Planning Statement – Issued for PAC

Project EAF – Construction of a new Electric Arc Furnace (EAF) and associated infrastructure

Land at Port Talbot Steelworks, Port Talbot

September 2024

Turley

Contents

Acronyms		3
Executive Summary		5
1.	Introduction	8
2.	The Need for the Proposed Development	10
3.	Tata Steel's Vision and Scope of the EAF Project	17
4.	The Application Site and Surrounding Context	21
5.	Pre-application Engagement	29
6.	Proposed Development	37
7.	Planning Policy Context and Material Considerations	52
8.	Planning Assessment	61
9.	Development Planning Obligations – Draft Heads of Terms	91
10.	Summary and Conclusion	92
Appendix 1:	Planning Policy Matrix	94

Client
Tata Steel UK Limited

Our reference
TATT3054

September 2024

Acronyms

ABP	Associated British Ports
BF	Blast Furnace
BOS	Basic Oxygen Steelmaking
CAPL	Continuous Annealing Process Line
CEMP	Construction Environmental Management Plan
COMAH	Control of Major Accident Hazards
DAM	Development Advice Map
DARE	Decarbonisation and Renewable Energy Strategy
DAS	Discretionary Advice Service
DAS	Design and Access Statement
DCO	Development Consent Order
DCWW	Dŵr Cymru Welsh Water
EAF	Electric Arc Furnace
ECIA	Ecological Impact Assessment
EIA	Environmental Impact Assessment
ES	Environmental Statement
EU	European Union
EV	Electric Vehicle
FEP	Fume Extraction Plant
FTP	Fume Treatment Plant
FW	Future Wales: The National Plan 2040
GGAT	Glamorgan and Gwent Archaeological Trust
GHG	Greenhouse Gas
GIA	Gross Internal Area
ha	Hectare
HAA	Hopper, type A, Air braked
HAZID	Hazard Identification Studies
HBI	Hot briquetted iron
HRA	Habitat Regulations Assessment
HSE	Health and Safety Executive
JR	Judicial Review

KC	King's Counsel
LCA	Life Carbon Assessment
LDP	Local Development Plan
LF	Ladle Furnace
LIA	Local Impact Area
LPA	Local Planning Authority
LSO	Long Sea Outfall
LVIA	Landscape Visual Impact Assessment
MMC	Main Control Centre
NBB	Net Benefit for Biodiversity
NG	National Grid
NPTC	Neath Port Talbot Council
NRW	Natural Resources Wales
ONVMP	Operational Noise and Vibration Management Plan
PAC	Pre-application Consultation
PEA	Preliminary Ecological Appraisal
PPA	Planning Performance Agreement
PPW	Planning Policy Wales
RH	Ruhrstahl Heraeus
RLDP	Replacement Local Development Plan
SAB	Sustainable Drainage Approving Body
SI	Site Investigations
SINC	Sites of Interest for Nature Conservation
SPG	Supplementary Planning Guidance
SRIA	Sub-regional Impact Area
SSSI	Site of Special Scientific Interest
SuDS	Sustainable Drainage System
SWIC	South Wales Industrial Cluster

Executive Summary

1. Tata Steel UK Limited ("Tata Steel") is the largest steel producer in the UK. It is a significant employer in some of the UK's most socio-economically deprived communities. The business and the steelworks at Port Talbot are of strategic environmental, social and economic importance in South Wales, Wales and the UK more widely.

2. The application site comprises 159.6 hectares (ha) of predominantly previously developed land, set in the established Port Talbot Steelworks ("Application Site"). The works dominate the heavy industrial landscape in the locality. The Application Site benefits from excellent access to the strategic transport infrastructure in this area of Port Talbot, including the dock, deep sea harbour, primary distributor road (Harbour Way), trunk road (M4 motorway) and local active travel (shared cycleway and footway) routes.

3. Port Talbot Steelworks is an ageing industrial installation. Much of the 'heavy end' infrastructure is at end-of-life and parts have already been closed as a result. The steelworks is a heavy carbon user and GHG emitter. The facility is in critical need of structural investment. This is the only means of:

    - Remaining competitive in a global market and ensuring the long-term viability of Tata Steel as an integral element of the UK economy.

    - Continuing to fulfil its long-established strategic environmental, social and economic role in the locality, region and UK.

4. There is also a critical need for new development to help decarbonise the steel sector in the UK. This is fundamental to ensure that:

    - Wales and the UK has a decarbonised and modern steelmaking industry; and

    - The Welsh and the UK governments can meet the legally binding national GHG emissions reduction commitments to achieve net zero by 2050.

5. To achieve this, Tata Steel is proposing the construction and operation of a new EAF based steel production facility and associated infrastructure within the existing Port Talbot Steelworks boundary, in Port Talbot ("the Proposed Development"). The Proposed Development forms part of a £1.25bn investment that is the largest in South Wales industry for many decades. It will secure steelmaking in Port Talbot for the foreseeable future.

6. The switch to a new EAF-based steel production facility is the only viable solution for the future of Port Talbot steelworks. If the investment does not proceed and the Proposed Development does not go ahead, steelmaking will eventually cease at the Site.

7. The long-term future of the Port Talbot facility is entirely dependent on the planned investment in the EAF. Without an EAF, there would be no steelmaking in Port Talbot,

which would cause a significant economic, social and environmental effect in Port Talbot, Wales and the UK. This essential context is a material consideration to which the authority should have regard in the determination of the planning application. All identified effects of the Proposed Development must be considered with this vital context in mind.

8. The delivery of the proposed EAF facility will place Port Talbot at the forefront of the Government's efforts to decarbonise the steel production sector, which is a recognised challenge throughout the industry. It will ensure Tata Steel can produce sustainable green steel, the sale of which is essential to being competitive in the highly competitive global steel market. The EAF is the only feasible opportunity to enable Tata Steel to become a viable and sustainable steelmaking business in the UK.

9. Port Talbot represents a prime and sustainable location for the EAF facility. The location is central to local skills and industry, geography and connectivity. It has an established role in the wider decarbonisation ambitions of the region.

10. Tata Steel has undertaken a comprehensive site selection process. The Application Site is the optimum location for the Proposed Development based on relevant functional, operational, environmental, and planning considerations. Extensive pre-application consultation and collaboration with NPTC and other key stakeholders has positively shaped the detailed design of the Proposed Development. Feedback from a variety of stakeholders and the local community at a series of in person and online consultation events has been positive, recognising the opportunity for Port Talbot to be at the forefront of the drive to achieving Wales' (and the UK's) net zero targets.

11. The planning application is supported by an EIA. The scope of the EIA has been agreed with NPTC and key stakeholders, including NRW. The application also includes a suite of technical documents assessing the Proposed Development against prevailing development plan policy and all relevant material considerations.

12. The EIA concludes that the Proposed Development will largely result in a wide range of significant beneficial effects. The only exceptions to this are significant adverse socio-economic and human health effects. These adverse effects must be considered against the contrary position of the end of steelmaking in Port Talbot should the EAF not be delivered.

13. The planning application demonstrates that the Proposed Development is planning policy compliant in all respects, taking into account all relevant material considerations. The Proposed Development represents the fundamental first and most significant step forward to a positive future for Port Talbot at the forefront of green steelmaking in the UK. It proposes the use of best available technology in implementing a highly sustainable development on predominantly previously developed land at an established heavy industrial location. The Proposed Development would serve as a catalyst for the long-term transformation of Port Talbot.

14. In summary, the Proposed Development will:

- Position Port Talbot as a leader in sustainable steel production, supporting the Welsh and UK Government's goals for steel industry development and net zero emissions targets.
- Sustainably regenerate an ageing and (in many respects) end of life and underutilised site with state of the art industrial and economic development.
- Align with local and national policy goals to promote sustainable growth, benefiting the local economy and community.
- Deliver net biodiversity benefit through a holistic approach to green infrastructure, including on-site mitigation that meets all relevant environmental protection requirements.
- Safeguard the amenity and significance of all sensitive environmental, heritage and residential receptors and land uses through a sensitive design approach.
- Ensure flood resilience by incorporating sustainable drainage systems and climate change adaptations.
- Promote the use of alternative modes of transport and active travel, whilst also being acceptable from a highway and transport perspective.

15. The Proposed Development accords with the adopted Development Plan. The balance of material considerations weighs heavily in favour of the Proposed Development. Planning permission should be granted on this basis.

1. Introduction

1.1 This Planning Statement has been prepared on behalf of Tata Steel. It is submitted in support of a hybrid planning application for the construction of an EAF and associated infrastructure on land at Port Talbot Steelworks, Port Talbot.

1.2 The description of development is as follows:

"Hybrid planning application: full planning permission for the demolition of existing buildings and structures, partial infill of the BOS lagoon, and construction of a new electric arc furnace-based steel production facility (1 no. arc furnace, 2 no. ladle furnaces). The development includes an upgraded slag processing facility, chemical/material storage and transfer infrastructure and pipework and cabling (above and below ground), buildings, fume and dust treatment plant, water treatment facility and material handling systems. Electrical control rooms and power infrastructure. Offices and ancillary facilities together with new and amended transport infrastructure, landscaping and green infrastructure, drainage and associated engineering operations.

Outline planning permission (with all matters reserved except for access and landscaping) for demolition and the construction of a scrap metal handling facility and associated scrap yards, scrap processing facility, underground and overground electrical infrastructure, and new and amended transport infrastructure, landscape and green infrastructure, drainage and associated engineering operations."

1.3 This statement sets out the relevant context for the Proposed Development, including the Tata Steel vision for the Proposed Development as the first critical step in decarbonising steelmaking operations at Port Talbot. It includes a description of the Application Site and its surroundings, and the extensive pre-application engagement that has been undertaken. It also sets out details of the Proposed Development and local and national planning policy framework, before presenting an evidence-based assessment, which demonstrates that the proposal accords with the adopted development plan.

1.4 This statement should be read in conjunction with the suite of documents submitted in support of the application. A summary of the supporting technical evidence is provided in Appendices 1 and 2 of the covering letter to the application.

Structure

1.5 The remainder of this statement is structured as follows:

- Section 2 identifies the critical need for the Proposed Development.
- Section 3 presents the Tata Steel vision and the scope of the EAF project.
- Section 4 describes the Application Site and its surrounding context.
- Section 5 details the pre-application engagement process.

- Section 6 sets out the Proposed Development.
- Section 7 identifies the relevant planning context and material considerations.
- Section 8 assesses the proposal against key planning considerations.
- Section 9 proposes Tata Steel's draft heads of terms for the legal agreement.
- Section 10 concludes the planning case in favour of the Proposed Development.

2. The Need for the Proposed Development

Introduction

2.1 This section sets out the relevant background context to the Proposed Development. It sets out Tata Steel's vision for the development, which responds to the acute need for strategic investment in the integrated steel production facility at Port Talbot. This need sets the basis on which planning permission is sought.

Pathway to Net Zero: The National Context

2.2 Both the UK and Welsh Governments have set legally binding targets to achieve net-zero emissions by 2050. The targets are established under the Climate Change Act 2008 and its subsequent amendments, including the 2050 Target Amendment Order 2019. The Welsh Government declared a climate emergency in April 2019, underscoring the urgency of addressing climate change.

2.3 The steel industry is fundamental to the UK Government's decarbonisation strategy. The steel industry is vital to the sustainable futures of sectors including renewable energy production, low-carbon transportation, and large-scale hydrogen projects. It is central to innovative supply chain collaborations for low-carbon steel.

2.4 The Industrial Decarbonisation Strategy (UK Government, March 2021) identifies the decarbonisation of the UK's two primary blast furnace steelmaking sites - Port Talbot and Scunthorpe - as crucial to the broader goal of reducing industrial emissions. It underscores the essential importance of low-carbon steelmaking to the UK Government's commitments on net zero by 2050.

2.5 The Energy Transitions Commission's 2017 report, 'Better Energy, Greater Prosperity', states that achieving a fully decarbonised economy necessitates rapid improvements in energy efficiency, the swift decarbonisation of power, and the gradual electrification of various economic sectors. It adds that this comprehensive transformation must include addressing the 'harder to abate' sectors, such as steel, cement, and chemicals, which present significant challenges to emission reductions.

2.6 The UK Government has announced a £2.5bn steel fund. The fund will be supported by a new strategy for the future of the sector in Spring 2025. The strategy is expected to promote decarbonisation in the UK steel industry. This approach is consistent with the significant body of evidence cited above on the importance of low-carbon steel in the UK pathway to net zero.

2.7 European steelmakers are increasingly moving away from traditional blast furnace production methods. This is driven by growing customer demand for low-carbon steel. Tata Steel must follow suit to be competitive in the global market. Tata Steel is committed to becoming CO_2 neutral by 2045. The alignment with the market and government initiatives in advanced economies like the UK and EU that aim to reduce emissions and increase the cost of pollution is clear.

Pathway to Net Zero: Tata Steel Group

2.8 Tata Steel Group is a globally recognised and geographically diverse steel producer, with worldwide operations and commercial presence. It ranks among the top global steel producers. The company has a global annual crude steel capacity of 34 million tonnes.

2.9 Tata Steel Group aims to set a global standard in value creation and corporate citizenship, with sustainability at its core. The company seeks to lead the steel industry's decarbonisation efforts and is committed to circular business models. Achieving this requires Tata Steel to foster an innovative culture that enhances cost efficiency and mitigates industry cyclicality.

2.10 Tata Steel is recognised as a leader in climate action, being one of only six companies designated as 'Sustainability Champions' by the World Steel Association. The company is also a founding participant and accredited member of the World Steel Climate Action Programme, underscoring its commitment to expediting the decarbonisation transition.

2.11 The size and diverse nature of the Tata Group is significant. Its significance is also evident in its global aspirations for decarbonised growth, and the wider trajectory to net zero. This includes the importance of the indigenous steelmaking industry to the legally binding commitments of the UK and Welsh Governments to achieving net zero set out above. The presence of the Tata Group and its commitment to the UK is of strategic importance.

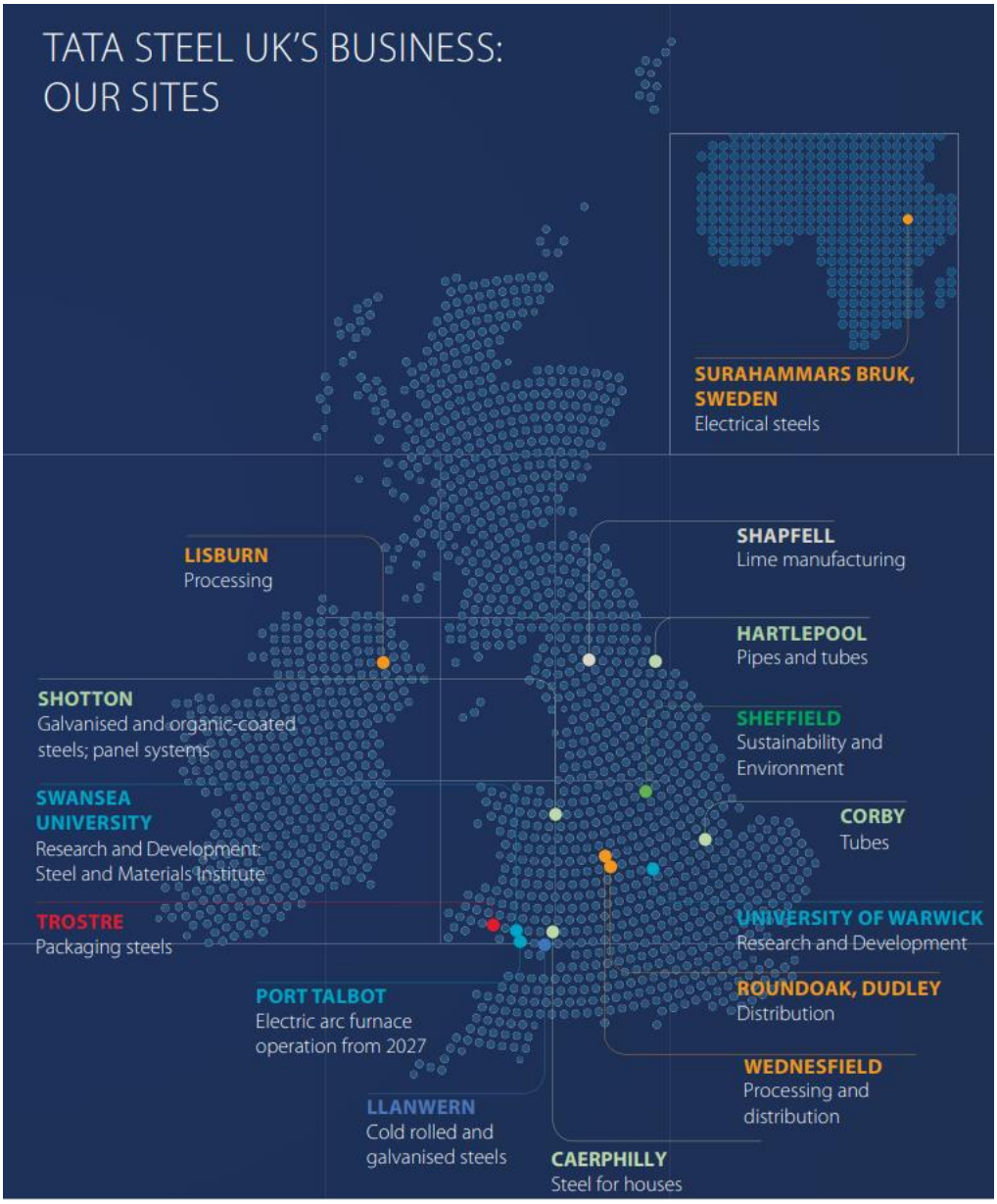
Pathway to Net Zero: Tata Steel

2.12 Tata Steel is the largest steel manufacturer in the UK. Tata Steel contributes approximately 10% of Tata Steel Group's global steel output. The UK market is of strategic importance to the group. Since its acquisition in 2007, Tata Steel Group has provided more than £6 billion in financial support for Tata Steel.

2.13 This support has ensured it now supplies approximately 54% of the nation's steel demand. Its products are integral to everyday items and infrastructure, including cans for baked beans, automobiles, buildings, and stadia. Tata Steel's sites span across the UK, as shown in **Figure 2.1**.

2.14 Tata Steel Group remains dedicated to the UK market provided that a long-term sustainable solution can be found. The sustainability and decarbonisation aims of Tata Steel are aligned with Tata Steel Group's global strategy. Decarbonisation is a key element of Tata Steel's vision, particularly for its operations in Port Talbot. This goal drives positive change and aligns with ongoing reviews of technology and operational assets in the UK. The drive to decarbonise is intensifying due to corporate, market, environmental, and social pressures. It is reinforced by the legal commitments from the UK and Welsh Governments.

Figure 2.1 – Tata Steel UK's Sites



2.15 Tata Steel has an essential role in the UK economy. This role is captured as follows:

- **Heritage –** the UK has a rich and proud history of steelmaking in the UK. Tata Steel is committed to continuing this role in collaboration with UK Government. To do so, it must create a fully sustainable UK steel business. In doing so, it will fulfil the goals of a circular economy whilst remaining at the heart of the UK manufacturing sector.

- **Strong business** – as part of an integrated European steel supply chain, Tata Steel has a strong position right across the UK and European Union (EU).

- **Household names** – Tata Steel is integral to a diverse range of partner brands and product innovations for future UK supply from companies including JCB, Kingspan, JLR, BMW and Nissan.

- **UK manufacturing** – two thirds of Tata Steel UK's products stay in the UK, supplying nearly 2,000 small and medium sized enterprises (SME). 40% of Tata Steel sales are differentiated products not available from most other European steel manufacturers.

- **Products** - Tata Steel's product range includes flat steel (sold as coils or sheet), and processed items such as tubes and building components. Over 60,000 combinations a year of product type, chemistry, gauge, surface and properties are supplied to meet the needs of UK customers.

- **Supply chain resilience** – reducing the UK reliance on low cost, commoditised imports of steel for future economic and security needs.

- **Social** – steel sites provide high quality and high paid jobs (36% higher than regional averages in South Wales) in many deprived parts of the UK, including Port Talbot. Tata Steel spends £1bn annually across its UK supplier base and contributes £3.2billion to the Welsh economy (Cardiff Business School). Tata Steel is committed to improving the life of the communities it serves and has a strong track record of investing in the future skills of its communities and employees.

2.16 The UK status in the global steelmaking industry is declining. Without a sustainable domestic steel maker, the UK risks the viability of the manufacturing sector. Tata Steel fulfils the following role:

- **Automotive** – Tata Steel is the only onshore supplier with an overall market share of 35% and has 50% share of spend on some models in a sector that adds £18.6 billion to the UK economy and accounts for over 14% of the UK's total export of goods.

- **Packaging** – Tata Steel is the sole UK producer of packaging steels, with a 77% share in the UK packaging steel market.

- **Construction** – Tata Steel has a 44% overall UK share in the steel-intensive construction market valued at £117bn and is forecast to be a critical engine for economic growth. The role of decarbonised steel and its circular economy credentials will be critical to support the delivery of construction sector goals, including modern methods of construction.

- **Engineering** – the highly diverse engineering sector is valued at £36bn. Tata Steel's assets supply over half a million tonnes of steel to a range of (31% market share) large and small manufacturing companies that process the material into market segments, including white goods, office and medical equipment, agriculture and trailers, and the Royal Mint.

- **All sectors** – Tata Steel has a 35% market share in the supply of steel to all sectors in the UK.

2.17 Investment in a competitive and sustainable domestic steel industry is essential to the economy given it underpins multiple facets of economic competitiveness. It is

also critical to achieving the social, economic and environmental benefits of the legal binding UK and Welsh Government commitments to net zero.

Pathway to Net Zero: Tata Steel in Port Talbot

Steelworks of National and Local Importance

2.18 Port Talbot steelworks is Tata Steel's primary steelmaking facility. It supports extensive manufacturing and distribution operations across the UK and Europe. Its supplies primary steel strip to and extensive network of sites in Wales, England, Northern Ireland, Norway, Sweden, France, and Germany.

2.19 Steelmaking has been established in Port Talbot for over 100 years. The current steelworks configuration (broadly) at Port Talbot has been a cornerstone of the local and national economy for over 60 years. This role has provided substantial economic and social benefits to the locality, region and wider UK.

2.20 The steelworks is located in the heart of Port Talbot. It is synonymous with the town and its role as a key employment hub in the region. Port Talbot has grown and evolved in the context of steelmaking activity at the Site. Tata Steel is an integral part of the Port Talbot economy and its community. The skill sets of the local and regional workforce are built on steelmaking at the works and in its supply chain, and manufacturing industries supported by its products. The economic and social importance of the steelworks in the locality and region cannot be underestimated.

Ageing Assets

2.21 Port Talbot steelworks is in decline and at critical cross-roads in its history. Its infrastructure is either at, or nearing the end of, its natural capital expenditure (capex) cycle. The primary steelmaking, or 'heavy end', facilities are in decline. The end-of-life status of the 'heavy end' assets is having a significant impact on the commercial viability of the integrated steelmaking facility in Port Talbot.

2.22 Significant production shortfall from the plant is resulting in financial losses. The plant is currently losing circa £1m a day. To continue meeting environmental and health and safety standards, Tata Steel has identified a need for £163 million in environmental investments by 2030 under a 'business as usual' scenario to maintain compliance with its environmental permit. The business is not in a commercially viable position.

Carbon Intensity

2.23 Making primary steel in the blast furnaces at Port Talbot involves importing mined iron ore and coal from the across the world. The key GHG emissions statistics from Tata Steel in Port Talbot are summarised as follows:

- Port Talbot steelworks was the single biggest emitting installation in the UK in 2020. It had direct Scope 1 emissions of just over 6million tonnes of carbon dioxide. These emissions were associated with producing 3.27million tons of crude steel.

- This total rose to 6.35million tonnes when taking into account Scope 2 (electricity generation) and again to 6.98million tonnes when taken into account

Scope 3 (procurement and delivery of materials) emissions in the period April 2020-March 2021.

- The facility accounts for approximately 20% and 2% of Welsh and UK annual carbon dioxide emissions respectively.

- The transportation of raw materials (iron ore, coal and coke) to the Port Talbot Site resulted in additional emissions of 165,000 tonnes of carbon dioxide.

Sustainability

2.24 Port Talbot is increasingly unsustainable owing to its aging infrastructure. The steelworks need continuous investment and maintenance. Any investment in continuing the plant in its current configuration is not sustainable. The steel product has a carbon footprint that will not compete in the global market generating a new demand for low-carbon steel. This market pressure is heightened by the non-negotiable need to align with the UK and Welsh Governments' decarbonisation commitments.

2.25 Maintaining the status quo is not an option. Tata Steel closed the Port Talbot coke ovens in March 2024. Blast Furnace 5 closed in July 2024. The remainder of the 'heavy end' facilities will close and the ability to produce primary steel in Port Talbot will come to a stop before the end of 2024.

2.26 The steelworks is in critical need of structural investment. This investment is essential if Port Talbot steelworks is to become financially, operationally and environmentally sustainable. It is essential to ensure the long-term viable presence of Tata Steel as an integral element of the local, regional and national economy.

2.27 Decisive action is required to regenerate the steelworks and secure a viable commercial future for low carbon steelmaking by Tata Steel in Port Talbot. Without action and strategic investment to regenerate the facility, the steelworks will continue to decline and result in the cessation of steelmaking in Port Talbot. This would have a highly significant social and economic impact on Port Talbot and the region.

2.28 The cessation of steelmaking would remove the majority share in UK steel production from the market, increasing reliance on imported steel. The Government is committed to protecting and decarbonising UK steelmaking. The cessation of steelmaking in Port Talbot without the planned investment would directly contradict this commitment. It would have a substantial negative impact on the ability of Wales and the UK to reach net zero.

Summary

2.29 There is a clear need for significant investment and decisive action to revitalise the steelworks. This need to evolve the established steelmaking base is vital to Port Talbot, the region, Wales and the UK on the basis that:

- The ability to produce indigenous low-carbon steel is of critical national importance to the ability to meet legally binding UK and Welsh Government net zero commitments to.

- Tata Steel Group is a global leading brand committed to decarbonisation of its assets, as part of both the pathway to net zero and for achieving long-term commercial sustainability.

- Tata Steel Group is committed to Tata Steel, which produces 10% of its output. 54% of steel produced in the UK is made at the steelworks in Port Talbot. The Site and its steel products are vital to the local, regional and UK economy.

- The steelworks is in sharp decline with the global market for its carbon intense products diminishing, the heavy end closing and circa £1m a day being lost. Its carbon emissions also directly contradict the UK and Welsh Government's commitments to net zero.

- The steelworks is at the economic and social heart of Port Talbot. Maintaining the status quo is not an option. The adverse impact of the loss of the steelworks on the locality and region would be very significant.

