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PLANNING

**ELECTROIMPACT UK LTD, HAWARDEN
DESIGN, ACCESS AND PLANNING STATEMENT
ELECTROIMPACT UK LTD
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Design, Access and Planning Statement



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1. Introduction

- 1.1 This Design Access and Planning Statement relates to a proposed development which seeks consent for erection of new high-bay industrial Building at Electroimpact UK Ltd., Manor Lane, Hawarden Industrial Park.
- 1.2 As can be identified in Figure 1 and 2, the site lies within a well-established industrial area which is dominated in terms of scale by the Airbus factory to the north and the associated buildings. An existing high bay building is sited on the site following a development approved under planning permission 054887 in 2017.

Figure 1: Aerial image identifying the location of the Electroimpact site and application site in the context of its wider surroundings

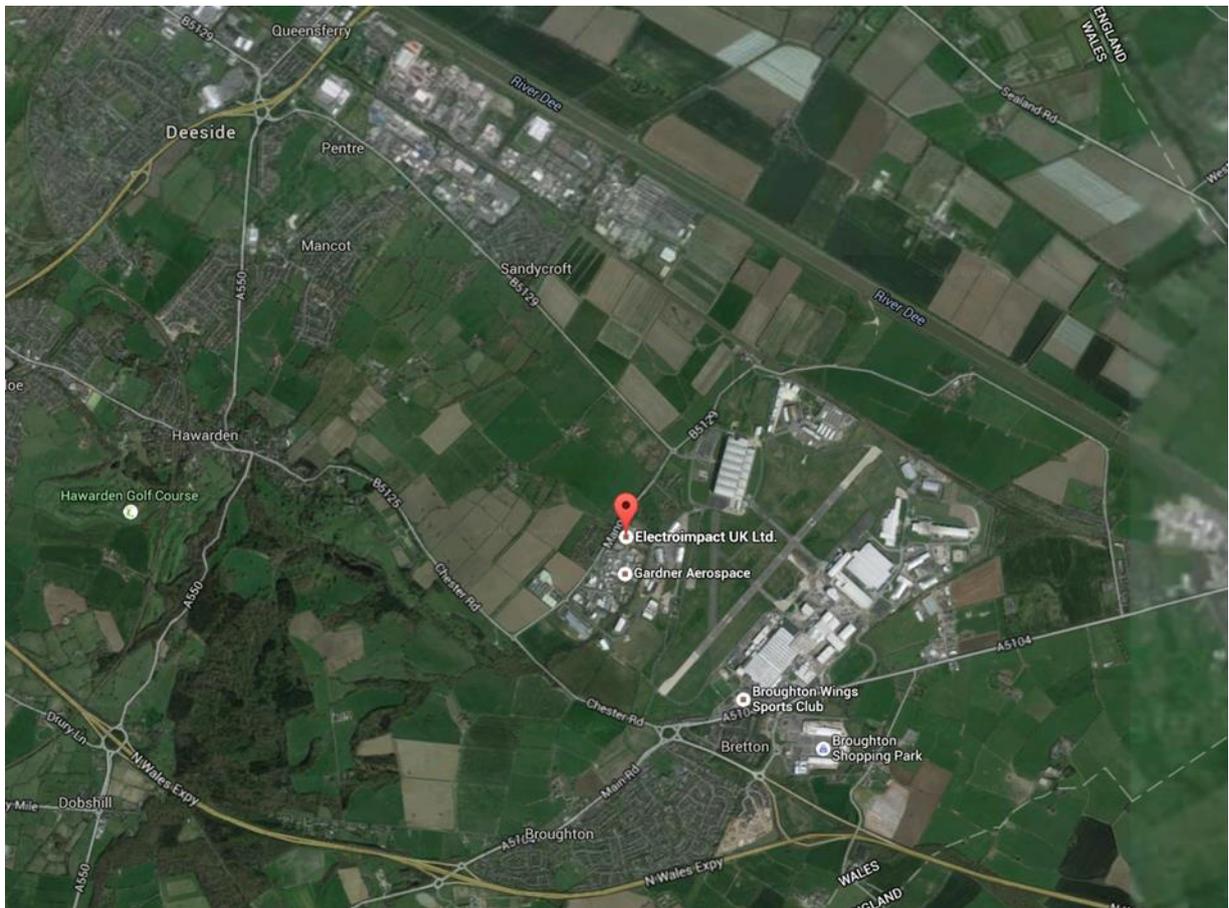


Figure 2: Aerial image identifying the location of the Electroimpact site and application site in the context of its immediate surroundings



