due to shallow mine workings is considered to be low.
- 6.181. In terms of hydrology Shotwick Brook forms the western boundary of the Site, orientated NE to SW flowing towards the River Dee. The River Dee is located c. 430m south of the Site boundary.
- 6.182. The Site is located within a currently defined Flood Risk Zone C1; which is an area with significant infrastructure served by flood defences.
- 6.183. The Groundsure Report confirms the presence of a lower tier Control of Major Accident Hazard (COMAH) site located c. 455m west of the Site, operated by Tata Steel UK Ltd.
- 6.184. The Groundsure Report confirms the absence of the following Hazardous Installations within 250 m of the Site:
- Explosive Sites;
  - Notification of Installation Handling Hazardous Substances (NIHHS);
  - Planning Hazardous Substance Consents; and
  - Planning Hazardous Substance Enforcements.
- 6.185. A Groundsure Report indicates the Site is situated in an Intermediate Probability Radon area, where between 5-10% of homes are estimated to be above the Action Level. The BGS reports that radon protective measures are necessary in the construction of new buildings on the site.
- 6.186. The UK Soil Observatory Map Viewer datasets referred to in the SGI Report details the topsoil concentrations of five potentially harmful elements (PHEs): Arsenic (As), Cadmium (Cd), Chromium (Cr), Nickel (Ni) and Lead (Pb). Elevated concentrations of these PHEs can

exist because of natural geological conditions or possible anthropogenic sources. A comparison of these estimated concentrations with relevant Tier I values would indicate that these heavy metal compounds would not pose a development constraint. The Site is also assessed to be located within a Low to Moderate sensitivity setting.

- 6.187. SGi has completed an assessment of potential geotechnical constraints based on the available desk-study information within the context of the proposed industrial development. This confirms no significant sources of contamination have been identified. Based on the results of the chemical tests previously carried out, no sources of contamination have been identified. Therefore there are no remediation requirements for the Site with regard to soil or water. Depending on structural loads, piled foundations may be required.
- 6.188. The regional unexploded bomb risk map from Zetica indicates that the Site is in an area of Deeside at low risk from possible Unexploded Ordnance (UXO) resulting from the Second World War.
- 6.189. There are no landfill sites (current or historic) recorded within 250 m of the Site boundary.
- 6.190. In accordance with Environment Agency, LC:RM (2019) and BSI 10175 (Code of Practice for Investigation of Potentially Contaminated Land), SGi Ltd has developed an initial CSM to identify potential contamination sources, migration pathways and receptors within the study area. The following potential on-site sources of contamination have been identified:
- Any existing Made Ground deposits underlying the Site may be a potential source of heavy metals, asbestos, PAH and TPH compounds.
  - There are no potentially significant off-site sources of contamination located in close proximity to the Site, other than a historic railway (now cycle path).
- 6.191. No significant sources of heavy metals have been identified at the Site; however, the presence of local heavy metals, non-volatile PAH and TPH compounds associated with infilled field boundaries or Made Ground deposits cannot be discounted, as such, there is considered to be a very low risk to human health.
- 6.192. If impacted soils are present, localised remediation may be required, however, any low-level impact will likely be capped by hardstand or a cover system in soft landscaped areas thereby removing the exposure pathway be removed.

- 6.193. No Site wide asbestos containing material is anticipated given the undeveloped nature of the Site.
- 6.194. However, the presence of local areas of Made Ground and ACM cannot be entirely discounted.
- 6.195. If encountered, ACM poses a risk through fibre and dust inhalation and if present may pose a risk to construction workers during any future earthworks / demolition and to adjacent third-party property should dust be generated during those works. These risks can be mitigated through the development of a detailed enabling works strategy following guidance and protocol specified within the Control of Asbestos Regulations (2012) and industry best practice as detailed in CIRIA733 (Asbestos in Soil and Made Ground: A guide to understanding risk).
- 6.196. The presence of alluvial soils (Tidal Flat Deposits) may represent a low-level source of ground gas which may pose a risk to human health.
- 6.197. Should a ground gas risk be identified, the risk to construction workers can be mitigated through appropriate management of confined space entry, whereas the risk to future end users can be mitigated through the adoption of suitable control measures within the building construction using guidance presented within CIRIA 665 (Assessing Risk Posed by Hazardous Ground Gases to Buildings) and BS8485 (Code of practice for the design of protective measures for methane and carbon dioxide ground gases for new buildings (2015 and A1:2019)).
- 6.198. The presence of low pH and high sulphate within any Made Ground deposits may result in corrosion of buried concrete within the Proposed Development. Assessment must be undertaken to confirm the levels of pH and sulphate within Made Ground deposits and thus determine the concrete classification.
- 6.199. In conclusion, given the undeveloped nature of the Site, there are unlikely to be any significant sources of contamination present that would pose a significant risk to human health or prejudice the future commercial development at the Site. However, local low-level impact associated with any Made Ground deposits cannot be entirely discounted.
- 6.200. The Initial Conceptual Site Model has not identified any potentially significant on-site sources of mobile contamination, as such the Site is deemed to pose no unacceptable level of risk to

controlled waters. The presence of alluvial soils (Tidal Flat Deposits) may represent a low-level source of ground gas which may pose a risk to human health.

- 6.201. A moderate risk of running sand and compressible ground is recorded at the Site, likely associated with the Tidal Flat Deposits. Depending on the likely loadings, the most feasible foundation option is likely to be driven piles set into (or onto) competent strata.
- 6.202. The ES Geology and Ground Conditions Technical Paper I outlines a number of construction and operational phase mitigation measures which results in negligible residual effect on impacts and receptors. These include a range of measures controlled through implementation of an approved CEMP. If a ground gas and radon risk is identified through further investigations, additional mitigation measures will need to be defined prior to commencement of development to prevent to prevent gas migration.

In conclusion, the ES Geology and Ground Conditions Technical Paper I concludes that any negative impacts are likely to be minor and transient being restricted to the construction phase and controlled with appropriate mitigation. This assessment goes on to conclude that there will be an overall negligible effect once the development reaches its operational phase. On this basis, there are no identified constraints in relation to the ground conditions that would preclude the development of the site.

### **Flood Risk, Drainage and Water Quality**

- 6.203. A Flood Consequence Assessment (FCA) and Water Environment ES Technical Paper 3 have been undertaken by Arcadis.
- 6.204. The FCA Paper Mill Facility proposals are located with the vicinity a number of existing waterbodies. This includes:
- The River Dee is located approximately 0.4 km to the south of the Site. This section of the River Dee is tidally dominated and benefits from flood defence infrastructure, which comprises raised earth embankments. The River Dee is designated a main river and is a designated RAMSAR, SSSI, SPA and Natura 2000 Site.
  - Shotwick Brook is culverted under the disused railway via a 2500 mm wide arch culvert in the north-west corner of the Site before flowing in open channel in a predominately south-westerly direction along the western boundary of the site.



Shotwick Brook ultimately outfalls to the River Dee via a flapped outfall after being culverted under the existing John Summers buildings to the south-west. Shotwick Brook is designated a main river.

- Garden City Drain enters the Site via a 900 mm culvert in the north-east corner of the Site. The watercourse remains in open channel flowing in a westerly and then south-westerly direction, outfalling to Garden City Drain West. Garden City Drain is designated main river.
- Manor Drain enters the Site via a 1200 mm diameter culvert under the A494 before flowing in open channel in a north-westerly direction along the south-east boundary of the Site to its confluence with Garden City Drain West. Manor Drain is designated a main river.
- Garden City Drain West is located to the south of the site. The watercourse remains in open channel, flowing in a south-westerly direction and ultimately outfalling to the River Dee via four flapped outfalls. Garden City Drain West is designated a main river.
- Northern Drain is culverted under the disused railway in the north-east corner of the Site. The watercourse subsequently flows in open channel in a predominately westerly direction along the northern boundary of the site to its confluence with Shotwick Brook. A swale connects Northern Drain with Garden City Drain via a culvert through the Phase I Spine Road on the Airfields site. Northern Drain is designated an ordinary watercourse.
- East Camp is an existing 975 mm diameter culvert which enters the site in the north-east corner and takes surface water flows from the RAF Sealand East Camp. The culvert has been diverted and outfalls to the new Garden City Drain open channel.

