Planning Statement (Rev 1)

This document represents a revision to the initial planning statement and has been updated to include additional information on the nature of the site, previous and proposed uses, and an Energy Statement. New text is shown in red.

AOC Resins Ltd

AOC is a global supplier of resin and solutions to allow the production of composites. AOC Resins Ltd (AOC) are currently engaged in the redevelopment of their Haverhill site.

The project involves the demolition of several existing structures, the creation of a new tank farm, workshop, and control room etc... with the works being completed in a phased manner of the next 3 years.

Site History

Resin manufacture at the Haverhill site goes back a long way.

In the 1960's a US company called Cargill entered a joint venture with a company called Blagden and purchased the Haverhill site as a joint venture. Subsequently the Haverhill resin plant was opened in 1970 to exploit a range of new technologies developed jointly by Cargill and Blagden.

In 1981 Cargill sold its interest to Blagden, following which there were several transfers of the business from company to company within the Blagden group ending in 1999 when Borden Chemicals bought Blagden and carried on the manufacture of resins at Haverhill.

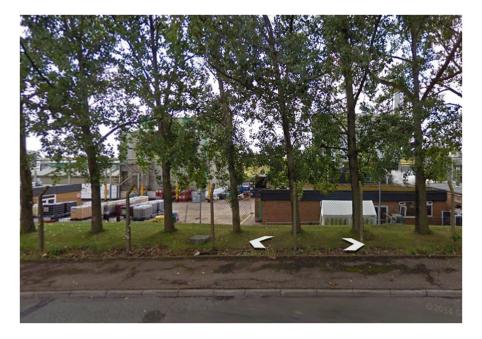
In 2000 Cray bought the Borden coating and structural resin business, and entered a toll manufacturing arrangement under which Borden would continue to manufacture resins at Haverhill for a short period before the site was to be closed.

However, before the site closed Deltech brought the site from Borden as a going concern, and the site continued to operate under Deltech's ownership until late 2022 at which time the site and associated business was purchased by AOC Resins Ltd, the current owners.

In summary, the site has been in operation since the early 1970's under a range of different names, therefore it should be noted that only limited historical data remains and much of the site's infrastructure dates to this time.

Previous Buildings

Below is a view from Piperell Way showing the two large building (which have now been removed due to their poor state of repair), the new warehouse is smaller. The picture also shows that the buildings are already well 'screened from the road by the mature trees and on the Hellions Bumpstead Roadside they are not visible.

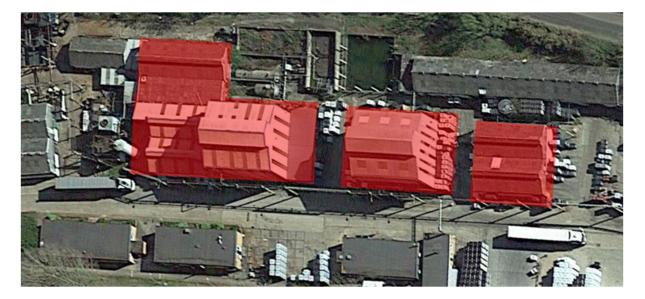


Additionally, the area between Hellions Bumpstead Road and Phenix Way is currently under development and a large (black clad) building has been erected with will entirely screen AOC proposed redevelopment for view.

As outlined in the Site History section, the site has undergone several expansions/ redevelopments in which resulted in the erection of various manufacturing and storage building across the site, most of which had in recent years fallen into disrepair, as the site's previous owners (Deltech) closed down / relocated production to non-UK sites.

Consequently, all the resin manufacturing / storage buildings located in the centre section of the site had been redundant for some time and on purchasing the site AOC resins took the decision to demolish a number of structures rather then spend money making them weather tight / safe.

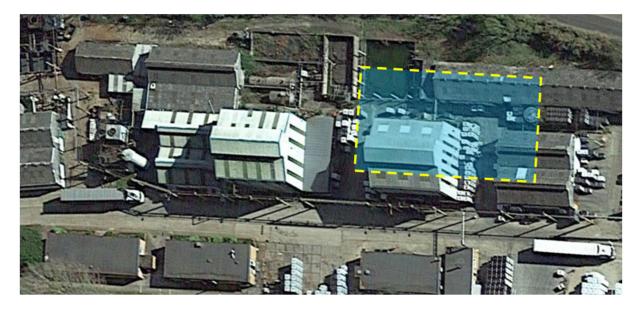
The area occupied by three of these buildings (each having footprints of 600m², 800m² and 900m² and the two tallest are 15m tall, they are shaded in red on the picture below) has been earmarked for redevelopment.



The area, which is currently hardstanding, will be re-used for a combination of simple covered storage (Dutch barn style building – roof and no sides) and a simple unheated dry storage warehouse (fitted with standard pallet racking).

New Warehouse

The new warehouse will be 9m to the eves and occupy an area of approximate 840m², in the location shown below as marked by the yellow dotted line.



The new warehouse will occupy the space outlined in yellow and will be 9m to the eves and have a floor area of no more than 800m². The remaining area will be returned to hardstanding / simple low level covered storage (area indicated by the green dotted outline).

The building will be clad in stand profile plastic coated metal sheeting and have two forklift truck entrance doors, one with a weather protection canopy above and a small annex with a dock-leveller unit installed. Furthermore, the building will have one pedestrian door and several fire escape doors. It will also contain a small, enclosed area (used for reviewing delivery vehicle paperwork).