- 1.3 There are existing houses at Little Roodee to the west but they are separated from the application site by existing industrial buildings, Manor Lane, and by the estate road at Little Roodee. There is also significant screening between the application site and the existing houses at Little Roodee, including hedgerows and mature trees. The layout of the housing development at Little Roodee, limits the number of houses which have a direct or oblique outlook towards the site.

2. Background to the proposal

- 2.1 Electroimpact UK Ltd are located on this site as they are a direct supplier to Airbus. Electroimpact is a highly experienced provider of factory automation and tooling solutions. Their forte is the integration of automation and tooling into synergistic production solutions.
- 2.2 Electroimpact was founded in June of 1986 by Peter Zieve, PHD. Located in the shadow of the Boeing Corporation's Everett Plant, Electroimpact started its life primarily as a supplier of machine tools to Boeing. However, over the years Electroimpact has gradually expanded its business overseas to act as a major supplier for other major aerospace companies such as Airbus, and Israeli Aircraft Industries.
- 2.3 Electroimpact is an engineer-driven company. Electroimpact are able to maintain continuity throughout the project process because the same engineer is involved in every stage of the project, from initial planning and development, to final assembly, tooling setting and buyoff. The engineer that designs the tool or machine also is responsible for detailed drawings, coordinating manufacturing, assembly, and any tooling setting or machine alignment. This minimizes the disconnects that happen at a typical company with an engineer, drafter, manufacturer, and assembler.
- 2.4 The Company has full-time staff with hands-on design engineers which are second to none in the industry.
- 2.5 The high-tech business requires multiple very large high-bay buildings for construction and buyoff facilities featuring cranes with up to 40 metric ton lifting capacity, as well as several smaller buildings. The site at Hawarden is essential to the Company's operation and the nature of the site with room for further expansion allows the Company the flexibility of taking-on multiple very large projects at one time.
- 2.6 The Company's unique approach has resulted in Electroimpact growing to become the largest integrator of aircraft assembly lines in the world. Their customer base includes Airbus, Boeing, Kawasaki Heavy Industries, Mitsubishi Heavy Industries, Fuji Heavy Industries, Spirit Aerospace, Vought, Northrop-Grumman, Israeli Aircraft Industries, Xi'an Aircraft of China, Bombardier, and Embraer among others.
- 2.7 Electroimpact's mission is to be the premier supplier of automated equipment to the worldwide aircraft industry. To do this, they hire the best people and remove all barriers which would prevent them from doing the best job they can. A key part of this approach is

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the Company's award winning apprentice scheme. The Company provides an exemplar apprentice scheme.

- 2.8 Internationally, Electroimpact is a company of over 750 professionals dedicated to the design and manufacture of state-of-the-art aircraft assembly equipment. The company is extremely proud of the fact that over 600 of its employees have engineering degrees.
- 2.9 Electroimpact's main campus, and head office is located in Mukilteo, Washington USA. However, to better serve its customers, Electroimpact established a large satellite office in the UK with. This is at the Company's base at Hawarden where there are 86 staff at present; 71 of which are engineers.
- 2.10 It is evident therefore that the Company is a valued employer and provides innovative high-tech engineering solutions to the aerospace industry and the link with Airbus in Flintshire is essential to the continued success of the Company in Europe. The Company faces global competition and, without this and other future expansion, business will be lost to competitors in Europe and the Far East. Operating costs at the US facility provides a compelling argument to expand UK operations further over the next 5 years. The Company's proposed investment arising directly as part of this application proposal represents a further investment of £4 million in Flintshire in the type of business which would be the envy of many Regions throughout the UK and worldwide.
- 2.11 The building must have the height as proposed to allow high-bay assembly of robots for the automotive industry which, with a value of circa £3 million each must then be meticulously transported from the site without horizontal or vertical constraint of movement. The building therefore needs level access and room to manoeuvre the Abnormal Load Heavy Goods Vehicle in a way which facilitates movement into the building, albeit on an infrequent basis as illustrated in Figure 3 below.