- Regenerative change is needed now. The viable future is clearly in low-carbon steelmaking, reflecting the trend of European steel makers transitioning away from blast furnace steel production.

- Port Talbot is a prime, sustainable location to develop low-carbon steelmaking, based on local skills and industry, geography and connectivity, and the wider decarbonisation agenda.

2.30 The future of the Port Talbot facility is entirely dependent on its regeneration. The need for this investment is substantiated by the role of the plant and its steel products in the national pathway to net zero. The opportunity to regenerate and meet the need to contribute effectively on the path to net zero in a location of steelmaking heritage is significant. Failure to meet this need would come at a significant economic, social and environmental cost to Port Talbot, Wales and the UK.

2.31 Investment in low-carbon production at Port Talbot is vital to safeguard the future of the steel industry in South Wales. Tata Steel's vision for delivering this investment and safeguarding the future of the steelworks is set out in the next section of this statement.

3. Tata Steel's Vision and Scope of the EAF Project

Electric Arc Furnace Steelmaking

3.1 Tata Steel is seeking to regenerate its steelworks at Port Talbot to achieve financial, operational and environmental sustainability. This will be achieved through a £1.25bn investment in a state-of-the-art EAF at Port Talbot steelworks. Best available technology will be used to ensure Port Talbot will become a world-leading centre for low-carbon steelmaking.

3.2 The vision is built on the following key objectives for the project:

- To ensure the continuity of the steel industry in the UK by creating a financially and environmentally sustainable business.
- To support the decarbonisation needs of the industry and legally binding Government commitments to reduce CO_2 emissions to near zero by 2035 and to Net Zero by 2050 respectively.

3.3 Tata Steel is an expert in its technology, markets and the hugely competitive global steel industry. Its vision for the future of Port Talbot and its UK business is the outcome of a significant and prolonged period of option testing, engineering design and business case assessment. The expert engineering input from its skilled workforce in Port Talbot and across the UK has been integral from the outset.

3.4 This process has established that the transition to an EAF steelmaking facility is the only feasible option to deliver low-carbon steelmaking in Port Talbot and achieve the above goals.

3.5 The fundamental elements of the EAF project, its scope and the programme are set out below as relevant context for the determination of the planning application.

EAF Project Funding

3.6 The delivery of an EAF facility in Port Talbot is underpinned by support at a national, regional and local level. The Proposed Development has been developed through extensive engagement with the UK and Welsh Governments, and other key stakeholders over several years.

3.7 On 11 September 2024, the UK Government and Tata Steel agreed on a proposed joint investment package to secure a sustainable future for steelmaking in Port Talbot. Tata Steel is expected to invest £1.25 billion, which includes a UK Government grant worth up to £500 million. This is one of the largest UK Government support packages in history.

3.8 The £1.25 billion investment proposal includes:

- Building a new 3.2 million tonne capacity state-of-the-art EAF in Port Talbot.
- Investing in two new ladle metallurgy furnaces at Port Talbot Steelworks.

3.9 The Proposed Development is dependent on the funding agreement signed with the UK Government on 11 September 2024. The key asks from Tata Steel to facilitate the Proposed Development are:

- £500m financial support.
- Address energy costs for the steel industry.
- Introduce a Carbon Border Agreement Mechanism (CBAM).
- Regulate scrap exports to ensure sufficient domestic supply of high-quality scrap.
- Extension of trade safeguarding measures.
- Increase UK steel in public procurement.

EAF and the Circular Economy

3.10 EAF's use the power derived from creating electric arcs between the electrodes of the furnace and a bath of metal to fully melt metal steel scrap. Ore based metallics are added to the bath of molten scrap metal. The liquid steel in the furnace bath is taken for secondary steelmaking treatment in ladle furnaces to make the final steel grade. Liquid steel is then taken to continuous casters to be cast into solid slabs ready for hot rolling.

3.11 The UK generates circa 10 million tonnes of scrap steel a year. Of this, circa 7-8 million tonnes is exported. Re-using this abundant supply of scrap steel rather than importing iron ore and coal from across the world would significantly increase self-sufficiency on a UK scale. It would improve recycling, reduce waste and make our steel more resilient to global events and supply chain risks.

EAF Capacity and Product Mix

3.12 EAF technology is evolving. It can already make 90% of the grades of steel made in the blast furnaces. Tata Steel is collaborating with stakeholders in the industry to further develop this technology. Adding an iron source (direct reduced iron, hot briquetted iron (HBI) or pig iron) to the scrap in the EAF will ensure Tata Steel can manufacture the most demanding steel products for its customers by the time the facility is operational at the end of 2027.

3.13 Tata Steel will develop an EAF facility that has a capacity of 3.2 million tonnes of low-carbon steel per annum. This will allow it to fulfil its current order books. The facility will produce low-carbon steel that will be a drive for a circular economy that can support the entire UK to reach its goals on the pathway to net zero.

EAF Project Scope

3.14 The funding agreement with UK Government only relates to the construction of the EAF Facility and associated upgrades to existing infrastructure needed to produce low-carbon steel at Port Talbot. This is the critical first step in the Tata Steel vision for the planned transformation of the steelworks.

3.15 The budget for the EAF facility is finite. Tata Steel must maximise the use of the budget to deliver the Proposed Development. To do so, the EAF facility will be located in Port Talbot, where there is scope to maximise the re-use of existing buildings and infrastructure, and to harness the established skilled workforce at the plant in the most efficient means possible.

3.16 Tata Steel is cognisant of future growth potential and the development context in the UK should the EAF facility be successful. This is evident in Wales and the need for new net zero infrastructure, including the potential focus on the Celtic Freeport in Port Talbot. When combined, the evidenced trend of continued investment in the steelworks and the development context is likely to drive future investment and regeneration at the steelworks.

3.17 Tata Steel will retain potential land holdings to facilitate anticipated additional growth as a means of future proofing the business. However, such future regeneration and further investment will only occur following successful delivery of the Proposed Development.

Decommissioning and Regeneration of the 'Heavy End'

3.18 Tata Steel will decommission and make safe the 'heavy end' infrastructure which is closing at the steelworks. There is no commitment to wholesale demolition of the 'heavy end' structures. Tata Steel will meet its safety, environmental and contractual obligations to third party landholders; and all legal commitments to NRW and other statutory bodies.

3.19 Any further regeneration of land on the steelworks will be subject to separate application(s). This will include collaboration between Tata Steel and the Port Talbot Transition Board, which has been set up with a remit for regeneration of land in Port Talbot no longer required by Tata Steel. The Transition Board is established with the remit of advising on how to protect and grow the economic environment in Port Talbot. It has two overarching areas of activity:

- Immediate support for the people, business and communities directly affected.
- A plan for regeneration and economic growth for the next decade.

3.20 The Proposed Development is focused on the critical step to deliver low-carbon steelmaking. The Proposed Development will not prejudice the work of the Transition Board in advising on future regeneration in the locality. The remit of the Proposed Development and this planning application has been carefully considered in this context.

EAF Project Programme

3.21 The challenging project programme illustrates the need for decisive change through the first step regeneration of the steelworks through an EAF facility. The only feasible programme for the development of the EAF facility is:

- **November 2024** – Submission of planning and Sustainable Drainage Approval Body (SAB) applications.
- **February 2025** – Determination of planning and SAB applications.
- **April - June 2025** – Discharge of pre-commencement conditions.
- **July 2025** – Lawful commencement of development on site.
- **July 2025 Onwards** – Discharge of remaining planning conditions.
- **Summery 2027** – lawful operation of the development.

Summary

3.22 The clear vision of Tata Steel to meet the urgent need for investment in Port Talbot steelworks is founded on a detailed engineering led feasibility process conducted over several years. This process has concluded that the transition to an EAF steelmaking facility is the only feasible option to deliver low-carbon steelmaking in Port Talbot. It is the only investment option capable of meeting the need to ensure the steelworks becomes financially, operationally and environmentally sustainable.

3.23 The vision to invest in an EAF facility at Port Talbot is:

- A transformative opportunity for the locality and region, placing Port Talbot at the forefront of EAF production in Wales and the UK.
- At the heart of a new circular economy, which will increase UK self-sufficiency, improve recycling, reduce waste and increase our steel resilience.
- Supported by strategic investment from UK Government in response to the need to protect the scope for low-carbon steelmaking capacity in the UK.
- Entirely reliant on the funding agreement with UK Government and the conditions associated with it, including the challenging delivery programme.
- Capable of replacing the steel quality, capacity and product mix required to meet the Tata Steel order book from Port Talbot.
- Of a specific scope to deliver an EAF facility that meets need inside a finite budget as a critical first step in transformative regeneration of the steelworks.

4. The Application Site and Surrounding Context

Site Selection

4.1 Tata Steel has undertaken a comprehensive Site search for the location of the proposed EAF facility. Several key considerations influenced the Site selection process, including:

- **Site location** – the location of the proposed EAF investment was carefully considered across the Tata Steel land portfolio, with particular attention given to the sites at Llanwern and Port Talbot.
- **Funding and commercial viability** – the project budget is determined by the agreement with UK Government which has driven the focus on the creation of a viable green steelmaking business at the Port Talbot site.
- **Principle of development** – most of the Tata Steel land holding in Port Talbot is allocated for employment use in the adopted Local Development Plan (LDP), with the principle of major industrial development established in this location.
- **Operational requirements** – Tata Steel has an order book and commitments to the market that must be met to ensure a viable operation at Port Talbot. This is a vital consideration in the successful transition to EAF steelmaking.
- **Proximity to existing process equipment and buildings** – the budget constraints dictate that it is essential that the EAF is located carefully relative to existing steelmaking process equipment and buildings being retained on the steelworks and utilised as part of the future configuration in Port Talbot.
- **Proximity to major transport corridors** – scrap metal that is delivered to Port Talbot mainly by rail will be the primary feedstock for the Proposed Development. Utilising existing rail links (with minimised modifications) is essential.
- **Ecology and biodiversity** – Tata Steel has worked successfully with NPTC and NRW over several years to manage its effects on ecology and biodiversity at the steelworks. The opportunity to build on this success is significant.

4.2 The Site search concluded that Port Talbot steelworks is the ideal location for the proposed EAF facility. The established steelmaking heritage of the site, its heavy industrial context and that of the surrounding area ensure that the Application Site is the most advantageous in environmental terms. The opportunity to utilise existing buildings, plant and infrastructure to integrate a new EAF facility in the most operationally effective and cost-efficient way is the only means of meeting the budget for the Proposed Development. Using the existing skilled workforce and maintaining steelmaking at the heart of the locality is a significant economic and social benefit of locating the Proposed Development in Port Talbot.

Port Talbot Steelworks

4.3 The development site sits within the confines of the long-established existing steelworks. Steelmaking at the Port Talbot site dates back over 100 years. Key developments in this history have included the Margam Iron and Steel Works in the 1920s, and the Abbey Works in the early 1950s. These sites formed part of the Steel Company of Wales.

4.4 At the time of peak employment in the 1960s, the Abbey Works had become both Europe's largest steelworks and the largest single employer in Wales, with a labour force of 18,000 people. The built extent of the Abbey Works broadly reflects the current scale and configuration of the steelworks today.

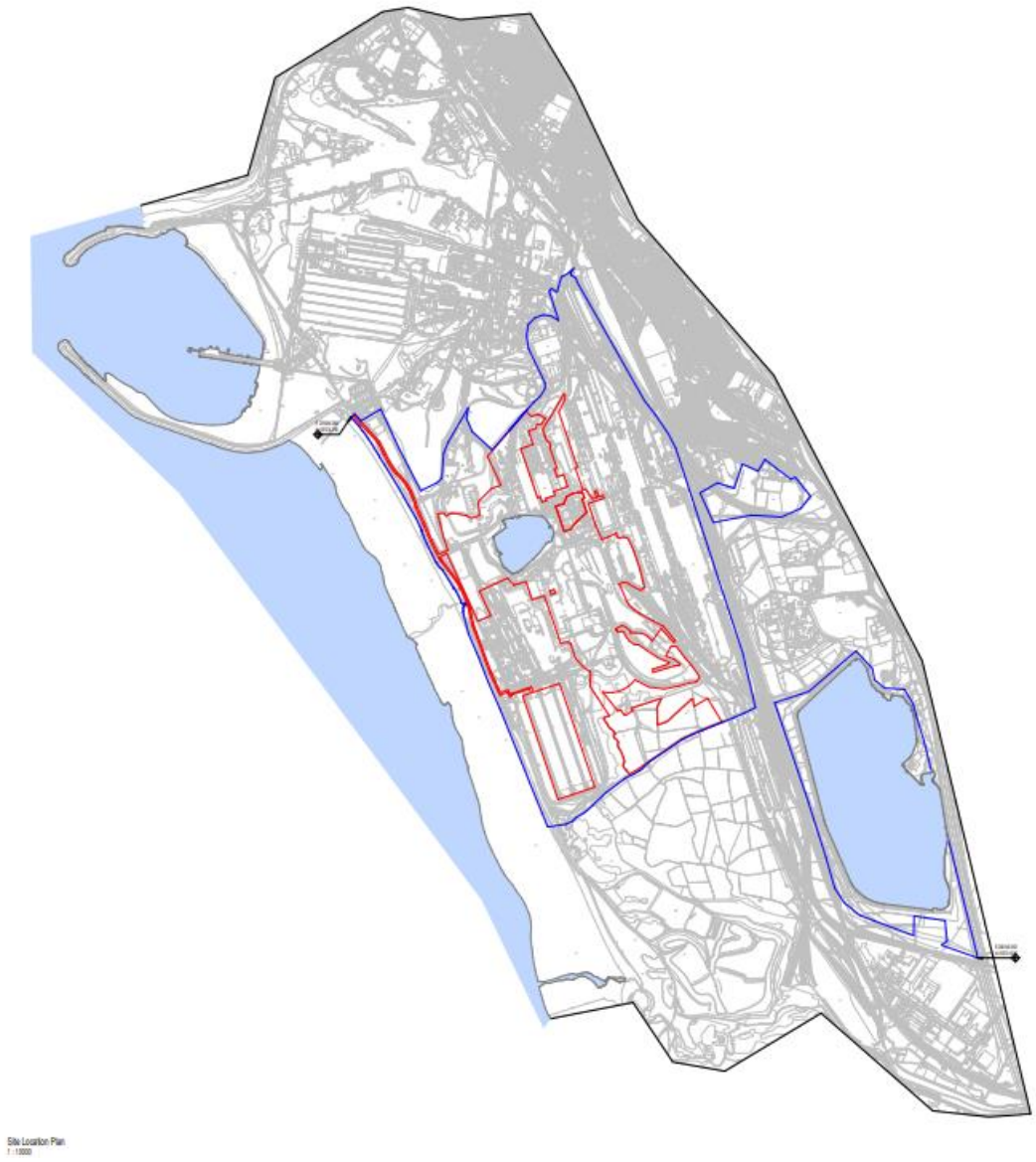
4.5 The current works is operated as one of Tata Steel's two European steelmaking and processing plants. The plant produces hot rolled and cold-rolled steel coil and employs around 4,000 people. It is characterised by a heavily industrialised built environment, which dominates the southern end of Port Talbot.

4.6 The steelworks lies to the south of the River Afan, which cuts through Port Talbot. The works extends south towards the Eglwys Nunydd Reservoir. It runs parallel to the M4 (between the motorway and the sea) and is highly prominent on the approach to Port Talbot from the south / east and on the skyline more generally.

The Planning Application Site Application Site

4.7 The Application Site boundary extends to approximately 159.6 ha and is illustrated below in **Figure 4.1.**

Figure 4.1 – the Application Site



4.8 The Application Site boundary is irregular in shape and includes the following parts of the extant steelworks:

- A continuous casting plant, slab yards, and part of a basic oxygen steelmaking (BOS) plant in the northern part of the Application Site.
- An operational lagoon, a steel service centre, and Margam colliery memorial in the central area of the Application Site.
- A haul road which forms the westernmost boundary.
- Coal yards in the south western area of the Application Site.

4.9 The rail network, open storage yards, scrap processing facilities and associated steelmaking infrastructure are located to the south and south west of the Application Site.

4.10 The Application Site slopes gradually down in a south-easterly direction, albeit it is undulating in parts. The lowest levels within the planning boundary are in the south-east, at approximately 4.15mAOD. The eastern side of the Application Site is generally lower than the west, with levels typically remaining below 10mAOD. The west of the Application Site is shown to have typically higher ground levels, likely due to existing material and slag storage, and scrap processing. Levels in the south-west of the Application Site are approximately 14.95mAOD, with the highest levels shown to be in the north-west of the Application Site at around 23.06mAOD.

4.11 The Application Site is set within an established industrial area. The industrial nature of surrounding buildings and structures form a key part of the character and skyline of Port Talbot and form the backdrop to the Application Site. The Application Site includes a wide variety of industrial buildings, plant and equipment associated with the ongoing operation of the wider steelworks. The largest building on the Application Site is the BOS plant, which measures approximately 60m in height, over 100m in width and 150m in length. The building dominates the skyline in this part of the steelworks. A series of smaller industrial buildings of standard steel frame and grey panelled cladding are visible across the steelworks.

4.12 Beyond the large industrial buildings, the Application Site is predominately bare ground or developed land. There is a large area of made ground, reflecting the established use of the Application Site as a steelworks. Open areas of material and plant storage, large industrial buildings and the internal road network dominate. Open mosaic habitat is observed across the Application Site, including a mixture of scrub, grassland and ephemeral vegetation. There are several open channels holding and conveying water throughout the Application Site, which form part of the Application Site surface and water treatment system. The BOS lagoon is located at the northern extent of the Application Site.

4.13 There are no designated assets located within the Application Site boundary. There are two non-designated historic assets:

- Morfa Colliery (421174) is a 19th century colliery in the north western area of the Application Site; and
- Theodorics Grange (20041) is a ruined Medieval building which formed part of a monastic grange, possibly of a domestic function.

Connectivity and Active Travel

4.14 The Application Site and steelworks as a whole benefit from excellent access to the strategic transport infrastructure in this area of Port Talbot, including the dock, deep sea harbour, primary distributor road (Harbour Way), trunk road (M4 motorway) and local active travel (shared cycleway and footway) route. The steelworks and adjoining harbour are secure sites with restricted access via a private road network. This

includes security lodges / gates. The Proposed Development will be accessed via this private road network.

4.15 The active travel links to the steelworks include:

- An eastern pedestrian access point into the central area of the steelworks, across Harbour Way. The route provides direct pedestrian access from the local highway network to the main office and canteen facilities for staff employed at the steelworks.

- Bus stops which are located on either side of the A48 Margam Road, less than 0.5 miles from the main gate access. Port Talbot Bus Station is located within an acceptable 1.2 mile walking distance and provides additional bus services to destinations including Maesteg, Goytre and the wider national network.

- Port Talbot Parkway Railway Station which is located within walking and cycling distance of the steelworks. The station offers regular direct services throughout the week to destinations including Neath Llanelli, Swansea, Manchester Piccadilly, Bridgend, Cardiff, Carmarthen and London, amongst others.

- National Cycle Route 4, which is located to the north-west of the main gate access. The network is a shared cycle and pedestrian facility that connects Swansea in the north with the outskirts of Cardiff in the south-east, whilst also providing a traffic-free link to National Cycle Route 887 in Port Talbot. National Cycle Route 887 runs in a south-west to north-east direction and provides a link between Port Talbot Town Centre and Glyncorrwg.

- The M4 which has two key junctions with the A48, A4107 and A474 in Port Talbot. The A48 Harbour Way is a key spine route through the town. The A4107 and A474 provide important inland connections, including to Maesteg and Neath. The A48 connects to the A4241 Harbour Way, which was opened in 2013. This runs adjacent to the wider steelworks site.

- Existing vehicular access from two locations off the A4241 Harbour Way: the A4241 Harbour Way / main gate access roundabout; and A4241 Harbour Way / west gate access roundabout.

- Port Talbot deep sea harbour which is located to the north west of the application Site. The harbour is operated by ABP and accessed from the steelworks via the internal harbour road and jetty road. The facility has been used throughout the operational life of the steelworks for importing raw materials, including iron ore, limestone and coal.

Surrounding Context

4.16 The Application Site is bounded to the north, east and west by additional Tata Steel owned land forming part of the steelworks. The main access road into the steelworks lies to the east of the Application Site boundary. The blast furnace structures, continuous annealing process line (CAPL) building, sinter plant building and numerous

emission stacks (chimneys) are huge structures in the immediate context of the Application Site.

4.17 The power plant supporting the ongoing operation of the steelworks is included in the industrial context to the immediate north and east of the application Site. The Tata Steel gas holder, now redundant coke ovens and associated storage yards are located to the south and south-west of the Application Site.

4.18 Buildings at the steelworks are typically large, steel frame construction with grey steel cladding. Steel frame chimney structures, plant and equipment are also highly visible. Heights reach up to 60m for buildings and as high as 150m for emission stacks.

4.19 The wider area has a highly distinctive landscape character. The large-scale industrial areas in and around the steelworks are part of that coastal landscape and create a unique skyline punctuated by large vertical structures. Key visual and sensory characteristics of the area include:

- Large scale heavy industry and Port Talbot docks, a deep-water port.
- Skyline dominated by the steel works.
- Flat landscape.
- Smaller industrial units around the docks and next to the town centre.
- The strong character of the area is dominated by overpowering and noisy heavy industry.

4.20 Coastal floodplain grassland and the Margam Moors Site of Special Scientific Interest (SSSI) lie adjacent to the south of the wider steelworks site. Beyond the boundaries of the wider steelworks, Margam sands lie to the west; Tarmac is situated to the north; and the main South Wales national rail lines to the east, beyond which is the M4 motorway.

Planning History

4.21 The Application Site has a long-standing history of industrial use. Major planning applications evidence the continued investment of Tata Steel in the use of best available technology in operating the steelworks, where possible. In recent years, these include:

- **De-Dust Extraction Technology (Ref: P2018/1036)** – planning permission was granted in February 2019 for the installation of a replacement secondary dust extraction system at Port Talbot steelworks. This development incorporated the best available dust suppression (bag filter) technology to replace the 1970s built electrostatic precipitator, which was nearing the end of its operational life.

The new system significantly reduced dust emissions and improved working conditions at the sinter plant. The application highlights Tata Steel's commitment to investing in the long-term operation of the steelworks, where possible.

- **Port Talbot Generating Station (Ref: EN010062) –** a Development Consent Order (DCO) was granted in September 2015 to enhance internal power generation at Port Talbot Steelworks. The main objective was to capture and burn previously flared residual gases from the steelmaking process to self-generate electricity, reducing reliance on power from the National Grid (NG). Phase one of the DCO has been implemented, showing Tata Steel's commitment to adopting advanced technologies to lower electricity demand, increase self-sufficiency and reduce greenhouse gas emissions, where possible.

- **Demolition and Decommissioning Activity –** Tata Steel has been proactively demolishing and decommissioning structures across the steelworks to clear the way for future development. This ongoing effort demonstrates Tata Steel's focus on improving site safety and operational efficiency at the steelworks.

- **Perimeter Fencing and Access Gates (Ref: P2024/0205)** – Planning permission was granted in June 2024 for the retention and construction of perimeter fencing and access gates. These measures provide a robust physical barrier to secure the steelworks, underscoring Tata Steel's commitment to public safety and controlled access.

- **P Fields** – Tata recently completed Pre-Application Consultation (PAC) for the installation and retention of hardstanding at Port Talbot steelworks. This forthcoming application (expected in September 2024) will secure much-needed additional laydown space to support the works required to decommission the 'heavy end' and facilitate the decarbonisation of the steelworks.

4.22 The history of the steelworks sets a positive precedent for major industrial development and continued transformation of the Application Site as part of the wider steelworks. This is further supported by the heavy industrial history of the wider area.

Summary

4.23 This section confirms that:

- A comprehensive site selection process was undertaken. The Application Site is the prime location for the Proposed Development, taking account of functional, operational and environmental considerations.

- There is an established history of on-site industrial uses, being an integrated steel producing facility in (broadly) the current configuration for approximately 60 years.

- Huge heavy industrial structures (buildings, plant equipment and emissions stacks) up to 150m in height dominate the local skyline.

- The Application Site represents a significantly underutilised brownfield location, surrounded by industrial uses and well situated to support modern industry.
- The Application Site is accessible by a range of modes of transport, including the road and rail networks and by the sea via the adjacent harbour.

5. Pre-application Engagement

5.1 This planning application has been informed by extensive and detailed discussions with officers across various disciplines at NPTC, NRW and a wide range of stakeholders. The key elements of comprehensive pre-application engagement are set out below.

Stakeholder Engagement

5.2 Discussions with officers at NPTC have taken place since the very early stages of the decarbonisation project. This included discussions in relation to the earlier iteration of the development, which involved the potential for a new standalone EAF facility in the green fields to the south of the current built extent of the steelworks. Tata Steel and its project team learned valuable insights and built excellent working relationships with NPTC and NRW during the discussions on that version of the project.

5.3 The key benefits of this early engagement were:

- **A real understanding of the Application Site context and established baseline** – survey derived data on ecology and biodiversity, air quality, ground investigations, noise, transport and connectivity. The team assessed the flood risk status of the Application Site and its drainage network.
- **Approach to collaboration with NPTC and NRW** – the planning performance agreement (PPA) with NPTC and discretionary advice service (DAS) agreement with NRW established an effective way for the Tata team to work effectively with both parties.
- **Involvement of Welsh Government** – establishment of a working relationship with the industrial transformation team at Welsh Government, including direct involvement alongside NPTC and NRW in regular consultation meetings for the Proposed Development.
- **Planning regime** – confirmation that the Town and Country Planning Act (as amended) is the most appropriate regime in which to determine the planning application, taking into account the scale and nature of development, and planned investment in rail infrastructure.

5.4 The establishment of the collaborative approach to a comprehensive preparation of the robust planning application was the most positive outcome of early-stage discussions with NPTC and NRW, with input from Welsh Government.

5.5 The Tata Steel team took stock of this position when it became apparent in 2022 that funding constraints made the first iteration of the EAF project unfeasible. Importantly, key lessons on technical topics and approach to planning were taken forward into the engineering review of the available options for an EAF at Port Talbot.

5.6 Ecology and biodiversity survey work continued across the Application Site during 2023 and into 2024. This occurred alongside a detailed engineering and design development process by Tata Steel. At the same time, Tata Steel continued funding agreement discussions with UK Government.

5.7 In response to budget constraints and ongoing engineering work, the engineering process identified a means of delivering an EAF facility in a manner better integrated into the existing steelmaking infrastructure at the steelworks. This was vital in reducing costs without compromising either the quantum or quality of steel to be produced to meet market demand. This significant breakthrough was reached in late 2023.

