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Our Ref: 23.151

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Dear Sir or Madam,

**The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017
Request for Screening Opinion under Regulation 6 (1)
Construction of a new building comprising offices, research and development and light industry
(B1 use) alongside reconfiguration of the highway, parking, access, landscaping, drainage, plant,
substation, sprinkler store, gas store and associated works
Land at Harbour Side Regeneration Area, Port Talbot**

On behalf of Neath Port Talbot County Borough Council and Morgan Sindall write to formally request a Screening Opinion (under Regulation 6 (1) of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017), as to whether Environmental Impact Assessment (EIA) is required for the proposed development at Land at Harbour Side Regeneration Area, Port Talbot (as per the above description of development).

In accordance with Regulation 6 (2), we provide the required information as follows:

- a) A plan sufficient to identify the land;
- b) A description of the development, including in particular;
 - A description of the physical characteristics of the development;
 - A description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected;
- c) A description of the aspects of the environment likely to be significantly affected by the development;
- d) A description of any likely significant effects, to the extent of the information available on those effects, of the proposed development on the environment resulting from –
 - The expected residues and emissions and the production of waste, where relevant; and,
 - The use of natural resources, in particular soil, land, water and biodiversity; and
- e) Such other information or representations as the person making the request may wish to provide or make including any features of the proposed development or any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment.

The following drawings are submitted:

- Site Location Plan

Site Context

The site comprises a brownfield parcel of land and currently is easily distinguishable in two distinct parcels north and south of a highway that has reasonably recently been developed. The site also includes additional areas of land to the southern periphery which are required to be included to ensure the necessary flood mitigation can be provided. This includes areas which were developed as ecology mitigation. The site sits to the south of Port Talbot Town Centre and is closely located to the train station. The site is bound to the north by Harbourside car park, to the east by Harbour Court which is a building in office use, the southern

boundary is formed by Harbour Way / the dock and finally immediately west of the site are further undeveloped parcels of land associated with the regeneration allocation alongside employment uses.

The site is predominantly located within flood zones 2 and 3 in relation to river flooding and zones 2 and 3 surface water / small watercourses flooding.

There are no listed buildings within the site boundary. Harbour Court to the east of the site is Grade II listed. The reason for designation is as an early C20 building retaining its external character, for its historic interest as the head offices of a nationally important company, and as the only surviving building of the Port Talbot Steel Company.

A review of the coal authority mapping shows the site is within a coal mining reporting area but is not within a development high risk area.

The Neath Port Talbot Local Development Plan shows that the site is:

- Within settlement limits for Port Talbot (SC1);
- Coastal Corridor Strategy Area (SP5);
- Harbour Side Regeneration Area (SRA2);
- Employment Allocation EC1/4 B1 Use

Port Talbot Parkway is located only 65m north of the site and immediately adjacent is a public footpath connection which could be connected to the site. On the Port Talbot town centre side of the railway track is a bus depot and is the starting point for Port Talbot Town Centre as defined by the LDP.

National Cycle Route 4 is located closely to the southern boundary of the site and is a long distance route between London and Fishguard via Reading, Bath, Bristol, Newport, Swansea, Tenby, Haverfordwest and St. Davids.

Proposed Development

The proposals include a new building comprising offices, research and development and light industry (B1 use) alongside reconfiguration of the highway, parking, access, landscaping, drainage, plant, substation, sprinkler store, gas store and associated works. The design document submitted includes floor plans which set out uses within the building.

Building Use

The new facility is a collaborative innovation centre working with academia, namely Swansea University as a key stakeholder to help end users from the steel and an End User from industry to develop and deploy new technologies, products and processes to help move the steel industry move towards a net zero carbon future.

The core theme of the SWITCH (South Wales Industrial Transition from Carbon Hub) programme is to assist decarbonisation of the steel and metals industry, to strengthen collaboration between industry and academia and to future proof the steel and metals industry in Wales and the UK.

