

WEST DUNBARTONSHIRE COUNCIL**Report by Strategic Lead for Regeneration****Council: 24 June 2020****Subject: ExxonMobil Commercial Agreement****1. Purpose**

- 1.1** To seek Council agreement to complete the transfer of the land owned by Esso Petroleum Company Limited and their affiliates at Bowling to the ownership of the Council. In addition the Council is asked to note the refreshed timetable for the procurement of a lead contractor to deliver the City Deal project and the expected overall project completion timeline.

2. Recommendations

- 2.1** It is recommended that Council:

- Agree to the transfer of ownership of land currently owned by Esso Petroleum Company Limited and its affiliates, at Bowling to the Council. The Council also give Delegated Authority to the Strategic Lead Regeneration and the Strategic Lead Regulatory to agree final terms for the transfer of the land to the Council on terms commensurate with this report.
- Note that Officers will re-examine and assess the Environmental Insurance market and propose possible solutions to Council prior to the completion of the land transfer.
- Note the refreshed timetable for the procurement of the lead Infrastructure Contractor for the overall project.
- Note the refreshed overall project completion timeline.
- Note that the additional £6.153m funding requested by the Council has yet to be approved by the Glasgow City Region City Deal Cabinet.

3. Background

- 3.1** The Glasgow City Region City Deal Infrastructure programme equates to £1.13b of investment for 20 projects over a ten year period. These projects are progressing and have reached various stages from Strategic, Outline and Full Business cases stages of approval.
- 3.2** In August 2014 the Council accepted an offer from the Scottish and UK Governments to participate in the Glasgow City Region City Deal. The offer was based on the project submitted by the Council for the re-development of

the site at Bowling, currently owned by Esso Petroleum Company limited and their affiliates (effectively referred to as ExxonMobil hereafter).

- 3.3** The approval process set by both Scottish & UK Governments for City Region City Deal projects requires Councils to follow a 3 stage approval. The first stage is the submission and approval of a Strategic Business Case outlining the Economic need locally for a project of this nature. The next stage is the submission and approval of an Outline Business Case. This case should provide the detail and clarity of what the Project will deliver and the expected timeline and costs. The last stage is the successful submission of a Final Business Case which provides the detail of the procurement route, final expected costs involved in delivering the project and a detailed timeline.
- 3.4** The Strategic Business Case was developed and submitted to Council on the 24 June 2015 and subsequently approved by the City Region City Deal Cabinet on the 18 August 2015.
- 3.5** The Strategic Business Case identified costs of £27.897m. The basis of City Deal funding is that there is an expectation the City Deal would support 86% of the costs (£23.991m) and the Council will fund the other 14% (£3.906m).
- 3.6** On the 22 February 2017 the Council approved the Outline Business Case for the project. The plan was submitted to the City Region Cabinet and was approved on the 11 April 2017.
- 3.7** Following scrutiny by the Scottish and UK Governments through 2017/18 it was felt that all Outline Business Cases should meet the rigour of the UK Governments Treasury Green Book criteria. All Glasgow City Region City Deal projects were asked to submit a refreshed Outline Business Case taking account of the criteria set out in the Treasury Green book. The opportunity to revisit the outline case allowed for the re-appraisal of the project, the complexity of the site and the likely costs to be incurred.
- 3.8** The Council subsequently approved a refreshed Outline Business Case on 28 November 2018 with updated cost estimate of £34.050m. This additional sum of £6.153m has had to be covered by Council funding due to the absence of funding support from the Glasgow City Region City Deal. It was agreed that officers would make every effort to try and secure additional City Deal funding from projects which though approved may be withdrawn by other Councils. The Programme Management Office (PMO) and the Chief Executives Group of the City Deal are aware that our Council is looking to take advantage of any City Deal funding which becomes available to cover our additional costs. As previously, any funds issued would be dispersed recognising the 86%-14% split. Therefore the Council would be expected to fund £0.861m of the requested £6.153m should this funding gap be identified by the PMO and approved by the Glasgow City Region City Deal Cabinet.
- 3.9** As the Council has been progressing the project through the Glasgow City Region City Deal diligence process, Council officers have been in regular

dialogue with ExxonMobil to ensure that the site will be remediated to a level acceptable to the regulatory standards governed by the Council's Environmental Health team and the Scottish Environmental Protection Agency (SEPA) and will be remediated to enable future industrial use on the site.