5.8 Planning focused discussions with NPTC's Development Management team resumed in January 2024. NRW and Welsh Government were involved in this discussion from the outset. Regular pre-application meetings have taken place throughout 2024. The teams at Tata Steel, NPTC and NRW have conducted joint meetings, where relevant. These meetings covered key crossover topics, such as noise, air quality and ecology elements.

5.9 Meetings were held with NPTC's leadership, Cabinet Councillors, Ward Councillors, Senedd Constituency Members and MPs, Assembly Members, Welsh Government officers and UK Government officials and Ministers. Specialist stakeholders including Cadw, Glamorgan and Gwent Archaeological Trust (GGAT) have also been consulted during the extensive pre-application consultation period. Further details of these meetings are provided within the submitted Pre-Application Consultation (PAC) Report.

5.10 The pre-application process is in line with, and in many instances exceeds, best practice guidance. The effective and detailed approach is reflective of the scale and profile of the development, and its role in supporting the employment led regeneration of Port Talbot. The feedback received throughout pre-application discussions has informed the design evolution of the proposal and the scope of the planning application, where possible.

Public Pre-application Consultation

5.11 A comprehensive consultation strategy with the local community was formulated at the start of the project and shared with NPTC for its input. Tata Steel has and is holding two phases of public consultation:

- **Phase 1:** Initial communications website launched in July 2024. Early consultation was held from 24 July 2024 – 16 August 2024. These events included a series of employee and community events, comprising of both webinar events and drop-in events.

- **Phase 2:** mandatory pre-application consultation (PAC) will be held from 17 September to 15 October. Full details to follow in the final document supporting the planning application.

5.12 Tata Steel has hosted several public consultation events in the local community. The proposal was well received, with recognition of the Application Site's context,

potential, the need to decarbonise and the opportunities associated with the Proposed Development. Comments were raised on numerous environmental topics, biodiversity and health and safety. The comments have been addressed as part of this planning submission, where possible.

5.13 Tata Steel will complete the mandatory PAC process in accordance with The Town and Country Planning (Development Management Procedures) (Wales) Order 2012 during October 2024. A PAC report is submitted in support of this planning application and contains full details of the statutory pre-application consultation undertaken.

5.14 As well as statutory consultation activities, Tata Steel has:

- Held meetings with key local stakeholders to present information about the proposals and answer any questions.
- Issued press releases to local and national media outlets.
- Hosted a project website that provided information and featuring interactive feedback facilities, which was kept updated throughout the consultations to include up to date relevant information.
- Hosted online webinars and in-person drop-in consultation events, where project information was made available.

EIA Scoping

Informal Scoping

5.15 The Proposed Development constitutes EIA development under the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 (EIA Regulations). The project programme and the need to act quickly once the in-principle funding agreement was reached with UK Government has driven the timescale for the pre-application process. The baseline position and survey-based assessment of the likely significant effects of the Proposed Development has evolved quickly in consultation with both NPTC and NRW. An informal EIA Scoping was undertaken during weekly pre-application meetings. This process involved the submission of various technical reports to NPTC, Welsh Government and NRW.

5.16 The approach has resulted in a comprehensive EIA being prepared and submitted in support of the application. The EIA robustly addresses all likely significant effects of the Proposed Development in detail.

Baseline Scenarios Assessed

5.17 The informal EIA Scoping process with NPT, NRW and key stakeholders has been extensive throughout the pre-application consultation period. The informal EIA scoping process has established a robust approach to the baseline scenarios for assessing the likely significant effects of the Proposed Development. The agreed scenarios are:

- **Established baseline** – the steelworks with 'heavy end' as operating in early 2024 and for most of the preceding 50+ years. This is the focus of the assessment conclusions detailed throughout the ES chapters.

- **Interim baseline** – the steelworks as they will operate at the time of planning determination with closure of the 'heavy end'.

5.18 The 'heavy end' encompasses the existing stockyard, sinter plant, coke ovens, blast furnaces, and steel converter. The coke ovens have already been closed and the remaining 'heavy end' components are scheduled for closure by the end of 2024. These closures will proceed regardless of the EAF planning application as these facilities approach end of life.

5.19 The established baseline description includes data from the period when the coke ovens were operational, as well as more recent data reflecting their closure. Where relevant, the specific impact of the coke ovens on individual environmental factors is detailed in the respective ES chapters.

5.20 The established baseline is a relevant reference point because:

- It reflects the operational situation at Port Talbot over the past 50+ years.

- It represents the condition during most baseline surveys for the current ES.

- It aligns with the Environmental Permit for the operation of Port Talbot steelworks issued by NRW. There are no plans to amend the permit prior to the planning application.

5.21 The interim baseline considers the steelworks without accounting for the demolition of structures or equipment in the 'heavy end'. Tata Steel will ensure that all structures, buildings, and machinery in the 'heavy end' are made safe but will not undertake any demolition as part of the EAF proposal. Regeneration of the 'heavy end' will follow separate commercial or planning processes at a later date.

5.22 The interim baseline is important as the 'heavy end' infrastructure will be closed regardless of the EAF approval. This closure will occur before the EAF begins operations. The inclusion of the interim baseline ensures an understanding of how the effects of the development differ from the established baseline in all technical topics and policy areas. This ensures the application presents a complete understanding of the likely significant effects of the Proposed Development. The application can be determined based on full environmental information, which accords directly with the EIA Regulations.

National Grid (NG) Works

5.23 NG is proposing to undertake major improvement works to electrical infrastructure at Port Talbot, including:

- An upgrade to NG's electrical substation at Margam (Margam Substation).

- The construction of a new electrical substation at Port Talbot steelworks (Port Talbot Substation).

- The installation of electrical cables to provide a connection between Margam Substation and Port Talbot Substation.

5.24 The construction of Port Talbot Substation and the connection between Margam Substation and Port Talbot Substation are required to support the future operation of the proposed EAF facility. The proposed works at Margam Substation are required to be undertaken regardless of Tata Steel's proposal for an EAF facility: the substation needs to be upgraded to support a range of projects in the area.

5.25 The application seeks planning permission for the Port Talbot Substation and the cabling works located within the red line boundary for the Application Site. These works will be carried out on Tata Steel owned land but would be undertaken by NG.

5.26 NG will be responsible for securing permission for and delivering the proposed upgrade to Margan Substation and the external cabling works between the upgraded facility and the red line boundary for the Application Site.

SuDS Approving Body (SAB)

5.27 Detailed informal discussions with the SAB team at NPTC have occurred through the pre-application consultation period since January 2024. The principles of the drainage design approach have been established. This includes balancing the use of the existing positive drainage and water treatment system that drains to the LSO at the steelworks with incorporating sustainable urban drainage system initiatives, where possible.

5.28 A formal pre-application advice request was submitted to NPTC in September 2024. A subsequent SAB application will be submitted in parallel with the planning application process.

Habitat Regulations Assessment

5.29 The EIA supporting the application confirms the likely ecological and biodiversity effects of the proposal are such that a Habitat Regulations Assessment (HRA) for the Proposed Development is not required. This position has been agreed with both NPTC and NRW during the pre-application consultation stage of the Proposed Development.

Associated Consents, Permits and Licensing

5.30 The industrial and technical nature of the Proposed Development is such that additional consents, permits and licenses will be required to support the operation of the Proposed Development. Table 5.1 below summarises the anticipated (separate) consents and where these are assessed. Further technical detail on the separate consents and permits is provided in the ES submitted as part of the planning application. All will be progressed by separate specialist technical teams and undertaken in line with relevant standards, guidance and requirements.

Table 5.1: Summary of Consents, Licenses, Permits and other approvals required separate to the planning process

Permit / Consent / License / Other Approval	Description	Lead Consultant and Relevant Determining Authority
Environmental Permit	A variation of the Port Talbot Environmental Permit will be required for the operation of the EAF, in accordance with the Environmental Permitting Regulations (England and Wales) 2016 (as amended)	The Environment team at Tata Steel will lead this process. Detailed discussions are ongoing between Tata Steel and NRW as the determining authority.
Greenhouse Gas Emissions Permit	A variation of the existing Greenhouse Gas Emissions Permit will be required for the operation of the EAF facility under the UK Emissions Trading Scheme.	The Environment team at Tata Steel will lead this process. Detailed discussions are ongoing between Tata Steel and NRW as the determining authority.
Hazardous Substances Consent	Required for the handling of hazardous substances and exceedance of controlled quantities in the Planning (Hazardous Substances) (Wales) Regulations 2015.	The Environment team at Tata Steel will lead this process. Detailed discussions are ongoing between Tata Steel and NPTC, with input from NRW.
Sustainable Drainage Approval Body (SAB)	In accordance with Schedule 3 of the Flood and Water Management Act 2010, the Proposed Development requires SAB approval.	JBA Consulting is leading this discussion with NPTC as the SAB, with input from Tata Steel.
Control of Major Accident Hazards (COMAH)	Required due to the handling of hazardous substances exceeding the Upper Tier COMAH threshold.	Tata Steel will lead this process. Detailed discussions will be held between Tata Steel, NRW and HSE, with input from NPTC.

5.31 Tata Steel is eager to continue to utilise the best and safest technology available to ensure the longevity of the steelworks at Port Talbot. The operation of the Proposed Development will require a separate variation to the existing Environmental Permit EPR/BL7108IM (2016, as Varied in 2021) from NRW. The environmental permitting

regime is entirely separate to planning and is required prior to the operation of the Proposed Development. The process aims to protect the environment and to ensure best practice in the operation of regulated facilities.

5.32 Where possible, ongoing collaboration has taken place across the technical teams to ensure consistency on associated consenting, permitting and licensing. The aim at this stage is to be robust and consistent in approach across complementary disciplines, taking account of the available evidence. There is no element of the planning application proposal that compromises any consistency with other consenting, permitting and licencing regimes.

Design Evolution

5.33 The primary design evolution for the Proposed Development has been the significant move away from the standalone new build EAF facility to the immediate south of the current operational footprint of the steelworks. Funding constraints were the dominant considerations driving this evolution. The engineering and operational benefits, and costs efficiencies of a new EAF facility integrated into the existing steelworks infrastructure were also determining factors.

5.34 Pre-application discussions and consultation has led to several design changes to the development. The extent and nature of the approach to green infrastructure as an integral element in the design process is agreed with both NPTC and NRW. This has maximised the opportunities to include soft and hard landscaped design features as part of the Proposed Development. Ecology, drainage and landscape inputs from NPTC and NRW have added significant value to the scheme. Similarly, technical evidence on noise and air quality has informed the scope for mitigation measures to be designed into the Proposed Development from the outset of the planning process.

5.35 This evolution illustrates an important fundamental nature of the Proposed Development: function and operational requirements are the key considerations, not form. The operation of the EAF dictates the size, location and appearance of much of the design proposal. There is little room for design flexibility beyond that described above.

5.36 In this context, the real benefit of the pre-application discussions with NPTC, NRW and Welsh Government has been the clarity of understanding in which the planning application is submitted. The basis for the determination of the application, the list of associated consents and the consistency in both understanding and approach with decision makers is clear. The scope and extent of the evidence base for the planning application and the technical documents included are agreed between all parties.

Summary

5.37 The extensive pre-application discussions have been positive. Tata Steel has actively engaged with a variety of stakeholders and residents through a range of methods and consultation events since launching communications in July 2024. Tata Steel will also complete mandatory PAC in line with the relevant guidance and legislation. Tata Steel is committed to continuing to engage with the relevant stakeholders throughout the planning application determination process.

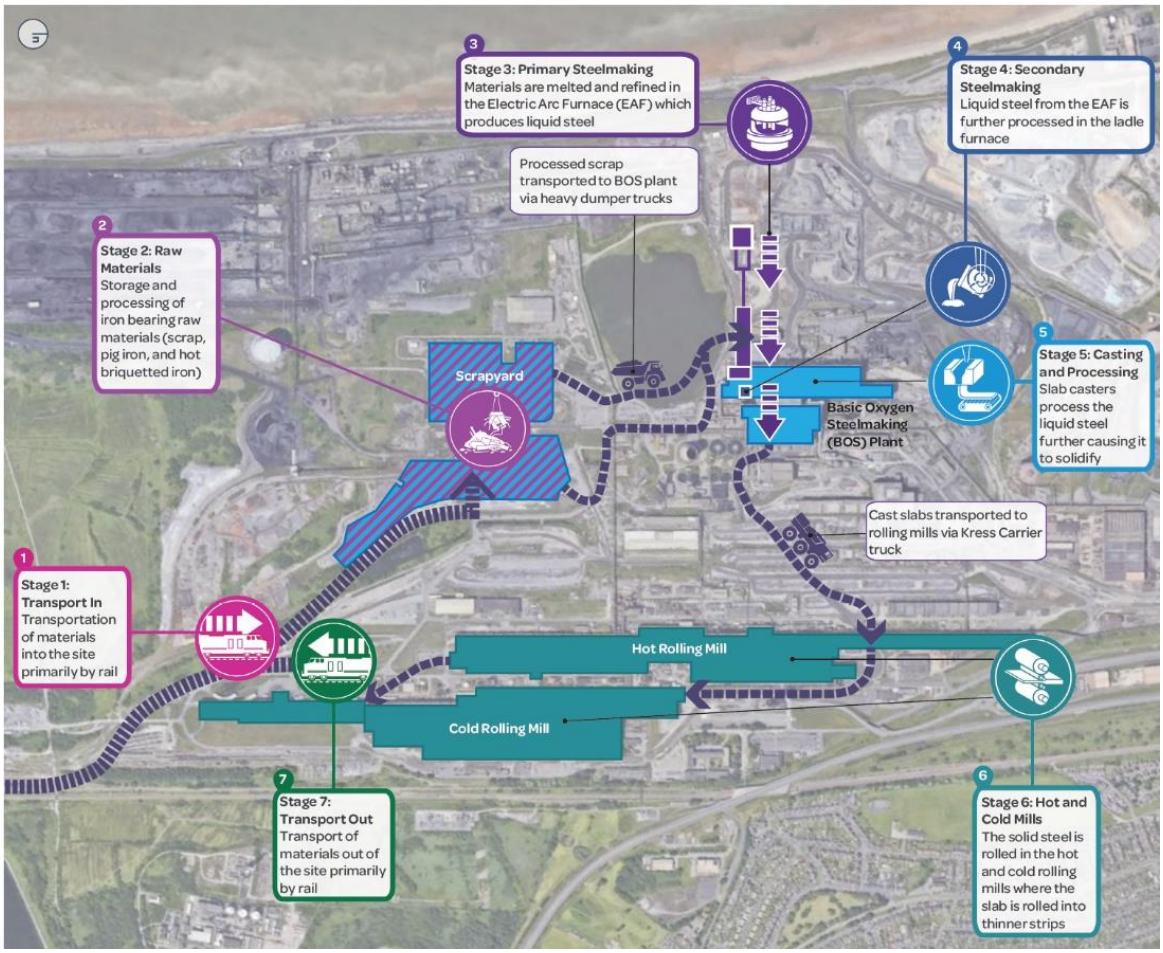
5.38 The positive influence of the pre-application consultation on the scope of the application submission and design of the Proposed Development accords directly with prevailing planning policy and best practice.

6. Proposed Development

EAF Process Overview

6.1 The process diagram below **(Figure 6.1)** captures the essential elements of the Proposed Development facility and how it will operate at Port Talbot.

Table 6.1: EAF Process Diagram in Port Talbot



6.2 The process diagram is submitted in the pack of drawings submitted in support of the planning application. The seven stages of the Proposed Development at Port Talbot are set out below.

Stage 1 – Transport Infrastructure

6.3 The main raw materials for the Proposed Development are scrap metal, HBI, and pig iron. The materials will be transported on to steelworks mainly via the existing rail network. The Proposed Development includes upgraded rail line infrastructure to remove an existing pinch point in the single rail track on the site. Dualling of the rail track will ensure two trains can service the scrap facility at any given time.

6.4 There will be some local deliveries of raw materials to the Site via the road network.

Stage 2 – Raw Materials

6.5 The Proposed Development will increase in the scale of open scrap metal handling at the steelworks. The proposal includes for a replacement new scrap yard facility, including storage and processing equipment. Operation of the EAF facility requires circa 2.2mt of scrap material per annum. Approximately 70,000 tonnes of scrap steel will arrive at the steelworks every week.

6.6 The HBI and pig iron storage area is in the southern area of the proposed new scrap yard. It will comprise a new concrete pad for temporary storage of these materials directly offloaded from freight trains. HBI will be transported to a HBI bunker and pig iron to the shredded scrap yard.

6.7 The raw materials will be transported through the Application Site by large transport vehicles using a new, extended and upgraded internal road network. This includes a combination of:

- Works to existing roads, including widening and re-surfacing.
- The creation of new roads that will facilitate the movement of super heavy vehicles from the scrap handling areas to the EAF.

6.8 The scrap metal will be moved to the shredded scrap yard for temporary storage before it is 'charged' on to the proposed consteel conveyor. Scrap will be continuously fed onto this conveyor, pre-heated (to prevent cooling and evaporate any water on the scrap) and loaded into the EAF in a continuous (rather than batch charging) process. The EAF is to be located within the existing BOS building, which will be extended and repurposed to accommodate electric arc steelmaking.

Stage 3 – Primary Steelmaking

6.9 Carbon electrodes within the furnace will create an electrical arc, which passes through the metal causing rapid heating, eventually melting the charge scrap. With the continuous process, the scrap will be charged into the furnace with molten metal already in the vessel. The EAF will be operated from a control room located in the roof of the BOS building that collects data and allows for optimisation of the process. Lime and dololime (stored in an external bunker) will also be added to the melt to remove impurities and to help form the slag layer.

6.10 The molten metal will be tapped from the EAF vessel at a production rate of 320 tonnes of steel every 42 minutes. This will create an annual production capacity of circa 3.2mt per annum.

Stage 4 – Secondary Steelmaking

6.11 The molten metal will be transferred into one of two new ladle furnaces (LFs). The chemistry of the steel will be refined to obtain the desired grade of steel for the customer. Ferro-alloys from the bunker will be added at this stage as appropriate for the application the steel is being produced for.

Stage 5 – Casting and Processing

6.12 Once the steel is fully refined in the LFs, it will be transported to the existing continuous casting plant (concast). Molten metal will be poured from a hopper high

in the roof of the building into the cooled aperture of one of two upgraded continuous casters, which rapidly solidifies the surface of the metal and forms a thick continuous steel block. The block will be cut with plasma torches to the correct length. These are known as steel slab and will be the feedstock for the cold and hot rolling mills already on the steelworks.

Stage 6 – Hot and Cold Mills

6.13 Once sufficiently cooled, these slabs will be transferred to existing stockyards to the west of the rolling mills. They will be transformed into coils in the upgraded Hot Strip Mill, before being processed in the new pickling line located in the Cold Rolling Mill.

Stage 7 – Transport Out

6.14 The low-carbon steel coil is then ready to be transported (predominantly by rail) to Tata Steel sites across the UK for further processing or delivered directly to its customers.

Demolition

- Demolition and deconstruction of the certain existing industrial structures within the planning application red line boundary will be required to deliver the Proposed Development. The buildings and structures to be demolished are shown on plan ref: EAF-LAW-X-X-DR-A-040001_P01 submitted in support of the application. The following buildings and structures will be demolished:

Full Element

- Scrap Storage Shed.
- Existing Pump House.
- Harsco Baler Plant.
- Weigh Bridge.
- Harsco Frag Plant.
- Electrical Room.
- Mechanical/Electrical Workshop.
- Ruhrstahl Heraeus (RH) Penthouse.
- RH Cooling Tower.
- RH Pump House.
- Slag Splashing Compound.
- Coal Conveyor Superstructure.
- Inlet Structure.

- Blast Furnace (BF) Gas Pipe Rack (Partially Removed).
- Existing Compressor House with Main Control Centre (MCC) Room.

Outline Element

- Storage Shed.
- Hopper, Type A, Air braked (HAA) Coal Rail Unloading Station.
- Concrete Abutments.

Development: Full Planning Permission

- The full planning element of the scheme includes the following works:
  - Alterations to existing BOS making and secondary refining building.
  - Water cooling systems and water treatment plant (including emergency backup power up systems and diesel generator rooms).
  - Fume and dust extraction systems with stacks.
  - Lime handling facility.
  - Slag processing facility.
  - Storage areas/buildings with material handling system.
  - Ancillary plant equipment and pipework.
  - Electrical control rooms with cable carrier systems.
  - Preparation and storage areas.
  - Compressor rooms.
  - Offices and ancillary facilities.
  - Partial infill of the BOS lagoon.
  - New access roads with gates and parking areas.
  - New and amended rail track and associated infrastructure.
  - Landscaping and green infrastructure.
  - Firefighting pump house.
  - Oxygen and argon vessels.
  - Upgraded laboratories.

- Lighting fixtures and fittings to ensure minimal operational lighting for safety.

- The detailed development specification for the full element is summarised in **Table 6.1** below.

Table 6.1: Detailed Development Specification

Built Development	Dimensions (m)			SL No. Reference on Reference Layout
	Length	Width	Height	
Canopy Hood	31.5	34.9	57.88	1
Consteel Conveyor	148.6	41.6	33.88	2
Fume Treatment Plant (FTP)	**37**	40.2	70	3
Shredded Scrap Yard	N/A	N/A	N/A	4
Hot Briquetted Iron Dolo & Lime Bunker	45.6	11.5	42.54	5
Ferro Alloys Bunker	34.6	14.3	33.99	6
Fire water pumphouse	25	27	9	7
Primary Pumphouse	28.9	80	10.32	8
Secondary Pumphouse	29.2	77.6	22.19	9
Main Power Centre	46.95	24.65	10.64	21
Power Compensation Building	77.1	59.5	12.99	22
Melt Shop Power Distribution Building	27.3	55.1	12.45	10
Meltshop Water Treatment Plant (WTP) Electrical Building	23.25	36.65	9.29	11
Meltshop Fume	46.7	16.45	10.09	12

Extraction Plant (FEP) Electrical Building				
Compressor House	15.85	20.6	14.69	13
Car parking area			N/A	14
Changing and office block building	24.8	83.4	7.34	15
Emergency Tank	13.5	11.65	54.33	16
Lagoon Water Pump House	10.5	31	9.78	17
Green Walkway Extension	172.65	87.55	11.84	18
HBI & Pig Iron Storage Area			N/A	30
Active Carbon Injection Silos	8.5	3.8	13.37	19
Power Silos	25.05	18.55	19.68	20
Charger Bay South Extension	34.95	14.65	43.34	31
HBI Electrical Building	8.1	16.8	7.81	32

Development: Outline Planning Permission (Phase 1)

6.15 Full details of the facilities required to support the ferrous scrap metal operation associated with the EAF are in preparation. The scrap operation is not required to be delivered on the steelworks until Summer 2027 hence permission for this element of the Proposed Development is being sought in outline. Full details of the scrap facility will be submitted in support of a future reserved matters application pursuant to the outline element of this application.

6.16 It is anticipated that the scrap metal will be received at the steelworks by one or two (possibly in combination) of the following three options:

- **Option 1** – the preferred option – Tata Steel purchases a large scrap company with established sites in the UK and will send 'furnace ready' scrap to Port Talbot.
- **Option 2** – least preferrable option – Tata Steel agrees a service option with scrap suppliers in the UK market, who send 'furnace ready' scrap to Port Talbot.

- **Option 3** – the second preferred option - Tata Steel has its own scrap reception and processing facility at Port Talbot to prepare scrap to the 'furnace ready' scrap metal feedstock on steelworks.

6.17 The exact source of scrap across the UK and the option/mix of options will not be determined prior to commencement of development. It will not be available prior to the determination of this planning application. The options set out above are reflected in the ES accompanying the application by basing the assessment on the basis of the likely worst-case scenario that the development will involve an element of both: EAF ready scrap being transported to site; and an element of on-site processing. This is the most robust position for the ES at this stage.

6.18 It is known that the scrap facility will be brought forward on a phased basis, depending on which options progress, as follows:

- **Phase 1 (Options 1 and 2)**: providing the facilities required to receive 'furnace ready' scrap and processing of internal arisings.

- **Phase 2 (Option 3)**: providing additional shredding and waste processing equipment to create 'furnace ready' scrap on the steelworks if Option 1 does not come to fruition and to prevent a ransom situation should Option 2 be pursued (only). This element would also take account of the possible hybrid solution described above.

6.19 This opportunity for a phased approach to the scrap facility is essential to provide flexibility in a competitive market and future proof the facility. The phasing will also facilitate the timely construction of the wider Proposed Development, taking into account space and configuration constraints during the construction period.

6.20 Scrap metal will be transported in containers to the main scrap storage and processing area, where each container will be removed from the train and replaced with an empty container. Trains will enter the area to ensure each load of scrap will go over the weigh bridge and be passed under a radioactivity scanning facility. This is to ensure that no radioactive sources, such as pacemakers or smoke detectors, are accidentally melted within the EAF. The containers will be tipped into the correct bay containing graded scrap ready for use or for further processing.

6.21 Empty containers will then be stacked ready for the next train. The proposed overflow scrap yard is for periods where additional stocks of scrap metal are required or if additional processing is required. Lastly, there is the potential for foreign materials to be included with the delivered scrap. Separation and processing will be completed in the non-ferrous processing area. Once the materials have been segregated and made furnace-ready, they will be transported to the EAF.

6.22 The potential Phase 1 works for the scrap facility will include:

- Rail receipt facilities for weighing, inspecting and unloading trains.

- Scrap bays for segregation and storage of scrap.

- Road network to provide access around scrap yard facility.
- Relocation of existing Harsco Shredder to new scrap yard for processing internal scrap arisings.
- Installation of a Shear to process internal arisings.
- Office and amenity provision for scrap yard workers.
- Dedicated scrap overflow yard.
- Scrap lorry unloading area.
- Associated mobile equipment for scrap handling.
- Minimal operational lighting (lux) levels across the scrap yard area.

6.23 The Proposed Development will be supported by a series of electrical upgrades undertaken by NG within the Application Site. As described above, this includes the construction of a new Port Talbot Substation at the steelworks and new cable infrastructure from the substation to the edge of the Application Site. These upgrades are essential for the operation of the EAF.

6.24 If implemented, the potential Phase 2 works for the scrap facility will include additional development, namely:

- Shredder and associated plant for production of high-quality shredded scrap; and
- Non-ferrous processing plant for processing waste generated by the shredder.

6.25 The outline planning elements of the scheme are based on the minimum/maximum parameters, defined by the Parameters Plan. Heights will vary across the outline element of the scheme, up to a maximum of 20m.