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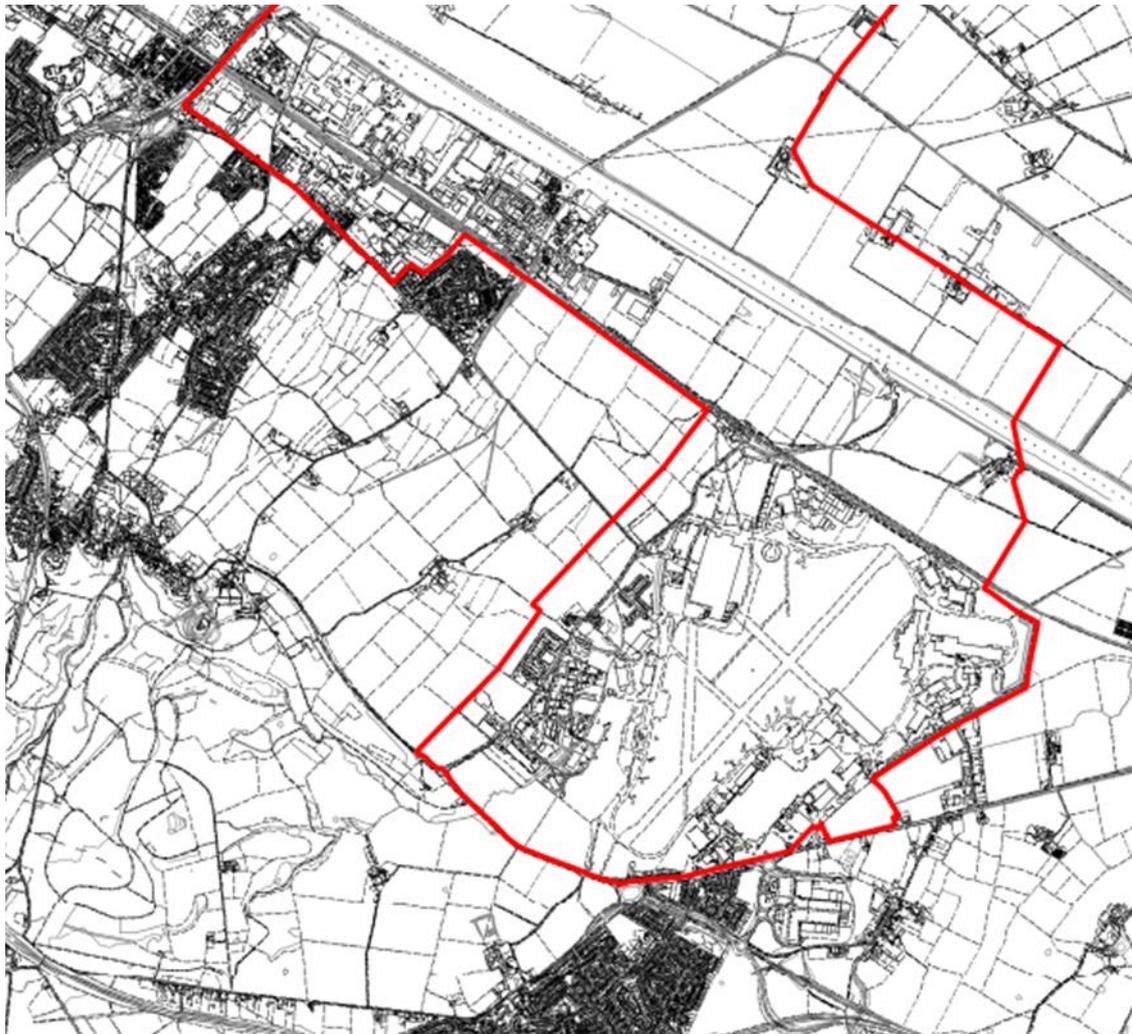
Figure 3: Photograph example of the type of abnormal loads which require access to the buildings on heavy goods vehicles.