#### **Flooding from Sea**

6.205. Planning Policy Wales Technical Advice Note 15 – Development and Flood Risk (TAN15) (WG, 2004) Development Advice Map 2019 classifies the majority of the site as being located within Flood Zone C1. Flood Zone C1 is defined as, “Areas of the floodplain which are developed and served by significant infrastructure, including flood defences”. A very small part of the site, in front of the Dee defences and corresponding to the proposed outfall location is



shown to be at high risk of flooding from the sea, an annual chance of flooding greater than 1 in 30 (3.3%).

- 6.206. The Weetwood 2020 FCA addendum, appended to the Arcadis FCA has quantified tidal flood risk during both defence overtopping and breach scenarios. The results show that no flooding of the Proposed Development site was modelled in the current day 0.5% (1 in 200) or 0.1 % 1 in 1000, overtopping tidal events. An allowance for climate changes was incorporated into the 2088 model scenario, and no inundation of the Proposed Development site, as a result of overtopping, was predicted in the 0.5% (1 in 200) 2088 tidal event.
- 6.207. In relation to breaches along the right bank of the River Dee, in the upstream breach scenario for a 1 in 200 year event, the southern portion of the Site would be inundated, with depths up to 1.00 meters. In the downstream breach scenario no flooding of the Site, was predicted for the 0.5% 1 in 200 year tidal event. Weetwood modelled the inclusion of the proposed mitigation measures, this indicated that the Site would be flood free in all tidal events modelled.
- 6.208. The FCA considers that with the proposed flood risk mitigation measures in place the Site is considered to be at low risk of tidal flooding.

#### **Flooding from surface water**

- 6.209. The Site is at very low risk of flooding from surface water and small watercourses, equivalent to an annual chance of flooding of less than 1 in 1000 (0.1%). The FCA notes that there are some small isolated areas of the Site shown to be at low risk of flooding from surface water and small watercourses between 1 in 1000 (0.1%) and 1 in 100 (1%). These areas are located in depressions and not considered to pose a significant risk. Whilst the development of the Paper Mill Facility will increase the impermeable land coverage, which could result in increase in surface water runoff, the risk will be mitigated through a surface water drainage strategy.
- 6.210. The FCA considers that the Site is at low risk of flooding from surface water and small watercourses, and subject to the implementation of the drainage strategy, the risk can be suitably managed. It is not considered that the Proposed Development would increase third party flood risk.

#### **Flooding from Groundwater**

- 6.211. The FCA considers that the risk of clearwater flooding is considered remote. Groundwater was recorded across the site of between 1.1. and 2.7 meters below ground level in a Geo

Environmental Appraisal (2013), and subsequently have been recorded at between 0.9 and 3.9 m below ground level. The assessment considers that with the local topography, the groundwater is considered to be linked to the River Dee. As the River Dee is tidal at this location, high groundwater levels are not expected over an extended period of time. The FCA notes that risk of groundwater flooding is considered remote. The extensive network of drainage channels is expected to significantly reduce the risk of flooding from this source. It is possible that groundwater ingress could occur within the drainage swales. Risks can be mitigated, any flooding would likely be at shallow depths, and not expected to pose a risk to the Proposed Development.

**Flooding from sewers.**

- 6.212. There is no history of sewer flooding events, the Proposed Development will be served by gravity and pumped systems that will discharge into a new foul sewer designed to serve the wider Northern Gateway development site.

- 6.213. The FCA considers that the Site is at low risk at flooding from sewers.

**Flooding from Reservoirs, Canals and other Artificial Sources.**

- 6.214. There are no canals or other impoundments located within the immediate vicinity of the site. The NRW Reservoir Flood Risk Map indicates that the site is not at risk of flooding from such sources. The Site is therefore not considered to be at risk of flooding from reservoirs, canals or other artificial sources.

**Flood Risk Mitigation**

- 6.215. Flood risk mitigation for the Northern Gateway, including the Site, has been developed strategically. A suite of measures have been developed and agreed with Natural Resources Wales (NRW), and Flintshire County Council. The FCA has been prepared based on the previous works undertaken and aligned with the Flood Risk mitigation measures that have been previously agreed. Some mitigation measures within the Weetwood 2020 FCA Addendum have been constructed or are under construction. The raising of the River Dee embankment crest, between the railway line and the A494, to a minimum of 7.20 meters has been completed. Works to be completed include some works to the Garden City Drain, Northern Drain, and some culverting works, widening of the Northern Drain and landscape strategy works including the creation of swales.
- 6.216. The Plots C (The Site) and D enabling works include implementation of the following flood risk mitigation measures:

- Lowering ground levels along the left (south) bank of Northern Drain to 4.20 m AOD.
- Lowering ground levels along the left (east) bank of Shotwick Brook to 4.20 m AOD.
- Creation of a swale between Plots C and D that will connect to the swale constructed as part of the works associated with the Road 2 and 3 Welsh Commercial Spine Road.
- Lowering ground levels over the existing DCWW rising main to 4.38 m AOD to allow water to spill from Shotwick Brook and into the proposed swale between Plots C and D.

6.217. Proposed mitigation for the site will be based on the agreed flood risk mitigation criteria, including works to Shotwick Brook and Northern Drain and offsite works to Sealand Bank Farm culvert, and setting Finished Floor Levels above the minimum agreed level of 4.98m AOD for all buildings except for the High Bay Warehouse. The High Bay Warehouse is required to be set at a lower level of 4.6m, in order ensure the effective operation of the loading bays, as a result a 1 meter high retaining wall will be constructed to completely surround the HBW foundation slab. The FCA notes that this will provide for flood protection in excess of the required minimum. The finished floor levels (FFL) of the main buildings which will be set at 5.25 m AOD, the office building at 6.15m AOD and the gatehouse building at 5.371m AOD.

6.218. A key element of the Flood Mitigation Plan outlined in the approved Weetwood FCA Addendum Report is the requirement to upgrade the culvert at Sealand Bank Farm. This culvert is on land owned by PGNGL and the works proposed include upgrade to a 2.00 m wide by 1.25 m high box culvert with natural bed material to a depth of 0.25 m.

6.219. The target date for completion of the culvert works is March 2022 and as a key component of the flood risk management strategy for the wider Northern Gateway site, these works are subject to a tri-partite contractual agreement between Welsh Government, CHEL and PGNGL. As detailed in the FCA, the Paper Mill Facility Phase I works are programmed to commence in June 2022, and this FCA is therefore based on the “Amended Flood Mitigation Plan” agreed with NRW which assumes the Sealand Bank Farm culvert upgrade to be in place. An alternative approach is not required on the basis of the timing of the proposed culvert

works. Works will be undertaken in parallel with the proposed Road 2 and 3 of the Commercial Spine Road which the proposed Paper Mill will be reliant on to facilitate access into the site. It is proposed that a Grampian planning condition could be attached any subsequent planning permission for the Paper Mill Facility that prevents the start of the development until any off-site works to the culvert that the Flood Mitigation Plan relies on have been completed on land not controlled by the Applicant.

- 6.220. The FCA also confirms the Proposed Development includes the construction of a new outfall from the Paper Mill to facilitate discharge of operational effluent to the River Dee. This planning application seeks planning permission for this new headwall, which is proposed to facilitate the discharge. This headwall has been designed in consultation with NRW and any temporary works to construct the outfall, as well as the operation of the structure, would be subject to the conditions of a Flood Risk Activity Permit issued by NRW. Details of the headwall design are provided in Appendix 9 of the ES Part I Report.