The scheme is to achieve Net Zero Carbon targets in Construction and Operation as set out in the Works Information and a BREEAM Excellent rating.

Swansea University will relocate from their existing facility located at Room 42 Talbot Building, Singleton Campus, Swansea University, Swansea, Wales, SA2 8PP. The current facility is referred to as SAMI (steel and metals innovation). Further information is on their website here: <https://www.samiswansea.co.uk/>

SAMI is a research facility so the processes are bespoke but relatively small scale. The building will have – welding and workshop capabilities that will support the core research elements rig manufacture, sample

preparation. Similar to a small fabrication workshop, offices to house university staff, industrial co-located staff and visiting industrialists and academics – standard office work and meetings spaces.

The proposed building can be split into the following key areas and a description of the use of each space is given below:

- **Pilot Area and store**– The pilot area is a large two-storey space housing the metals processing equipment required to make small scale (50kg) alloy batches of research interest via vacuum induction melting, small rolling mill and other research scale industrial metals processing (metallic feedstock sorting and technology to enhance this activity). Most of the equipment is used to develop, manufacture and assess small batch alloys for material properties and manufacturing process research and development. The store is for work in progress materials and samples, mostly metallic substrates with some consumables required for the operation.
- **Welding and Workshop** – supporting activities relating to sample preparation, testing rig and assessment capability manufacture. Essentially there to support the research by have an ability to design and develop or modify existing equipment in house to the required designs and specifications.
- **Mechanical testing** – a suite of capability designed to test the new and existing alloys for material performance and longevity in use, utilising a range of mechanical testing equipment
- **Sintec** – This is a custom designed suite of capabilities to enable the testing of materials in harsh environments. Utilising specialised cabinets and test regimes for high temperature and high pressure atmospheres in hydrogen or other relevant gaseous environments
- **Material characterisation** – an analytical capability to look at the microstructure, chemical properties and surface characteristics of the materials and processes in use. utilising microscopes, SEM and elemental analysis and some wet chemistry capability
- **SEM room** – Housing a high magnification Field Effect Scanning electron microscope and ancillary equipment, part of the overall materials characterisation capability.
- **Office spaces, meeting areas and Welfare** - To support the strong industrial collaborative requirements of the project to house both university and industrial researchers and enable the bringing together of the required process expertise to rapidly accelerate the progress of materials development.

WHAT IS SaMI?

SaMI is an open access facility established at Swansea University to deliver practical research solutions to support steel innovation within the industry. This is achieved this through a combination of SaMI's expertise and equipment capability.

Academic experts and industrial technologists design and implement bespoke research to provide practical innovative solutions with the ultimate aim of supporting the innovation and decarbonisation of the industry.

STEEL INNOVATION

SaMI's core focus is to support the steel and metals industry in the challenge to decarbonise through lower carbon products and processes, reduced carbon emissions, and creation of a circular economy.

The aim is to develop steel innovation partnerships with companies in the steel and metals industry to deliver practical solutions.

RESEARCH CAPABILITIES

SaMI has specific steel and metals capabilities and expertise in:

- Bespoke testing & evaluation in extreme environments (takes place in the SINTEC area, includes hydrogen atmospheres, high temp and high-pressure environment)
- Innovative and effective alloy and downstream pilot scale product and process development (takes place predominantly in Pilot area – vacuum induction melting and small batch alloy manufacture (kg's not tons), small scale rolling mill and run out table)

- Product characterisation (Materials characterisation lab – mainly analytical techniques such as SEM, Microscopes, Spectroscopy and metallographic preparation)
- Fatigue, fracture and annealing analysis (tensile and fatigue testing of materials, at various sizes – from 1mm dog-bones to long steel sections (2 to 3 m long with 20 to 30cm cross section))
- Product and process integrity testing of materials (makes use of the characterisation and testing capabilities to assess suitability and lifetime testing)
- Due to the flexibility of the approach and ability to create bespoke research, SaMI has the potential to more broadly support industry sectors in research and innovation focused on decarbonisation. (essentially means they can use a combination of existing and new testing methodologies to suit the industry requirements using the workshop and welding equipment)

Screening Opinion

As set out within the Town and Country Planning (Environmental Impact Assessment) Wales Regulations 2017, “EIA development” means development which is either—

- (a) Schedule 1 development; or
- (b) Schedule 2 development likely to have significant effects on the environment by virtue of factors such as its nature, size or location.