3. Planning Policy

- 3.1 National and local planning policy guidance considered relevant to the principle of this development is set out in this section.
- 3.2 As can be identified in Figure 4, the application site is located within the Deeside Enterprise Zone. Enterprise Zones are geographical areas that support new and expanding businesses by providing a first class business infrastructure and compelling incentives. Deeside Enterprise Zone in Flintshire, North East Wales, is a modern, high skills driven manufacturing area with ambitions to be recognised as a centre for advanced manufacturing and technology excellence on a world scale.

Figure 4: Map identifying the application site within the context of the Deeside Enterprise Zone



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3.3 The relevant national planning policy is set out in:

- Planning Policy Wales (PPW) Edition 11, (2021);
- Technical Advice Note (TAN) 3 'Simplified Planning Zones (1998); and,
- Technical Advice Note (TAN) 23 'Economic Development' (2014).

3.4 Each document will be discussed in turn below.

Planning Policy Wales (Ed.11)

3.5 Paragraphs 5.4.4 and 5.4.5 of PPW states that;

“Wherever possible, planning authorities should encourage and support developments which generate economic prosperity and regeneration. Sites identified for employment use in a development plan should be protected from inappropriate development.

Local planning authorities are required to ensure that the economic benefits associated with a proposed development are understood and that these are given equal consideration with social and environmental issues in the decision-making process, and should recognise that there will be occasions when the economic benefits will outweigh social and environmental considerations”

3.6 Paragraph 5.4.7 goes on to state that;

“ Development plans and development management decisions should be based on up-to-date local and sub-regional evidence. It is important that such evidence demonstrates the suitability of the existing employment land supply as well as future provision in relation to the locational and development requirements of business”.

Technical Advice Note 3

3.7 TAN 3 sets out guidance on Simplified Planning Zone,

3.8 Paragraph 17 guides that where conditions are relevant in the SPZ's, that these should be kept to an absolute minimum.

3.9 Paragraph 18 states that;

‘In general SPZ schemes should not be concerned with detailed aspects of development. They should ensure that any essential health and safety standards are specified where such matters

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are not covered by other statutory provisions. Such matters are pollution emissions, contaminated land, unstable land, access for disabled people, vehicular access, parking, highway construction, crime prevention, protection and replacement of natural features and habitat, landscaping and design may need to be included insofar as planning control is appropriate. Particular attention should be paid to flood defence and to safeguarding water quality and water resources.'

Technical Advice Note 23

3.10 TAN 23 sets out guidance on the importance that the planning system recognises the economic aspects of all development and that planning decisions are made in a sustainable way which balance social, environmental and economic considerations.

3.11 Paragraph 2.1.2 states that;

'Where economic development would cause environmental or social harm which cannot be fully mitigated, careful consideration of the economic benefits will be necessary. There will of course be occasions when social and environmental considerations will outweigh economic benefit. The decision in each case will depend on the specific circumstances and the planning authority's priorities.'

3.12 Paragraph 2.1.4 goes on that the;

'It is recognised that quantifying the economic impacts is not always straight forward. To assess these benefits and weigh them against any social or environmental damage that development may cause, local planning authorities should use a qualitative, criteria-based approach as set out below.'

3.13 Section 2.1 sets out a test for 'Weighing economic benefit' and sets out three criteria to test development proposals against:

- Alternatives;
- Jobs accommodated; and,
- Special Merit.

'2.1.6 Alternatives: if the land is not made available (the site is not allocated, or the application is refused), is it likely that the demand could be met on a site where development would cause less harm, and if so where?'