The ES Water Environment Technical Paper 3 and ES Ecology and Nature Conservation Technical Paper 5 report that there is a potential for operational impacts to the River Dee and BALA Lake SAC/SSSI relating to the temperature and volume of treated waste water discharged into the River Dee. However this will be controlled through measures contained in the Environmental Installation Permit. With controls measures agreed to a level confirmed in the HI Water Screening Assessment contained in the Marine Discharge Assessment (appended to the ES Water Environment Technical Paper 3), the measures will ensure that the proposed discharge will not significantly alter the temperature of the receiving river water throughout the year in a manner which would adversely impact upon the qualifying features of the SAC/SSSI.

- 6.221. During construction, all works with the potential to impact on flow conveyance and flood risk will be undertaken in accordance with Flood Risk Activity Permits from NRW. Works will be required not to cause detriment to the flow regimes of watercourses and no increase in flood risk either up or downstream.
- 6.222. Surface water runoff will be managed in line with national and local policy requirements through the implementation of the surface water drainage strategy which will include SuDS features to ensure no detrimental effects on Site or neighbouring/third party land.

- 6.223. Following on site treatment, waste water from the paper manufacturing process will also be discharged to the River Dee via one outfall. The discharge would be made in accordance with the conditions of an NRW Environmental Permit (discharge consent). The discharge would be routinely monitored, to ensure compliance with water quality standards.
- 6.224. In conclusion, the FCA demonstrates that subject to the implementation of the agreed flood risk mitigation measures described in the amended flood mitigation plan and the surface water drainage strategy, flood risk to the Site would be acceptable and the development would not increase the flood risk to third party land, consistent with the requirements of TAN 15. There are no Flood Risk or Drainage constraints that would preclude the development of the site for employment purposes.

### **Ecology and Nature Conservation**

- 6.225. Tyler Grange have prepared the ES Ecology and Nature Conservation Technical Paper 5 for the Environmental Statement submitted alongside this application. This was supported and informed by a range of surveys including, an Extended Phase I Habitat Survey (July 2021), Badger Survey (July 2021), Reptile surveys (August to September 2019), Water vole/otter surveys (June – September 2019 and updated in July 2021). The ES Technical Paper provides a detailed analysis of ecology issues.
- 6.226. The Technical Paper considers the impacts of the proposed development on ecological resources including protected sites, habitats and protected and priority species, and is informed by desk based study, site survey work and published guidance.
- 6.227.
- 6.228. The Site is not covered by any statutory or non-statutory designations. Eight statutory and nine non-statutory nature conservation sites were noted within the Zone of influence around the Proposed Development site. This includes the following:
- River Dee and Bala Lake, SAC
  - River Dee, SSSI
  - Dee Estuary, SAC
  - Dee Estuary, SPA

- Dee Estuary, Ramsar
- Dee Estuary, SSSI
- Deeside and Buckley Newt Sites, SAC
- Connah's Quay Ponds and Woodlands, SSSI
- Shotton Lagoons and Reedbeds, SSSI
- The River Dee, LWS
- Shotton Bank 1 and 2, LWS
- Engineer Park 1 and 2, LWS
- Wepre Wood, LWS
- Shotton Steelworks, LWS

6.229. The closest included the River Dee and Bala Lake SAC/SSSI directly adjacent to the southern boundary, which only extends to the River Dee to allow discharge of the Waste Water.

The ES Technical Paper confirms that an assessment relating to potential construction phase impacts on the River Dee and the other statutory sites and non-statutory sites identified that potential construction phase impacts could be mitigated through the production and implementation of a CEMP for the site. Specific mitigation measures for this SAC and its qualifying features to be included within a CEMP to be agreed prior to construction works commencing. The CEMP will be informed by an Appropriate Assessment.

6.230. Mitigation in relation to the potential operational impacts on the River DEE SAC/SSSI and Dee Estuary SAC/SSSI will be controlled through the Environmental Installation Permit for the discharge into the River Dee. Any Operational phase impacts on the River Dee and Bala Lake SAC/SSSI relating to the temperature and volume of water discharge from the Paper Mill into the River Dee SAC/SSSI will be controlled through measures contained in the Environmental Installation Permit. The measures will ensure that the proposed discharge will not significantly alter the temperature of the receiving river water throughout the year in a manner which would adversely impact upon the qualifying features of the SAC/SSSI.

6.231. Mitigation regarding potential operational phase impacts on the River Dee and Bala lake SAC/SSSI relating to the temperature and volume of water discharge into the River Dee SAC/SSSI will need to ensure that the proposed effluent from the Paper Mill would not significantly alter the condition (including temperature) of the receiving river water throughout the year in to an extent that would adversely impact upon the aforementioned qualifying features. Details of this will be set out in the Environmental Permit for the discharge and considered in the Appropriate Assessment.

6.232. Adherence to the conditions of the Permit and any mitigation will safeguard the water quality of the River Dee and ensure that any potential impacts on the River Dee and qualifying features of the nature conservation designations for which the River is designated will be negligible.

#### **Habitats**

6.233. The Habitat survey identified the following habitats within the Site: Arable Land; Bare ground; Grassland (amenity); Grassland (poor semi-improved); Hedgerow (intact species poor); Marginal vegetation; Tall ruderal; Watercourse; Woodland. None of the habitats within the site were considered to be of greater than local ecological importance and none are representative of habitats of conservation concern under national or local biodiversity action, with the exception of the Watercourses, which the application only extends to the River Dee in order to discharge waste water, the construction of the outfall is considered to have a negligible impact on the habitat at this location.

6.234. The main habitat loss relates to poor semi-improved grassland and arable land of negligible ecological importance with some smaller scale losses of hedgerow and woodland habitat of local ecological importance. The habitat loss will be mitigated through the creation of new habitats, in accordance with the Framework Mitigation Strategy for the wider Outline Application for the Northern Gateway, within the Plot C enabling works area currently under construction, immediately adjacent to the Application Site. This includes measures such as re-seeding existing grassland, the creation of small bunds, bramble and scrub planting, no additional mitigation in this regard is required. The habitats will be subject of an Ecological Conservation Management Plan (ECMP), which will ensure habitats are managed and protected from incidental disturbance and habitat degradation due to lack of maintenance during the operation of the Proposed Development. This is considered to result in a residual minor beneficial impact overall.

- 6.235. The majority of habitat to be lost comprises arable land which is of negligible ecological importance. It is noted that it does have some value for overwintering birds, this is mitigated against through the provision of funds to a nearby RSPB lapwing mitigation project. Some habitats were assessed as providing negligible/site importance and are noted to offer value to nesting birds/small mammals (including bats). Their loss does not require any specific mitigation, the Framework Ecological Mitigation Strategy for the wider Outline Application at Northern Gateway incorporated the inclusion of ecological mitigation areas, which would secure long-term benefits for wildlife and habitats. Details are provided in the Technical Paper.