- 3.10** ExxonMobil have been considering their approach to remediation over a number of years and subsequently submitted their planning application (DC18/013) in January 2018 and received approval to proceed on the 20 March 2019.
- 3.11** Council previously agreed that officers were to submit a further report for consideration of a commercial agreement when the terms of the agreement were known and also, that it was to be accompanied by an Environmental Impact Assessment (EIA) of the site. This could only be done once ExxonMobil had settled on their approach. The EIA is an assessment of future land conditions after remediation has been carried out. The full Environmental Impact Assessment, due to its size, can be accessed by following the hyperlinks listed in Appendix 3. The EIA can also be accessed through the Council's planning portal and the hyperlink can be found in the background papers section of this report.

4. Main Issues

- 4.1** The Commercial negotiations have been ongoing throughout the last 2 years. ExxonMobil have made it clear from the outset of these negotiations that any agreement regarding the transfer of ownership of their site at Bowling following completion of their remediation works to a generic commercial - industrial standard must include a provision which protects ExxonMobil in the future from any liability which may occur after the transfer of the land to the Council including any events caused by underlying conditions at the time of transfer. As a condition of sale and in order to prevent any likelihood of claim arising as a result of inappropriate end uses, the future use of the site will be restricted to commercial - industrial uses together with public open space, and with specific restrictions e.g. residential development.
- 4.2** This life time protection clause places all responsibility in the future for any Environmental damage arising from the site upon the Council once the land ownership transfer has taken place. Such indemnity provisions, whilst onerous, are not uncommon in transfers of land having a contaminative history where subsequent development is proposed. However this conditionality is compensated for by the financial provisions narrated in the following paragraph. ExxonMobil have committed to undertake remediation at the former oil storage facility to clean up the site by addressing levels of contaminants that would be unacceptable in a commercial - industrial developed environment. This is to facilitate the purchase by the Council and redevelopment of the site for commercial and industrial use and the construction of a road through the site and to protect the water environment before the land transfer is completed.

- 4.3** The financial aspects of the commercial proposal put forward by ExxonMobil to the Council includes the transfer of all the sites owned by them at Bowling, running from Eastfield adjacent to the former Scotts Yard at Bowling Harbour, to Westfield and Sheepfold adjacent to Glasgow Road at Milton, comprising 150 acres in total including 45 of the developable land and a further 2 acres for the proposed new road (see Appendix 1), remediated to the standards agreed by the Council's Environmental Health team and the Scottish Environmental Protection Agency (SEPA) as suitable for generic commercial use to the Council at nil cost. In addition the Council will receive from ExxonMobil the sum of £1m on the day the transfer of land ownership to the Council is completed. The Council will also acquire the Jetty Structures adjacent to the site under lease.
- 4.4** It should also be noted that following extensive discussion with the Council and its representatives, synergies between the remediation works proposed to be carried out by ExxonMobil and the Council's own works will allow the Council to realise an estimated cost reduction to the works required of approximately £0.630m on the Council's estimated costs contained in the Outline Business Case previously approved by Council on the 28 November 2018.
- 4.5** The extent of remediation has been agreed with the statutory regulators and this is further being overseen by independent consultants (Stantec) acting for the Council.

The remediation is based on extensive ground investigation, sampling, laboratory testing and field monitoring that has identified the types of contamination and its extent across the site. The most significant form of contaminants are as expected, comprising middle and some light distillate hydrocarbons. Other contaminants such as heavy metals and asbestos are present as is commonplace on brownfield sites with an industrial history. These latter contaminants are less mobile and can be readily remediated including through the standard technique of development design whereby such materials captured and safely sealed during the development process. The extent of unacceptable contamination has been defined from this investigative work and forms the basis for the extent of the remediation work. If any unexpected contamination is found during their planned remediation works this will be explored further and also remediated by ExxonMobil.

- 4.6** In order to mitigate risk to the Council, our appointed Environmental advisors have been examining the overall approach ExxonMobil has adopted in developing their remediation plan. Stantec have looked at the detail of the various ground investigations, laboratory testing and field testing and their results. During this process Stantec have actively challenged, the interpretation of the information and successfully made the case to test more often and in more areas. They have suggested to ExxonMobil and their advisors how they could best achieve the requirements of both the regulator and the Council, as acquiring party, by considering a number of issues put forward by them. It has been our finding that ExxonMobil have been

responsive to this approach, understanding that such a co-operative approach brings dividends in terms of time and certainty.