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*'2.1.7 This test follows from the principle in PPW, that the planning system should steer development to the most sustainable locations. When a proposed site allocation or development scheme is rejected the associated economic activity will usually be redirected to another site. To gauge the benefit of the proposal, it will be necessary to compare it with the 'base case' in which the proposal does not go ahead. The answer relates partly to the locational flexibility of the economic sectors concerned. For example, retail and local consumer services usually mean that demand can be more easily steered to alternative sites within the local authority area or sub-region. At the other extreme, some internationally footloose operations may not locate in Wales, or remain in Wales at all, unless they secure a particular site. **Similarly, some existing firms may not be able to grow unless they are allowed to expand on their existing site, or close to it.** Before concluding that "there is no alternative" local planning authorities are encouraged to try to assess whether competing firms, serving the same markets, could generate the same development and jobs. This would generally require close liaison with the local authority Economic Development Department or other appropriate stakeholders (see 4.1.1) who might have detailed knowledge of the capacity and expertise of firms in the area or sub-area.'*

2.1.9 Jobs accommodated: how many direct jobs will be based at the site?

'2.1.10 This provides an approximate measure of a development's contribution to the wider economy. Economic growth is worthwhile wherever it is located, and in the interests of economic growth the planning system should generally aim to provide land where there is demand for it 6. A local authority may wish to conduct a more detailed assessment of potential job creation taking in to account indirect job creation. There may be good reasons why jobs in some places are even more worthwhile than in other places. The third test below deals with this.'

2.1.11 Special merit: would the development make any special contribution to policy objectives?

*'2.1.12 Such policy contributions may relate to the objectives listed in PPW, or to more general policy objectives set out elsewhere in PPW. For example, a major employment site may be a key element of a wider spatial strategy which aligns jobs, development and infrastructure. **The office or production plant of a high-technology firm could bring supply-side benefits by raising skills and introducing innovation. An industrial estate in a disadvantaged area could help fight social exclusion, improving run-down places and creating job opportunities for people at high risk of unemployment.'***

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‘2.1.13 PPW advises that the planning system should particularly support the low-carbon economy, innovative business / **technology clusters** and social enterprises which are defined as businesses that are particularly important in providing opportunities for social groups disadvantaged in the labour market. Developments that will provide space for these categories of businesses count as making special policy contributions. This assessment of special policy contributions has to be largely qualitative but it can, and should, be rigorous, including critical review of applicants’ claims. In particular, claims about jobs and physical regeneration for disadvantaged communities need careful consideration, taking account of displacement. If jobs housed in new development displace jobs that are within or close to the disadvantaged area, then there is no employment benefit to the community concerned.’

3.14 Section 1.3 discusses Larger than Local Planning and states that;

‘1.3.1 Market forces do not respect local authority boundaries and the planning system should steer development to the most efficient and sustainable locations. This means that strategic planning, larger than individual local planning authorities, for economic development is essential. It is for individual local authorities, in the first instance, to identify the most appropriate strategic affiliation and groupings, and functional economic areas such as Travel to Work Areas or Housing Market Areas, and to develop a common evidence base for these areas. Authorities are expected to share skills or pool resources to gain efficiencies when developing evidence bases.’

‘1.3.2 Local planning authorities are encouraged, therefore, to work jointly in regional groups, which ideally already exist, to prepare regional economy evidence bases, including an analysis of the dynamics of the regional commercial and industrial property market, followed by an economic strategy. It would be appropriate that the strategies include a modelling of future economic scenarios based upon an extrapolation of past trends and a stock-take of current economic assets, including output and employment by sector.’

‘1.3.3 Furthermore, the strategies should focus on identifying strategic sites of national and regional importance. They should also provide agreed land provision targets for the B-class uses, showing how development is to be distributed across local authority areas in LDPs.’

3.15 Paragraphs 4.6.7 and 4.6.8 relate to existing employment sites and state that;

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'4.6.7 Certain industrial and related uses may conflict with other uses, especially housing. To operate effectively, these activities usually need dedicated industrial areas, where they can be confident that they will not be a bad neighbour to anyone. In managing the retention and release of existing employment sites authorities should aim to ensure that the integrity of remaining employment sites is not compromised.'