6.26 The development forming part of the outline planning application is detailed in **Table 6.2** below.

Table 6.2: Outline Development Parameters

Built Development	Dimensions (m)			SL No. Reference on Reference Layout
	Length	Width	Height	
National Grid Compound	200	100	15	23
Incoming Scrap Yard	35	25	15	24

Electrical Building				
Office	**40**	20	8	
Car Park	**25**	25	0	
Disabled Car Park	**3.6**	1.5	0	
Workshop	**70**	25	8	
Incoming Scrap Yard Electrical Building	**30.2**	20	11.7	
Scrap Storage	**Varies**	Varies	7	
Shear	**58.7**	53	19.5	25
Pre-Shredded Feed Stock Pile	**25**	20	6	
Pre-Shredder	**12**	11.3	9	
Shredder Feed Stock Pile	**62**	32	9	
Shredder (Block 01 – Infeed Conveyor)	**30**	10	10	
Shredder (Block 02 – Hammer Mill)	**40**	40	20	
Shredder (Block 03 – Air Separation)	**25**	125	20	
Shredder (Block 04 – Pickling & Stacker)	**60**	125	20	
Acoustic Mitigation Barrier	**800**	5	15	
Lorry Tipping Area	**150**	50	7	
HARSCO Shredder	**50**	50	7	
Shear	**58.7**	53	7	26
Overflow Scrap Bay 01	**50**	100	7	

Overflow Scrap Bay 02	**80**	68	7	
Existing Repurposed Building	**115**	65	15	
Non Ferrous Processing Area	**67**	125	13	27
Scanning Facilities	**15**	15	15	28
Railway Weigh Bridge	**15**	15	15	29

Proposed Development

6.27 The proposed site layout is reflective of the industrial nature of the Proposed Development. It has been informed by technical, design, planning, operational and safety requirements, including but not limited to:

- Proximity and connectivity required to accommodate interacting stages of the Tata Steel EAF technology and process.
- Accessibility, including to the private road network and public highway.
- Engineering and operational efficiencies.
- Safe movement and operation around the Site, including minimum lighting levels in all required areas of the Application Site.
- Reducing heights to respond to amenity, visual impact and environmental health considerations.
- Amending technical designs to improve operation and respond to corresponding planning considerations, such as noise generation.
- A material palette that utilises muted and matt colours on equipment, as shown in the supporting Design and Access Statement (DAS).

6.28 The proposed Application Site layout responds to these considerations and ensures a functional and efficient use of the Application Site.

Waste Production

6.29 There will be two major waste streams from the steelmaking process: EAF dust (also known as red dust) and EAF slag.

6.30 EAF slag will be produced from the EAF and will contain elements that are detrimental to steel quality. Quick lime and / or dololime will be added to the furnace to help create a slag layer that floats on top of the molten metal. This slag layer removes impurities such as phosphorus, silicon and aluminium. Slag can be

tapped separately from the molten metal and taken to the existing slag processing area on the steelworks, where it is cooled. The slag can be further weathered and processed to create a very hard-wearing aggregate which is often used as road stone.

6.31 EAF dust is a mix of three extracted dusts generated as part of the process. Primary dust is generated directly from the EAF and is captured by a hood and will be transferred into the ducting above the plant and into the FEP. Fugitive dusts, often called secondary dust, within the BOS building will be extracted via a canopy located in the roof of the BOS plant. This extraction will also be transferred to the FEP and mixed with the primary dust.

6.32 The auxiliary dusts will be generated from the materials handling system which will also be transferred to the FEP. This FEP will contain bag filters that remove dust from the air with a very high efficiency. The dust will then be recycled externally in furnaces that remove zinc. This waste can then be used in pigments and other industries and creates an iron-rich pellet that can be recycled.

Construction and Operational Staff

6.33 A new office building will be constructed on the eastern side of the BOS plant to house construction staff. Eventually, the office building will accommodate operators of the EAF facility. There will be a new car parking facility that will allow workers to arrive at this part of the steelworks by vehicle and then change into their work wear, before using an extended covered walkway to enter directly into the main construction area.

Drainage

6.34 The management of surface water across the Application Site will reflect its industrial nature. It takes account of the contamination risk being high, medium or low across different areas of the Application Site and has been developed in discussion with NPTC. The principles of the SuDS surface water drainage strategy will be adopted, including:

- Areas of development and new facilities located on existing impermeable surfacing will be drained via the existing systems towards the on-site wastewater treatment works.
- Two main surface water systems:
  - **The clean water stream** – this will accept surface water from areas where no contamination is anticipated; these will flow into the SuDS system and be discharged directly into designated on-site surface water bodies in the south of the Application Site (e.g. Lower Mother Ditch), where possible.
  - **The contaminated stream** – this will drain surface water from high-risk process areas and direct flows within a piped system to the on-site wastewater treatment works, prior to being discharged via the LSO into the Bristol Channel.

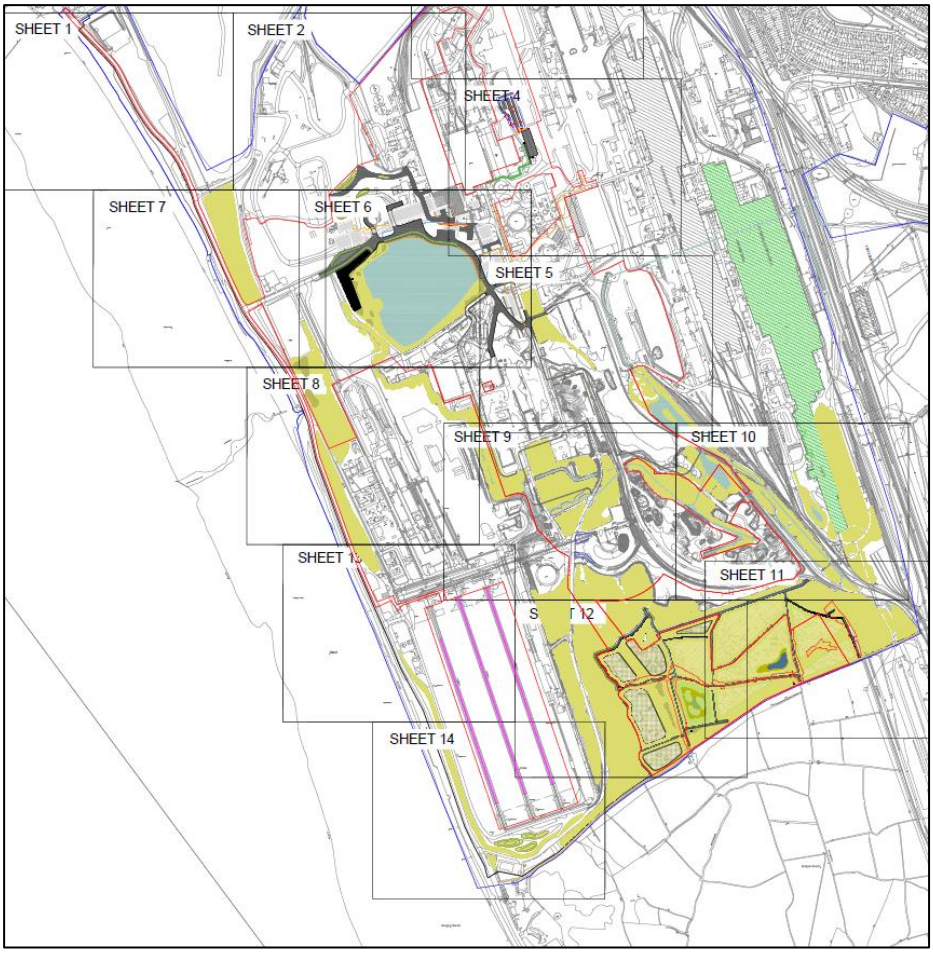
6.35 Both streams shall ultimately be pumped to the established LSO at the steelworks into the Bristol Channel.

Green Infrastructure and Landscaping

6.36 The application is supported by a comprehensive green infrastructure and landscape strategy and reflecting ecological survey work and analysis, prepared by RSK.

6.37 As shown in Figure 6.2, the key focus for mitigation and enhancement works is largely focused on the grazing marshes located towards the southern proportion of the Application Site. This is complemented by other localised interventions which are proposed around the margins of the lagoon and locations within the wider steelworks.

Figure 6.2: Landscape and Habitat Mitigation Proposals Location Plan



6.38 Please note Figure 2 illustrates the broad location and balance of planting proposed. The key / legend for each detailed planting sheet is included on the particular sheet submitted as part of the planning application for approval.

6.39 The southern grazing fields will be partially affected by the EAF operational works at the construction stage where the new NG electricity cable will be installed, providing power to the new EAF plant. The cable will enter the Application Site from the east and return north through the central area although NG is yet to be determine a fixed route.

The cable will be laid in an open trench up to 1.5m in depth below ground levels with sections 'threaded' below landscape features such as the drainage ditches and existing vegetation to minimise any potential damage to the existing green and blue infrastructure.

6.40 It is acknowledged that the associated cable works will cause some temporary disturbance to the ground along the route including within the NG working zone during the construction phase. The restoration of the cable route forms part of the landscape and ecological mitigation proposals for the southern grazing fields phased after the installation of the cable.

6.41 The spoil from areas of slag to be cleared for the development will be stored and used to create open mosaic habitat within the wider Application Site. This will be accomplished via the creation of spoil heaps, roadside bunding and gabion baskets. All of these will be allowed to naturally colonise from the seedbank within the spoil and the retained areas of vegetation across the steelworks.

6.42 The proposal includes the following features:

- Grazing marshes.
- Ditches.
- Ridges and furrows.
- Seasonal wetland scrapes.
- Reed beds.
- Scrub and grassland.
- Spoil mounds and gabions.
- Native coastal tree planting.
- Wildlife tower.
- Native coastal scrub planting.
- Reed bed habitat.
- Restored / improved / naturally colonised grassland habitat.
- Restored ditch with re-profiled banks.

Materials

6.43 A full description of the materials and colours proposed is set out in the accompanying DAS and supporting plans. The material palette for the industrial process area is operationally led and reflective of the surrounding area. This includes metal, galvanised steel and silo materials.

Proposed Access

6.44 The Application Site will be accessed predominantly via the existing main gate site access off the A4241 Harbour Way. The west gate site access off the A4241 Harbour Way may also be used occasionally for larger plant / specialist deliveries etc.

6.45 Both access points provide significant queueing capacity between the gate house and the local highway network. The barrier security system at the gate house monitors arrivals / departures and allows quick touch-card access to the steelworks for registered staff / frequent visitors.

6.46 All construction workers will be registered as a frequent visitor and provided with a pass allowing for quick touch-card access through the barrier.

6.47 The existing internal road network which is currently used by frequent two-way HGVs will continue to be utilised. Within the Application Site, access will be facilitated by works to the existing road network and the creation of new roads. All proposed new roads, widened roads, service yards and turning areas have been designed based on swept path analysis and to meet Tata Steel's requirements and relevant standards.

6.48 Pedestrian / cycle access to the Application Site will continue to be provided via the existing main gate access off the A4241 Harbour Way.

Temporary Construction Areas

6.49 Temporary Constrution Areas (TCAs) are required as part of the construction phase of the Proposed Development. These will be utilised for a period of approximately 2.5 years and until Summer 2027.

6.50 Land availability and the need to deliver the EAF alongside the safe decommissioning of the areas of the steelworks site not forming part of the future configuration was the key consideration in selecting TCAs. The areas provide accessible construction laydown, compound, storage and staff facilities for the duration of the construction period.

6.51 Each of the TCAs is located to ensure that they:

- are sited on previously developed land and laid to existing hardstanding.
- benefit from existing road access with convenient links to the development.
- are understood through existing environmental information to manage risk.
- have little or no ecological or biodiversity interest.

6.52 A combination of functional and operational requirements for the construction period, close proximity, ready access, land and ground conditions, and ecology factors have shaped the sites selected for the TCAs.

Operating Hours

6.53 The steelworks will continue to operate 24 hours a day (across two shifts), seven days a week. This will take place 365 days per year.

Summary

6.54 Overall, the hybrid planning application proposal seeks to provide:

- A new EAF steel production facility (1 no. arc furnace, 2 no. ladle furnaces) that is closely linked to the existing built infrastructure on site but comprises both demolition of some existing and construction of new built development.
- A scrap metal handling facility and associated scrap yards, slag processing facility, chemical and material storage structures, buildings, handling systems, electrical control rooms and power infrastructure, laboratories, offices and ancillary facilities.
- Safe access and egress for staff and visitors, industrial / operational use, truck loading and emergency operators.
- On-Site landscaping / SuDS / biodiversity features where possible and safe to do so surrounding the operational steelworks.
- Internal two-way access roads for safe movement of all relevant vehicles around the industrial process area.
- A drainage strategy which takes account of SuDS and responds to the operational requirements of the administration, industrial processing and truck loading areas.
- External lighting to facilitate safe working, operation and movement throughout the Application Site, taking account of biodiversity and amenity considerations.

7. Planning Policy Context and Material Considerations

7.1 This section summarises the local and national planning policy context relevant to the Proposed Development. This should be read alongside the Planning Policy Matrix included at **Appendix 3**.

The Development Plan

7.2 In accordance with section 70(2) of the Town and Country Planning Act 1990, in dealing with an application for planning permission or permission in principle a planning authority must have regard *inter alia* to the provisions of the development plan, so far as material to the application. For any area in Wales, the development plan includes the National Development Framework for Wales, any strategic development plan and the local development plan (section 38(4) of the Planning and Compulsory Purchase Act 2004). Planning applications must be determined in accordance with the development plan, unless material considerations indicate otherwise (section 38(6) of the Planning and Compulsory Purchase Act 2004). The development plan should be read objectively as a whole in determining planning applications. The merits of the proposal must be assessed on a case-by-case basis.

7.3 The development plan comprises Future Wales: The National Plan 2040 (February 2021) and the Neath Port Talbot Council Local Development Plan (LDP), adopted in January 2016.

Future Wales: The National Plan 2040

7.4 Future Wales (FW) was published by Welsh Government in February 2021 and constitutes the national development framework, setting out the direction of development in Wales to 2040. FW addresses key national priorities, including sustaining and developing a vibrant economy, achieving decarbonisation and climate-resilience and improving the health and well-being of our communities. FW is strongly influenced by Planning Policy Wales (PPW) which establishes key principles for the planning system.

7.5 Outcome 11 of FW states that "decarbonisation commitments and renewable energy targets will be treated as opportunities to build a more resilient and equitable low-carbon economy". FW aims to ensure that the planning system will help Wales "lead the way in promoting and delivering a competitive, sustainable decarbonised society" (page 56).

7.6 Policy 1 (Where Wales Will Grow) identifies three National Growth Areas for Wales, which are complemented by Regional Growth Areas. One of the National Growth Areas is Swansea Bay and Llanelli, which includes Port Talbot.

7.7 Policy 28 (National Growth Area – Swansea Bay and Llanelli) confirms that Swansea Bay and Llanelli area (including) Port Talbot, will be the main focus for strategic economic growth and investment in the south west region.

7.8 Policy 9 (Resilient Ecological Networks and Green Infrastructure) states that development proposals must demonstrate action towards securing the maintenance and enhancement of biodiversity to provide a net benefit, the resilience of ecosystems, and green infrastructure assets, through innovative, nature-based approaches to site-planning and the design of the built environment.

7.9 The Proposed Development aligns with FW's aim for Wales to become a world leader in renewable technologies, support investment and reduce carbon emissions.

Local Development Plan

Site Specific Policies

7.10 The adopted LDP guides the future development for NPTC, and sets out where, when, and how much new development can take place during the plan period (2011 to 2026).

7.11 The whole of the Application Site area is allocated in the adopted LDP as:

- **Existing Employment Area** – **Policy EC2** seeks to protect the employment function of NPTC's employment areas, including Tata steelworks (EC2/11).

- **Coastal Corridor Strategy Area – Policy SP5** promotes sustainable growth and development to benefit the County Borough, while protecting and enhancing the area's character and environment.

7.12 Strategy Policy 11 – Employment Growth – states that existing employment areas will be supported and safeguarded for employment uses. Uses on the steelworks will be restricted as follows in accordance with **Policy EC3** unless otherwise specified and where appropriate:

- Use Classes B1, B2 and B8.

- Ancillary facilities or services which support and complement the wider role and function of the primary employment use.

- Commercial services unrelated to class B.

7.13 Policy EC3 also states that developments must demonstrate no adverse impacts on the overall function of the employment area and neighbouring commercial and residential properties. Any development must be sustainably justified in the location and be appropriate in scale and form to the role and function of the employment area.

7.14 Supporting text to Policy EC3 in paragraph 5.2.22 of the LDP states that:

'Within the heavy industrial Sites, such as Tata Steel, the types of ancillary facilities or services that would be appropriate would be different to that of general employment estates or employment parks. Due to their heavy industrial nature, the types of ancillary services that may be appropriate could include energy and power generation, and waste recovery and transfer proposals not contained withing traditional B use classes.

Such proposals will be favourably considered where the proposals would support the overall function of the employment area and would not cause any adverse impact on the area for employment purposes or cause unacceptable harm to the amenity of neighbouring properties'.

7.15 **Policy EC4 (Protection of Existing Employment Uses)** sets out criteria for proposals to meet if such development would result in the loss of existing employment land or buildings.

7.16 The suite of employment land policies in the LDP are directly applicable to the Proposed Development. They should be afforded greatest weight in the determination of the EAF planning application.

Strategic and Development Management Policies

7.17 More generally, there is a series of strategic and development management policies in the adopted LDP of relevance to the determination of the planning application. The policies are summarised in the Planning Policy Matrix in Appendix 3. Objective 1 (Climate Change) seeks to minimise the causes and consequences of climate changes through reduced greenhouse gas emissions and adapt to climate change through consideration of its effects in the design and location of new development.

7.18 The policies listed below are relevant to the Proposed Development. A Planning Policy Matrix (included at Appendix 3) sets out each policy in detail and provides an analysis demonstrating how the application proposal complies with the requirements of each.

- **Policy SP1 (Climate Change)** addresses how the causes and consequences of climate change will be addressed.
- **Policy SP2 (Health)** encourages measures to be taken in relation to the high levels of poor long-term health and sickness, including reducing people's exposure to elements that can have an adverse impact on their health such as social, economic or physical environment.
- **Policy SP3 (Sustainable Communities)** confirms that the delivery of sustainable, healthy, and cohesive communities, and the conservation of the countryside will be promoted.
- **Policy SP4 (Infrastructure)** states that development will be expected to make efficient use of existing infrastructure, and where required make adequate provision for new infrastructure.
- **Policy SC1 (Settlement Limits)** states that outside of settlement limits, development will only be permitted under specified circumstances.
- **Policy TO4 (Walking and Cycling Routes)** states that any proposals that would prevent or have any adverse impact on the implementation of the three specified routes will be resisted. The routes include the Wales Coast Path (reference TO4/1) which runs to the south-east of the Tata steelworks and Application Site.

- **Policy SP14 (Countryside and the Undeveloped Coast)** confirms that the countryside and undeveloped coast, including landscapes, seascapes, and agricultural land, will be protected and where feasible enhanced through measures including the protection of the open countryside through the control of inappropriate development outside the settlement limits.

- **Policy SP15 (Biodiversity and Geodiversity)** notes how important habitats, species, and sites of geological interest will be protected, conserved, enhanced, and managed.

- **Policy EN6 (Important Biodiversity and Geodiversity Sites)** requires development that would impact Regionally Important Geodiversity Sites (RIGS), Local Nature Reserves (LNRs), Sites of Interest for Nature Conservation (SINCs), Sites meeting SINC criteria, Sites supporting Local Biodiversity Action Plan (LBAP), or S42 habitats or species to conserve and enhance the natural heritage importance of the site.

- **Policy EN7 (Important Natural Features)** states that development proposals that would adversely affect ecologically or visually important natural features will only be permitted where full account has been taken of the relevant features in the design of the development.

- **Policy SP16 (Environmental Protection)** states that air, water, ground quality, and the environment generally, will be protected and improved where feasible through the measures set out in the policy.

- **Policy SP17 (Minerals)** states that a proportionate contribution to meeting national, regional and local demand for a continuous supply of minerals will be made while balancing the impact of development on the environment and communities.

- **Policy EN8 (Land Stability)** refers to proposals which would be likely to have an unacceptable adverse effect on health, biodiversity, and/or local amenity, or would expose people to unacceptable risk.

- **Policy SP18 (Renewable and Low Carbon Energy)** states that a proportionate contribution to meeting national renewable energy targets and energy efficiency targets will be made while balancing the impact of development on the environment and communities. It sets out how this will be achieved.

- **Policy SP19 (Waste Management)** seeks to make provision for the delivery of an integrated network of waste management facilities.

- **Policy W3 (Waste Management in New Development)** states that new development proposals need to demonstrate that provision is made for the design, layout, storage and management of waste generated by the development during both construction and operation. Site Waste Management Plans are required for proposals for industrial development that would generate more than 1,000 tonnes of waste per annum or developments that generate hazardous waste.

- **Policy SP20 (Transport Network)** states that the transport system and infrastructure will be developed in a safe, efficient, and sustainable manner through the measures set out in the policy.

- **Policy SP21 (Built Environment and Historic Heritage)** requires the built environment and historic heritage to, where appropriate, be conserved and enhanced.

- **Policy TR2 (Design and Access of New Development)** states that development proposals will only be permitted where criteria set out in the policy are satisfied.

- **Policy BE1 (Design)** states that all development proposals are expected to demonstrate high quality design which takes into account the natural, historic, and built environmental context, and contributes to the creation of attractive, sustainable places. The Policy states that proposals will only be permitted where specified criteria are met.

- **Policy I1 (Infrastructure Requirements)** confirms that further works or funding may be required in addition to SP4, to mitigate the impact of new development.

- **Policy OS1 (Open Space Provision)** confirms that provision will be sought for amenity space for employment and commercial development proposals over 1,000sqm.

- **Policy RE2 (Renewable and Low Carbon Energy in New Development)** encourages schemes that connect to existing sources of renewable energy and incorporate on-site zero/low carbon technology (including microgeneration technologies).

Material Considerations

Planning Policy Wales

7.19 PPW (Planning Policy Wales Edition 12 (published in February 2024) sets out the land use planning policies of the Welsh Government. The primary objective of 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, as required by the Planning (Wales) Act 2015, the Wellbeing of Future Generations Act and other key legislation.

7.20 It is supplemented by a series of Technical Advice Notes (TANs), Welsh Government Circulars, and policy clarification letters, which together provide the national planning policy framework for Wales.

7.21 Paragraph 3.3 states that good design is fundamental to creating sustainable places. Design is not just about the architecture of a building but the relationship between all elements of the natural and built environment. To achieve sustainable development, design must go beyond aesthetics and include the social, economic, environmental, cultural aspects of the development.

7.22 Paragraph 3.7 sets out that development should seek to maximise energy efficiency and the efficient use of other resources (including land), maximise sustainable movement, minimise the use of non-renewable resources, encourage decarbonisation and prevent the generation of waste and pollution.

7.23 Paragraph 3.30 notes that the Welsh Government declared a climate emergency in 2019. The planning system plays a key role in tackling the climate emergency through the decarbonisation of the energy system and the sustainable management of natural resources.

7.24 Paragraph 5.44 confirms that planning authorities should encourage and support developments which generate economic prosperity and sites identified for employment use should be protected.

7.25 Changes were made to Chapter 6 of PPW on 18 October 2023. The changes, made in a letter to Chief Planning Officers, have now been included in PPW (Edition 12). These include the need for all development to deliver a net benefit for biodiversity (NBB) and ecosystem resilience (paragraph 6.4.5). Development within an SSSI which is not necessary for the management of the site must be avoided. Green Infrastructure Statements should also be submitted with all planning applications (paragraph 6.2.5).

Wales Technical Advice Notes (TANs)

7.26 The Technical Advice Notes relevant to the determination of the application proposal include:

- TAN 11: Noise (October 1997).
- TAN 15: Development and Flood Risk (July 2004).
- TAN 18: Transport (March 2007).
- TAN 5: Nature Conservation and Planning (September 2009).
- TAN 23: Economic Development (February 2014).
- TAN 12: Design (March 2016).
- TAN 24: The Historic Environment (May 2017).

Wales National Marine Plan

7.27 The Welsh National Marine Plan (WNMP) was adopted in November 2019 and constitutes the first marine plan for Wales. It aims to shape the seas of Wales to support economic, social, cultural and environmental objectives.

7.28 The document guides the sustainable development of Wales' marine areas by setting out how proposals will be considered by decision makers. The document covers the inshore and offshore Welsh National Marine Plan regions and sets out the Welsh Government's policies for, and in connection with, the sustainable development of the Marine Plan Area.

7.29 The key policies relevant to the Proposed Development include:

- GEN_01: Planning Policy.
- GEN_02: Planning Policy.
- ECON_01: Sustainable Economic Growth.
- SOC_02: Well-being of coastal communities.
- ECON_02: Co-existence.
- SOC_03: Marine Pollution Incidents.
- SOC_07: Seascapes.
- SOC_08: Resilience to Coastal Change and Flooding.
- SOC_09: Effects on Coastal Change and Flooding.
- SOC_10: Minimising Climate Change.
- SOC_11: Resilience to Climate Change.
- ENV_01: Resilient Marine Ecosystems.
- ENV_05: Underwater Noise.
- ENV_06: Air and Water Quality.
- GOV_01: Cumulative Effects.

7.30 Further detail on the WNMP and policies relevant to the Proposed Development are set out in the Planning Policy Matrix (Appendix 1).

Supplementary Planning Guidance

7.31 The LDP is supported by Supplementary Planning Guidance (SPG). The relevant SPGs are listed below:

- Planning Obligations (October 2016).
- Pollution (October 2016).
- Parking Standards (October 2016).
- Open Space and Greenspace (July 2017).
- Renewable & Low Carbon Energy (July 2017).
- Design (July 2017).
- Landscape and Seascape (May 2018).
- Biodiversity and Geodiversity (May 2018).

Emerging Local Planning Policy

7.32 NPTC has begun the preparation of the Replacement Local Development Plan (RLDP). The Delivery Agreement was approved by Welsh Government in October 2023. The Pre-deposit Participation / Preparation is now underway until September 2024. Following this, the Pre-deposit (Preferred Strategy) Consultation is expected to be undertaken between November 2024 and December 2024.

7.33 There are no draft policies in the current stage of the emerging RLDP of relevance to the proposals.

7.34 Tata Steel previously submitted a representation to the Delivery Agreement stage consultation of NPTC's RLDP in September 2021. Tata Steel has since engaged consistently with officers at NPTC in preparing Candidate Site Submission representation. An initial meeting was held with the NPT Planning and Public Protection Team on 12 April 2022. A further meeting was held on 16 May 2022 to discuss the preferred approach to the Candidates Sites process.

7.35 Candidate Site Submission representation was subsequently submitted on 31 May 2022 and regular, positive discussions have been held with the NPTC Planning Policy Team. Tata Steel outlined the need to continue to safeguard the steelworks as an employment Site and requested that a site-specific policy is provided for Port Talbot steelworks. This would be critical to support the sustainability and investment ambitions of national government, NPTC, Tata Steel and SWIC in Port Talbot.