- 4.7** The remediation strategy submitted by ExxonMobil was approved by Planning Committee on 20 March 2019. Following such approval but before ExxonMobil had completed the procurement for an Environmental Contractor to carry out the remediation of the site a sheen was discovered at the water edge at the Centrefield area of the site. After investigation by ExxonMobil a decision was taken by them that the cause of the sheen would have to be removed from the site. This meant that a new wall approximately 150 metres in length which was going to be constructed outside the old wall could no longer be built. To overcome this issue ExxonMobil have elected to put in a revetment solution and have acquired land from the Crown Estate to enable this.
- 4.8** As a result of this investigation ExxonMobil agreed to Council officers' request to re-test other key water edge locations throughout the site. These tests were monitored jointly by ExxonMobil's advisors and Stantec, on behalf of the Council. These tests showed that these areas did not show any unusually high level of contaminants.
- 4.9** As stated previously, ExxonMobil had their Remediation Strategy approved on 20 March 2019. The approach adopted to meet the environmental targets agreed with the Regulators was by a Thermal process which sees contaminated soil exposed to extremely hot temperatures which in turn breaks down the contaminants until the soil is remediated.
- 4.10** The deliverability of this approach was called into question by the logistics of bringing in the technical equipment to carry out this process and the fact that the contractors who bid for the work during ExxonMobil's procurement process all preferred more traditional methods of remediation. As a result ExxonMobil requested that the regulators allow them to change the method of remediation to a "soil washing" solution. This change would not lessen the remediation targets set by the Regulators and approved within their initial application to remediate their site.
- 4.11** ExxonMobil, at the request of the regulators, produced an evidence based report detailing for the regulators that this alternative process of soil washing will be capable of achieving the Environmental targets previously set by the regulators when the approach included a thermal process. The end outcome will be the same or better but achieved by using a different method than that originally proposed.
- 4.12** The Environmental Health team within the Council and SEPA have considered the evidence showing clearly that an improved treatment target than previously agreed can be achieved by soil washing and therefore have agreed to the change in approach in the delivery of the original remediation strategy.

- 4.13** In addition to the improved treatment target the soil washing approach has been shown to be physically and technically suitable, whilst having a significantly reduced net environmental impact relative to thermal treatment.
- 4.14** Based on the approved remediation strategy for the site by ExxonMobil and taking account of all the factors affecting the Council's proposed development on the site the Council's advisors have been able to produce an application for Planning Permission in Principle (PPiP) and an Environmental Impact Assessment for the entire site.
- 4.15** The PPiP application was submitted on behalf of the Council by Stantec at the end of April 2020. The application clearly shows the significant ambitions the Council has for the site and highlights the deliverables of the Masterplan which includes:
- up to 44,550m² commercial and light industrial development, comprising a mix of Storage, Distribution, Industrial, Business and Office space;
 - 1.95km of new spine road with associated drainage and lighting infrastructure;
 - 1.32km of upgraded existing public road (A814);
 - a new junction on the A82 at Dumbuck with closure of the existing junction;
 - a remodelled junction on the A82 at Dunglass;
 - an enhanced routing of 475m of the National Cycle Network Route 7 in the vicinity of the site;
 - a new underbridge of the Glasgow – Dumbarton Railway at the western access to the site;
 - a new railway overbridge at the eastern access to the site;
 - flood mitigation works;
 - environmental mitigation works
 - site drainage works; and
 - establishment of platforms for development across the site.
- 4.16** The site masterplan layout (see Appendix 2) identifies the areas to deliver the commercial - industrial floorspace by the construction of platforms for development. Office and Industrial development is proposed to be located in Eastfield, with Business in Centrefield and Storage and Distribution in the Westfield areas. In addition to the above, landscaping, open space, green corridors and public spaces have also been incorporated throughout the development, in many cases overlapping between these zones.

The masterplan also includes a new link road with upgraded A82 and A814 access junctions alongside a railway underpass and overbridge.