**Protected and Notable species**

- 6.236. With regards to protected and notable species, survey revealed the following:
- No badgers setts on Site;
  - No potential bat roost sites on Site, potential commuting sites between Shotwick Brook and Garden City drain, and potential for use of Shotwick Brook and Northern Drain, adjacent to the site for foraging and commuting;
  - Nesting birds within and adjacent to the site, including song thrush, linnet, reed, willow warbler, dunnock, lapwing, skylark, redwing, starling, snipe, and meadow pipit. Adjacent to the Site at the River Dee, the site was used by redshank, herring gull, lapwing, blackheaded gull, little egret, grey heron, and cormorant.
  - Absence of Great crested newts, common toad and common frog likely to be present.
  - Some evidence of presence of Mink along Shotwick Brook.
  - No evidence of otter.
  - Small population of common lizard and grass snake adjacent to the Site at Shotwick Brook.
  - Population of water vole along Shotwick Brook.
- 6.237. The ES Technical Paper states the effects of the Proposed Development are considered to comprise:



- Potential disturbance to commuting/foraging routes for bats;
- Potential for damage/disturbance to active nesting birds;

6.238. It has been assessed that the potential impacts on protected and notable species can be adequately mitigated through the implementation of a Construction Environmental Management Plan, detailing sensitive methods and timings for works, along with pollution prevention measures and the implementation of EcMP to maintain quality of retained/created habitats in perpetuity. Measures include making sure that no lighting is directed towards wildlife habitats, installation of heras fencing with hessian screening around selected boundaries, works to take place outside nesting season, or checking vegetation prior to commencement of works.

6.239. It has been assessed that over the short to medium term there would be negligible impacts on all habitats and protected/notable species; all potential impacts on Natura 2000 sites, and consequently their SSSI components) would be mitigated for controlled through appropriate mitigation measures put forward as part of respective Appropriate Assessments for each phase of development.

6.240. In the long term it is concluded that the site and wider development parcels would introduce minor beneficial impacts for a range of protected species overall once habitats have matured and ecological management plans have been implemented.

6.241. The approach is therefore in accordance with national and local policy and guidance, in particular Policy WB2 and WB5.

### Noise

6.242. Cundall have prepared an ES Technical Paper 7 on Noise and Vibration, providing detailed analysis of noise and vibration issues. The Paper considers the baseline conditions at the Application Site and surrounding, the anticipated effects and mitigation measures required to prevent, reduce or offset any significant adverse effects. The receptors include, Dee Bank Cottages, The Lodge and Old Hall Farm, Residential dwellings at Garden City, John Summers Building, Sealand Community Primary School, Future residential, Future employment uses, and other residential receptors adjacent to roads assessed as part of Transport Assessment.

6.243. Baseline surveys have been undertaken and consideration has been given to noise and or vibration effects on sensitive receptors and their occupants during construction works and

associated with the operation of the Proposed Development, alongside the effects arising from increased noise resultant from changes in traffic flows due to the proposed development.

- 6.244. The assessment considers that the Proposed Development may have a Minor Negative impact on affected sensitive receptors, resulting in a Minor Adverse Significance of Effect.
- 6.245. A Construction Environmental Management Plan (CEMP), will set out appropriate controls for noise and vibration during the construction phase. Best practice mitigation measures have been provided in the Framework Construction Environmental Management Plan submitted within the Environmental Statement.
- 6.246. In terms of the operational phase, it is understood that the following mitigation measures are to be adopted at the proposed residential development on the opposite site of the commercial spine road, and have been included within the operational phase noise modelling:
- Receptor F-2.6m tall earth bund with 1.4 acoustic barrier positioned on top along the full boundary extent with the commercial spine road, currently under construction.
- 6.247. Good acoustic design measures have been incorporated within the design of the Proposed Development to control noise impacts during the operation of the Proposed Development. The external building fabric constructions will be designed to see that the following weighted sound reduction index values as proposed and considered within the noise modelling assessment are maintained:
- Paper Mill wall and roof constructions providing broadband sound reduction of 46 dB Rw.
  - All other industrial building wall constructions providing broadband sound reduction of 39 dB Rw.
  - All other industrial building roof constructions providing broadband sound reduction of 47 dB Rw.
  - Noise emissions from individual flue / stack emission sources will be embedded into the design and controlled via acoustic mitigation (e.g. silencers or noise hoods) to

see that the sound power level values presented and included within the noise modelling assessment are not exceeded.

- All stack / chimney sources are designed to discharge vertically and the resultant benefits of acoustic directivity losses at nearby noise-sensitive receptors has been considered within the 3D noise modelling process.

6.248. In conclusion, the Proposed Development is therefore in accordance with national and local policy and guidance, including PAW, TAN 11, and UDP policies GEN1 and EWP 13.

### **Air Quality, Odour and Dust**

6.249. Cundall have undertaken an Air Quality, Odour and Dust Assessment as part of ES Technical Paper 8. The Paper describes the baseline conditions at the Site and surroundings, and considers the anticipated environmental effects associated with the construction and operational phase of development, and was prepared in consultation with Natural Resources Wales and Flintshire County Council. The assessment takes account of traffic from the Proposed Development and from other cumulative developments in the area, combustion plant at the Site, treatment and processing of waste-water.

6.250. Receptors are identified as including human receptors in close proximity to the site, and those likely to be affected by road traffic. High sensitivity receptors include the proposed residential development to the south of the site, with some medium sensitive receptors including commercial uses to the south east and to the north of the Site. Ecological receptors include the Dee Estuary SSSI and Special Area of Conservation., 500m to the south west of the site.

6.251. The Technical Paper confirms that the Proposed Development is not located within or near an AQMA. No exceedances of the annual mean NO<sub>2</sub> objective were recorded at any of the NO<sub>2</sub> diffusion monitoring sites within 5km of the Proposed development between 2015 and 2019. The nearest PM<sub>10</sub> monitoring data indicates exceedances of the short-term objective. This is a considerable distance from the site and not considered to be representative of local conditions. The Technical Paper notes that Defra background concentrations within the study area are below the NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> air quality objectives.

The Proposed Development has evolved through discussions with the consultant team, and this has resulted in the Waste Water Treatment Plant being located away from residential receptors. A source pathway receptor assessment for odour impact has been undertaken. This has predicted a negligible impact and low likelihood of odour nuisance complaints as a result of the Proposed Development. This is based on the assumption of embedded mitigation at the wastewater treatment plant, such as closed primary and biological sludge tanks, deodorized with activated carbon and also a consideration of distance to sensitive receptors.

- 6.252. Emissions of construction dust were assessed, and the Technical Paper concluded in the absence of adequate mitigation, there is a low risk from earth works, construction and trackout dust generating activities. However with the implementation of appropriate mitigation measures, it is anticipated that the dust generation and harmful emissions from construction site activities will not be significant. The mitigation of construction dust emissions will be addressed by an appropriate Construction Environmental Management Plan (CEMP), developed by the main contractor, and controlled by planning condition. Best practice construction dust mitigation measures recommended for inclusion in the CEMP and are detailed in appendix 8.6 of the Air Quality, Dust and Odour ES Technical Paper. This includes erection of solid screens or barrier around dust activities, avoidance of runoff, full enclosure of specific operations where there is a high potential for dust, monitoring, green walls, screens and other green infrastructure, switching engines off when stationary, and implementation of travel and logistics plans.
- 6.253. Based on the predicted concentrations using opening (2022) emissions and backgrounds the impact of the operation on all traffic sensitive receptors is negligible, and therefore no mitigation measures are required. The predicted concentrations associated with operational traffic will be accounted for as a cumulative impact in the assessment of the on-site combustion plant.
- 6.254. The Assessment considers the combined impact of the operational traffic and operational combustion for Phases 1, 2 and 3 indicates a slight impact at some of the receptors. However, this is due to already elevated traffic flows in the area or the absence of any existing flows and therefore a greater change in emissions. Sensitivity testing of the flue height of the gas turbines (E3 and E10) specified in the ES Technical Paper recommends a flue height of 30m for the gas turbines (E3 and E10) flues is embedded into the detailed design to mitigate any impacts. On

this basis the predicted concentrations at modelled receptors are below the NO<sub>x</sub> annual mean objective and therefore a negligible impact is predicted.