The Decarbonisation and Renewable Energy Strategy (DARE) (May 2020)

7.36 The Decarbonisation and Renewable Energy Strategy (DARE) sets out how NPTC will reduce its carbon footprint when carrying out operations and functions and respond to the challenges of climate change. The strategy addresses the NPTC approach to renewable and low carbon development across the borough.

Biodiversity Duty Plan 2020 – 2023 (December 2021)

7.37 The NPTC Biodiversity Duty Plan is required under Section 6 of the Environment (Wales) Act 2016. It sets out a summary of the many important ecosystems existing across the borough and how these will be supported and monitored.

Summary

7.38 This section has summarised the planning policy context relevant to the Proposed Development, taking into account material considerations. The key themes identified relate to decarbonisation, sustainability, sustainable economic growth, natural environment, amenity, and design.

7.39 National legal commitments to achieving decarbonisation form an essential framework against which this planning application should be determined. Prevailing development plan policy is supportive of decarbonisation, including the use of low carbon and best available technology development. This agenda is an important driver for achieving sustainability and the delivery of sustainable development, including climate change resilience.

7.40 The site is allocated as a safeguarded employment area (ref. EC2/11) in the LDP. The use of existing employment land in this area is an important opportunity recognised in the development plan. Development Plan policy and relevant material considerations promote sustainable economic development in such locations, particularly where it delivers regeneration and investment in strategic existing growth locations served by existing infrastructure.

7.41 Development must be of high quality, taking into account the nature of the site and its surrounding context. Placemaking criteria must be met in relation to:

- Environmental protection criteria relating to land, health, waste, air quality and noise.
- Health and safety requirements must be met, including on fire risk and major accidents and emergencies.
- The significance of known built and natural heritage assets, and their setting.
- Impact on nearest sensitive environmental and residential receptors, and land uses.
- Landscaping quality and avoidance of any undue visual impacts from public vantage points in the vicinity of the Site.
- Flood consequences taking into account the requirement for sustainable drainage and climate change resilience.
- Net biodiversity benefit delivery.

7.42 Further analysis of the Proposed Development and its compliance with national and local planning policy objectives is provided in the following section of this report.

8. Planning Assessment

8.1 This section considers the Proposed Development against the planning policy context identified in Chapter 7. The assessment is broken down into core policy themes. A detailed summary of all planning policy relevant to the application proposal is presented at Appendix 1.

Principle of Development

8.2 The Application Site is primarily under-utilised brownfield land located within the operational Port Talbot steelworks. The Application Site and its immediate surroundings have a long-established history of heavy industrial and steelmaking uses, dating back over 60 years in its (broadly) current configuration. The site is an established landmark and employment destination of strategic importance on a local, regional and national level. The principle of major industrial development is firmly established in this location.

8.3 The ageing infrastructure at the steelworks is resulting in ongoing closures of the 'heavy end'. The carbon intensity of the steel product(s) at Port Talbot is increasingly uncompetitive in a market creating demand for low-carbon steel. The current configuration of the steelworks is commercially unsustainable. The site will close without strategic intervention.

8.4 The Proposed Development is a strategic scale new investment in a key growth location identified in Future Wales. It complies with the strategic aims of FW, the goal to decarbonise and the following key planning principles:

- **Growing our economy in a sustainable manner** – the proposed regeneration of the site will bring forward a new vibrant and dynamic employment opportunity in an accessible location which directly delivers on the Government's ambitions for sustainable steel production.
- **Making best use of resources –** redevelopment of previously developed land that is currently underutilised and will act as a catalyst for wider development opportunities. It seeks to cluster industrial development at an established location to maximise proximity to surrounding resources and skills.
- **Deliverability** – the development will meet an identified and acute need without delay. Tata Steel UK products and the transition to low-carbon steel is fundamental to the decarbonisation of the UK economy on the pathway to net zero. Public and private funding is in place and, subject to obtaining planning permission, Tata Steel will deliver an operational EAF facility to programme in Summer 2027.

8.5 The Proposed Development is a critical first step investment in the regeneration of the steelworks. It is the only viable means of regenerating the steelworks. The scheme represents another iteration in the historic evolution of steelmaking activity on the Application Site. The Application Site is the only viable location for the planned investment. It is the only location on the steelworks capable of being knitted

seamlessly into the existing fabric and infrastructure of the steelworks. The Application Site is the ideal location to deliver the state-of-the-art EAF facility, both form a cost-efficiency and steelmaking perspective.

8.6 The EAF facility and all ancillary industrial uses proposed at the site are critical to the creation of a feasible operational, environmental and commercial steelmaking business in South Wales. Delivering this regenerative investment on established employment land accords directly with the suite of employment land policies in the adopted LDP. The principle of the proposal is supported on this basis.

8.7 The site scores highly in active travel terms. It is accessible by strategic transport infrastructure, including sea, rail, road, public transport and the pedestrian/cycle network. The operation of the facility will be largely reliant on transport by train. The Proposed Development is a clear opportunity to promote the use of alternative sustainable forms of transport.

8.8 The Proposed Development will underpin a positive future for a vital social and economic hub for the locality, region and the UK. Its decarbonisation credentials will be transformative. The scheme will also complement the existing and future industrial role of the wider area, including the wider Port Talbot docks through the Celtic Freeport initiative. In itself, and in combination with the potential developments coming forward in the area, the Proposed Development represents a huge opportunity to place Port Talbot and the region at the heart of the national pathway to net zero.

8.9 The principle of development is fully supported by the adopted development plan, including FW.

Material Planning Considerations

8.10 The significant in principle support for the Proposed Development is on the basis that it also complies with the wide range of strategic and development management policies in the adopted Development Plan, taking into account material considerations. These Development Plan policies must be read objectively and as a whole. The application must be determined on the balance of the relevant policy considerations, taking into account the merits of the development.

8.11 The remainder of this section assesses the Proposed Development against the development plan policies, taking into account material considerations.

8.12 It must be reiterated at the outset of this assessment that the proposal forms part of a £1.25bn investment that is the largest in South Wales industry for many decades. The proposal will secure steelmaking in Port Talbot for the foreseeable future. This is the only viable solution for the future of Port Talbot steelworks. If the investment does not proceed and the development does not go ahead, steelmaking will cease at the site.

8.13 The future of the Port Talbot facility is entirely dependent on the planned investment in the EAF. Without an EAF, the inevitable cessation of steelmaking in Port Talbot, would cause a significant adverse economic, social, and environmental effect in Port

Talbot, Wales and the UK. This essential context is a material consideration to which the authority should have regard in the determination of the planning application. All identified effects of the proposal must be assessed by NPT with this essential context in mind.

Employment Land

8.14 The planning application proposes a continuation of the established industrial or steelmaking use on site. The Proposed Development represents a strategic investment in the transformation of the steelworks for low-carbon steelmaking. It is acceptable and policy compliant when assessed against the directly relevant adopted LDP policies and the LDP as a whole in that it will:

- Protect the employment function of the allocated steelworks (Policy EC2/11).
- Revitalise an established steel-making use, including through the introduction of new (EAF) and intensified (scrap handling) ancillary uses (Policy EC3 and SP11).
- Deliver strategic scale sustainable growth and development to support the continued function of the operational steelworks (Policy EC3 and EC4).
- Drive investment in the Coastal Corridor Strategy Area in a manner entirely consistent with the industrial character of the area and the environment (Policy SP5).

8.15 Open scrap handling and processing is an established use on site and will be intensified by the Proposed Development. The proposed scrap facility will necessitate approximately 70,000 tonnes of scrap waste each week to be transported to the site, mainly by train and some via the local road network.

8.16 A strict interpretation of The Waste Framework Directive (2008/98/EC as amended 2020) indicates that scrap metal is 'waste'. However, it is also an essential circular raw material or feedstock in steelmaking. This is the case for both iron ore (the existing steelworks configuration) and EAF (proposed) steel. The waste policies in the LDP must be read in this context when determining the proposed EAF hybrid planning application.

8.17 Strategy Policy 19 (Waste Management) and the associated Policy W1 (In-Building Waste Treatment Facilities) of the LDP are topic-based and specific waste policies. Objectively, they read together. They do not relate specifically to development on safeguarded employment land such as the Application Site. Policy SP19 makes provision for the delivery of an integrated network of waste management facilities across the Local Authority area.

8.18 Policy W1 identifies three preferred sites for the development of in-building waste treatment facilities, namely Baglan Bay, Junction 38 (M4) Margam and Kenfig Industrial Estate, Port Talbot. These facilities at the identified sites have the capacity to serve as part of this strategic network to meet regional and local need. The second half of the policy then sets out criteria when proposals for the treatment, processing, storage and distribution of waste will be permitted.

8.19 All six criterion must be satisfied: a) the proposal reflecting the priority order of the waste hierarchy; b) the proposal being carried out in an appropriately modified existing building, unless it can only be in the open; c) no compromise on highways safety; d) measures to reduce or avoid damage to the environment and amenity of neighbouring land uses can be implemented; e) appropriate site management proposal are submitted for the duration of the development; f) the proposal is supported by an appropriate Waste Planning Assessment.

8.20 The supporting text to Policy W1 (paragraph 5.3.114 of the LDP) states that:

'For the purposes of this policy, in-building facilities include in-vessel composting, thermal treatment including incineration with energy recovery, pyrolysis, gasification, anaerobic digestion, mechanical and biological treatment, and materials recycling facilities'.

8.21 The existing and proposed steelmaking operations in Port Talbot cannot be assessed objectively as falling readily into any of the above categories. The steelworks in its current or future EAF configuration cannot be considered a 'materials recycling facility' for the purposes of interpreting the LDP. Only an overly fine grain analysis of the ancillary scrap handling use on site would indicate that Strategic Policy 19 and Policy W1 are directly relevant to anything other than the shredding and scrap processing equipment that may be required in the Phase 2 element of the scrap facility (Option 3 above) only.

8.22 In contrast, the employment land policies in the LDP are directly applicable to the development. Supporting text to Policy EC3 in paragraph 5.2.22 of the LDP states that:

'Within the heavy industrial sites, such as Tata Steel, the types of ancillary facilities or services that would be appropriate would be different to that of general employment estates or employment parks. Due to their heavy industrial nature, the types of ancillary services that may be appropriate could include energy and power generation, and waste recovery and transfer proposals not contained withing traditional B use classes. Such proposals will be favourably considered where the proposals would support the overall function of the employment area and would not cause any adverse impact on the area for employment purposes or cause unacceptable harm to the amenity of neighbouring properties'.

8.23 The proposed intensification of the established and ancillary scrap handling and processing uses required for the Proposed Development meets this explicit (and Tata Steel related) flexibility in the employment land policies in the adopted LDP. The thrust of employment land use policies in the LDP support the continued core steelmaking use and ancillary processes at the Application Site, including for waste recovery and transfer.

8.24 This support is subject to assessment against clear policy criteria. The case in favour of the Proposed Development against the Policy EC3 criteria and its supporting text is considered below:

- **Ancillary scrap handling** – the importance of ferrous metal scrap to the only viable (EAF) future of Port Talbot steelworks supports and complements the wider role and function of the primary steelmaking use of the site.

- **Support for the overall function of the employment area** – the ancillary scrap handling element of the proposed EAF is fundamental to the continued operation and commercial regeneration of viable steelmaking in Port Talbot. It is the only viable route to secure the continued overall function of the established employment site.

- **Suitably justified in this location –** open ferrous metal scrap handling already occurs lawfully and in an unrestricted manner at Port Talbot Steelworks. The scale of the proposed ancillary scrap element has been carefully considered to support this continued role and function of the employment area in the long-term future. It is suitably justified in this location.

- **Operational requirements** – the location and nature of the proposed scrap facility represents the most efficient and cost-effective configuration to support the Proposed Development. The relationship to the existing rail access is critical and the proximity to the BOS Plant (housing the EAF) is essential to the viable delivery of the facility.

  It is only possible for large parts of the scrap operations to be carried out in the open. The alternative would necessitate a purpose-built large building. The size of such a building would be circa 68,000 sq m and of significant height. Even assuming the use of a simple uninsulated steel-clad building, with steel frame, minimal services and no fit out or finish, the associated cost would be circa £45m. There is only a finite level of funding available for the Proposed Development. The cost of enclosing these scrap operations within a building is unnecessary and would be disproportionate in the context of the Proposed Development.

8.25 In summary, the established Tata Steel steelworks is a strategic employment area of local, regional and national significance. The suite of employment land policies in the adopted LDP is the most directly relevant to the proposed development in this location. The policies support the flexibility required in ancillary uses and activities required to secure investment in established employment areas, including explicitly the Tata Steel steelworks site.

8.26 Ferrous scrap metal scrap handling already occurs lawfully and on an unrestricted basis at the site. It is a strategic and circular feedstock for the proposed EAF facility. LDP policy supports the proposed open scrap handling element of the proposal on the basis set out. The worst-case scenario parameters set a framework within which the future detailed design of the scrap element can comply with Policy EC3 of the LDP and its supporting text. This includes (under Policy EC3) that any impacts on neighbouring land uses/residents can be successfully mitigated as part of the design, which is addressed in the topic areas assessed below.

Socio-Economics

8.27 Chapter 14 of the ES summarises the likely significant socio-economic effects of the Proposed Development. These effects are identified for both the construction and operational phases of the proposed EAF facility.

8.28 The construction effects include:

- **Employment** – an estimated 1,030 net full time equivalent (FTE) jobs will be directly supported across the UK by activities associated with demolition and construction phase of the Proposed Development. This is split into:
  - Approximately 730 to those living in the Wider Impact Area (WIA) (those living in Wales but outside of the two geographic areas below).
  - 570 (of the 730 in Wales) are living in the Sub-regional Impact Areas (SRIA) (the combined local authority administrative areas of NPTC, Swansea County and Bridgend Council).
  - 290 (of the 730 in Wales) are residents living in the Local Impact Area (LIA) (NPT administrative area).

  When compared to the established baseline, there is likely to be a net reduction of circa 3,590 FTE jobs because of the Proposed Development. This will comprise of approximately 2,520 jobs lost in the WIA, 1,880 in the SRIA and 1,140 in the LIA. There will be major adverse effect on the labour force during the construction of the proposed development.

- **Education, skills and training** – there is likely to be up to 30 apprenticeships at any one time offered by the contractor organisations carrying out demolition and construction activities on the Proposed Development. The learning and training opportunities created for the apprentices will have a minor beneficial effect.

- **Health** – the scale of job losses during the demolition and construction phase of the Proposed Development will be off-set to a degree in the LIA by the scale of embedded mitigation associated with the Transition Board activities and funding. The overall effect on health during this period of the Proposed Development is likely to be moderate adverse.

8.29 The operational effects include:

- Employment – the site once the Proposed Development is complete and operational could support a total of 5,720 FTE jobs in the UK, including:
  - 3,880 in the WIA (Wales).
  - 2,890 in the SRIA (of the 4,340 in Wales).
  - 1,660 for residents of the LIA. (of the 4,340 in Wales).

When compared to the established baseline, there is likely to be a net reduction of 4,070 FTE jobs in the UK, with 2,830 jobs being lost in the WIA, 2,130 in the SRIA and 1,230 in the LIA. There will be a major adverse effect on the labour force during the operational phase of the development.

- **Employee Expenditure** – a notable proportion of direct employees who no longer work at the site following the Proposed Development are likely to retire. Others may find alternative employment and/or remain unemployed. This is also the case for indirect or induced jobs that are lost because of the Proposed Development.

  In the worst-case scenario, the expenditure profile of those holding jobs that are to be lost as a result of the Proposed Development will revert to that which is consistent with a person who is unemployed. Applying this to the total net reduction of direct and indirect/induced jobs in the SRIA (totalling 1,820), it is estimated that expenditure in the area could reduce by c. £10.7 million (circa 18% or £58 million of the established baseline worker expenditure supported by the site). This is a moderate adverse effect on businesses and associated labour force as a result of the change in employee expenditure during the operational phase of the Proposed Development.

- **Health** – the scale of job losses from the Proposed Development means that long-term detrimental effects on health outcomes locally cannot be ruled out, albeit they are off-set somewhat by the mitigation associated with the Transition Board activities and funding. The overall effect on health during this period of the Proposed Development is likely to be moderate adverse.

8.30 Overall, the likely adverse socio-economic effects of the construction and operation phases of the Proposed Development are significant. Tata Steel is working closely with UK Government, the Unions, the Transition Board and its staff to mitigate the likely adverse effects as far as possible. The proposed mitigation measures include:

- **Voluntary Redundancy Package** - Tata Steel offers employees voluntary redundancy packages which includes:

  – 2.8 weeks of pay per year of service (capped at 25 years).

  – Minimum redundancy payment of £15,000 (pro-rata for part-time employees).

  – £5,000 retention bonus for maintaining attendance.

- **Internal Job Advertisements** - future jobs associated with the EAF facility will be advertised on Tata Steel internal boards, enabling employees to express interest in the new roles to be created.

- **Support and Funding by UK Steel Enterprise (UKSE)** - in addition to Tata Steel's £20 million contribution to the Transition Board fund, UKSE will provide an extra package of support with the objective of creating up to 2,800 jobs across the South Wales region over a five-year period.

- **Skills, Support, and Reskilling** – Tata Steel's £20 million contribution to the £100 million Transition Fund will focus on the following four areas of the wider Transition Fund remit:

  – **Skills and learning accreditation** – this initiative will ensure that affected members of the workforce have an opportunity to convert the skills they have gained while working at Tata Steel into widely recognised qualifications.

  – **Outplacement support** - a service that is designed to support employees who might be affected by redundancy, by providing access to resources and a support network designed to help them successfully transition to the next stage of their career.

  – **Mental health support** – Tata Steel's independent and confidential Employee Assistance Programme will provide counselling support, as well as support and advice on a number of wider matters such as financial concerns.

  – **Reskilling and retraining programs** - Tata Steel will design and implement a scheme to be available for those selected as potentially compulsory redundant and offer a period of extended employment with the focus on re-skilling. This will support individuals with securing future alternative employment with a new employer.

8.31 Tata Steel has a proven track record as a high performing employer in the locality. It is committed to the local community and the UK. The mitigation measures put in place as part of the agreement with UK Government and in discussions with Unions reflect this commitment to the workforce, and locality.

8.32 NPTC must consider the likely adverse socio-economic effects in the context of the inevitable cessation of steelmaking in Port Talbot should the Proposed Development not go ahead. Such an eventuality would result in a very significant adverse socio-economic effects in the assessment geography. The mitigation measures are significant. This mitigation and the adverse effects identified must also be considered in the context of the proposed EAF facility being the critical first step in the regeneration of the steelworks. This step is likely to be a catalyst for further growth in the future. In this context, the significant number of jobs sustained by the Proposed Development during the construction and operational phases are highly positive.

8.33 When considered on balance, the effects of major investment in the regeneration of the steelworks, the socio-economic mitigation packages provided by Tata Steel and the prospect of further growth associated with the reconfiguration of steelmaking at the site are positive. They directly contrast the significant adverse outcomes associated with ceasing steelmaking at the steelworks if Tata Steel does not deliver the Proposed Development.

Placemaking and Safe Design

8.34 The DAS prepared by Turley and submitted in support of the planning application sets out how the layout, scale, appearance, and landscaping of the Proposed

Development responds sympathetically to the site and its surrounding context. It is important to consider these elements of the hybrid application in outline (for the electrical infrastructure and proposed scrap yard) and in full (for the EAF facility and the balance of development required for low-carbon steelmaking).

8.35 The outline element of the hybrid planning application sets out minimum and maximum parameters for the quantum of built development proposed. This includes:

- The electrical cable connection, Port Talbot Substation and ancillary electrical equipment to be installed by NG at the Application Site.
- The upgrade and dualling of the railway line to ensure capacity for two trains to service the proposed scrap yard facility.
- The scrap bays, acoustic barriers, hardstanding, processing equipment and transportation infrastructure in the main and overflow scrap yard facility.

8.36 The proposed facilities are of an essential scale to service the EAF facility. They are in an area of the site currently dedicated to transport infrastructure, open steel storage, scrap receipt/processing/transportation and ancillary industrial activity. The buildings, plant and equipment are placed strategically to ensure the effective and safe functioning of the proposed EAF facility.

8.37 The proposed parameters will ensure the quantum of development, its layout, scale and function of the areas are entirely consistent with the established use of this part of the application site. The maximum height parameter in this part of the site is 20m tall. This is shorter than the CAPL building and lower in height than the BOS Plant buildings in the locality. It is similar to the redundant coke ovens and the gas holder.

8.38 The proposed parameters provide significant design scope to ensure the detailed design of the structures will be readily assimilated into the established built industrial context. This is evidenced by the illustrative masterplan submitted in support of the application.

8.39 There is significant electrical infrastructure in the locality, including at the steelworks and at the nearby Margam substation. The substation compounds will be open structures with some smaller buildings. This is entirely consistent with the local context. Cable infrastructure will be buried in its routing through the southern fields, which will be fully restored and enhanced following construction. This protects the character and appearance of this area of the site.

8.40 The site layout and appearance of the EAF facility proposed in the full element of the application is reflective of the industrial nature of the Proposed Development. The proposal is informed by technical, design, planning, operational and safety requirements, including:

- Proximity and connectivity required to accommodate interacting stages of the EAF technology and process with the re-utilised and upgraded equipment on site.

- Engineering and operational efficiencies across each of the seven stages of the EAF process, using the existing site assets wherever possible.

- Minimal infill of the BOS Lagoon to ensure a functional lagoon remains as an important operational asset at the site.

- Meeting all necessary health and safety requirements, including those relating to fire risk and major accidents and emergencies.

- Reducing new buildings and adaptations to existing structures to ensure heights that respond positively to the current scale of the steelworks.

- Except for the new canopy hood above the EAF in the existing BOS Plant building, new buildings, structures and plant equipment are lower in height than the established scale of built development in this area of the site.

- The use of a typical industrial materials palette of steel cladding, muted and matt colours for all new build elements complement the approach to the size and scale of the proposed built development.

8.41 The above considerations and final layout ensure a functional and efficient use of the site. Tata Steel and the consultant team have worked closely with NPTC to develop a comprehensive scheme that balances design with the overall function of the facility.

8.42 The layout, scale, height(s) and appearance of the Proposed Development are considered acceptable in this location. The high quality and innovative nature of the proposed bespoke EAF facility at the site accords with the principles set out in LDP Policy BE1 (Design), TAN 12 (Design) and the placemaking principles set out in PPW (Edition 12).

Sustainability and Climate Change

8.43 A comprehensive assessment of the effects relating to climate change are set out in Chapter 13 of the ES. Turley has also prepared a Sustainability and Climate Change Report in support of this planning application.

8.44 The design of the Proposed Development responds positively to the sustainability principles set out in national and local planning policy in:

- Making a step change reduction in CO_2 emissions and exceeding the Tata Steel's 2030 CO_2 reduction target of 30%.

- Reducing GHG or carbon emissions by up to 90% relative to the established baseline of blast furnace steel production at the site.

- Delivering over 71% of GHG savings forecast by UK Government from the electrification of the UK steel sector up to 2030.

- Using circa 71% less water than the established baseline, including Tata Steel surrendering the abstraction licences at Port Talbot Dock and the Ffrwd Wyllt entirely. Water abstraction from the Afan river will reduce by 33%.

8.45 Beyond these headline benefits, the Proposed Development features a range of sustainability initiatives to ensure long-term resilience to climate change. It will:

- **Use best practice flood risk management** - SuDS will be used to manage surface water runoff, including filter and channel drains, rain gardens and permeable paving to mitigate the effects of climate change.
- **Sustainable design** – consider the use air source heat pumps and cooling on the proposed office facility during the construction and operational phases of the development.
- **Net biodiversity benefit –** an extensive on-site biodiversity enhancement plan will be implemented.
- **Use of electric vehicle (EV) charging** – ten percent of all car parking spaces on site during the operational phase of the development will be served by EV charging points.

8.46 The proposal accords with LDP Policies SP1 (Climate Change), SP18 (Renewable and Low Carbon Energy) and RE2 (Renewable and Low Carbon Energy in New Development). The beneficial effects of the Proposed Development for GHG emissions and sustainability more generally are a material consideration and factor to which significant weight should be given in determining the application.

Archaeology and Heritage

8.47 An Archaeological and Heritage Assessment has been prepared by Headland Archaeology in support of this planning application. The report includes the findings of a geophysical survey report of the southern fields element of the Application Site undertaken in September 2022.

8.48 There are no designated assets located within the Application Site. There are two non-designated historic assets located within the Application Site:

- Morfa Colliery (421174) is a 19th century colliery in the north western area of the Application Site; and
- Theodoric's Grange (20041) is a ruined Medieval building which formed part of a monastic grange, possibly of a domestic function.

8.49 The assessment finds that there is:

- A low potential for below ground archaeological remains to be present from the Mesolithic to Early Medieval periods.
- A medium potential for archaeological remains dating to the Palaeolithic, Post-Medieval and Modern periods likely to be associated with Morfa Colliery and the steelworks respectively.
- A high potential for archaeological remains dating to the Medieval remains within the site, likely to be associated with Theodoric's Grange (20041).

- A low potential for archaeological remains in the southern fields element of the Application Site, which are largely agricultural with no evidence of ridge and furrow ploughing and no geophysical evidence of likely remains.

8.50 Tata Steel has collaborated closely with Glamorgan and Gwent Archaeological Trust (GGAT) throughout the pre-application engagement phase of the planning programme. The likely effects and mitigation measures were discussed and agreed in August 2024. The focus of agreement was:

- Any peat encountered will be sampled to undertake radiocarbon dating and paleoenvironmental analysis to make a baseline record for any deposit.
- Theodoric's Grange will not be subject to development and preserved in situ. The nearest activity will be over 20m away. Temporary fencing may be useful to ensure accidental encroachment does not occur.
- The Morfa colliery has been comprehensively truncated by the establishment of the post-war steelworks. The key surviving component is the memorial to deaths during 19th Century colliery disasters, which will be preserved in situ. Temporary fencing may be useful to prevent accidental damage to the monument.
- Tata Steel is working with CADW and the National Library of Wales to prepare a photographic and video survey of the current operations, supported by the collection of artefacts to illustrate the operation of the plant. This is a preservation by record of the current steelworks ahead of the Proposed Development.
- No further investigations or mitigation measures are considered appropriate where the proposed electric infrastructure is in the southern fields area of the Application Site.

8.51 The Proposed Development has evolved in response to the heritage assets on site. It fits with the pattern of land use and industrial heritage of the area. Proportionate archaeological and heritage mitigation measures are agreed with GGAT and included in the planning application.