A heritage area has been identified around Dunglass Castle and this will comprise of a protection zone to ensure the listed structure and its setting are not compromised as the site develops and evolves. Council ownership of the Heritage assets; the Castle and the Obelisk provides an opportunity to allow public access in the future. The City Deal funding is focussed on the infrastructure works required to create an attractive location for businesses.

Every effort will be made by Council officers to seek Heritage type funding to promote the Historic assets.

Details regarding green infrastructure, flood defence, drainage, and utilities infrastructure also accompany the masterplan proposals.

- 4.17** Planning Officers are considering the application and it will be presented to the Planning Committee in the near future for decision. Based on that approval being given by July/August 2020, the following timetable highlighting key milestones can be put in place which shows members the expected timeline from Planning Permission in Principle to delivery of the City Region's City Deal project:
- PPiP Approval by end July/August 2020;
 - Geotechnical Investigations can re-start in July 2020 and conclude reporting early October 2020;
 - Preliminary Designs and Approvals – May 2020 – December 2020;
 - Detailed Designs and Approvals – December 2020 – October 2021;
 - Finalise Construction Costs (requires earlier appointment of Contractor) – December 2021;
 - Submit Final Business Case (FBC) – December 2021;
 - Mobilise Contractor/Prelim works – from January 2022; and
 - Construction of Roads, Bridges, Platforms, Drainage and Flood Mitigation February 2022 – December 2025
- 4.18** Throughout the development of the Council's City Deal project ambitions for the ExxonMobil site, the Council has been aware that land holdings either surrounding or near to the site were going to be required to come into Council ownership to effectively develop the plan outlined in the Outline Business case.
- 4.19** A number of discussions have taken place with the six affected third party land owners. Council officers have discussed and explained the proposed development to these owners and the reasons why the Council would wish to conclude a commercial negotiation to purchase the land required by the Council.
- 4.20** The discussions, in themselves, have been useful but Council officers have been restricted in making any financial offer until the Council has agreed to accept the commercial agreement proposed by ExxonMobil. If the commercial agreement is approved by Council, Council officers will be able to put forward terms to all land owners and hopefully progress quickly in securing the land ownerships on behalf of the Council. In the event of there being an unwillingness to sell or unrealistic commercial expectations of any owner then, the Council may have to consider action under the Compulsory Purchase Order process. Officers will do all they can to avoid this process and would expect to conclude all land transfer negotiations on terms acceptable to all parties. A further report would be brought back to members to approve such terms.

5. People Implications

- 5.1** There will be a requirement for the Council to closely manage this project. The Capital Investment team continue to lead on the project and will be assisted by the Regeneration Team in ensuring the various project milestones are met.

6. Financial and Procurement Implications

- 6.1** The overall cost estimate for the project is £34.050m. As was agreed in November 2018 by Council, this sum which was a £6.153m increase on the previous estimate at Strategic Business Case of £27.897m would require to be funded by the Council if no other external funding became available. Council officers have notified the Project Management Office of the City Region of our requirement for additional funding. In turn this request has been shared with all the Chief Executives of all eight Local Authorities which make up the City Region. To date the additional funding request has not been approved.
- 6.2** The Council's Procurement team together with officers from Regeneration have been involved in a market testing exercise to identify potential main contractors for this project. This exercise was very productive and identified 3 companies with the past experience who could be suitable for the role.

The Council's procurement team have identified a 46 week procurement timetable for developing the Contracting strategy to Main Contractor start. We would intend to commence that procurement process immediately on approval of this report.

7. Risk Analysis

- 7.1** Even though the site will be fully remediated to the required national standards by ExxonMobil, large scale development on a site such as the ExxonMobil site at Bowling has many environmental risks for the Council which cannot be fully anticipated. The size and complexity of the site with numerous underground water courses running through it and the scale and complexity of the proposed civil engineering works makes it susceptible to changing environmental conditions which could produce new risks. In order to mitigate against this potential eventuality Council officers have been investigating the possibility of purchasing insurance under an Environmental Impairment Liability (EIL) cover.
- 7.2** Using the Council's existing insurance broker, the Environmental Insurance market was tested for a policy designed to protect the Council against:
- potential claims in relation to Pre-existing contamination associated with the site; and
 - pollution that could be caused/released during the site's redevelopment.

Environmental Impairment Liability (EIL) cover for this type of large-scale brownfield site and development is a very specialist area and suitable cover is only available from a limited number of insurers.