6.255. In addition to the measures outlined above, the following aspects have been included within the design of the development to minimise air quality impacts:

- The design and layouts for the buildings on site have been selected to reduce the impact of the site on its local setting. This includes locating the potentially odourous processes furthest from the residential development;
- The plant will be equipped with a heat recovery system through a heat exchanger dedicated to heating the combustion air and makeup air of the drying system, reducing energy consumption;
- A heat recovery system will be installed as part of the cogeneration system. The recovered heat will be used for the paper machine hall ventilation system as well as converting hall and warehouses heating

6.256. A Travel Plan has been developed and is submitted with the planning application. This identifies an overarching framework for minimising the impacts of travel, ensuring easy access for all and allowing site users to make informed travel choices. The Travel Plan sets out a range of key objectives and potential measures relevant to users for each land use and processes for the management and review of travel behaviour. This sets out measures to encourage the use of public transport, cycling and car sharing. The proposals also include provision for a total of 15 electric vehicle charging points.

6.257. The development is therefore suitable from the perspective of air quality. The proposed development is therefore in accordance with national and local policy and guidance including PAW, TAN 18 and UDP policies EWP 12.

### Lighting

6.258. Cundalls have undertaken a Light Spill Assessment, which is appended to the ES Part I Report. This assesses the impact of the Proposed Development on the surrounding areas, including a lighting calculation to ensure that all legislation is met and regard is given to sensitive receptors. The assessment has been prepared in accordance with PPV and provisions within the Development Plan.

- 6.259. The technical assessment considers that the receptors include, Chester Millennium Greenway, Deeside Industrial Estate, Airfields, proposed residential development, residential building on Sealand Avenue, residential building on Brookside, Sealand Primary School, Jubilee Bridge, Wales Coast Path, residential building at Old Farm Hall, poplar trees to the south, residential building on Rowley Drive, Hawarden Bridge, Shotton Point Trees, Shotwick Brook, dense scrub brushes.
- 6.260. The assessment confirms that the Site is located within zone classed as E3 Environmental Zone within ILP Guidance Notes, the following standards are required to be met:
- Sky Glow (ULR0 5.0%)
  - Light Trespass (LUX) – 10 (pre-curfew), 2 (post curfew)
  - Source intensity (cd) – 10,000 (pre-curfew), 1,000 (post curfew)
  - Building luminance (cd/m<sup>3</sup>) - 10
- 6.261. The assessment establishes a lighting strategy for the Proposed Development, the strategy and principles of the design are as follows:
- Any building mounted luminaires or column luminaires which are introduced to the external areas adjacent to the perimeter of the site have flat glass diffusers to minimise sky glow. The diffusers are positioned horizontally to the ground or with a 5° tilt if necessary;
  - All public realm lighting proposed for the development have been specified with flat glass diffusers which would control the light distribution and are mounted horizontally to the ground or with a 5° tilt if necessary;
  - Any signage brightness, position and design needs must be considered with respect to sky glow and source glare;
  - A higher quantity of low power luminaires mounted closer to the area to be lit has been the overriding strategy, as this will provide a scheme which is far less likely to cause light pollution compared with more powerful but fewer luminaires;

- All lighting columns and wall mounted bulkheads will not exceed a height of 8m in order to achieve minimal sky glow;
- No lighting will be installed within the proposed habitat mitigation areas in order to allow species to use the areas freely. As these areas aim to be light exclusion zones, the surrounding lighting will be dimmable in order to avoid light spill and glare;
- To minimise the disturbance to wildlife, construction should only take place during daylight hours, unless otherwise agreed with the local planning authority, and exterior lighting such as street and security lights in the vicinity of hedgerows, trees and the wildlife corridor should be avoided, or if absolutely necessary, should be of a type that has a minimum impact on the use of these areas by bats; and
- During the construction stage, the lighting levels recommended within Light and Lighting – Lighting of workplaces Part 2: Outdoor Workplaces (BS EN 12464-2:2014) must be adhered to and cannot be exceeded.

6.262. The assessment calculated light spill and source intensity at the 22 receptor points. Each receptor point passed the requirements pre curfew and post curfew. The assessment highlights that the calculation indicates that there is no sky glow at all from the ICT Paper Mill site. The light spill onto the wildlife habitat areas was considered, it was concluded that these areas will attain a minimum amount of luminance.

6.263. Mitigation measures are considered within the assessment, this highlights the need for lighting installation to be inspected to ensure that the aiming of all flood lights is appropriate and not lighting is being directed towards residential properties or wildlife habitats. No mitigation measures are required for the operational phase of development.

6.264. In conclusion, there are no reasons associated with the proposed lighting scheme to preclude the development of the Site.

### **Energy Carbon Reduction**

6.265. An Energy and Sustainability Statement has been prepared by Cundall and forms part of the Energy ES Technical Paper 11. It has been prepared to reflect the Development Plan policy requirements. ICT's Paper Mills are designed to improve environmental performance to a high standard.



6.266. The Paper outlines the projects approach to meeting the energy and sustainability targets, as set by Flintshire County Council. The main objectives are 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 need for energy and providing some of the requirements by renewable/ sustainable means.

6.267. The Paper and supporting Energy and Sustainability Statement confirms the following measures could be incorporated into the design to achieve Flintshire's policy requirements:

- Fabric build up that optimises insulation and protection from outdoor conditions;
- High performing glazing with low solar heat transmittance shall be installed throughout the development, enhancing solar heat gain control throughout the year;
- Application of a natural ventilation strategy, wherever possible minimising the use of mechanical ventilation and cooling;
- The development shall use low energy lighting throughout, reducing energy consumption and internal gains.
- Air source heat pumps will be used throughout for the provision of heating, cooling and hot water.
- Use of Photovoltaic panels on the roof space.

6.268. The Statement also notes a range of other sustainable design measures that can be adopted at the Proposed Development. These include:

- All insulation materials used within the Proposed Development will be selected to be CFC free in both manufacture and through their composition;
- Building materials, where possible will be sourced local to reduce transportation pollution and support the local economy;
- All timber will be purchased from responsible forest sources;
- Recycling facilities will be provided on site for construction and operational waste;



- Water use will be reduced by the specification of water efficient taps, showerheads, dual flush toilets and low water use appliances; and
- The construction site will be managed in an environmentally sound manner in terms of resource use, storage, water management, pollution. A Site Waste management Plan will be produced.

- 6.269. The energy hierarchy that has been followed is based on the reduction of energy demand, using energy efficiently, renewable energy generation, minimising carbon impact of other energy generation, minimising extraction of carbon intensive energy materials.
- 6.270. The assessment considers that the combination of passive design measures, energy efficient systems and renewable energy technologies could result in a 10.5% reduction in CO<sub>2</sub> emissions over the Target Emissions Rate. This achieves compliance with policy EWP3 of Flintshire's Unitary Development Plan, which requires a 10% reduction in CO<sub>2</sub> emissions.
- 6.271. The requirement for a detailed Energy and Sustainability Statement to seek approval of details to meet FCC UDP Policies can be secured by planning condition and approved by FCC prior to commencement of development.
- 6.272. The approach is therefore in accordance with national and local policy and guidance, in particular UDP Policy EWPI, EWP2 and EWP3 and the provisions within emerging policy EN12.

### **Human Health**

- 6.273. The ES Human Health Technical Paper 12 and supporting Health Impact Assessment (HIA) confirms the construction and operation phases of the Proposed Development will have a variety of impacts, which could have effects on human health. Consultation has been undertaken with Public Health Wales which has informed the scope the HIA which 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.
- 6.274. The ES Technical Paper presents an analysis of the baseline data for the study area alongside a review of scientific literature showing its relationship with human health. This informed the assessment of impacts on human health considering the determinants set out in the

consultation draft document named “Addressing Human Health in Environmental Impact Assessment” by Cave et al in 2019.