'4.6.8 The traditional employment uses tend to generate lower land values than many other land uses, especially housing and retail, consequently, any land lost to these uses is generally difficult to replace. Planning authorities should avoid releasing for other uses sites where there is strong evidence of likely future need for B1-B8. In some areas, older, lower-cost employment areas may be required, especially for small and new firms who cannot afford newer and more prestigious accommodation. The loss of such areas may cause harm to local economies and should be avoided.'

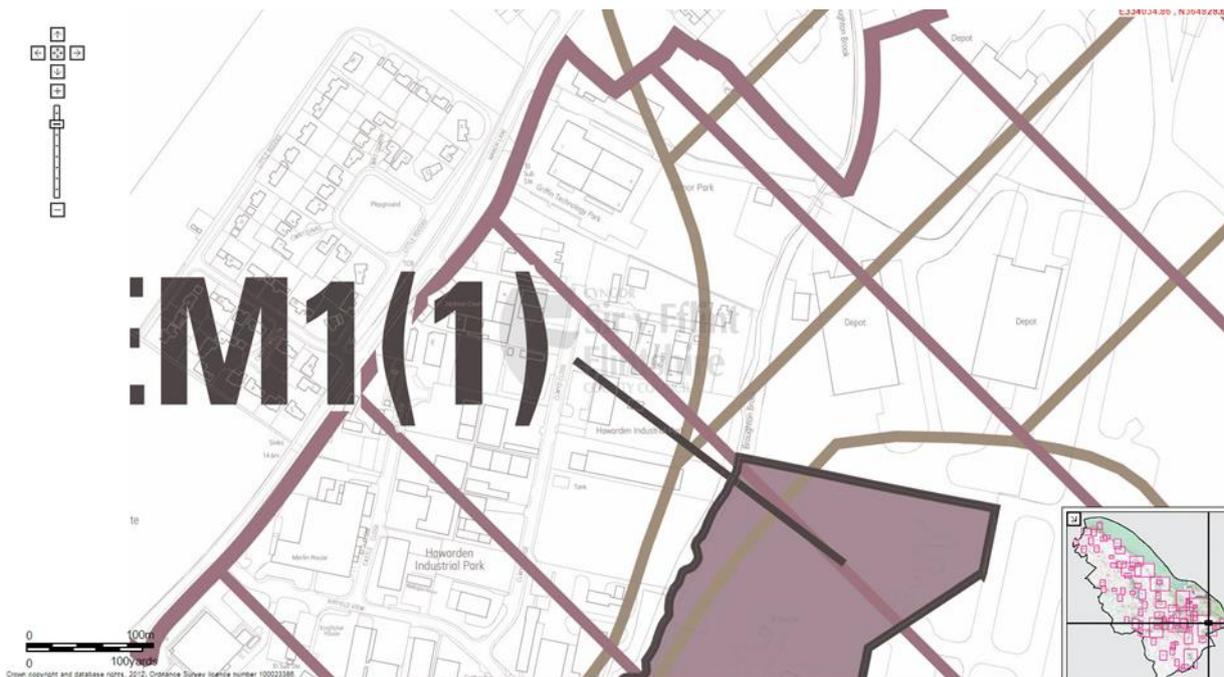
Local Planning Policy

3.16 The current adopted development plan is the Flintshire Unitary Development Plan (2011).

Flintshire Unitary Development Plan (FUDP)

3.17 Within the FUDP, the site is allocated as part of the Hawarden Industrial Estate as identified in the FUDP Policy Map extract in Figure 5.

Figure 5: Extract of FUDP Policy Map



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3.18 This proposal will utilise vacant brownfield land within the curtilage of the existing Hawarden Industrial Estate, where former units have been demolished to slab level. In addition, by helping to facilitate the expansion of the existing business, the proposed development will contribute to economic growth and job creation in the area.