The broker approached 12 insurers capable of being able to satisfy the minimum criteria of providing:

- A 10 year duration Environmental Damage & Pollution Legal Liability Policy (EDPLL policy) to protect the Council against clean-up costs and third party liability arising from pre-existing (historic) pollution conditions; and
- 10 year duration of cover to include Contractors Operational Loss to cover future site development works.

The method on which insurers were selected was based on the following criteria:

- A. Fundamental coverage requirement, as agreed with WDC - 10-year duration Property Pollution Liability policy for pre-existing contamination and Contractors Pollution Liability policy for the development works (as described above)
- B. Breadth of cover, conditions exclusions etc.
- C. Cost competitiveness
- D. Experience and ability of underwriting team to service the policy over the 10 year duration
- E. UK Track record of insurer on EIL for large brownfield development Standard of policy coverage offered projects
- F. Credit rating

- 7.3** The Market testing exercise identified 5 companies who may be able to provide cover for such insurance. On requesting that the Insurers submit more detailed proposals based on a 10 year £25m and £40m cover two insurers did not submit and of the three others one was clearly more experienced and provided the lowest cost for the cover. This an insurer would provide, subject to due diligence, a 10 year cover meeting the Council's requirements as specified in para 7.2 at a cost of £0.465m for £25m or £0.659m for a £40m cover.
- 7.4** The quote is conditional on the Insurers being able to assess all information held by the current owner. As the quote cannot be guaranteed so far in advance of the site acquisition (approximately 2 years time) the current quote would need to be accepted in advance of site transfer. Officers will consider the options in this respect further before reverting back to Council.
- 7.5** The project also has a number of other key risks which are directly linked to the actual delivery of the infrastructure development proposed:
- 1) Third party land acquisition cannot be achieved or creates delays:

All of the six landowners will be made an offer for their land ownership rights for the projects required land requirements. This will be based on market land value information. If land owners have an unrealistic value for their land the Compulsory Purchase Order process may be required to be considered.

- 2) Network Rail approvals cannot be secured:
The Council is developing and refining its approach through Network Rail's Governance for Railway Investment Projects (GRIP) which is a management and control process developed by Network Rail for delivering projects on the operational railway. Issue 2 of the GRIP Policy Standard (NR/L1/INI/PM/GRIP/100) was published on 3 March 2012. We have already achieved approval up to GRIP 3 of a 4 stage process.
- 3) Delay in completing the remediation works:
ExxonMobil are waiting on the Council's agreement and lifting of Covid restrictions before commencing their remediation strategy. Their contractor is awaiting instruction to commence.
- 4) Programme slippage resulting in increased costs and also taking into account the effect COVID 19 may have on the speed of delivery:
The programme is being considered in detail and key milestones have been identified which require to be achieved. A constant review of speed of progress will be in place by appointed Project Managers. COVID 19 has had an initial effect of delay in works over the past months. A review of the longer term effects on timelines will need to take place once the situation becomes less fluid. The programme budget includes contingencies which aim to mitigate against this risk.
- 5) Agreement on technical approach with key stakeholders cannot be achieved:
Our pre design works are being shared and agreed upon with all current stakeholders and this approach will continue to be adopted as we move into more detailed design works.
- 6) No additional City Deal funding becoming available:
As explained in Para 6.1 every effort will be made to secure additional monies from the Glasgow City Region or Scottish Government. In the event that this is not possible, the Council has already taken the decision to meet any remaining funding gap.

8. Equalities Impact Assessment (EIA)

- 8.1** The Equalities Impact Assessment was updated in November 2018 is relevant and aligns with the position of the project. It noted potential short and longer term equality impacts. It will continue to be revised and updated to inform the project at all key stages.

9. Environmental Sustainability

- 9.1** In addition to the extensive contaminated land remediation program to bring this important brown field site back into use and in line with national energy policy, the new developments should seek to increase energy efficiency and reduce energy demands through sustainable design and construction.
- 9.2** A review of the suitability of various renewable and low carbon technologies for the Site has been undertaken, at both a ‘multi-plot’ level and ‘building-specific’ level, to identify a ‘suite’ of technologies that could potentially be deployed in ensuring the proposed development meets the Climate Emergency as declared under the Climate Change Act (Scotland) 2009.