The proposed development is not categorised as ‘Schedule 1 development’ where EIA would be mandatory.

‘Schedule 2 development’ is development of a type listed in Schedule 2 which:

- (a) is located wholly or in part in a ‘sensitive area’ as defined in regulation 2(1); or
- (b) meets one of the relevant criteria or exceeds one of the relevant thresholds listed in the second column of the table in Schedule 2.

The application site is not located within a ‘sensitive area’ as defined in regulation 2(1). However, it is considered that the proposed development falls within class 4 (a – e). which relates to production and processing of metals:

- (a) Installations for the production of pig iron or steel (primary or secondary fusion) including continuous casting;**
- (b) Installations for the processing of ferrous metals—**
 - (i) hot-rolling mills;**
 - (ii) smitheries with hammers;**
 - (iii) application of protective fused metal coats;**
- (c) Ferrous metal foundries;**
- (d) Installations for the smelting, including the alloyage, of non-ferrous metals, excluding precious metals, including recovered products (refining, foundry casting, etc.);**
- (e) Installations for surface treatment of metals and plastic materials using an electrolytic or chemical process;**
- (f) Manufacture and assembly of motor vehicles and manufacture of motor-vehicle engines;
- (g) Shipyards;
- (h) Installations for the construction and repair of aircraft;
- (i) Manufacture of railway equipment;
- (j) Swaging by explosives;
- (k) Installations for the roasting and sintering of metallic ores.

The proposal exceeds the threshold listed in the second column of the table in Schedule 2 i.e. (i) The area of new floorspace exceeds 1,000 square metres. The building is circa 3,000sqm.

Swansea University have provided comment on each of the processes outlined above stating:

Criteria	Building Operations – Responses provided by Swansea University SAMI team
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(a) Installations for the production of pig iron or steel (primary or secondary fusion) including continuous casting;	4.a. Melting and production of new ingots, and steel alloys will take place – typically a few kg's – no continuous casting processes, ingots will be made, - reheated and rolled on a small reversing hot mill simulator.
(b) Installations for the processing of ferrous metals— (i) hot-rolling mills; (ii) smitheries with hammers; (iii) application of protective fused metal coats;	4.b. i.) Mini Lewis mill – hot rolling capability for small scale ingots produced on site. ii.) Smitheries- cutting, joining, bending activities will take place in the workshop –some amount of bashing too. iii.) this sounds like powder coating or electroplating – possibility at small scale (A4 size typically in similar centres) but no current activity.
(c) Ferrous metal foundries;	c.) Ferrous metal foundries – yes – small scale alloy production for research purposes (kg scale) – using the two-vacuum induction melters and other high temp furnaces (all large lab scale)
(d) Installations for the smelting, including the alloyage, of non-ferrous metals, excluding precious metals, including recovered products (refining, foundry casting, etc.);	d.) mostly ferrous metals, but no reason non-ferrous couldn't be examined in the future.
(e) Installations for surface treatment of metals and plastic materials using an electrolytic or chemical process;	e.) yes – surface treatment of metals at lab and pilot scale

Whilst the proposals do involve activities described within class 4 of Schedule 2 of the EIA regulations all processes are for the creation of materials for research, prototype and investigative purposes, i.e. non-commercial production where materials are processed in the above, and will typically involve kg's of materials per process.

Schedule 3 of the Regulations sets out the selection criteria which must be taken into account in determining whether a development falling in Schedule 2 is "likely to have significant effects on the environment". The three broad criteria are:

- 1) characteristics of the development;
- 2) the environmental sensitivity of the location; and
- 3) types and characteristics of the potential impact.