3.19 FUDP Policy EM3 relates to Development Zones and Principal Employment Areas and states that;

'Within development zones and principal employment areas, as defined on the proposals map, the following types of employment development will be permitted:

- a. B1 business use;*
- b. B2 general industry;*
- c. B8 storage and distribution.*

provided that:

- i. the site is not allocated for a specific employment use by virtue of policy EM1 or EM2;*
- ii. the proposal is of an appropriate type and scale for both the site and its surroundings;*
- iii. the proposal will not have a significant adverse impact on residential or other amenity or unacceptably restrict neighbouring land uses;*
- iv. the proposal provides satisfactory on-site parking, servicing and manoeuvring space and that the highway network (including access and egress) is adequate to safely cater for the type and volume of traffic generated by the proposal; and*
- v. the proposal has no significant adverse impact on the integrity of nature conservation sites, the landscape and historic features.'*

3.20 Paragraph 13.28 of the supporting policy states that;

'This policy seeks to identify on the proposals map the areas where most employment development is likely to take place. The concept of Development Zone designations has been rolled forward from the Alyn and Deeside Local Plan. However, they have been rationalised so that they only embrace areas within the County that are truly strategic in nature in terms of their economic importance. It is considered that the following 3 areas satisfy this approach:

Deeside Development Zone: this area is of strategic economic importance within the sub-region of eastern Flintshire, west Cheshire and the Wirral, forming the 'Northern Gateway' to the County. The designation recognises its current and long term development potential, specific employment land allocations and its existing and potential transport links. The proposed boundary has been drawn back to exclude land North

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of Shotwick Road, which will now have a countryside designation, and the former power station site to the south of the River Dee, which is now more appropriately dealt with through a specific employment allocation. A minor extension is proposed to the east of the A550 to include the DARA site, which has been highlighted as having potential for future high quality business use. **Airport Development Zone: this is another area of existing employment uses and industrial estates and which also encompasses the Hawarden Airfield and the aerospace industry. Given the existing focus of employment, the expansion of Airbus and the growing potential for spin-off developments from the aerospace sector, the area has a strategic function in the context of the County's economy. The existing boundary of the Zone is proposed to be extended to the north west up to the B5129 and to the south to include a proposed new employment land allocation east of Manor Lane.'**

3.21 As stated above, the company will use the building for aircraft manufacturing equipment, and therefore the use is in line with the Deeside Development Zone and Airport Development Zone.

3.22 Paragraph 13.28 states that;

'The Principal Employment Areas comprise a mixture of:

- existing employment land and buildings;
- land or buildings with planning permission (commitments);
- undeveloped employment allocations;
- other undeveloped / unannotated land.'

3.23 Paragraph 13.30 goes on to state that;

'By identifying key areas where new employment development will generally be acceptable, the Plan aims to provide a greater degree of certainty and consistency and avoid the need to identify numerous small allocations or commitments. The policy is applicable to the use of land, new build, conversion, redevelopment and extension or expansion. Within these areas, employment development will generally be acceptable, unless it is allocated for a specific use by virtue of another policy. However, it will still be necessary for proposals to be of a type and scale which respects the local environment and amenity of other land uses and residents. Similarly, the local highway network must be capable of catering for the volume and nature of traffic likely to be generated. Proposals which are major traffic generating developments will be assessed against policy AC4 to assess how they seek to reduce car based journeys.'

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3.24 Paragraph 13.23 goes on to state that;

'Brownfield sites account for over 60% of the employment land allocations. New allocations include sites at Broughton, Buckley and Connah's Quay. The Manor Lane/Hawarden Park Extension site is intended to facilitate aerospace sector spin-off developments and enable improved access from the B5125 to the existing industrial estates at Hawarden Park and off Manor Lane. Whilst the site comprises best and most versatile agricultural land, it is considered that there is an overriding need for the development. Aerospace related projects are primarily driven by proximity to their customers and therefore need co-location in the form of a dedicated supplier park. The allocation is a natural extension to the Airport Development Zone and has well defined physical boundaries. No other brownfield sites or land of lesser agricultural quality in the vicinity or wider area is considered to satisfy the criteria for such a development. A development brief will be produced for the Manor Lane/Hawarden Park Extension site which will include matters such as the protection of landscape and nature conservation features.'