8.52 The Proposed Development will not have any unacceptable impact on the significance of any built or buried heritage assets or their setting. It is entirely compliant with LDP policies SP21 (Built Environment and Historic Heritage) and BE1 (Design), as well as TAN24 (The Historic Environment).

Air Quality

8.53 The specialist air quality assessment by Temple is set out in the ES (Chapter 6) supporting the planning application.

8.54 A total of eight scenarios have been modelled to assess air quality impacts from road traffic and industrial emissions between construction and operational phases (compared to both established and interim baselines).

8.55 The modelling evidence confirms that the Proposed Development will result in a positive step change in likely air quality emissions from the development relative to the established baseline. These outcomes are predicated on the following mitigation measures included in the Proposed Development:

- The use of best available technology in the proposed state-of-the-art EAF facility.
- Demolition and construction effects will be mitigated through a Construction Logistics Plan (CLP) and Constrution Environmental Management Plan (CEMP).
- An annual air quality management plan for the operational phase of the development, taking into account the requirements of the updated Environmental Permit to be sought from NRW.

8.56 Subject to implementation of the stated mitigation, the model outputs demonstrate that the Proposed Development will result in the following effects:

- Negligible effects from fugitive dust from construction activities, with potential minor adverse effects during adverse weather.
- Emissions from construction vehicle movements and industrial sources are not significant compared to the established and interim baselines, resulting in a beneficial effect at all identified human and ecological receptors.
- The fully operational Proposed Development (including vehicle movements and industrial sources) will be beneficial for most pollutants at human receptors and generally beneficial at ecological receptors.

8.57 The results of the sensitivity tests showed likely pollutant concentrations were within acceptable ranges when utilising different sets of meteorological data and model input parameters. Overall, the assessment demonstrates that air quality outcomes are beneficial to identified human and ecological receptors.

8.58 The model-based assessment concludes that there will be generally beneficial effects on air quality associated with the mass of NOx emissions (tonnes/annum, tpa) emitted from the site in the interim baseline and at operation of the EAF facility, when compared to the established baseline. NOx emissions will reduce significantly because of the Proposed Development, as follows:

- 4,970 tpa in 2017.
- 3,810 tpa 2023 (before closure of Heavy End)
- 760 tpa once the proposed EAF facility is operational.

8.59 This represents an 84.7% and 80.1% reduction at the point at which the proposed EAF facility is operational compared to the 2017 and 2023 NOx emissions, respectively. This is a significant positive benefit of the Proposed Development.

8.60 The above demonstrates that the Proposed Development complies with policies SP16 and EN8 of the LDP, as well as the Pollution SPG (October 2016).

Noise

8.61 RSK Acoustics has undertaken noise and vibration impact assessments for both the construction and operational phases of the Proposed Development. Baseline noise surveys have been undertaken to establish the existing acoustic environment experienced at sensitive receptors in the vicinity of the site, the results of which have been used to inform the noise impact assessments.

Construction Phase

8.62 An assessment of construction noise and vibration has been undertaken based on the anticipated activities that will take place during the demolition and construction phases of the Proposed Development. The construction assessment indicates that adverse effects generated by noise and vibration at the nearest sensitive receptors are not significant. An Outline CEMP has been prepared, and with the recommended mitigation measures, residual effects at residential receptors are anticipated to be not significant. Key mitigation measures include:

- Implementing a CEMP or Construction Noise and Vibration Management Plan (CNVMP).
- Prior consent for works outside of core hours if adverse impacts are expected.
- Providing contact details for a site representative to handle complaints.
- Using quiet, low-noise equipment and methods.
- Strategically placing acoustic screens and equipment to minimise noise.
- Installing acoustic enclosures around static plants.
- Utilising broadband vehicle alarms to reduce noise.

Operational Phase

8.63 Sound propagation modelling has been undertaken to establish whether the operation of the Proposed Development is likely to give rise to adverse impacts at noise sensitive receptors. The initial assessment identified the potential for significant adverse impacts. However, and following consideration of the context of the site, the adverse impacts are considered as not significant. As part of the detailed design phase of the Proposed Development, the operational phase noise assessment will be refined with specific requirements for embedded mitigation measures identified, which are summarised in the below table.

Table 8.1: Summary of Proposed Mitigation Measures for Operational Phase

Element	Summary of Control Measures
Scrap handling facility	15m high noise control barrier. Shear enclosure – indicative reduction 20 dB. Shredder localised barrier or enclosure – indicative reduction 10 dB. Non-ferrous localised barrier – indicative reduction 5 dB. Hammer mill / shredder enclosure – indicative reduction 15 dB. These measures will be optimised through development of the ONVMP at detailed design.
Existing BOS Plant Building	Strategic enhancement of existing BOS building façade cladding (to become the EAF building) to a total effective weighted sound reduction index of 48 dB Rw 1. This may include internal EAF enclosures (a 'doghouse') or a combination of internal enclosure and/or strategic cladding.
Continuous Steel building	Optimised cladding ranging from 28-48 dB Rw.
Compressor house	Enhancement of building façade cladding to a total effective weighted sound reduction index of 48 dB Rw.
Louvers	Louvers assumed to be a minimum of 300 mm deep, single bank and acoustically treated to achieve a minimum of ~20 dB Rw.
Access routes / doors	All access doors assumed to be acoustically treated to achieve a minimum of 30 dB Rw.
Any building not requiring specific noise control measures	External roof and wall panel system used to achieve a minimum of 28 dB Rw.

Main fan / blower	Enclosure performance of 45 dB Rw^2; and Inline attenuator.
MHS booster fan	Enclosure performance of 35 dB Rw^2; and Inline attenuator.
LF Fan	Enclosure performance of 47 dB Rw^2; and Outlet attenuator.
Temporary boilers	Enclosure of temporary boiler required limiting noise source emission level to a maximum of 86 dB L_{wA} or 68 dB L_{Aeq}, T at 10m distance.

8.64 The proposed acoustic barrier is 15m high. This is consistent with the height indicated by modelling as being required to adequately mitigate a worst-case assessment of the noise generated by the scrap handling process. It is anticipated that as further information emerges around the outline elements of the scheme, and the acoustic benefit provided by closure of the 'heavy end' processes is available for full quantification, there may be opportunity to reduce the height of the barrier whilst remaining compliant with required noise limits at off-site receptors. Any such change will be subject to consultation with NPTC and NRW and addressed through the appropriate stage of the planning and permitting processes.

8.65 An Operational Noise and Vibration Management Plan (ONVMP) will be implemented, detailing the noise control strategy and allowing for ongoing refinement of mitigation.

8.66 The assessment concludes that when the average ambient sound levels are compared with the Proposed Development specific sound level results, there is the potential to increase overall ambient sound levels by less than 1 dB. An increase of 1 dB is considered as almost imperceptible to the human ear. Given the context of the site, it is considered unlikely that an imperceptible increase in the average ambient sound level would be significant.

8.67 Overall, the Proposed Development is not considered to give rise to significant adverse impacts at nearby residential or ecological noise sensitive receptors. It complies entirely with prevailing planning policy, taking into account of relevant material considerations on noise.

Ground Investigation

8.68 Chapter 10 of the ES relates to the assessment of land, soil and groundwater at the site. The application is also accompanied by a Site Investigation Report prepared by RSK.

8.69 The assessment work listed above confirms the following:

- There are no sites that are classified as being of geological importance on or close to the site.
- There are no protected mineral resources (sand, gravel or clay deposits which could be extracted for use in construction projects) on-site or nearby.
- While there is some soil present across the site, significant areas of the site are covered by buildings or concrete at the surface. No soil that would be of value for farming is present.
- There is potential for contamination at the site, albeit it is not a constraint on development. Intrusive phase 2 investigations are required to identify the extent of such contamination and/or any remediation required to facilitate the Proposed Development.
- The groundwater beneath the site is categorised as a secondary aquifer, meaning that some water from below the ground could be used to provide water resources for the local area. There are no recorded abstraction points for drinking water within 1 km of the site boundary.

8.70 Overall, land and soil features at the site are not considered to be sensitive. No significant impacts are expected to occur. Groundwater at the site is of medium sensitivity. No significant impacts are expected to occur.

8.71 A coal risk assessment prepared by Wardell Armstrong LLP is also submitted in support of the planning application. The site is in an area of coal risk, with three known mine entries in and around the Application Site. The proposed layout has been carefully designed to avoid the exclusions zones surrounding the known mine entries.

8.72 The planned intrusive phase 2 site investigations are in progress. The scope and methodology for the phase 2 site investigation works is informed by the phase 1 conceptual site model. They have been discussed and agreed with NPTC during the pre-application phase of the project.

8.73 The phase 2 intrusive investigation will determine the requirement for suitable contamination, hydrology and hydrogeology mitigation measures to ensure that significant adverse effects do not occur from the development. This may include targeted and proportionate remediation works.

8.74 This requirement for any mitigation and/or remediation will be subject to a standard planning condition on any planning permission granted for the Proposed Development. Tata Steel welcomes the opportunity to discuss and agree a suite of suitably worded planning conditions for agreement in advance with NPTC, if appropriate.

8.75 The Proposed Development complies with Policies SP16 and EN8 of the LDP, as well as the Pollution SPG (October 2016).

Flood Risk

8.76 A comprehensive Flood Consequences Assessment (FCA) has been prepared by JBA Consulting. The FCA confirms:

- The site is mostly located in Flood Zone 1 of the Flood Map for Planning for Rivers. All proposed built development falls within this low-risk area.
- A small area in the southern reaches of the Application Site is within Flood Zones 2 and 3. No built development is proposed within the flood risk extent.
- There are localised areas of surface water flooding within the site boundary, represented by Flood Zones 2 and 3. These areas will be managed by SuDS features across the site.
- Most of the Proposed Development will be delivered to a minimum level of 6.2m AOD, which is above the reservoir flood level (low risk).
- The site is at very low risk of flooding from the sea and sewer flooding.
- The Proposed Development is classified under TAN15 as 'less vulnerable' development.

8.77 The FCA demonstrates that the Proposed Development satisfies the Justification Test requirements in TAN15. This includes managing the low level of identified flood risk in line with the acceptability criteria. The Proposed Development is resilient to flood risk in all predicted climate change scenarios.

8.78 The Proposed Development is acceptable when assessed against LDP Policy SP1 (Climate Change). It meets the principles and requirements set out in TAN15 and the aims of PPW.

Green Infrastructure Strategy

8.79 The Green Infrastructure Statement submitted in support of the Application captures the holistic approach adopted by Tata Steel in response to the stepwise approach required in PPW12 (chapter 6). The holistic approach captures design inputs from landscape, ecology and drainage experts. It is the outcome of extensive pre-application collaboration with officers at NPTC and NRW.

Baseline Habitat

8.80 A Preliminary Ecological Appraisal (PEA) and full suite of detailed phase 2 protected species surveys has been prepared by RSK in support of the planning application. The scope of surveys and the validity of the results have been agreed in consultation with NPTC and NRW.

8.81 The survey evidence confirms that the Application Site comprises the following habitats:

- Bare ground / developed land with scrub and ephemeral short perennial vegetation.
- Semi-improved neutral grassland.

- Broadleaved plantation woodland.
- Standing water.
- Reedbeds.

8.82 The industrial history of the site results in the previously developed areas of the site being classed as open mosaic habitat. The southern fields and the drainage network in this location is classed as coastal floodplain grazing marsh habitat.

8.83 The watercourses within the site are all designated as Site of Importance for Nature Conservation (SINC). The Kenfig / Cynffig European Designated Site is located in close proximity as are Margam Moors and Eglwys Nunydd Reservoir Sites of Special Scientific Interest (SSSI) and two further SINCs.

8.84 Phase 2 surveys have confirmed that there are no European Protected Species on the Application Site. The Site does accommodate a district level importance population of breeding birds. It is of local importance for wintering birds. There are populations of common reptile species. The invertebrate assemblage is of regional importance.

Landscape Design

8.85 The landscape elements of the green infrastructure strategy for the Proposed Development respond to the industrial nature of the site. It is largely ecology led to deliver net biodiversity benefit from the Proposed Development. The strategy is fully detailed in the planning application with landscape sought in detail in the outline element of the hybrid planning application.

8.86 The southern fields form the key focus of the landscape proposals. The Proposed Development includes the following comprehensive landscape measures:

- Ditches:
  - Remove overgrown scrub along the internal banks and along the top edges, together with silt removal to improve water flow.
  - Clearance works to create an open ditch network for wildlife, improve waterflow, site wide drainage and management.
  - 7m wide grass field margins will be retained either side of the ditches for maintenance access, field margin habitat and wildlife corridors.
- Ridge and Furrow:
  - Undertake an initial grass cut and vegetation clearance to reveal the original field patterns.
  - Grass and weeds will be cleared to a level that can be grazed for maintenance.
  - Habitat monitoring will take place over the initial years to establish the seasonal effectiveness of the existing system.

  - Some minor excavation works may be required to improve the current system for further effectiveness subject to monitoring reports.

- Seasonal Wetland Scrapes:
  - Creation of two new wetland scrapes.
  - Excess soil and subsoil to be used on site where possible or, as spoil mounds across the wider site to preserve the seed bank, and encourage self-colonisation.
- Reed Beds:
  - Create new reed bed habitat covering an area of around 32,200sqm.
  - Each scrape will be graded to create a shallow end and deep end to further support a range of wetland habitats.
  - Any excess soil will be removed and used to create soil mounds or for gabion fill to replace habitat loss.
  - Reed planting will be generated from onsite seed collection and restricted to sowing around the dryer edges to allow successful establishment.
  - Natural colonisation will prevail over time and will be monitored.
- Scrub and Grassland:
  - New pockets of coastal scrub habitat are proposed to replace existing removed through the clearance works.
  - Any existing grassland removed, or ground disturbed through site clearance works will be made good but will not be reseeded. Instead, the preferred method of grassland re-establishment is to allow natural colonisation, expanding the species diversity of the Margam Moors SSSI.
  - Large wide areas of grassland corridor will be left to establish as additional habitat across this area.

8.87 Beyond the southern fields, the landscape design includes the following high quality design initiatives:

- Excess soil and spoil from the wider site works will be retained on site and utilised for habitat creation.
- This will be as soil / spoil mounds formed around the site, retaining the seed bank and left to colonise naturally, forming the open grass mosaic habitat as found across the wider Tata Steel site.
- Additional soil and spoil will be used to fill gabion baskets located around the lagoon edge.

- The mixed fill will create unique habitat for plants, insects, expanding provision and biodiversity across the northern area of the site.

- Additional pockets of species rich coastal scrub are proposed around the lagoon to compensate for loss in the southern grazing marshes and to further expand biodiversity across the wider site.

8.88 The Green Infrastructure and Landscape Strategy seeks to support drainage and enhance biodiversity. It accords with the principles set out in LDP Policy BE1 (Design), Policy 9 (Resilient Ecological Networks and Green Infrastructure) of FW and the placemaking principles set out in PPW (Edition 12).

Drainage

8.89 The proposed surface water drainage strategy aims to control surface water runoff without increasing flood risk or impacting on water quality downstream using Sustainable Drainage Systems (SuDS), where possible.

8.90 The proposed drainage strategy ensures areas of development and new facilities located on existing impermeable surfacing will be drained via the existing systems towards the onsite wastewater treatment works.

8.91 The proposed site use, layout and space constraints across the site make the use of conventional SuDS assets difficult. Two main surface water systems will be operated to serve new areas of development across the proposed development, including:

- **Contaminated stream** – will drain surface water from high-risk process areas and direct flows within a piped system to the on-site wastewater treatment works prior to being discharged via the LSO into the Bristol Channel.

- **Clean water stream** – will accept surface water from areas where no contamination is anticipated. These will flow into the SuDS system and be discharged directly into designated on-site surface water bodies in the south of the site (e.g. Lower Mother Ditch), where possible. This stream will be drained via above ground SuDS wherever feasible, comprising of filter strips and gravel-based rain gardens with self-seeded vegetation.

8.92 A detailed management and maintenance plan for the proposed system shall be in place under the responsibility of Tata Steel. This will be subject to SAB approval, as required under Schedule 3 of the Flood and Water Management Act 2010.

8.93 The above approach has been carefully considered against the SAB requirements and six standards. This has been discussed with SAB and Biodiversity Officers at NPTC during pre-application discussions. The formal SAB pre-application and full submission will take place in parallel to the planning process.

8.94 The above demonstrates that the Proposed Development meets the principles and requirements set out in TAN15 and the aims of PPWs, as well as LDP Policy SP1 (Climate Change).

Ecology Mitigation and Enhancement

8.95 The package of on-site mitigation ecological mitigation included in the green infrastructure comprises:

- **Grassland management** – implement an annual cutting regime of random areas of established grassland to diversify grassland (i.e. c.5 – 10%), with the arisings removed. This cutting would need to be done in a 'messy' way (no straight lines).
- **Scrub management** – control scrub growth to ensure is doesn't dominate as a means of maintaining the structural diversity of the habitats.
- **Woodland Management** – clear existing areas of woodland of dense scrub understorey to promote tree heath and create more open areas such as clearings / rides.
- **Design initiatives** – creation of bunds, artificial slag piles and gabion baskets to encourage the natural regeneration of open mosaic habitat (to SINC status).
- **New planting** – areas of lichen heath and heathland to be created within some of the proposed landscaping / SUDS areas.
- **Replacement habitat** – all new railway lines will have extended ballast either side to provide greater opportunity for development of open mosaic habitat
- **Artificial Hibernacula** – Provide artificial hibernacula using ballast / brash from other areas of the site within the woodland and scrub areas.

8.96 The following enhancement measures are proposed to the southern extent of the Application Site:

- **Cattle grazing** – low level of cattle grazing to diversify existing vegetation.
- **Ditch enhancement** – upgrading of ditches to ensure they qualify at SINC status.
- **Wildlife tower** – a built feature to provide potential habitat for barn owl, roosting bats, invertebrates and nesting birds
- **Topography manipulation** – optimum site grading to maximise habitat efficiency to promote species diversity.
- **Reedbed creation** – the creation of new reedbed habitat in the regenerated southern fields.
- **Wetland habitat creation** – the use of excavation to create new depressions and wetland habitat in the southern fields.
- **Interpretation boards** – public information boards explaining the green infrastructure strategy and the achievement of net biodiversity benefit.

Peat

8.97 Paragraph 6.4.34 of PPW12 confirms Welsh Government guidance that 'peat soils' are extremely fragile. If compromised, peat soils put at risk the resilience of the ecosystems they support. Peatland habitats cover only 3-4% of Wales yet store in the region of 20-25% of all soil carbon. Where peat is identified within proposed developments, considerable weight should be given to its protection because of its special importance in underpinning and supporting national natural resources such as soil carbon, biodiversity and flood management, and unless other significant material considerations indicate otherwise, it will be necessary to refuse permission. When considering criterion 1 of the step-wise approach and when undertaking the search sequence in the preparation of development plans access to information will be important and Welsh Government have made available the Peatlands of Wales map as a first step to assist in identifying peatland locations.

8.98 Welsh Government indicated during pre-application engagement that paragraph 6.4.34 of PPW12 is engaged in determining this planning application.

8.99 Tata Steel does not share this view. It is Tata Steel's understanding that the policy is targeted toward peatlands identified on the Peatlands of Wales map available on the NRW website. The policy confirms that this evidence base should be the reference point when applying the stepwise approach to peat. The third sentence of para 6.4.34 could be interpreted as a reference to any peat deposits, including those which are not mapped by NRW. However, the contrary view is that the second sentence is still referring to mapped areas. This is a logical interpretation having regard to the overall context of the paragraph.

8.100 Reference to the Peatlands of Wales map confirms there are no areas of peatlands within the red line boundary for the planning application. No peatland identified on the Peatlands of Wales map will be affected by the Proposed Development. Therefore, paragraph 6.4.34 is not engaged in this case.

8.101 Tata Steel recognises that areas of the site are underlain by buried peat. Early results of the phase 2 site investigations confirm the depth of the buried peat deposits across the site. These depths have been plotted relative to the Proposed Development layout, including all new buildings. The intended excavation depths to construct the new buildings known at this stage have been modelled against the buried peat deposits.

8.102 This assessment is included in the site investigations chapter (Chapter 10) of the ES. It demonstrates that the peat occurs below the maximum depth of excavation. It will remain undisturbed by the Proposed Development.

8.103 Notwithstanding this evidence, and on a without prejudice basis, Tata Steel has prepared an initial Peat Management Plan (PMP). To the extent that NPTC considers that para 6.4.34 applies in this case, the PMP includes measures aimed at protecting the buried peat resource. These mitigation measures are that:

- Where possible, all buried peat will be left in situ.

- Any buried peat required to be excavated will be stored carefully such that it does not dry out and lose its carbon.

- Peat will be stored for as short a time as possible, in stockpiles of no more than one metre in height. Stockpiles will be covered to minimise drying. Water sprays may be required in hot weather to prevent the peat form drying out.

- All excavated peat will be reburied below the normal water table in identified suitable locations within the site as part of the site reinstatement process. This will ensure it remains waterlogged and a carbon store in the long-term.

8.104 If NPTC applies PPW12 policy, Tata will work with NPT to submit the PMP once the full details of the phase 2 site investigations and final geo-technical design of the Proposed Development are available.

Maintenance and Monitoring

8.105 The comprehensive green infrastructure strategy includes a long-term maintenance and monitoring strategy. The strategy will be implemented by Tata Steel. This implementation can be controlled through a suitably worded planning condition. Tata Steel would welcome discussion with NPTC and agreement of such a planning condition during the determination of the planning application.

Summary

8.106 A stepwise approach has been followed during the site selection and design development process for the proposed EAF facility at Port Talbot steelworks.

8.107 The development and funding context, operational constraints and green infrastructure assets on the site have been integral considerations in this site-specific step-wise approach. This has included considerable weight to buried peat at the site.

8.108 Minimisation and mitigation have been adopted on a proportionate basis. Net biodiversity benefit will be achieved through the proposal. This includes through the holistic approach to maximising on-site green infrastructure through the careful co-ordination of drainage, landscape and ecology considerations. This provision is on a 'like for like' basis, where practicable.

8.109 Immediate off-site green infrastructure delivered on land owned and controlled by Tata Steel complements this approach entirely. Long-term management and maintenance of all green infrastructure will be conducted by Tata Steel and (where appropriate) its tenants.

8.110 The Proposed Development maximises the potential long-term biodiversity that can be achieved on-site and immediately off-site on land controlled by Tata Steel. The avoidance, mitigation, compensation and enhancement measures will ensure a positive biodiversity outcome. They will achieve net biodiversity benefit. The Proposed Development is fully compliant with the requirements of the Environment (Wales) Act 2016 and Planning Policy Wales 12.

Landscape and Visual Impact

8.111 The application is supported by a Landscape and Visual Impact Assessment (LVIA) prepared by Stephenson Halliday.

8.112 The LVIA utilises a best practice methodology that was informally agreed with the Council as part of pre-application discussions. It concludes that:

- Landscape effects generally diminish with distance away from the site.
- They are assessed as moderate-minor neutral for LCA 6: Mynydd Bromil, Mynydd Emroch & Mynydd Dinas, which overlooks the site to the east.
- Landscape effects are minor neutral for the more distant elevated LCA 3 Margam Country Park landscape.
- Permanent visual effects are moderate neutral (not significant) for the footpath adjoining the southern boundary of the site to Longlands Lane and the Wales Coast Path in elevated views overlooking the site to the east.
- Visual effects then diminish with distance, judged as at most moderate-minor neutral (not significant) from the Ogwr/Glamorgan Ridgeway with no other effects judged as greater than minor neutral (not significant).

8.113 Short-term moderate adverse construction visual effects along Longlands Lane constitute the only effects judged as significant for the scheme.

8.114 Although potentially visible with the proposed Y-Bryn Wind Farm, the Proposed Development would be viewed as visually well separated and located within a different LCA which is already characterised by industrial development. Levels of landscape and visual effects would therefore not increase because of the addition of the Proposed Development to a baseline containing the Y-Bryn Wind Farm.

8.115 The Proposed Development will not result in any permanent, significant adverse or unacceptable landscape and visual impacts on identified human or ecological receptors. This includes at nighttime. It complies with the relevant local and national policy LDP policies SP21 (Built Environment and Historic Heritage) and BE1 (Design), as well as the Landscape and Seascape SPG (May 2018). The Proposed Development is acceptable in landscape and visual terms when assessed against adopted development plan policy.

Transportation

8.116 The submitted Transport Assessment provides an assessment of the traffic and transport implications associated with the Proposed Development. It concludes that:

- **Site accessibility** – the site benefits from good levels of accessibility by sustainable modes and has a large residential catchment as well as a good range of local amenities within close proximity. Access to the site on foot and by cycle is of a good standard and there are multiple transport connections within close proximity providing access to a range of local destinations. Prospective

construction workers and operational staff will not be wholly reliant on the private car for travel to work.

- **Proposed access arrangements** – vehicular access to the development site will be provided via the existing main gate site access off the A4241 Harbour Way. The west gate site access off the A4241 Harbour Way may also be used occasionally for larger plant and specialist deliveries. Both accesses provide significant queueing capacity between the gate house and the local highway network. The barrier security system at the gate house monitors arrivals/departures and allows quick touch-card access to the site for registered staff/frequent visitors.

- **Trip generation (construction) –** the Proposed Development will result in a net increase in traffic during the PM peak hour of the construction phase. Detailed capacity assessments have been undertaken at the A4241 Harbour Way / main gate access junction and the M4 Junction 38, where the predicted traffic increase exceeds 30 two-way trips, which demonstrate these junctions are both predicted to operate well within capacity with the proposed construction traffic in place. The Transport Assessment concludes that the additional traffic will not have a material impact at any junctions within the study area.

- **Trip generation (operational)** – the Proposed Development will result in a significant reduction in vehicle movements when compared to the established and interim baseline positions. This is due to staff reductions, the reduction in coal deliveries and increased use of rail to deliver scrap metal. The Proposed Development will provide benefits to the operation of the local highway when compared to the established baseline position.

- **Parking (construction)** – the construction compound will accommodate 395 spaces, with additional space in the temporary construction areas to provide a total of 1,160 spaces if demand dictates.

- **Parking (operation)** – east of the BOS Plant – the proposed car park will provide a total of 180 spaces, including 9 disabled bays and 10% EV bays.

8.117 The promotion of sustainable transport methods and provision to support this is an integral part of the Proposed Development. The Proposed Development accords with relevant local and national policy, including active travel considerations as applicable to an industrial site of this nature.

Other Considerations

8.118 The following considerations are addressed in the planning application:

- **Lighting** – a Light Pollution Study and Lighting Plan has been prepared by Tata Steel in collaboration with EB7 and submitted in support of this planning application. Exterior lighting is required at the site to allow for safe access and use of the area by employees and visitors. The design and its likely effects have been assessed in the LVIA and ecology assessments supporting the application. No unacceptable adverse lighting impacts have been identified. The Proposed

Development accords with Policy EN8 of the LDP, as well as the Pollution SPG (October 2016).