In addition, Welsh Office Circular 11/99 sets out that in general EIA will be needed for Schedule 2 development in three main types of case as follows:

- 1) for major developments which are of more than local importance;
- 2) for developments which are proposed for particularly environmentally sensitive or vulnerable locations; or
- 3) for developments with unusually complex and potentially hazardous environmental effects.

An assessment of the likely significant effects of the proposed development on the environment in the context of the selection criteria outlined in Schedule 3 of the Regulations is set out below.

Characteristics of the Development

A brief assessment of the detailed criteria outlined at Paragraph 1 of Schedule 3 in relation to the characteristics of the development is provided below:

(a) the size and design of the development

The proposals include a new building comprising offices, research and development and light industry (B1 use) alongside reconfiguration of the highway, parking, access, landscaping, drainage, plant, substation, sprinkler store, gas store and associated works. The site comprises a brownfield parcel of land which has previously been prepared and cleared for development. The exact GIFA is 3680sqm. The site is located within an area allocated for regeneration and specifically for uses such as those proposed here.

Although the proposals exceed the relevant thresholds listed in Schedule 2 of the EIA regulations it is considered that the size and design of the proposed development respond sensitively to the character of the site and surrounding area.

Annex A of Circular 11/99 is relevant in considering the size of the development, confirming at Paragraph A16 that *new manufacturing or industrial plants of the types listed in the regulations may well require EIA if the operational development covers a site of more than 10 hectares*. Firstly it is acknowledged that the proposals **do not** comprise manufacturing i.e. **non-commercial production** and are for research and development purposes. Notwithstanding this is the closest description to the proposed development. The site is well below 10 hectares in size.

(b) the cumulation with other existing development and/or approved development

There is no existing development, and no known approved/committed development, on the application site / within the surrounding area which would necessitate the consideration of cumulative development impacts. Whilst the site is within a regeneration allocation there are not considered to be cumulation effects as a result of the development.

(c) the use of natural resources, in particular land, soil, water and biodiversity

In regard to the use of natural resources, the proposal makes good and efficient use of a previously developed site, which will incorporate sustainable drainage in accordance with Schedule 3 to the Flood and Water Management Act 2010. The site was previously cleared and prepared for development. As part of this ecological mitigation was installed. As such there are areas present on the site which are desirable for retention from an ecological value perspective. Notwithstanding the proposals have been developed to retain such features where possible and the ecology consultant has outlined that As this development is happening relatively soon after the construction of the original site with the development platforms, it is not considered that there will be a significant short or long term loss of SINC quality habitat as a result of this development. In summary, it is considered that the proposed development would not give rise to any significant implications in respect of use of natural resources.

(d) the production of waste

The proposed development is unlikely to create any significant implications in respect of the production of waste, and the management of waste/recycling will be carefully incorporated into the design of the proposed development (bin and recycling storage details will be shown in detail on the application drawings). There will be very limited waste materials arising from the construction works and a construction waste management plan will be produced by the contractor at the appropriate time. It is acknowledged that some waste will be hazardous. There is an existing facility within Swansea University and the University has protocols with regards hazardous waste and proper handling. As such the end user already has stringent waste protocols which are enforced by Swansea University and would apply to this building. It can be concluded that there are no likely significant environmental effects in regard to the production of waste.

e) pollution and nuisances

It is anticipated that a degree of air pollution could potentially arise in relation to an increase in traffic movements arising from the proposed use of the site – however, it is not considered that the development will be a significant potential source of either pollution or nuisances. The site is located within Port Talbot centre and has excellent opportunities for transport by bus and train given the proximity of Port Talbot Train Station and the Central Bus Station. Equally cycling is a realistic prospect with the It is noted that the site is within close proximity to National Cycle Route 4 a long-distance route between London and Fishguard via Reading, Bath, Bristol, Newport, Swansea, Tenby, Haverfordwest and St. Davids. The site is within close proximity to Port Talbot Air Quality Management Area albeit is technically outside of the area. It is not

considered that the proposals be a significant potential source of either pollution or nuisances given the scale of the development and produced uses being for the creation of materials for research, prototype and investigative purposes, i.e. non-commercial production.