- 6.275. The assessment identified positive environmental impacts as a result of the construction phase of the Proposed Development. These include the provision of employment and training opportunities, therefore providing a benefit in terms of social and economic health determinants. Where potential negative impacts on human health have come to light through the assessment mitigation measures have been outlined. For example, the Outline CEMP appended to the ES Part I Report outlines the necessary measure to mitigate impacts during construction. Specific restrictions for some health determinants are also required, for example in relation to noise and vibration limits are set which must be adhered to.
- 6.276. Similarly, with regard to the operational phase, a number of positive impacts have been identified in relation to the health determinants. For example, it is thought that the Proposed Development will act as a catalyst for further investment in the area. It will contribute to the achievement of the strategic objectives of the Northern Gateway Mixed Use Development Site as set out in the Flintshire Local Development Plan.
- 6.277. Where potential negative impacts have been identified as a result of the operation of the Proposed Development mitigation measures have been outlined. For example, impact on access to and quality of public transport will be reduced by proposed infrastructure improvements and pedestrian/cycle linkages.
- 6.278. As a result of the mitigation measure 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.

### **Utilities**

- 6.279. Utility Connections (UK) Ltd and Crookes Walker Consultlant have undertaken Utility Assessments for the Proposed Development.
- 6.280. The feasibility of the Proposed Development is considered from a utilities perspective and assess the existing utility infrastructure local to the site and the requirements for proposed utilities servicing the Proposed Development. It notes that a separate assessment will be undertaken to assess the electrical services required to facilitate the proposed development.

The paper considered the impacts on existing utility infrastructure including diversions, disconnections and alterations.

6.281. The Proposed Development will require new gas, telecoms and water services, the following capacities will be required:

- Gas - 110000kW at minimum 2bar;
- Telecommunications 50/50mb fibre connection;
- Potable water – 2.47l/s at minimum 1 bar; and
- Non potable (raw) water – 5,184 m<sup>3</sup>/day at minimum 1 bar

6.282. All relevant asset owners have been contacted to offer points of connection suitable to meet the proposed development requirements. Network capacity enquiries have been issued to all relevant network operators based on anticipated loadings require to service the overall proposed development.

6.283. The assessment confirms that there are no mains or services that will need to be disconnected to facilitate the Proposed Development.

6.284. Plot C has no mains or services that will need to be diverted to facilitate the Proposed Development.

6.285. The proposed site has been set out to ensure any existing network assets can, where possible remain, and easements maintained in accordance with the asset owners requirements. Currently all the approvals have been agreed in principle and the technical appraisals have been undertaken to ensure that:

- Sufficient Gas, Potable Water, non-Potable Water and Telecommunications services and capacities are available to the site to support the Proposed Development.
- The proposed underground utility services are all envisaged to be run, predominantly from the point of connection to the Proposed Development within the proposed highway and footway.

- 6.286. In terms of electrical services Crookes Walker have undertaken a separate Utilities Assessment in respect of electricity.
- 6.287. This confirms a new HV supply will be provided to a new Primary Sub Station, recently granted reserved matters approval, adjacent to Plot C (the Application Site).
- 6.288. The Primary Sub Station will be procured and supplied via Crag Hill Estates Ltd (CHEL) Landowners and the appointed IDNO, PWRO.
- 6.289. The Primary Sub Station is to be rated at 33kV 24MW with 11MW of this supply capacity dedicated to feed the new ICT Papermill Facility as detailed below. The proposed SPEN Point of connection is detailed within the SPEN Offer and this is derived from the 6th Avenue Primary Sub Station HV ring circuit.
- 6.290. The Paper Mill facility will be built over 3 phases.

**Phase 1:**

- 6.291. The ICT Paper Mill site will be connected to the Primary Sub Station through a feed having a capacity of 11 MW. ICT UK Ltd will install a cogeneration / CHP plant that will displace 8 MW of grid supplied energy when in operation. On this basis it is anticipated the normal demand on the Primary Sub-Station will be 3 MW.

**Phase 2:**

- 6.292. ICT UK Ltd will install an additional CHP/cogeneration plant that will displace a further 8 MW of grid supplied energy when in operation. On this basis it is anticipated the normal demand on the Primary Sub-Station will be 5 MW at the completion of Phase 2.

**Phase 3:**

- 6.293. ICT UK Ltd will install an additional CHP plant that will displace a further 8 MW of grid supplied energy when in operation. On this basis it is anticipated the normal demand on the Primary Sub-Station will be 8 MW at the completion of Phase 3.
- 6.294. In summary, the fully developed site will feature 11 MW of grid supplied electrical capacity from a new Primary Sub-Station and 3No 8MW CHP units producing a total of 24 MW of on-

site generated electricity. It is anticipated that normal demand on the Primary Sub Station will be circa 8 MW and will not exceed the 11 MW capacity during transient peak demand.

- 6.295. The proposed approach is therefore in accordance with national and local guidance. There are no known utilities constraints that would preclude the development of the site for the Paper Mill Facility.

### **Waste**

- 6.296. RPS group has undertaken a Waste ES Technical Paper 10 to form part of the Environmental Statement (ES). It has regard to the relevant legislative and policy framework, and the Development Plan.
- 6.297. This confirms the site currently comprises open land, and waste currently generated is minimal. The assessment notes that there a number of waste management facilities within the area surrounding the Site.
- 6.298. The assessment considers that the types of waste generated from the enabling works, earthworks, and construction of the Paper Mill Facility include:
- Soils (spoil from preparing foundations, installation of drainage and infrastructure);
  - Glass;
  - Concrete/Cement;
  - Tarmac, asphalt, bitumen;
  - Oils (lubricating oil)
  - Metals (cables, wires, bars, relict structures);
  - Timber (softwood and broad products such as plywood, chipboard), pallets;
  - Packaging;
  - Plastics (pipes, cladding, frames, non packaging);
  - Paints and solvents;

- Insulation (glass fibre, mineral wool or foamed plastic; and
- Plasterboard.

6.299. The assessment notes that the achievement of the required development platforms, will be achieved via cut and fill, and primarily by the importation of materials, a net fill importation of 3,781 m<sup>3</sup> is required to achieve a balanced earthworks scheme. Subject to confirming the suitability of the underlying material, no excavated spoil associated with the Site levelling, creation of the development platforms and from the construction of the Proposed Development will be exported from the Site.

6.300. The assessment estimates that 15,667 tonnes of waste will be generated by the Proposed Development, 2.1% of the county's construction and demolition waste. This assumes the absence of any mitigation, however it is noted that there is capacity within the local waste management facilities.

6.301. The technical paper notes the potential to generate hazardous waste.

6.302. The operational phase of the Proposed Development will generate the following types of waste:

- Metallic wires from cellulose pulp bales;
- Sludges from Paper Mill effluent treatment;
- Empty containers (e.g. 1,000l IBC tanks, Barrels, can) from raw/auxiliary liquid material ( some containing residues);
- Jumbo roll cores;
- Packaging from converting rolls (cardboard and plastic);
- Aqueous liquids containing ink and/or sealants, or adhesives from washing converter machine equipment;
- Replaced paper machine felts and or webs;
- Oils;

- Oily rags/wiping cloths, filter materials;
- Discarded metals from carpentry activities;
- Dust from air dust removal system.
- Waste from the welfare and office areas (paper, cardboard, packaging, plastic, metals, food waste, fluorescent light tubes, and printer and toner cartridges).

6.303. It is noted that paper sludge material will be treated in the effluent treatment plant and dewatered. The dewatered sludge will be discharged into a sludge container. It is estimated that approximately 7,845 tonnes per year of operational waste would be generated by the Proposed Development. This equates to 1% of the total commercial and industrial waste in North Wales (2012 figures).

6.304. The Technical Paper notes the potential for the generation of hazardous waste.

6.305. The strategy for mitigation is based on a series of obligations, including the pre-treatment of waste. This is in order to reduce the impact that waste has and increase the amount of waste recycled. All non-hazardous waste generated will be managed in accordance with the obligations for pre-treatment.