- **Fire safety** – Tata Steel has an in-house fire service. Fire risk forms an integral element of the health and safety commitments and operational requirements of the site. This continues to be the case in the proposed EAF facility. The Proposed Development layout is cognisant of fire risk and safety.

- **Construction and demolition** – an Outline CEMP has been prepared by RSK as part of the planning application. It sets the framework for a final CEMP, which will be prepared by the contractor considering the outcomes of the planning application and EIA. This will continue to evolve and will be subject to an appropriately worded planning condition.

  The final CEMP will:

  – Provide a mechanism for ensuring that measures to mitigate potentially adverse environmental impacts identified in the ES are implemented.

  – Ensure that good construction practices are adopted throughout the construction of the works.

  – Provide a framework for mitigating impacts that may be unforeseen or that are not identified until construction is underway.

  – Provide assurance to third parties that their requirements with respect to environmental performance will be met.

  – Provide a mechanism for ensuring compliance with environmental legislation.

  – Provide a framework for compliance with auditing and inspection.

  – Provide trained and experienced environmental personnel to satisfy relevant requirements and responsibilities.

  Demolition associated with the Proposed Development has been considered in relevant technical documents and the accompanying ES. Full details of the proposed demolition method will be provided in a Demolition Method Statement, to be conditioned. All relevant construction and demolition will be carried out in accordance with best practice, relevant legislation, and planning policy.

- **Construction waste** - the submitted Waste Management Plan (WMP) supports the Outline CEMP. Table 1 in the WMP sets out that the main waste types generated during the construction period include soil material, concrete material, and steel. The appointed construction contractor Health, Safety and Environment department will control and supervise construction waste during construction.

All waste will be managed in accordance with the waste hierarchy to reduce waste at source and the quantity requiring final disposal to landfill. This applies to excavated material arising on-site, which will be reused within the site as far as reasonably practicable.

An appointed contractor will segregate waste streams on-site, prior to them being taken to a licensed waste facility for recycling or disposal. All waste will be removed from the site which will be undertaken by fully licensed waste carriers and taken to licensed waste facilities.

- **Operational Waste –** Table 2 in the WMP sets out the details of the waste types, estimates quantities, site storage and disposal. Specific waste compounds and storage areas are designated and labelled on the proposed site layout plan. Operational waste from the Proposed Development will be managed via the following measures:

  – **EAF slag** – the slag would be tipped, de-metalled and crushed to the required specification. The primary outlet for this material is as road stone, which requires weathering prior to use in asphalt.

  – **Red dust** – this dust will be sent for recycling to recover the zinc content and produce an iron rich pellet. This is standard practice for production of red dust.

  – **Refractory bricks** – the majority of the refractory bricks in the EAF will be sent for regeneration so that they can be re-used. The are typically Mag-carbon, alumina silicate or alumina chrome products, which are currently used on site and are sorted and processed at the onsite HAA. There may be small quantities of bricks that require disposal, but this can be done at the on-site landfill.

  – **Water** – the water would continue to be discharged via Tata Steel's private effluent treatment network to the LSO, which is regulated under the current permit and would continue to be under any future permit. Current discharge is approximately 2,000m3 per hour at the LSO and this will fall to less than 1,000 m3/hr after the EAF is commissioned. The majority of this water would be from existing processes and storm water discharge. The contaminant profile would not change significantly but there would be a reduction in the contaminants associated with coke production.

  Appropriate storage facilities will be provided for waste substances with specific requirements (e.g., hazardous, flammable, sensitive to heat or light). Hazardous waste substances will be stored exclusively in areas laid with impervious hard standing and provided with secondary containment. A series of measures to ensure this are set out in the WMP and summarised below:

  – **Lubricating oils** – will be stored in compliance with the Oil Storage (Wales) Regulations. There is a contract set up to recover used oils on site and this

will be utilised wherever possible with the remainder being sent to Energy from Waste facilities.

– **Fuel** – will be compliant with Oil Storage (Wales) Regulations and will allow the safe refuelling of vehicles moving steel and scrap.

– **Water Treatment** – Tata Steel already has established on site storage and chemical facilities, which will continue to be utilised as part of the Proposed Development.

The Proposed Development will not give rise to any negative environmental impacts because of any waste generated. It complies with Policy W3 of the LDP.

Summary

8.119 This section has assessed the Proposed Development against the development plan policies identified in this statement, taking into account material considerations. The Proposed Development accords with the planning policy and guidance set out in the Planning Policy Matrix at Appendix 1.

8.120 The Proposed Development delivers direct support to prevailing development plan policy by supporting strategic decarbonisation and sustainable economic development. The Proposed Development constitutes major scale sustainable development in the heavy industrial heart of Port Talbot. It will act as a catalyst for the transformational regeneration of safeguarded employment land in Port Talbot through the critical transformation of the steelworks to low-carbon steel production.

8.121 The Proposed Development is the only feasible means of meeting the acute need to create a viable operational, economic and environmental low-carbon steel production facility in South Wales. Without this planned investment, steelmaking in Port Talbot will cease. The adverse social, economic and environmental effects of such cessation would be very significant. All effects of the Proposed Development must be assessed in this context.

8.122 The high-quality Proposed Development complies with relevant planning policy, as follows:

- It is the only means of regenerating the steelworks and securing a feasible operational, economic and environmental future for steelmaking in South Wales.
- It will deliver sustainable economic development on under-utilised brownfield land in a manner that promotes the growth of the Coastal Corridor Strategy Area in Port Talbot and strategic area identified in FW.
- It will deliver a comprehensive green infrastructure strategy, including net biodiversity benefit.
- The Proposed Development meets environmental protection planning policy criteria relating to land, health, air quality and noise.

- Health and safety requirements have been considered from the outset of the design process, including on fire risk and major accidents and emergencies.
- It avoids any unacceptable impacts on nearest sensitive environmental and residential receptors through sensitive proposed site layout and design.
- It is acceptable from a flood consequence perspective, taking into account the requirement for sustainable drainage and climate change resilience.
- It will protect job opportunities at the heart of the locality and region, albeit in the context of an overall net loss of employment.
- It promotes the use of alternative modes of transport and active travel, whilst also being acceptable from a highway and transport perspective.
- It has considered built and natural heritage assets and their setting and will not result in any unacceptable impacts.
- It Proposed Development will not give rise to any unacceptable waste effects during either the construction or operational phases of the Proposed Development.

9. Development Planning Obligations – Draft Heads of Terms

Planning Obligations and Developer Contributions

9.1 The scale and nature of the Proposed Development indicates the need for elements of the mitigation proposed to be secured by means of Section 106 of the Town and Country Planning Act 1990 (as amended).

9.2 Negotiations with NPTC on appropriate obligations are ongoing and will be concluded during the determination of the application. These discussions will be informed by NPTC's Planning Obligations SPG (adopted in October 2016). The SPG sets out the approach and procedures which will apply, and the types of development that may require planning obligations, subject to relevant thresholds and triggers.

9.3 The draft 'Heads of Terms' anticipated by Tata Steel are set out below and will be refined during the determination of the planning application:

- **Biodiversity and the natural environment** – a fully detailed green infrastructure strategy for the Application Site that delivers net biodiversity benefit, including a habitat enhancement and management plan(s). Tata Steel will implement the plan but NPT is likely to seek a s106 to assure it can deliver the measures should Tata Steel not do so.

- **Active Travel** – a proportionate financial contribution towards the off-site enhancements to the active travel network in Port Talbot to mitigate the likely effects of the Proposed Development.

10. Summary and Conclusion

10.1 Port Talbot Steelworks is an ageing industrial installation. Much of the 'heavy end' infrastructure is at end-of-life and parts have already been closed as a result. The steelworks is a heavy carbon user and GHG emitter. The facility is in critical need of structural investment to avoid the inevitable cessation of steelmaking at the steelworks.

10.2 The proposal forms part of a £1.25bn investment that is the largest in South Wales industry for many decades. The Proposed Development will secure steelmaking in Port Talbot for the foreseeable future. This is the only viable solution for the future of Port Talbot steelworks. If the investment does not proceed and the Proposed Development does not go ahead, steelmaking will eventually cease at the site.

10.3 The future of the Port Talbot facility is entirely dependent on the planned investment in the EAF. Without an EAF, there would be no steelmaking in Port Talbot, which would cause a significant adverse economic, social and environmental effect in Port Talbot, Wales and the UK. All identified effects of the Proposed Development must be considered with this essential context in mind.

10.4 The Proposed Development will:

- Position Port Talbot as a leader in sustainable steel production, supporting the Welsh and UK Government's goals for steel industry development and net zero emissions targets.
- Sustainably regenerate an ageing and (in many respects) end of life and underutilised site with industrial and economic development.
- Align with local and national policy goals to promote sustainable growth, benefiting the local economic, skills and community.
- Deliver net biodiversity benefit through a holistic approach to green infrastructure, including on-site mitigation that meets all relevant environmental protection requirements.
- Safeguard the amenity and significance of all sensitive environmental, heritage and residential receptors and land uses through a sensitive design approach.
- Ensure flood resilience by incorporating sustainable drainage systems and climate change adaptations.
- Promote the use of alternative modes of transport and active travel, whilst also being acceptable from a highway and transport perspective.

10.5 The Proposed Development accords with local and national planning policy and guidance and in doing so enables NPTC to grant planning permission.

10.6 The Proposed Development presents a well-considered development, which responds positively to the relevant planning policy context at the local and national levels, including the Local Development Plans, Future Wales and Planning Policy Wales. Planning permission should be granted based on the overwhelming policy support at all levels.

Appendix 1: Planning Policy Matrix

18 Windsor Place
Cardiff
CF10 3BY

T 029 2034 4445

Issued for PAC

Turley

Tata Steel UK Ltd

Port Talbot EAF Project

Planning Policy Matrix – Issued for PAC

Updated: September 2024

Introduction

1. This Policy Matrix identifies the planning policies considered most relevant to the determination of the hybrid planning application for a new Electric Arc Furnace (EAF) facility at the Port Talbot Steelworks. It assesses the compliance of the Proposed Development with development plan policy, taking into account relevant material consideration.

2. The matrix only considers those development plan policies relevant to the determination of this planning application. It is intended as a living document that will be updated by Turley in collaboration with the Applicant and key stakeholders through the project programme.

Planning Policy Context

3. The Town and Country Planning Act 1990 (as amended) states that planning applications must be determined in accordance with the development plan, unless material considerations indicate otherwise.

4. The development plan and material considerations are summarised at Section 6 of the Planning Statement submitted in support of the application.

The Development Plan

5. Planning applications must be determined in accordance with the development plan, unless material considerations indicate otherwise. The development plan should be read objectively as a whole in determining planning applications. The merits of the proposal must be assessed on a case-by-case basis.

6. The development plan comprises Future Wales: The National Plan 2040 (February 2021) and the Neath Port Talbot Council Local Development Plan (LDP), adopted in January 2016.

Future Wales: The National Plan 2040

7. Future Wales (FW) was published by Welsh Government in February 2021 and constitutes the national development framework, setting out the direction of development in Wales to 2040. FW addresses key national priorities, including sustaining and developing a vibrant economy, achieving decarbonisation and climate-resilience and improving the health and well-being of our communities. Future Wales is strongly influenced by Planning Policy Wales (PPW) which establishes key principles for the planning system.

Turley

Material Considerations

- Planning Policy Wales
- Wales Technical Advice Notes (TANs):
  - TAN 11: Noise (October 1997).
  - TAN 15: Development and Flood Risk (July 2004).
  - TAN 18: Transport (March 2007).
  - TAN 5: Nature Conservation and Planning (September 2009).
  - TAN 23: Economic Development (February 2014).
  - TAN 12: Design (March 2016).
  - TAN 24: The Historic Environment (May 2017).
- Wales National Marine Plan
- Supplementary Planning Guidance:
  - Planning Obligations (October 2016).
  - Pollution (October 2016).
  - Parking Standards (October 2016).
  - Open Space and Greenspace (July 2017).
  - Renewable & Low Carbon Energy (July 2017).
  - Design (July 2017).
  - Landscape and Seascape (May 2018).
  - Biodiversity and Geodiversity (May 2018).
- Emerging Local Planning Policy
- The Decarbonisation and Renewable Energy Strategy (DARE) (May 2020)
- Biodiversity Duty Plan 2020 – 2023 (December 2021)

Tata Steel UK Ltd

Port Talbot EAF Project

Planning Policy Matrix

Key	
Weight	
Full Weight	
Moderate Weight	
Authority & Policy Document	
Welsh Government Document	
Neath Port Talbot Council (NPTC) Document	

Weight	Authority & Policy Document	Planning Policy Reference	Summary of Policy Requirements	Turley Commentary	Scheme Compliance[1]
Development Plan					
Full Weight	Welsh Government Future Wales: The National	Overview	Future Wales is a national development framework, setting the direction for development in Wales up to 2040. Future Wales provides a strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, achieving decarbonisation and climate-resilience, developing strong ecosystems, and	The Proposed Development will make a significant contribution towards achieving Wales' and the UK's decarbonisation commitments. There are	

[1] The scheme compliance has been considered in relation to the information available at the date of preparing this report. Compliance will be reassessed once further details of the scheme become available.

Turley

Weight	Authority & Policy Document	Planning Policy Reference	Summary of Policy Requirements	Turley Commentary	Scheme Compliance[1]
	Plan 2040 (published February 2021)		improving the health and well-being of communities. Future Wales is strongly influenced by Planning Policy Wales (PPW) which establishes key principles for the planning system.	clear legally binding objectives and Government requirements to decarbonise the steel industry and support the transition to Electric Arc Furnace (EAF) facilities.	
		Policy 1: Where Wales Will Grow	Policy 1 identifies three National Growth Areas for Wales, which will see growth in employment and housing opportunities and investment in infrastructure. The application site falls within one of these areas, the Swansea Bay and Llanelli National Growth Area. The National Growth Areas will be complemented by Regional Growth Areas, which will grow, develop and offer a variety of public and commercial services at regional scale.	The application site is located within the Swansea Bay and Llanelli National Growth Area. Bringing forward a major employment and infrastructure proposal in this location is directly supported by Policy 1 of FW.	
		Policy 9: Resilient Ecological Networks and Green Infrastructure	Development proposals must demonstrate action towards securing the maintenance and enhancement of biodiversity to provide a net benefit, the resilience of ecosystems, and green infrastructure assets, through innovative, nature-based approaches to site-planning and the design of the built environment.	A full suite of ecological surveys have been undertaken to determine the existing baseline conditions at the site. The surveys inform a comprehensive understanding of the constraints and opportunities at the site. They form the	

Weight	Authority & Policy Document	Planning Policy Reference	Summary of Policy Requirements	Turley Commentary	Scheme Compliance[1]
				foundation for the comprehensive approach for maintaining and enhancing biodiversity and green infrastructure. Net biodiversity benefit will be achieved through the holistic approach to maximising on-site green infrastructure through the careful co-ordination of drainage, landscape and ecology considerations.	
		Policy 28: National Growth Area – Swansea Bay and Llanelli	Policy 28 identifies Swansea Bay and Llanelli as a National Growth Are. This area will be the main focus for growth and investment in the South West region. The application site is located within Swansea Bay and Llanelli.	The application site is located within the Swansea Bay and Llanelli National Growth Area. Bringing forward a major employment and infrastructure proposal in this location is directly supported by Policy 28 of FW.	
	Neath Port Talbot Council (NPTC)	Overview	The Local Development Plan (LDP) guides the future development for NTCBC, and sets out where, when, and how	The Proposed Development seeks to support the overarching objectives of the LDP. It makes a direct positive	

Weight	Authority & Policy Document	Planning Policy Reference	Summary of Policy Requirements	Turley Commentary	Scheme Compliance[1]
	Local Development Plan 2011-2026 (adopted January 2016)		much new development can take place between 2011 and 2026. The LDP is guided by four overarching objectives relating to climate change (objective 1), health (objective 2), sustainable communities (objective 3), and recreational and community facilities (objective 4). Objective 1 seeks to minimise the causes and consequences of climate changes through reduced greenhouse gas emissions and adapt to climate change through consideration of its effects in the design and location of new development.	contribution to objective 1, which seeks to minimise the causes and consequences of climate change.	
		Policy SP1: Climate Change	The causes of climate change will be addressed by implementing measures including minimising greenhouse gas emissions from transport by encouraging freight/commercial transport by alternatives to road (e.g. rail or sea) and reducing dependence on the private car by promoting alternative means of transport. The consequences of climate change will be addressed by following a sequential approach to development at risk from flooding, and by minimising the fragmentation of habitats and creating opportunities for habitat and species change and migration where possible.	The Proposed Development is an important decarbonisation project. It makes a national scale contribution to the decarbonisation of the steel industry. It places Port Talbot at the forefront of initiatives to meet Government commitments to reduce CO2 emissions. The transition to EAF will result in a significant reduction in GHG emissions compared to the existing emissions produced by the	

Weight	Authority & Policy Document	Planning Policy Reference	Summary of Policy Requirements	Turley Commentary	Scheme Compliance[1]
				current blast furnace at the site. The proposal features a range of measures to reduce carbon emissions, mitigate the effects of climate change, and to ensure the long-term resilience of the development to the effects of climate change. Access to the site on foot and by cycle is of a good standard and there are multiple transport connections within close proximity providing access to a range of local destinations. Overall, the proposal will result in a significant reduction in vehicle movements and an increase in rail movements, thereby helping the aim of Policy SP1 in reducing GHG emissions produced by transport.	

Weight	Authority & Policy Document	Planning Policy Reference	Summary of Policy Requirements	Turley Commentary	Scheme Compliance[1]
		Policy SP2: Health	Measures will be taken in relation to the high levels of poor long term health and sickness, including reducing people's exposure to elements that can have an adverse impact on their health such as social, economic or physical environment.	While there would be a significant effect on human health in the area resulting from the Proposed Development, the Applicant is implementing inherent/embedded/primary mitigation to minimise impacts, including retention and ongoing redeployment of a proportion of current supply chain capacity, as well as employment and skills measures associated with the Transition Fund. The mitigation measures forma comprehensive package to support social and economic considerations during the transition of the steelworks to an EAF facility. Without this transition, the continued decline could results in the cessation of steelmaking in Port Talbot.	

Weight	Authority & Policy Document	Planning Policy Reference	Summary of Policy Requirements	Turley Commentary	Scheme Compliance[1]
		Policy SP3: Sustainable Communities	The delivery of sustainable, healthy, and cohesive communities, and the conservation of the countryside will be promoted. Settlement limits will be defined within which development which accords with the settlement hierarchy will be permitted in principle, and inappropriate development outside of the settlements limits will be resisted.	Port Talbot is identified under Policy SP3 as a 'Town', which sits at the top of the settlement hierarchy. Locations within this tier are recognised as being regionally important settlements providing the widest and most diverse range of functions. The site is located within the settlement boundary and is specifically allocated as a safeguarded employment area (ref. EC2/11) in the LDP. Strategic investment in, and regeneration of, existing employment land in this area is an important opportunity that is fully supported in the development plan.	
		Policy SC1: Settlement Limits	Outside of settlement limits, development will only be permitted under specified circumstances. Where development is permitted outside settlement limits, any new buildings must be located adjacent to existing buildings or settlements wherever possible, and be of an appropriate scale and form.		
		Policy SP4: Infrastructure	Development will be expected to make efficient use of existing infrastructure, and where required make adequate provision for new infrastructure. Where necessary, Planning Obligations	The development site sits within the confines of the existing steelworks. It has	

Turley

Weight	Authority & Policy Document	Planning Policy Reference	Summary of Policy Requirements	Turley Commentary	Scheme Compliance[1]
			will be sought to ensure that the effects of developments are fully addressed in order to make the development acceptable.	been located within the steelworks to make the most efficient use of the existing infrastructure and equipment retained on site. New infrastructure required to facilitate the EAF development is being provided as part of the proposal. This will include new internal estate roads and works to existing rail infrastructure (where required). Discussions will continue with NPTC during the consideration of the application to determine any requirement for planning obligations. Potential obligations are detailed in Section 9 of this Statement.	
		Policy I1: Infrastructure Requirements	Further works or funding may be required in addition to Policy SP4, to mitigate the impact of new development. This includes consideration and appropriate provision for open space,	The requirement for additional works or financial contributions to mitigate the	

Turley

Weight	Authority & Policy Document	Planning Policy Reference	Summary of Policy Requirements	Turley Commentary	Scheme Compliance[1]
			biodiversity, environmental and conservation interests, improvements to walking and cycling routes, community and public transport, education and training, and historic and built environment and public realm improvements.	impact of the Proposed Development will continue to be reviewed with NPTC during the consideration of the application.	
		Policy OS1: Open Space Provision	For employment or commercial development proposals of over 1,000sqm, provision will be sought for associated amenity space.	The constraints and opportunities to provide amenity space on the site have been considered and areas of open space have been provided for future employees, where necessary and possible.	
		Policy SP5: Development in the Coastal Corridor Strategy Area	In the Coastal Corridor Strategy Area (in which Port Talbot and the development site are located), sustainable growth and development will be promoted to benefit the County Borough, while protecting and enhancing the area's character and environment. Area specific measures to achieve this include safeguarding existing employment uses and sites for employment purposes.	The proposal involves the retention and regeneration of a of a long-established employment use, which is of local, regional and national importance. It secures steelmaking in Port Talbot for the foreseeable future.	
		Policy SP11: Employment Growth	Existing employment uses will be supported and safeguarded, and new and expanding employment measures will be encouraged.		

Weight	Authority & Policy Document	Planning Policy Reference	Summary of Policy Requirements	Turley Commentary	Scheme Compliance[1]
		Policy EC2: Existing Employment Areas	In order to protect the employment function of the County Borough's employment areas, uses on sites including Tata Steelworks, Margam (policy reference EC2/11) will be restricted in accordance with Policy EC3.	The application site is specifically allocated for employment use under Policy EC2/11 (Tata Steelworks, Margam) of the NPTC LDP. Whilst the Proposed Development does not provide new employment land, it will support the transformational regeneration and continued use of an existing employment site and ensure that the future of the site is secured in the long-term. The proposal will complement and strengthen the industrial role of the area. The principle of major industrial development in this location is well established.	
		Policy EC3: Employment Area Uses	Within allocated and existing employment areas, unless otherwise specified and where appropriate, uses will be restricted to uses within classes B1, B2, and B8, ancillary facilities or services, or commercial services unrelated to class B. Developments will be expected to demonstrate that proposals do not cause any adverse impacts on the overall function of the employment area, and neighbouring commercial and residential properties. The proposal must be sustainably justified in this location and be of an appropriate scale and form to the role and function of the employment area.		
		Policy EC4: Protection of Existing Employment Uses	Proposals which would result in the loss of existing land or buildings in employment use as defined in Policies EC2 and/or EC3, will only be permitted where specific criteria are satisfied. This includes demonstrating that employment uses are no longer viable or appropriate in this location, continued use for employment purposes would have unacceptable impacts on the environment, local amenity, or adjacent uses, or the existing space can be redeveloped for employment uses that		

Turley

Weight	Authority & Policy Document	Planning Policy Reference	Summary of Policy Requirements	Turley Commentary	Scheme Compliance[1]
			achieve an increased level of employment combined with other appropriate uses.		
		Policy SP15: Biodiversity and Geodiversity	Important habitats, species, and sites of geological interest will be protected, conserved, enhanced, and managed through measures including the identification of Internationally, Nationally, regional and locally important sites, and the protection of important natural heritage features.	A full suite of ecology surveys have been undertaken to assess and determine the baseline biodiversity of the application site and identify constraints and opportunities for maintaining and enhancing biodiversity and green infrastructure. The Green Infrastructure Statement submitted in support of the application, responds to the industrial nature of the site and is ecology-led, aiming to contribute to the enhancement of biodiversity, where practically possible. The southern fields is key focus for mitigation and	
		Policy EN6: Important Biodiversity and Geodiversity Sites	Development proposals that would affect Regionally Important Geodiversity Sites (RIGS), Local Nature Reserves (LNRs), Sites of Interest for Nature Conservation (SINCs), sites meeting SINC criteria, sites supporting Local Biodiversity Action Plan (LBAP), or S42 habitats or species will only be permitted where they conserve or enhance the natural heritage importance of the site, or where the development could not reasonably be located elsewhere and the benefits outweigh the natural heritage importance of the site. Mitigation and/or compensation measures will need to be agreed where adverse effects are unavoidable.		
		Policy EN7: Important Natural Features	Development proposals that would adversely affect ecologically or visually important natural features such as trees, woodlands, hedgerows, field boundaries, watercourses, or ponds will only be permitted where full account has been taken of the relevant features in the design of the development with measures to retain and protect features wherever possible, or		

Weight	Authority & Policy Document	Planning Policy Reference	Summary of Policy Requirements	Turley Commentary	Scheme Compliance[1]
			where the biodiversity value and role of the relevant feature has been taken into account. Where the removal is unavoidable, mitigation measures must be agreed.	enhancement works. The proposed measures, which have been agreed through pre-application discussions with Biodiversity Officers at NPTC, will result in a net biodiversity benefit.	
		Policy SP16: Environmental Protection	Air, water, ground quality, and the environment generally, will be protected and where feasible improved through measures including ensuring that proposals have no significant adverse effects on water, ground, or air quality, and do not significantly increase pollution levels, giving preference to brownfield sites over greenfield sites, and ensuring that developments do not increase the number of people exposes to significant levels of pollution.	Assessments of the development's potential environmental impact, including air quality, noise, and ground contamination have been undertaken and are detailed in the submitted ES.	
		Policy EN8: Pollution and Land Stability	Proposals which would be likely to have an unacceptable adverse effect on health, biodiversity, and/or local amenity, or would expose people to unacceptable risk due to air, noise, light, or water pollution, contamination, or land instability will not be permitted. Proposals which create new problems or	The Proposed Development is not considered to give rise to significant adverse impacts at nearby residential or	

Turley

Weight	Authority & Policy Document	Planning Policy Reference	Summary of Policy Requirements	Turley Commentary	Scheme Compliance[1]
			exacerbate existing problems will not be acceptable unless mitigation measures are included.	ecological noise sensitive receptors. The Air Quality Assessment concludes that the Proposed Development will result in a substantial reduction in emissions from on site pollutants and road traffic emissions. No significant residual effects on ground contamination have been identified. The Phase 2 assessment is ongoing and utilises a methodology agreed with NPT. The outcome of the intrusive investigations will be discussed with NPT and NRW, and a remediation strategy implemented if required.	
		Policy SP17: Minerals	A proportionate contribution to meeting national, regional and local demand for a continuous supply of minerals will be made	The Land, Soil and Groundwater Chapter of the	

Weight	Authority & Policy Document	Planning Policy Reference	Summary of Policy Requirements	Turley Commentary	Scheme Compliance[1]
			while balancing the impact of development on the environment and communities. This will be achieved through measures including safeguarding identified resources and promoting the efficient use of aggregates.	ES and supporting Coal Risk Assessment indicate a manageable level of risk at the site. Phase 2 assessment is ongoing and utilises a methodology agreed with NPT. The outcome of the intrusive investigations will be discussed with NPT and NRW, and a remediation strategy implemented if required.	
		Policy M1: Development in Mineral Safeguarding Areas	Development proposals within mineral safeguarding areas will only be permitted where it can be demonstrated that the mineral is no longer of value, the mineral can be extracted prior to development, there is an overriding need for development, or the scale and location of development would have no significant impact on the possible working of the resource.		
		Policy SP18: Renewable and Low Carbon Energy	A proportionate contribution to meeting national renewable energy targets and energy efficiency targets will be made while balancing the impact of development on the environment and communities. This will be achieved by measures including encouraging low carbon technology development, encouraging energy conservation and efficiency measures in all new major development proposals, and by ensuring that development will not have an unacceptable impact on the environment and amenity of local residents.	A Sustainability and Energy Statement is submitted in support of the planning application. It confirms that the Proposed Development has adopted an Energy Hierarchy to optimise energy demand and renewable energy generation. Overall, carbon dioxide emissions from the site are projected to fall by up to 90% as a result of the project.	
		Policy RE2: Renewable and Low Carbon	Schemes that connect to existing sources of renewable energy and incorporate on-site zero/low carbon technology (including microgeneration technologies) will be encouraged. Development with a total floorspace of 1,000sqm or more will		

Weight	Authority & Policy Document	Planning Policy Reference	Summary of Policy Requirements	Turley Commentary	Scheme Compliance[1]
		Energy in New Development	be required to submit an Energy Assessment to determine the feasibility of incorporating renewable energy schemes.		
		Policy SP19: Waste Management	Provision will be made for the delivery of an integrated network of waste management facilities through measures including ensuring that provision is made for the sustainable management of waste in all new developments.	The proposed approach to waste is detailed in the supporting Waste Management Plan. The plan covers both operational and construction waste and how this will be processed. The document confirms that all waste will be managed in accordance with the waste hierarchy which aims to reduce waste at source and to reduce the quantity that requires final disposal to landfill. This applies to excavated material arising on-site, which will be reused within the site as far as reasonably practicable.	
		Policy W1: In-Building Waste Treatment Facilities	Proposals for the treatment, processing, storage and distribution of waste will only be permitted when set criteria are satisfied. This includes supporting the proposal with an appropriate Waste Planning Assessment. It also includes demonstrating that measures can be taken to reduce, and where possible avoid, damage or disturbance to the environment and amenity of neighbouring land uses to acceptable levels.		
		Policy W3: Waste Management in New Development	Proposals for new built development will need to demonstrate that provision is made for the design, layout, storage, and management of the waste generated by the development both during the construction phase and occupation. Industrial or commercial development that would generate in excess of 1,000 tonnes of waste per annum, and development that would generate hazardous waste will be required to produce Site Waste Management Plans.		