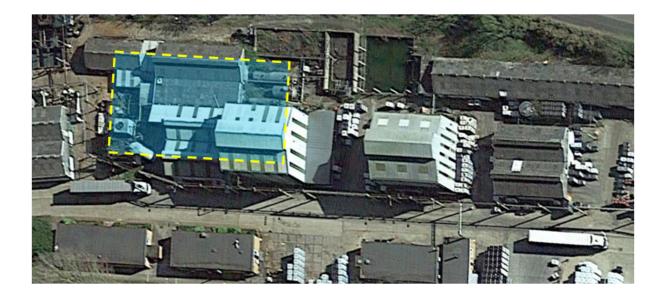
A copy of the Warehouse building preliminary steelwork drawings have been supplied.

New Covered Storage

The new covered storage building will be 4.9m to the eves and occupy an area of approximate 810m², in the location shown below as marked by the yellow dotted line.

The structure will be a simple covered area of hardstanding with a dock-leveller located to the eastern end to allow the safe loading of finished products onto vehicles.

The area will be open on all sides to allow the free movement of air and will be fully bunded to prevent the release on any liquids to unmade ground or the sites drains in the unlikely event of a spillage.



Business Case

The proposed multi-million-pound investment is necessary to secure the future of AOC's manufacturing at their Haverhill site, as it further strengthens the site's overall position as the Company's primary UK manufacturing site.

If the project where not be go ahead due to planning restrictions this would potentially place the longterm prospects for the continued manufacture at Haverhill in very real doubt, which in turn would place the overall site's viability in question and risk the loss of countless jobs both at the site and across the smaller companies that depend on the Haverhill site.

Although the project will not result directly in the creation of more jobs at AOC's Haverhill site, the project will result in a significant investment in the local community as AOC will be looking to undertake the works necessary by utilising its relationships with local engineering and construction companies.

<u>Traffic</u>

The project covers the redevelopment of the site's existing raw material and finished product storage and as such does not result in the need for any new staff roles, contractors and other vehicle movements.

Therefore, should the planning application be granted the will be no additional traffic demand on the local roads around the site's Piperell Way entrance.

Indeed, as part of the site's redevelopment the haulage company currently using buildings owned by AOC to the east end of the site will be relocation way to new premises, and therefore overall, the number of HGV vehicles will in the short term reduce.

<u>Fire</u>

The risk of fire resulting from the proposed investment is low to negligible as the Company already safely handles and processes all of the chemicals involved. Furthermore, the new installation will be subject to detailed and rigorous Process Safety studies and utilise all comply with industry good practice (as a minimum) to ensure it meets all aspects of UK regulation.

The site already operates under the Control of Major Accident Hazards (COMAH) Regulations and as such the proposed modifications have been discussed with the UK Health and Safety Executive (HSE) and Environment Agency (EA) working together as the COMAH Competent Authority, and the Company's insurers FM Global.

As a Lower tier COMAH site, the site already has an on-site emergency response team.

As part of the redevelopment, the site is installation a new high pressure fire main running around the site designed to supply both fixed fire protection systems (sprinklers) and a number of strategically located fire hydrants. The proposed warehouse will be equipped with purposed designed fixed fire protection, with the coverage storage being an unmanned area, positioned remotely from the existing resin plant structure to ensure the risk of an event spreading between buildings being minimised.

Rainwater Management

The redevelopment of the site does not introduce any new rainwater catchment, as the new building simply replace existing structures and hardstanding.

As part of the redevelopment work AOC are looking at the possibility of diverting rainwater from the roofs of the new warehouse and covered storage areas to new soak aways in order to reduce the discharge from site during rainstorms.

Regardless, of whether this is possible, AOC will be installing a new fire water retention lagoon on the site designed to retain around 1,800m³ of water (in the even of a fire at the site). The design of the site's new tertiary containment system will also allow the site to attenuate the flow of surface water from the site during extreme rainfall as the fire water lagoon will double as a storm water attenuation basin.

<u>Waste</u>

The works to redevelop the site will not lead to the creation of additional waste streams.

Foul Sewage

The new warehouse and covered storage areas have no connection to the site's existing foul sewer connection and so impose on additional loading.

Employment

The new warehouse and covered storage areas do not directly result in the requirement to increase the level of employment at the site however, by allowing the AOC to progress with the creation of the new warehouse and covered storage areas this unlocks the potential for further investment at the site and the corresponding increase in direct and indirect employment.

Hazardous Substances

The new warehouse and covered storage areas do not result in any change to the site existing Hazardous Substance Planning consent, or the site's COMAH status. The works result in an overall reduction in the site's risk profile as the new warehouse will be fitted with fully compliant fixed fire protection system (sprinklers) supplied by new fire water pumps and tanks to be installed on site.

As part of the larger redevelopment project the Company is undertaking extensive improvements to its secondary and tertiary containment structures therefore reducing the risk of any environmental impacts.

Energy Statement.

The creation of the proposed covered storage and warehouse areas at the AOC Haverhill site introduce little additional energy demands on the site, as both structures are un-heated, unoccupied storage areas, and as such have an extremely small energy footprint.

Both structures are always open to the environment and so have been designed as such, with simple single skinned cladding as insulated panels would add no additional energy saving benefit and have a significantly higher carbon footprint in their manufacture then standard cladding.

As such the structures will be fitted with energy efficient LED lighting, operated on photocells. The use of motion detection within both areas is inappropriate as both areas need to remain illuminated at all times for the safety of personnel / avoidance of accidents and to ensure the security of the site.

Due to the chemical manufacturing nature of the site and the present of potentially flammable vapours within the coverage storage areas (area covered by the site's DSEAR risk assessment), following discussions with the HSE, AOC have chosen to not include any solar panels within the design due to the elevated fire risk these systems pose.