6.306. Any hazardous waste will not be mixed with non-hazardous waste or different types of hazardous waste, with appropriate procedures in place to ensure reliable segregation and secure storage. Opportunities to substitute hazardous materials will be investigated to reduce the use of hazardous materials and limit hazardous waste.

6.307. The ES Technical Paper confirms that waste generated from the Proposed Development will be managed according to the principles of the waste hierarchy. Mitigation measures include:

- Minimising waste generation through design and construction techniques (e.g. the use of pre-fabricated materials/structures, just in time deliveries) and reducing the risk of damaged goods (e.g. provide appropriate packaging) and avoiding over ordering of stock;
- Preparation of a Materials Management Plan to facilitate the re-use of site won materials;

- Divert waste from landfill (where practicable) by either reusing or recycling materials on Site (during construction) or by transferring the waste to an appropriate waste management facility for re-use, recycling/composting or recovery;
- Improve the likelihood of materials to be reused or recycled by selecting durable and recyclable materials and by implementing a source segregation system to minimise contamination;
- Pre-treat non-hazardous waste and ensure no mixing of hazardous wastes;
- Procure non-hazardous materials rather than hazardous materials where practicable; and
- Agree landfill diversion targets for the key types of wastes in line with the national targets. Set out the measures that would be implemented to achieve these targets within a Site Waste Management Plan (for the construction phase) and an Operational Waste Management Plan (for the operational phase). An outline is provided within the ES Waste Technical Paper, Appendix 10.2.

6.308. The assessment concludes that with the implementation of the mitigation measures proposed, the overall impact of the Proposed Development with regards to waste is considered to be minor adverse to negligible.

6.309. The proposed approach is in accordance with national and local guidance, including the Unitary Development Plan policies Policy EWPI0, and emerging policies STR15, PC4 and EN19.

### **Planning Balance / Weighted Balance?**

6.310. Section 38(6) of the Planning and Compulsory Purchase Act 2004, states that applications should be determined in accordance with the development plan unless material considerations indicate otherwise.

6.311. This section draws together the assessment section of this Report and demonstrates how the scheme complies with the development plan and the weight to be attached to other material policy considerations.





- 6.312. We consider that the application proposals are in accordance with those parts of the adopted Development Plan which are themselves in accordance with national policy. Where we have identified conflict with the relevant policies of the development plan, we consider that substantially reduced weight should be afforded to such policies by reason of inconsistency with national planning policy.

### The material issues that weigh in favour:

- 6.313. The material issues that weigh in favour of the application proposals are:

- The Plan led presumption in favour of Proposed Development, which should be afforded **SIGNIFICANT** weight in the planning balance.
- The proposed development will deliver 124,344 sq.m. of employment floorspace on 23.86 hectares of land in a strategic location, that forms part of a long established strategic allocation, which has benefited from significant public investment. The application will make a significant contribution to the delivery of the economic and regeneration objectives of the Flintshire UDP, the emerging Development Plan, which seeks the delivery of 72.4 hectares of employment land at this location, Future Wales, which identifies the site as being within a Growth Area for employment. **SIGNIFICANT** weight is attached to this issue in the planning balance.
- The Proposed Development will generate 154 FTE jobs during the construction phase of the development. **LIMITED** weight should be ascribed to this issue.
- The operation of Proposed Development will generate 463 gross FTE jobs, and an estimated 211 net additional FTE jobs within Flintshire (299 net additional FTE jobs within the wider impact area, 311 net additional FTE jobs within Wales). **SIGNIFICANT** weight should be attached to this issue.
- There would be substantial regeneration benefits associated with the Proposed Development, through creation of significant job opportunities, which are genuinely accessible to the local labour force, by virtue of their alignment with the skills profile of the local workforce, including the unemployed, and by active and public transport modes. The average salaries in paper and wood manufacturing are noted to be higher than the national average. In addition to the provision of job opportunities, the Proposed Development will lead to the provision of training and employment opportunities, and estimated 63 opportunities during the construction phase alone,



in close proximity communities identified as being some of the most deprived neighbourhoods in the County and in Wales and in England, supporting access to employment and career development opportunities. **SIGNIFICANT** weight should be ascribed to this issue.

- Indirect regeneration benefits will result from the Proposed Development, arising from the increased confidence in the employment and commercial market, the removal and redevelopment of under-utilised land. Through increased expenditure, the Proposed Development will support the vitality and viability and regeneration of Garden City and Deeside.
- The Proposed Development will generate circa £90 million in GVA during the construction, and circa £26.7 million in GVA per annum over the lifetime of its operation. This should be ascribed **MODERATE** weight.
- The Proposed Development will generate circa £2.9 million in business rates. **LIMITED** weight should be attached to this issue.
- The Proposed Development will help respond to the significant shortfall in domestic production of tissue paper products, circa 30% of demand being met from suppliers outside the UK. **MODERATE** weight should be attached to this issue.
- The Proposed Development could result in a 10.5% reduction in CO2 emissions over the Target Emissions Rate within the adopted Plan. This should be afforded **MODERATE** weight.
- The Application Site is located in a sustainable location, within the existing built-up area, with easy access to residential areas, including by excellent active travel connections, and public transport including bus and train services. The locational benefits of meeting employment need as part of the wider scheme in this key location should be ascribed **SIGNIFICANT** weight.
- The Proposed Development will make effective and efficient use of underutilised land. **MODERATE** weight should be attached to this matter.



- 10% of car parking spaces will support electric charging, consistent with emerging policy, **MODERATE** weight should be attached to this matter.
- Ecological enhancement within the site and embedded mitigation on wider development parcels as part of separate enabling works would introduce **minor beneficial impacts** for a range of protected species overall, once habitats have matured and ecological management plans have been implemented.

### The material issues that cause impacts:

6.314. The material issues that cause impacts from the application proposals are:

- The Construction Phase of the development will result in a change to the character of the site, and will change the landform and site topography. **LIMITED** weight should be ascribed to this matter.
- The Construction Phase is expected to result in residual visual impacts, in particular in views from the National Cycle routes, due to the presence of a crane and high level building operations, which will not be screened by hoarding or other mitigation measures. **LIMITED/MODERATE** weight should be ascribed to this matter.
- Notwithstanding perimeter planting introduced around the boundaries of the site, there will still be the need to remove trees at the outfall into the River Dee, therefore the Operational Phase is expected to result in minor/moderate adverse effects on landscape character of the site. **LIMITED** weight is attached to this matter.
- In terms of visual impacts of the Operational Phase, moderate/high adverse impacts are expected on three of the 16 viewpoints, and in particular from the National Cycle Routes, where the High Bay Warehouse, despite the use of horizontal colour banding to diminish the visual impact of the height of the building will remain a prominent feature. **SUBSTANTIAL** weight is afforded to this matter.