Turley

Weight	Authority & Policy Document	Planning Policy Reference	Summary of Policy Requirements	Turley Commentary	Scheme Compliance[1]
		Policy SP20: Transport Network	The transport system and infrastructure will be developed in a safe, efficient, and sustainable manner through measures including restricting development which would have an unacceptable impact on highway safety, requiring appropriate parking provision, facilitating movement of freight by means other than road, and requiring development proposals to be designed to provide safe and efficient access and promote sustainable transport.	The potential impact of the Proposed Development on the existing transport network has been assessed in the submitted Transport Assessment. A Travel Plan is also submitted in support of the application. Access to the site on foot and by cycle is of a good standard and there are multiple transport connections within close proximity providing access to a range of local destinations. Overall, the proposal will result in a significant reduction in vehicle movements by increasing the use of the rail network. It complies with all transport	
		Policy TR2: Design and Access of New Development	Development proposals will only be permitted where criteria are satisfied. The criteria include avoiding an adverse impact on highway safety or unacceptable levels of traffic generation, providing appropriate levels of parking and cycling facilities, accessibility to a range of travel means including public transport and safe cycle and pedestrian routes, and providing Transport Assessment and Travel Plans to developments that are likely to generate significant traffic generation.		

Weight	Authority & Policy Document	Planning Policy Reference	Summary of Policy Requirements	Turley Commentary	Scheme Compliance[1]
				policies in the development plan.	
		Policy SP21: Built Environment and Historic Heritage	The built environment and historic heritage will, where appropriate, be conserved and enhanced. This includes encouraging high quality design standards in all development proposals, protecting arterial gateways from intrusive and inappropriate development, safeguarding features of historic and cultural importance, and identifying and where appropriate enhancing, designated sites.	The potential impact of the Proposed Development on the built and historic environment has been assessed in the ES. The Proposed Development would have no unacceptable impact on designated historic assets (such as listed buildings and scheduled monuments).	
		Policy BE1: Design	All development proposals will be expected to demonstrate high quality design which takes into account the natural, historic, and built environmental context, and contributes to the creation of attractive, sustainable places. Proposals will only be permitted where specified criteria is met. This includes complementing and enhancing the character and appearance of the site, respecting the context of the site and local landscape, utilising materials appropriate to surroundings, avoiding an adverse impact on highway amenity, retaining and enhancing important local features, playing a role in achieving	The design evolution of the application proposal is set out in the submitted Design and Access Statement (DAS). The accompanying plans and images provide details of the proposed design. The site layout responds to the requirements of the	

Weight	Authority & Policy Document	Planning Policy Reference	Summary of Policy Requirements	Turley Commentary	Scheme Compliance[1]
			and enhancing an integrated transport and communications network, utilising land and energy resources efficiently, limiting surface water run-off and flood risk.	industrial process and health and safety considerations. The various buildings and structures are placed strategically to ensure the effective and safe functioning of the facility, taking account of the site context.	
Material Considerations					
Full weight	Welsh Government Planning Policy Wales (PPW) Edition (published February 2024)	Overview	Planning Policy Wales (PPW) establishes key principles for the planning system. It is supplemented by a series of Technical Advice Notes (TANs), Welsh Government Circulars, and policy clarification letters, which together provide the national planning policy framework for Wales.	The proposals comply with national and local planning policy and guidance.	
		Sustainable Development	Paragraph 1.2 sets out that 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. Figure 4 sets out Key Planning Principles which comprise: - growing the economy in a sustainable manner - making the best use of resources - facilitating accessible and healthy environments - creating and sustaining communities	The application proposal supports the key principles set out in PPW and proposes economic development which will promote the best use of resources and land. The sustainability credentials of the Proposed Development are considered are clear and compelling.	

Weight	Authority & Policy Document	Planning Policy Reference	Summary of Policy Requirements	Turley Commentary	Scheme Compliance[1]
			- maximising environmental protection and limiting environmental impact	The Proposed Development will continue to deliver economic benefits to Port Talbot and the wider region. The Proposed Development will ensure that Wales and the UK has a decarbonised and modern steelmaking industry. It will help both the Welsh and UK Governments in meeting legally binding national greenhouse gas emissions reduction targets implemented following the declaration of a climate emergency.	
			Paragraph 3.3 states that good design is fundamental to creating sustainable places. Design is not just about the architecture of a building but the relationship between all elements of the natural and built environment. To achieve sustainable development, design must go beyond aesthetics and include the social, economic, environmental, cultural aspects of the development.		
			Paragraph 3.55 requires that previously developed (brownfield) land should, wherever possible, be used in preference to greenfield sites.		
			Paragraph 3.7 sets out that development should seek to maximise energy efficiency and the efficient use of other resources (including land), maximise sustainable movement, minimise the use of non-renewable resources, encourage decarbonisation and prevent the generation of waste and pollution.		
			Paragraph 3.30 states that in 2019, the Welsh Government declared a climate emergency. The planning system plays a key role in tackling the climate emergency through the decarbonisation of the energy system and the sustainable management of natural resources.		

Weight	Authority & Policy Document	Planning Policy Reference	Summary of Policy Requirements	Turley Commentary	Scheme Compliance[1]
		Distinctive and Natural Places	Chapter 5 of PPW relates to 'Productive and Enterprising Places', and which covers the economic components of placemaking. Productive and Enterprising Places are those which promote economic, social, environmental and cultural wellbeing by providing well connected employment and sustainable economic development. These places are designed and sited to promote healthy lifestyles and tackle the climate emergency. Chapter 6 of PPW, relating to 'Distinctive and Natural Places' was originally updated in October 2023 via a 'Dear Chief Planning Officer Letter'. The updates seek to address the nature emergency through the planning system. The updates require a Green Infrastructure Statement to be submitted with all planning applications with immediate effect. A scheme of enhancements must also be provided to ensure a net benefit for biodiversity. Paragraph 6.4.34 of PPW confirms that peat soils are extremely fragile and, if compromised, put at risk the resilience of the ecosystems they support. Where peat is identified within proposed developments, considerable weight should be given to its protection.	A Green Infrastructure Statement is submitted in support of the planning application. The proposal will deliver high quality and sympathetic development, taking into account of the local context.	
		TAN 5: Nature Conservation	Planning should contribute to protecting and enhancing biodiversity and geological conservation. It demonstrates how	A full suite of ecology surveys have been undertaken to	

Weight	Authority & Policy Document	Planning Policy Reference	Summary of Policy Requirements	Turley Commentary	Scheme Compliance[1]
Moderate Weight	Welsh Government Technical Advice Notes (TAN)	and Planning (published September 2009)	local planning authorities, developers, and key stakeholders in conservation can work together to deliver more sustainable development that does not result in losses from the natural heritage but instead takes every opportunity to enhance it.	assess and determine the baseline biodiversity of the application site and identify constraints and opportunities for maintaining and enhancing biodiversity and green infrastructure. The Green Infrastructure Statement submitted in support of the application, responds to the industrial nature of the site and is ecology-led, aiming to contribute to the enhancement of biodiversity, where practically possible. The southern fields is key focus for mitigation and enhancement works. The proposed measures, which have been agreed through pre-application discussions with Biodiversity Officers at	

Weight	Authority & Policy Document	Planning Policy Reference	Summary of Policy Requirements	Turley Commentary	Scheme Compliance[1]
				NPTC, will result in a net biodiversity benefit.	
		TAN 11: Noise (published October 1997)	The planning system can be used to minimise the adverse impact of noise without placing unreasonable restrictions on development, or adding unduly to the costs and administrative burdens of business. Local authorities should adopt a corporate approach and ensure close co-operation between planning and environmental health departments when considering noise and noise generating developments. Measures to control the sources of, or limit exposure to, noise should be proportionate and reasonable, and may include engineering, layout, or administrative mitigation.	A range of noise-controlled measures have been introduced during the design development to mitigate the impact of higher noise sources. The Proposed Development will implement an Operational Noise and Vibration Management Plan (ONVMP) which will include details of the proposed noise control strategy.	
		TAN 12: Design (published March 2016)	TAN 12 provides advice on promoting sustainable design through the planning system. The guidance promotes early consideration of design and a multi-disciplined collaborative approach. This includes pre-application discussions with the Local Planning Authority, end users, and stakeholders.	The Proposed Development includes a design dictated largely by the essential operational and functional needs of the EAF facility in Port Talbot. A sympathetic palette of industrial materials	

Weight	Authority & Policy Document	Planning Policy Reference	Summary of Policy Requirements	Turley Commentary	Scheme Compliance[1]
				has been used to co-ordinate with the established site character and context. The comprehensive green infrastructure strategy takes all possible opportunities to complement the high quality design of this industrial development.	
		TAN 15: Development and Flood Risk (published December 2021)	TAN 15 provides a framework within which the flood risks arising from rivers, the sea, surface water, and coastal erosion can be assessed. It also provides advice on the consequences of the risks, and adapting to and living with flood risk. A new Flood Map for Planning (FMfP) has been published but currently holds no formal weight as it is not yet national policy. The FMfP can, however, still be regarded as a material consideration where it is demonstrated to be 'best available information'.	A detailed Flood Consequences Assessment (FCA) is submitted in support of the application. The site is mostly located in Flood Zone 1 of the Flood Map for planning for Rivers. An area in the south of the site is located within Flood Zones 2 and 3. No built development is proposed within the flood risk extent.	

Weight	Authority & Policy Document	Planning Policy Reference	Summary of Policy Requirements	Turley Commentary	Scheme Compliance[1]
				The Proposed Development satisfies the Justification Test requirements within the FCA, including managing flood risk in line with the acceptability criteria. The Proposed Development meets the principles and requirements set out in TAN15 and the aims of Planning Policy Wales, as well as LDP Policy SP1 (Climate Change).	
		TAN 18: Transport (published March 2007)	An efficient and sustainable transport system is a requirement for a modern, prosperous, and inclusive society. Integration of planning and development of transport infrastructure has a key role to play in addressing the environmental aspects of sustainable development, in particular climate change.	The potential impact of the Proposed Development on the existing transport network has been assessed within the submitted Transport Assessment. A Travel Plan is also submitted in support of the application. Access to the site on foot and by cycle is of a good standard and there are multiple transport connections within	

Weight	Authority & Policy Document	Planning Policy Reference	Summary of Policy Requirements	Turley Commentary	Scheme Compliance[1]
				close proximity providing access to a range of local destinations. Overall, the proposal will result in a significant reduction in vehicle movements due to the increased use of rail to deliver scrap metal.	
		TAN 23: Economic Development (published February 2014)	Economic development can include any form of development that generates wealth, jobs, and income. The TAN deals principally with B Use Classes, but states that it is important 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. Where economic development would cause environmental or social harm which cannot be fully mitigated, careful consideration of the economic benefits will be necessary.	The socio-economic benefits and impacts of the development are considered in the Environmental Statement. Whilst the Proposed Development does not provide new employment land, it will support the continued use of an existing employment site and ensure that the future of the site is secured in the long-term.	

Weight	Authority & Policy Document	Planning Policy Reference	Summary of Policy Requirements	Turley Commentary	Scheme Compliance[1]
				The Proposed Development will continue to deliver economic benefits to Port Talbot and the wider region. Contractor organisations delivering the Proposed Development are likely to support apprentice roles, thereby offering further learning and training opportunities to the local population.	
		TAN 24: The Historic Environment (published May 2017)	TAN 24 provides guidance on how the planning system considers the historic environment during development plan preparation and decision making. Specific guidance is provided in relation to World Heritage Sites, Scheduled Monuments, archaeological remains, Listed buildings, Conservation Areas, Historic Parks and Gardens, historic landscapes, and historic assets of special local interest.	There are no designated heritage assets on the application site, and it is not located within a Conservation Area. An Archaeological and Heritage Impact Assessment has been submitted with this application which reviews the potential for any archaeological findings during construction and	

Weight	Authority & Policy Document	Planning Policy Reference	Summary of Policy Requirements	Turley Commentary	Scheme Compliance[1]
				recommends appropriate mitigation, where required.	
	Neath Port Talbot Council (NPTC) Supplementary Planning Guidance (SPG)	Planning Obligations (published October 2016)	It is important that sufficient new development is secured to meet the needs of communities, and that where possible the impacts of new development are addressed by the planning system. It is expected that developers pay for, or contribute to, improvements to infrastructure that would not otherwise be needed. The principal categories for which the Council will seek contributions include transportation and access, open space, and biodiversity and the natural environment.	Discussions will continue with NPTC during the consideration of the application to determine any requirement for planning obligations. Potential obligations are detailed in Section 7 of this Statement.	
		Open Space and Greenspace (published July 2017)	The SPG supports LDP Policies SP10 (Open Space), OS1 (Open Space Provision), and OS2 (Protection of Existing Open Space). Employment and commercial proposals which result in a net increase in floorspace of 1,000sqm or more will be required to provide amenity space to allow employees access to an outdoor amenity area close to the workplace.	The constraints and opportunities to provide amenity space on the site have been considered and the drawings detail the areas of open space that are proposed within the development.	
		Landscape and Seascape (published May 2018)	The SPG supports LDP Policies SP14 (The Countryside and the Undeveloped Coast), EN1 (Undeveloped Coast, EN2 (Special Landscape Areas), and EN3 (Green Wedges). Landscape and Visual Impact Assessments (LVIA) will often be required as part of the Environmental Impact Assessment (EIA) process for development, and should be undertaken in all cases where there is likely to be a significant landscape or seascape	The potential impacts of the development on landscape and the wider area have been assessed and a full Landscape and Visual Impact Assessment has been submitted with the planning application.	

Weight	Authority & Policy Document	Planning Policy Reference	Summary of Policy Requirements	Turley Commentary	Scheme Compliance[1]
			impact from a proposal. Impacts on skylines, views, and panoramas will be important considerations. These impacts should be identified in relation to significant receptors (such as local residents or communities) as well as the wider landscape/seascape generally. Visualisation of the appearance of a proposal can assist in the assessment of its landscape impact, by submitting plans, elevations, sections, sketches, annotated photographs, wirelines, augmented reality, photomontages, or 3D simulations.	The application is also supported by plans, elevations, sections, and drone images. The Proposed Development will not result in any unacceptable impacts on the amenity of the site or receptors in the surrounding area.	
		Biodiversity and Geodiversity (published May 2018)	The SPG supports LDP Policies SP15 (Biodiversity and Geodiversity), EN6 (Important Biodiversity and Geodiversity Sites), and EN7 (Important Natural Features). The SPG sets out a basic framework for dealing with biodiversity and geodiversity in the planning process in Neath Port Talbot. This includes anticipating potential biodiversity impacts of a development proposal early in the planning process, protecting designated sites and species, taking account of indirect or cumulative impacts, protecting wildlife corridors, and identifying opportunities for a development to contribute towards a net gain for biodiversity and protection of geodiversity.	A full suite of ecology surveys has been undertaken to assess and determine the baseline biodiversity of the application site and identify constraints and opportunities for maintaining and enhancing biodiversity and green infrastructure. The Green Infrastructure Statement submitted in	

Weight	Authority & Policy Document	Planning Policy Reference	Summary of Policy Requirements	Turley Commentary	Scheme Compliance[1]
			To achieve this, pre-application discussions with NPTC are encouraged. Sufficient information about the existing biodiversity is also required. For certain developments consideration should also be made for whether there is a need for licenses from Welsh Government of Natural Resources Wales, and/or an Environmental Impact Assessment (EIA), and/or a Habitat Regulations Assessment (HRA).	support of the application, responds to the industrial nature of the site and is ecology-led, aiming to contribute to the enhancement of biodiversity, where practically possible. The southern fields is a key focus for mitigation and enhancement works. The proposed measures, which have been agreed through pre-application discussions with Biodiversity Officers at NPTC, will result in a net biodiversity benefit.	
		Pollution (published October 2016)	The SPG supports LDP Policies SP16 (Environmental Protection), EN8 (Pollution and Land Stability), EN9 (Developments in the Central Port Talbot Area), and EN10 (Quiet Areas). The overall approach to be taken to pollution	Assessments of the potential impact of the development on aspects of the environment including air quality, noise,	

Weight	Authority & Policy Document	Planning Policy Reference	Summary of Policy Requirements	Turley Commentary	Scheme Compliance[1]
			matters is set out in PPW, with further detailed advice in relation to noise matters in TAN 11. It is emphasised that the role of the planning system is to determine whether a development is an acceptable use of land, rather than to seek to control the processes or substances used in any particular development. The SPG notes that matters of water, air pollution, and land contamination are controlled by other agencies, therefore planning authorities will need to ensure that planning conditions do not duplicate or contradict measures more appropriately controlled under these regimes. Further details are set out in the SPG of factors to be taken into account when reviewing potential causes and impacts of air, noise, light, and water pollution, and land contamination. Relevant reports are required to be submitted with planning applications to ensure compliance with the LPA and SPG.	and ground contamination have been carried out as part of the submitted ES and other supporting documents.	
		Renewable & Low Carbon Energy (published July 2017)	The SPG supports LDP Policies SP18 (Renewable and Low Carbon Energy), RE1 (Criteria for the Assessment of Renewable and Low Carbon Energy Developments), and RE2 (Renewable and Low Carbon Energy in New Development). The SPG outlines how the plan policies will be applied. An Energy Assessment is required for any development which results in a new floorspace of 1,000sqm or more.	A Sustainability and Energy Statement has been submitted in support of the planning application which details the measures proposed to comply with this requirement as set out in Policies SP18 and RE1.	

Weight	Authority & Policy Document	Planning Policy Reference	Summary of Policy Requirements	Turley Commentary	Scheme Compliance[1]
		Parking Standards (published October 2016)	The NPTC parking standards encapsulate the CSS Wales Parking Standards (published 2014), the Joint Transport Plan for South West Wales 2015-2020, and the LDP. The SPG designates zones across NPTC derived from the six zones set out in the Wales Parking Standards. The application site lies partially within Zone 4 (Suburban of Near Urban) and Zone 5 (Countryside).	Parking requirements have been considered, and the submitted Transport Assessment demonstrates that the Proposed Development is fully compliant with the relevant standards.	
		Design (published July 2017)	The SPG supports LDP Policies SP21 (Built Environment and Historic Heritage) and BE1 (Design). The SPG provides guidance for designing all types of development, including commercial development. The SPG sets out that although the function of commercial development often dictates form, and operational constraints or requirements define massing and scale, the external appearance, location of entrances, key views, and frontages can be delivered and designed in a way that maintains quality. The SPG also provides details on the implementation of the design criteria in Policy BE1 (Design). These include character and appearance, wider context, materials and landscaping, highway safety and amenity, retention of important features, community safety, integrated transport and linkages, resource efficiency, drainage systems, and inclusive design.	The design of the application proposal has evolved with input from a multi-disciplinary team. The design has primarily been influenced by the operational and functional requirements of the development, taking account of the site context. The proposed design has been discussed with NPTC during pre-application discussions. A detailed Design and Access Statement (DAS) (and accompanying plans and images) is submitted in support of the planning	

Weight	Authority & Policy Document	Planning Policy Reference	Summary of Policy Requirements	Turley Commentary	Scheme Compliance[1]
				application to provide a detailed overview of the proposed design approach.	
	Welsh National Marine Plan (published November 2019)	Overview	The Welsh National Marine Plan (WNMP) sets out the long term vision for the sustainable development of the Welsh marine area. The WNMP should be used by applicants to shape proposals and licence applications; public authorities to guide decision making; and other users to understand Welsh Government's policy for the sustainable development of the Plan area. The WNMP covers both the Welsh inshore region and offshore region, as set out in Figure 1 of the WNMP. Any decision with the potential to affect the Plan area, including those related to terrestrial activities, should be taken in accordance with the WNMP unless relevant considerations indicate otherwise or with regard to the WNMP. The level of detail required to demonstrate compliance should be proportionate to a project's scale, potential impacts and risk.	The development site is in proximity to the 'inshore region'.	
		GEN_01: Planning Policy	There is a presumption in favour of the sustainable development of the plan area in order to contribute to Wales' well-being goals.	The development site is not within the WNMP area but is within proximity. A proportionate approach by NPTC should be taken when considering the impact of the	
		GEN_02: Planning Policy	Relevant public authorities should take a proportionate, risk-based approach to application of relevant marine planning policies in decision making.		

				development. The proposal will secure the future of steelmaking in Port Talbot, promoting continued growth in the coastal corridor and wider growth region. It is entirely appropriate in this location.	
		ECON_01: Sustainable Economic Growth	Proposals for economically sustainable activities are encouraged, particularly where they contribute to criteria such as a more resilient economy.	The application proposal comprises economically sustainable development that will benefit Port Talbot, and the wider region.	
		SOC_02: Well-being of coastal communities	Proposals that contribute to the well-being of coastal communities are encouraged.		
		ECON_02: Coexistence	Proposals should demonstrate how they have considered opportunities for coexistence with other compatible sectors in order to optimise the value and use of the marine area and marine natural resources. The background text recognises that projects may not be able to identify realistic coexistence opportunities.	The steelworks is the primary source of employment within Port Talbot's established industrial area, and the proposed EAF facility marks a crucial first step in revitalising and decarbonising the steelworks. Integrating this modern steelmaking facility with the area's strategic transport infrastructure (sea, rail, and road) and existing employment base presents a	

				significant opportunity for Port Talbot. This potential is further amplified by the anticipated investment in the Celtic Freeport.	
		SOC_03: Marine Pollution Incidents	Proposals should demonstrate how they minimise their risk of causing or contributing to marine pollution incidents.	With the proposed drainage strategy in place and the EAF's operations governed by an environmental permit, the risk of pollution will be effectively managed.	
		SOC_07: Seascapes	Proposals should demonstrate how potential impacts on seascapes have been taken into consideration and should avoid, minimise, and/or mitigate impacts.	The potential impact of the development on landscape has been assessed and submitted with the LVIA which accompanies the planning application.	
		SOC_08: Resilience to Coastal Change and Flooding	Proposals should demonstrate how they are resilient to coastal change and flooding over their lifetime.	The proposed approach to flood risk has been discussed with NPTC and a FCA is submitted in support of this application.	
		SOC_09: Effects on Coastal Change and Flooding	Proposals should demonstrate how they avoid significant adverse impacts upon coastal processes and minimise the risk of coastal change and flooding.		

Turley

		SOC_10: Minimising Climate Change	Proposals should demonstrate how they avoid, minimise, and/or mitigate the emission of greenhouse gases.	The proposal features a range of measures to reduce carbon emissions, mitigate the effects of climate change, and to ensure the long-term resilience of the development to the effects of climate change.	
		SOC_11: Resilience to Climate Change	Proposals should demonstrate that they have considered the impacts of climate change and have incorporated appropriate adaptation measures.		
		ENV_01: Resilient Marine Ecosystems	Proposals should demonstrate how potential impacts on marine ecosystems have been taken into consideration and avoid, minimise and/or mitigate adverse impacts.	The potential impact of the development has been assessed in the Environmental Statement which has a chapter focused on impacts from noise during construction and operation. Mitigation where appropriate is recommended.	
		ENV_05: Underwater Noise	Proposals should demonstrate that they have considered noise impacts on the marine environment and avoid, minimise and/or mitigate adverse impacts.		
		ENV_06: Air and Water Quality	Proposals should demonstrate that they have considered their potential air and water quality impacts and avoid, minimise and/or mitigate adverse impacts.		
		GOV_01: Cumulative Effects	Proposals should demonstrate that they have assessed potential cumulative effects and avoid, minimise and/or mitigate adverse impacts.		

Tata Steel UK Ltd

Port Talbot EAF Project

Turley Office
Cardiff

Client
TATA Steel UK Limited

Our reference
TATT3054

Date
September 2024

Issued for PAC

Turley