(f) the risk of major accidents and/or disasters relevant to the development concerned, including those caused by climate change, in accordance with scientific knowledge

By nature of the development proposed there is unlikely to be any undue risk of major accidents and/or disasters. The facility currently operates within the Swansea University campus with minimal risk to accidents. The facility has a long running history with no major incidents.

(g) the risks to human health (for example due to water contamination or air pollution)

The proposal is unlikely to result in a risk to human health from contamination. The site will be developed in accordance with the latest building regulations and appropriate ground testing is taking place. Construction management plans will support the application along with contamination assessments in accordance with industry practice. Air pollution factors are considered above. As above there is an existing facility within Swansea University Campus that has been and currently runs with no major incidents having occurred. The facility has strict protocols and regulations to ensure the safety of people within the building.

Environmental Sensitivity of the Location of the Development

It is set out at Paragraph 2 of Schedule 3 that “*The environmental sensitivity of geographical areas likely to be affected by development must be considered*”, having regard to the following detailed criteria:

(a) the existing and approved land use;

The site is not subject to any national or international designations in regard to ecology / landscape / heritage or any other matters and as such the site is not located in a ‘sensitive area’ as defined by Regulation 2(1) of the 2017 EIA Regulations. The site is located within the Harbourside Regeneration Area and has works have previously been carried out to prepare the site for development. The site is brownfield and the development proposals are considered appropriate in the context of the existing and approved land use.

(b) the relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground;

It is considered that owing to the previously developed nature of the land, the development of the site as proposed will be unlikely to have significant environmental implications in respect of the relative abundance, quality and regenerative capacity of natural resources in the area. Previous ecology work undertaken identified that there were some areas of land that were SINC quality. As such the enabling site works considered the impacts to these areas and provided mitigation and as such there was an overall gain of SINC habitat in the long-term. There is now a proposal to build the development referred to as the SWITCH building on the site. This current proposal does not fit within the development platforms that were originally constructed and which the biodiversity mitigation was designed and planted around. Notwithstanding a large proportion of the mitigation can be retained. As this development is happening relatively soon after the construction of the original site with the development platforms, it is not considered that there will be a significant short or long term loss of SINC quality habitat as a result of this development. Overall the proposals will be required to provide biodiversity enhancement and this can be achieved through long term management.

(c) the absorption capacity of the natural environment paying particular attention to the following areas—

(i) wetlands, riparian areas, river mouths;

(ii) coastal zones and the marine environment;

(iii) mountain and forest areas;

(iv) nature reserves and parks;

(v) European sites and other areas classified or protected under national legislation;

(vi) areas in which there has already been a failure to meet the environmental quality standards laid down in Union legislation and relevant to the project, or in which it is considered there is such a failure;

(vii) densely populated areas;

(viii) landscapes and sites of historical, cultural or archaeological significance.

The site is not located within an area that is subject to any national or international designations in regard to ecology / landscape / heritage or any other matters and as such the site is not located in a 'sensitive area' as defined by Regulation 2(1) of the 2017 EIA Regulations. The site has a local SINC designation and as previously stated any impacts can be appropriately mitigated for. Whilst the site is within close proximity to the coast it will not result in detrimental impacts to this area. The only interaction with the marine environment will be a proposed SuDS discharge to the dock south of the site. This will be managed by the SAB to ensure water is clean. It is not considered that the proposed redevelopment of the site as proposed would have any adverse impact on the absorption capacity of the natural environment.

In conclusion, the application site is not considered to be in, or have a direct impact upon, a sensitive location as defined by the EIA Regulations.