10. Consultation

- 10.1** This project has been in the public domain for a number of years and has been consulted upon with the public at a number of stages, most recently in connection with the Council’s own Planning Permission in Principle application which was submitted to Planning at the end of April 2020.
- 10.2** ExxonMobil carried out a number of public consultations when they were developing their planning application for their Remediation Strategy.
- 10.3** All necessary consultations with regulatory bodies have taken place as appropriate.
- 10.4** Discussions have been ongoing at each stage between the Council’s Asset’s Team and all third party landowners to keep them informed.

11. Strategic Assessment

- 11.1** At its meeting on 25 October 2017, the Council agreed that its five main strategic priorities for 2017 - 2022 are as follows:
- A Strong local economy and improved employment opportunities.
 - Supported individuals, families and carers living independently and with dignity.
 - Meaningful community engagement with active empowered and informed citizens who feel safe and engaged.
 - Open, accountable and accessible local government.
 - Efficient and effective frontline services that improve the everyday lives of residents.
- 11.2** This report is directly related to and will underpin the Council’s approach in the strategic priority;
- A Strong local economy and improved employment opportunities

Jim McAloon
Strategic Lead Regeneration

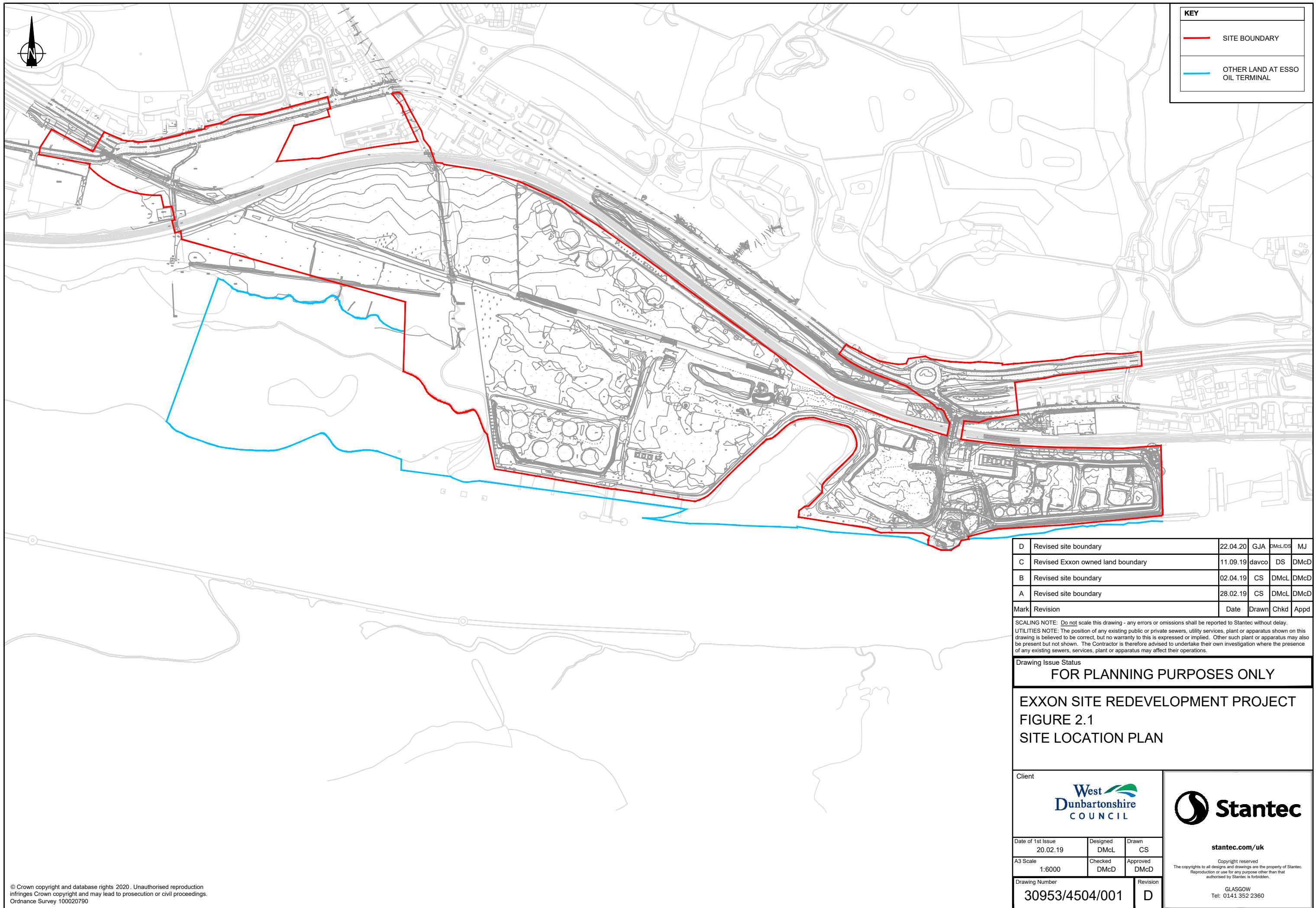
Date: 16 June 2020

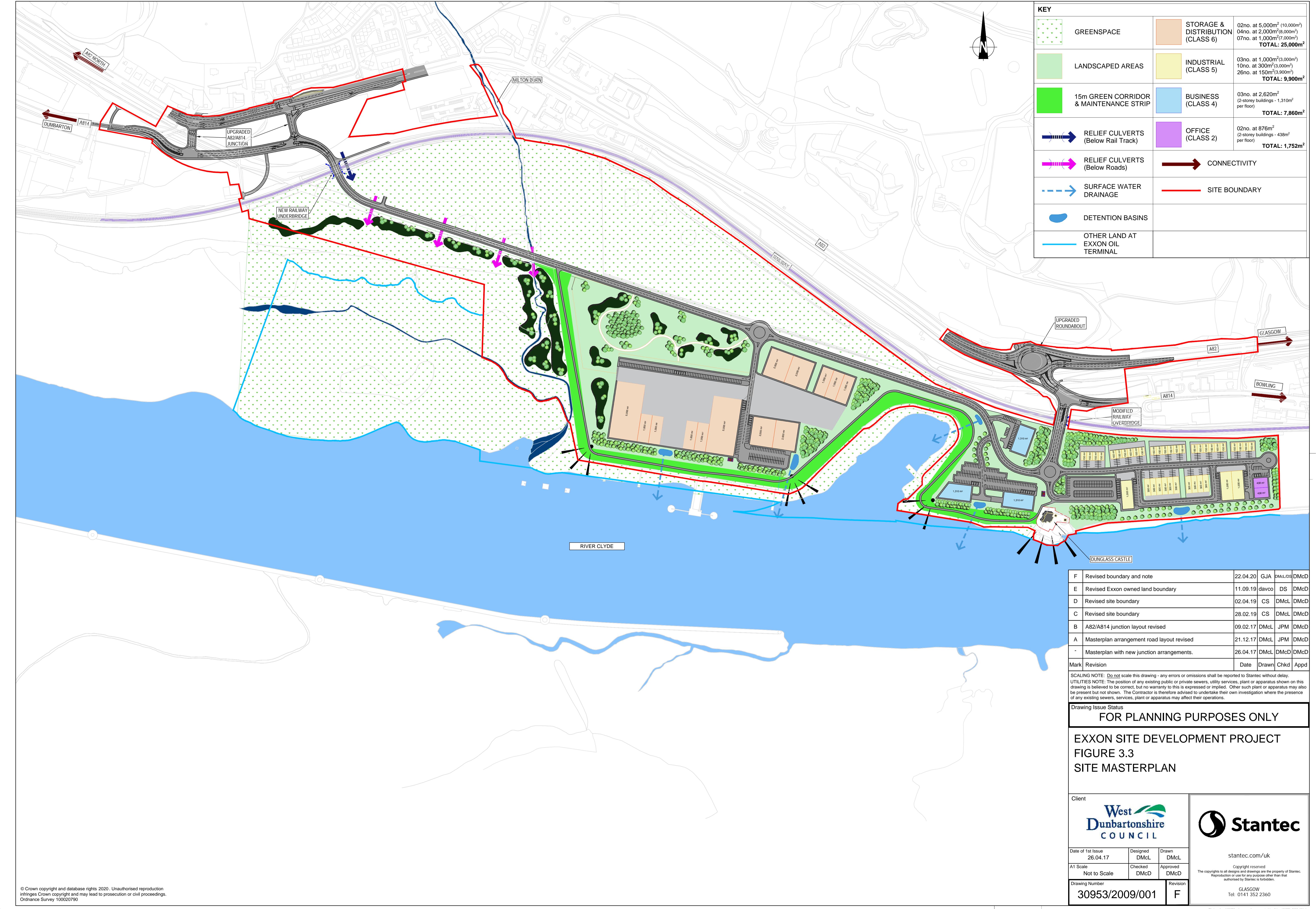
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Appendices: Appendix 1 – Site Location Plan
Appendix 2 – Site Masterplan
Appendix 3 – EIA Environmental Statement