4. Economic Benefit Test

- 4.1 Given that the Local Planning have raised concerns in the past in terms of the impact of the high bay buildings on the outlook of residential properties there is a need as set out in Section 2.1 of TAN 23 to consider the test for 'weighing economic benefit' against the following three criteria:
- Alternatives;
 - Jobs accommodated; and,
 - Special Merit.
- 4.2 This statement has already set out the key economic benefits in terms of the jobs accommodated, both in terms of the number and quality of existing jobs the number and quality of new jobs to be created. Additionally, the special merit of the proposal in terms of the uniqueness and quality of the product is clear as set out in the background to the proposal.
- 4.3 The remaining test relates to the consideration of alternatives. Given the synergy with the Airbus facility, the need for the proposed new building to be on this site is clear. The high bay building needs to be very close to the Airbus factory but also needs to be on the existing Electroimpact UK Ltd site in particular. Potential future customers would initially be hosted at the conference/meeting rooms within the existing building to the immediate north of this application site, then shown to the facilities available within the high bay building. The building also needs to be in very close proximity to technical support and administrative teams within the main building.
- 4.4 It is clear therefore that the proposed building would need to be on the current site.
- 4.5 The current proposal now strikes a balance between the need to protect residential amenity, the setting of listed buildings and the economic benefits arising from this proposal.
- 4.6 In addition to the consideration of off-site and on-site alternatives TAN 23 advises that before concluding that 'there is no alternative' local planning authorities are encouraged to try to assess whether competing firms, serving the same markets, could generate the same development and jobs. This requires close liaison with the local authority Economic Development Department or other appropriate stakeholders who might have detailed knowledge of the capacity and expertise of firms in the area or sub-area. In this case, due to the unique nature of the operation, it is clear that there are no alternative firms in

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Flintshire who could provide the same product. In fact, competitors would only be found outside the UK. With that in mind we are certain that, if consulted, as required by TAN 23 the Council's Economic Development Department would support the proposal, as would the Economic Development Departments within Welsh Government.

- 4.7 It is therefore clear from the foregoing that the proposal complies with the tests for weighing economic benefits against any perceived harm to other interests in this case.

5. Conclusion

- 5.1 The proposed development relates to the expansion of the existing manufacturing business Electroimpact UK Ltd (the owner occupier) on their site at the Hawarden Industrial Estate and within the Deeside Enterprise Zone. Full planning permission is sought for Category B2 General Industrial building.
- 5.2 The application can be supported under planning policy EM3 of the UDP and national planning policy and guidance.
- 5.3 The proposed new building will enable Electroimpact Ltd to expand their manufacturing business on their existing site without the need to relocate to a less suitable site.
- 5.4 The building will be used for the assembly of various aircraft manufacturing equipment - tooling and jigs. This is from small drill jigs, to large complex automated machines, to custom robot drilling machines, to a mock-up of a complete aircraft assembly jig.
- 5.5 The locational need of the proposal relates to the direct link to Airbus, who's factory is located directly to the north of the site. Due to the unique nature of production line of this manufacturing process, and the use of the same engineer throughout the process, it is essential that the additional building is located on the same site. This will also prevent the need for large components such as the example shown in Figure 3, having to be transported considerable distances around the area on public roads.
- 5.6 There are no other suitable, alternative sites within the vicinity for this hay-bay building, or a secondary site. Therefore, through the assessment of suitable alternative sites, the evidence of additional highly skilled Jobs accommodated; and, the Special Merit of the company and their locational need, it is considered that the economic case does in this instance outweigh the potential for impact on the area.
- 5.7 A significant material consideration is that the site is within the Hawarden Industrial Estate and Deeside Enterprise Zone. There was previous a building of similar footprint, albeit lower in height located on this site. With this in mind, the principle of this type of development is appropriate in this location.
- 5.8 Given that the Local Planning the Local Planning Authority had raised concerns in terms of the impact of this high building on the outlook of residential properties there is a need as set out in Section 2.1 of TAN 23 to consider the test for 'Weighing economic benefit' against

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the three criteria of the consideration of alternatives; jobs accommodated; and, special Merit.

- 5.9 This statement shows that the proposal strikes the correct balance between the need to deliver the significant economic benefits arising from this proposal and the need to protect residential amenity and the character and appearance of the area.

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