Types and Characteristics of Potential Impact

The type and characteristics of the potential impacts arising as a result of the development are considered below, having regard to the criteria under Paragraph 3 of Schedule 3, namely:

- (a) the magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected);*
- (b) the nature of the impact;*
- (c) the transboundary nature of the impact;*
- (d) the intensity and complexity of the impact;*
- (e) the probability of the impact;*
- (f) the expected onset, duration, frequency and reversibility of the impact;*
- (g) the cumulation of the impact with the impact of other existing and/or approved development;*
- (h) the possibility of effectively reducing the impact.*

Traffic and Transportation

The site is within a highly sustainable location within the centre of Port Talbot. There are realistic prospects of any future users of the site being able to utilise public transport and active travel. A Transport Scoping Statement has been prepared by Hydrock. This confirms that based on the proposed GFA of 3,980.7sqm, in order to comply with the NPT parking standards, a total of 199 car parking spaces would be required at the development. A 'reduction in parking requirement' calculation is set out in the Parking Standards SPG which allows a reduced level of parking provision, dependant on the number of sustainability points achievable by a development. It has been calculated that the proposed development could achieve a sustainability score of seven and therefore a 20% reduction can be applied to the car parking requirement as per the 'reductions in parking requirement' table within the SPG. Once the 20% reduction factor is applied to the parking requirement, the policy compliant level of car parking provision would be 159 car parking spaces. The initial, indicative development proposals are to provide a total of 93 car parking spaces within the site. At this stage it is acknowledged that this represents an under provision with regards to the policy requirement however, justification for this level of provision will be provided within the TS, based on proposed staffing levels (88 staff).

Overall considering the site position in a highly sustainable location and supported by a well-maintained road network it is considered that an EIA is not required on transport grounds.

Ecology

As alluded above previous ecological surveys and works have been completed at the site. The previous works that prepared the site for re-development included mitigation and there was an overall gain of SINC habitat in the long-term. There proposed for the SWITCH building on the site does not wholly fit within the development platforms that were originally constructed and which the biodiversity mitigation was designed and planted around. Notwithstanding a large proportion of the mitigation can be retained. As this development is happening relatively soon after the construction of the original site with the development platforms, it is not considered that there will be a significant short or long term loss of SINC quality habitat as a result of this development. Overall, the proposals will be required to provide biodiversity enhancement and

this can be achieved through long term management. In light of the above, it is considered that an EIA is not required on Ecology grounds.

Landscape and Visual Impact

The site is not within a sensitive area with regards landscape and does not sit within any formally designated landscape areas. The site is set within an area identified for regeneration and as such is anticipated for development. The backdrop to the site includes industrial uses and dock lands to the south with Port Talbot town centre to the north. The proposals are supported by a comprehensive Landscaping Scheme, and the enhancement of the site's existing landscape features and network of green infrastructure forms an integral part of the design. As such, it is considered that an EIA is not required on landscape and visual grounds.

Ground Conditions

Works previously undertaken and associated with permission P202/0294 included Construction of an access road, flood mitigation works, **land contamination remediation works**, improving the load capacity of the ground and associated works to facilitate the regeneration of a former brownfield land for future commercial development. Any future planning application will be supported by relevant geo-environmental and geotechnical assessments. It is considered that EIA is not required in relation to ground conditions and contamination.

Noise

The site is located within an area that has been prepared for commercial development and as such there are very limited sensitive noise receptors within the area of the site. A noise assessment will be completed to inform the building design. It is considered that EIA is not required on noise grounds.

Air Quality

As above the proposal will be supported by an Air Quality Assessment given the close proximity of the air quality management area. A degree of air pollution could potentially arise in relation to an increase in traffic movements arising from the proposed use of the site – however, it is not considered that the development will be a significant potential source of either pollution or nuisances. The site is located within Port Talbot centre and has excellent opportunities for transport by bus and train given the proximity of Port Talbot Train Station and the Central Bus Station. Equally cycling is a realistic prospect with the It is noted that the site is within close proximity to National Cycle Route 4 a long distance route between London and Fishguard via Reading, Bath, Bristol, Newport, Swansea, Tenby, Haverfordwest and St. Davids. The site is within close proximity to Port Talbot Air Quality Management Area albeit is technically outside of the area. It is not considered that the proposals be a significant potential source of either pollution or nuisances given the scale of the development and produced uses being for the creation of materials for research, prototype and investigative purposes, i.e. non-commercial production.