- The visual setting of some heritage assets, including Shotton Point buildings and garden and the Hawarden Bridge may be impacted by the presence of tower cranes during the construction phase, but the impact will be minimal due to the distances involved. A minor adverse impact is predicted upon the John Summers Building, and the associated Registered Garden. The visual impact on the Former Office Buildings, Shotton Steelworks, the locally listed buildings and Hawarden Bridge will be negligible. **LIMITED** weight is afforded to this matter.
- In terms of built historic assets, the residual impacts upon the associated Headquarters Buildings Garden and Forecourt to the south of the Site are assessed as minor adverse. A minor adverse impact is anticipated on the setting of the former John Summers Headquarters Building, with a negligible impact on the setting the former office buildings to the Shotton Steelworks and setting of buildings of local interest within the Shotton Point Building Group. These impacts will relate to minor impacts upon the openness to the Shotton Point buildings and the visual impact of the development.. **MODERATE** weight is attached to this matter.
- The site is at low risk of tidal, fluvial flooding, groundwater, and localised surface water flooding, based on the proposed mitigation outlined in the supporting FCA which will ensure that the risk to third party land is not increased. **LIMITED** weight is ascribed to this matter.
- There is a potential for Operational Impacts to the River Dee and BALA Lake SAC/SSSI relating to the temperature and volume of treated waste water discharged into the River Dee. However this will be controlled through measures contained in the Environmental Installation Permit. With controls measures agreed to a level confirmed in the HI Water Screening Assessment contained in the Marine Discharge Assessment (appended to the ES Water Environment Technical Paper 3), the measures will ensure that the proposed discharge will not significantly alter the temperature of the receiving river water throughout the year in a manner which would adversely impact upon the qualifying features of the SAC/SSSI. **LIMITED** weight is ascribed to this matter based on the measures controlled through the Environmental Permit.
- The Noise Assessment confirms that there is potential adverse noise effects at sensitive receptors as a result of noise emitted from the Paper Mill Facility, however with mitigation embedded into the detailed design of the building and plant, including the vertical orientation of all plant flues, silencers and acoustic hoods and appropriate specification of façade and roof construction to provide adequate sound insulation levels the impacts are negligible to minor adverse. **LIMITED** weight is ascribed to this matter.



- The Air Quality, Dust and Odour ES Technical Paper confirms the potential adverse air quality and odour effects based on odour from the Waste Water Treatment Plant (WWTP) and emissions from on-site combustion plant. However, the Assessment confirms with embedded mitigation included within the design of the on-site WWTP and proposed height of the main stacks, the impacts are negligible. **LIMITED** weight is ascribed to this matter.
- The proposed development will generate waste, including hazardous waste as a result of the construction and operation. However with appropriate mitigation this is anticipated to have a negligible/minor adverse impact. **LIMITED** weight is ascribed to this issue.

### The Balance

- 6.315. In light of the above, it is considered that planning permission should be granted for the application proposals because they accord with the relevant policies of the Development Plan when considered as a whole and the adverse impacts of doing so would **NOT** significantly and demonstrably outweigh the benefits.

## 7. Summary and Conclusions

- 7.1. The Proposed Development is located in an area which has been identified as the focus for economic growth, it is a location of sub regional, regional and national importance. It will not only have a significant role in meeting the established employment needs, delivering on long term employment allocation, creating of 945 net person years of construction employment, and 299 net FTE's within the wider impact area during the operation of the development., and deliver on long term employment allocations, it will also play a significant role in the wider sustainability of the area. The immediate locality is relatively deprived both overall and within the employment domain. The Development Plan, Economic Regeneration Strategy, and Deeside Plan set out the requirement to address regeneration needs. The delivery of employment land at this location will therefore serve to improve access to employment, through the provision of jobs that align with the skills profile of the labour force and the unemployed, and through the provision of training and apprenticeship opportunities during both construction and operational phases.
- 7.2. Furthermore, the development will play a significant role in responding to a substantial shortfall in the domestic production of tissue paper product, currently estimated to be circa 340,000 tons per annum. With domestic manufacturing meeting around 72% of UK demand. The Facility is of importance in building resilience in the UK supply, particularly when considered against the context of Brexit, which has highlighted the importance of onshoring for business continuity and resilience. Thus contributing to wider sustainability of the area and towards meeting the well-being goals.
- 7.3. This Planning Statement outlines the Applicant's operational requirements for a High Bay Warehouse to support ICT's Manufacturing process and distribution programme. The 39.65m high 10 level automated finished product High Bay Warehouse forms an integral component of the facility, consistent with the Applicants other facilities, currently operational within Europe. The height and form of the High Bay Warehouse is driven by a specialised automated racking system at a capacity to support the storage and distribution operations of the facility. Notwithstanding the location and orientation of the building on the site and use of colour cladding to reduce its visual impact, there are associated impacts upon the landscape as a result of visual impact, particularly from the National Cycle Routes and the change in landscape character, the visual setting of some nearby receptors. However, PPW, chapter 6 is clear that where adverse impacts are identified, they should be considered with due weight attached to



the nature, and extent of harm assessed, in the context of the wider planning benefits associated with the Proposed Development. These substantial benefits are set out with the Socio Economic Technical Paper 6 of the ES and summarised within this Planning Statement. As stated herein the industrial heritage and context of the areas should be appreciated, there has always been a juxtaposition of large scale industrial buildings in close proximity to the Shotton Building Complex.

7.4. The Proposed Development has been prepared having regard to the PPW and the five ways of working, the applicant and wider technical consultant team have developed the proposals and assessed the scheme following engagement with key stakeholders, with regard to the long term. Having regard to the Proposals and the significant body of technical work it is considered that the Proposed Development will contribute towards meeting the well-being goals:

- A Prosperous Wales - delivering increased economic activity; significant employment and training opportunities; and above average salaries.
- A Resilient Wales - supporting the provision of employment in a location close to where people live and making effective use of underutilized land, delivering economical improvements; ensuring continuity of supply of tissue paper products to serve domestically generated needs; protection of protected sites, species and habitats through ensuring appropriate mitigation measures; and ensuring that the development will not result in an increased risk to flooding, including on third party land.
- A more equal Wales - through securing additional employment and training opportunities, that match the skills base of the local population, and are therefore genuinely accessible to the local population in a deprived neighbourhood, as ranked in the Welsh Indices of Multiple Deprivation 2019;
- A cohesive community, development will be well connected with the surrounding area, and recently constructed and proposed residential development, in turn supporting greater opportunities for active travel, and providing genuinely accessible employment and training opportunities.
- A Healthier Wales, provided through opportunities to increase active travel to work, supporting sustainable commuting patterns and the opportunity for employment

which has a significant effect on the health and well-being of residents, alleviating poverty, addressing worklessness and income and employment deprivation, by access to employment with above average levels of income; and ensuring appropriate mitigation to ensure that significant adverse impacts on air quality, and noise do not result during the construction and operation of the proposed development; and

- a more Globally responsible Wales through: supporting more sustainable travel to work patterns, addressing the net outflow of commuters, meeting a greater proportion the domestically generated needs for tissue paper within the UK in a location that makes efficient use of underutilised land, delivering a 10.5 % reduction in carbon emissions.

7.5. The Proposed Development is in accordance with the Development Plan (Flintshire UDP and Future Wales), consistent with the provisions within PPW, and the emerging Local Plan, and key local strategies including the Deeside Plan and Economic Regeneration Strategy. The Proposed Development makes beneficial and effective use of an underutilised site, consistent with the current and emerging allocations, delivering employment that will secure a number of regeneration objectives, improving access to employment, supporting ambitions to address worklessness and the pockets of deprivation present within the locality.

7.6. We respectfully request that the application proposals for the site are supported by the Local Planning Authority and Members since:

- The principle of development is consistent with the Development Plan (UDP, and Future Wales) and the emerging Plan.
- The Proposed Development will make a substantial contribution towards the delivery of employment land, delivering 23.86 hectares of employment land.
- The Proposed Development will deliver significant employment and training and apprenticeship opportunities. Including 154 FTE jobs during construction and 463 gross FTE jobs (211 net additional FTE's in Flintshire, 299 in the wider impact area, and 311 net additional FTE's in Wales)



- The Proposed Development will generate circa £90 million in GVA during construction, and £26.7 million in GVA per annum during the operation of the development.
- The development is in a highly sustainable location being genuinely accessible via active travel modes, and public transport modes.
- It will support the regeneration ambitions, through provision of job opportunities that are accessible to the local labour force, the provision of jobs with above average salaries, and deliver a boost to the confidence and perceptions of the area.
- It will help respond to the significant shortfall in domestic production of tissue paper products, circa 30% of demand being met from suppliers outside the UK