Background Papers: Glasgow City Region City Deal - Council updates on the following dates: 26 February 2020, 30 October 2019, 28 August 2019, 29 May 2019, 14 February 2019, 29 August 2018, 27 June 2018, 31 May 2018, 5 March 2018, 20 December 2017, 25 October 2017, 30 August 2017, 28 June 2017, 26 April 2017, 21 December 2016, 26 October 2016, 31 August 2016, 29 June 2016, 27 April 2016, 24 February 2016.
Glasgow City Region City Deal - Exxon Site Refreshed Outline Business Case 28 Nov 2018
Glasgow City Region City Deal - Update and Exxon Site Outline Business Case 22 Feb 2017
Clyde Valley City Deal - Update and Strategic Business Case- Council 24 June 2015
Clyde Valley City Deal Update - Council 16 December 2015
Clyde Valley City Deal Update - Council 25 August 2015
Appointment of Strategic Services to Support West Dunbartonshire Council's City Deal Project- IRED 18 March 2015
Clyde Valley City Deal- Governance- Council 17 December 2014
Glasgow City Region City Deal- Council 13 August 2014
“City Deal Initiative” Clyde Valley Investment Fund- Council 30 April 2014 (Memorandum of Understanding)
Clyde Valley Community Planning Partnership – City Deal Initiative – Council 28 August 2013
Equalities Impact Assessment November 2018
Environmental Impact Assessment - [DC20/088 – Planning Application – Documents](#)

Wards Affected: All





Appendix 3 – Environmental Impact Assessment

<u>Environmental Statement: Non-Technical Summary Pt1</u>	40 pages
<u>Environmental Statement: Non-Technical Summary Pt2</u>	3 pages
<u>Environmental Statement: Volume 1 - Main Text</u>	307 pages
<u>Environmental Statement: Volume 2 - Technical Appendices (Appendix 1 - Cover Sheet, Introduction & Pen Profiles)</u>	8 pages
<u>Environmental Statement: Volume 2 - Technical Appendices (Appendix 2 - Site & Surrounding Area)</u>	4 pages
<u>Environmental Statement: Volume 2 - Technical Appendices (Appendix 3 - The Proposed Development)</u>	6 pages
<u>Environmental Statement: Volume 2 - Technical Appendices (Appendix 4 - Assessment Methods)</u>	105 pages
<u>Environmental Statement: Volume 2 - Technical Appendices (Appendix 5 - Legislative & Policy Context)</u>	1 page
<u>Environmental Statement: Volume 2 - Technical Appendices (Appendix 6 - Ground Conditions)</u>	1022 pages
<u>Environmental Statement: Volume 2 - Technical Appendices (Appendix 7 - Hydro)</u>	283 pages
<u>Environmental Statement: Volume 2 - Technical Appendices (Appendix 8 - Ecology)</u>	392 pages
<u>Environmental Statement: Volume 2 - Technical Appendices (Appendix 9 - Traffic & Transport)</u>	252 pages
<u>Environmental Statement: Volume 2 - Technical Appendices (Appendix 10 - Air Quality)</u>	14 pages
<u>Environmental Statement: Volume 2 - Technical Appendices (Appendix 11 - Noise & Vibration)</u>	29 pages
<u>Environmental Statement: Volume 2 - Technical Appendices (Appendix 12 - Landscape & Visual)</u>	74 pages
<u>Environmental Statement: Volume 2 - Technical Appendices (Appendix 13 - Archaeology & Cultural Heritage)</u>	72 pages
<u>Environmental Statement: Volume 2 - Technical Appendices (Appendix 14 - Impact Iterations)</u>	1 page
<u>Environmental Statement: Volume 2 - Technical Appendices (Appendix 15 - Schedule of Mitigation and Monitoring)</u>	1 page