Potential air quality impacts arising as a result of construction activities will be short term and temporary and can be minimised through the adoption and implementation of good construction practices. As such it is considered that EIA is not required on air quality grounds.

Waste

The proposed development will not result in significant waste production that would have unacceptable impacts on the environment. At construction stage, there will be scope to re-use material on site as part of ground re-profiling works, minimising the amount of material that will need to be taken away from the site. Appropriate provision will be made within the scheme layout for waste and recycling provision once operational. As such it is considered that an EIA is not required on waste grounds.

Flood Risk & Drainage

The Development Advice Map (DAM) is used to trigger different planning actions based on a precautionary assessment of fluvial and tidal flood risk. The site is located within Zone C1. Zone C1 is described as areas of the floodplain which are developed and served by significant infrastructure, including flood defences. All

forms of development are permissible in Zone C1, subject to the application of the justification test, including the acceptability of consequences.

JBA's flood modelling work has shown that it is comparatively simple to manage flood risk on the site. This can be achieved by raising site levels 200-300mm and FFL's a further 200mm. However, these comparatively small changes alter flow patterns in the area, with the potential to significantly increase flood risk elsewhere. Consequently, the main aim of the flood mitigation strategy is to manage this potential off-site detriment.

The preferred option is a combination of opening up flow paths along the eastern and southern boundary of the site, together with 1 or 2 additional culverts under Harbour Way.

Although the preferred option is successful in managing flood risk around the site, there is a measure of detriment to flooding in and around the dock. As this impacts upon existing property, in spite of being very minor (generally <1cm), this detriment is unlikely to be acceptable without further mitigation of its own. We believe that minor operational changes in how ABP manage dock water levels could comparatively easily address this concern, to the benefit of the SWITCH site and many other sites around the dock.

A detailed Drainage Strategy for the site has been prepared and will be submitted in support of the Planning Application, which will demonstrate that the proposed development can be delivered in a SuDs-compliant manner in accordance with the provisions of Schedule 3 of the Flood and Water Management Act 2010. The proposed drainage system will be designed in accordance with Statutory Standards for Sustainable Drainage Systems – Designing, constructing, operating and maintaining surface water drainage systems 2018, Building Regulations Document H 2010, Sewers for Adoption 7th Edition and Ciria's SUDs Manual where appropriate and will comply with any further Local Authority Design Guides and requirements of statutory undertakers.

It will also be important to ensure that surface water run-off from the site during construction is controlled so as to prevent contamination of environments directly adjoining the site. To this end, the CEMP will detail surface water will be controlled during construction to ensure no damaging run-off. Strict adherence to the CEMP during construction will ensure no impact on the natural environment. In light of the above, it is considered that an EIA is not required on flood risk / drainage / surface water pollution grounds.

Heritage & Archaeology

There are no listed buildings within the site boundary. Harbour Court to the east of the site is Grade II listed. The reason for designation is as an early C20 building retaining its external character, for its historic interest as the head offices of a nationally important company, and as the only surviving building of the Port Talbot Steel Company. The site is within an area that has already undergone significant redevelopment with modern commercial buildings forming a key aspect of the site setting. Further to this there are a number of industrial buildings to the south and south east of the site which again further inform the setting of the listed building. Overall, it is not considered that the proposals would detrimentally impact the setting of the listed building considering the scope of change that has already taken place.

There have been significant ground works associated with the permission P2020/0294 being developed. As such it is highly unlikely that there's any archaeological interest in the grounds.

In light of the above, it is considered that an EIA is not required on heritage and archaeology grounds.

Requirement for EIA – Summary

As set out within this letter, Neath Port Talbot County Borough Council and Morgan Sindall request a formal Screening Opinion from Neath Port Talbot County Borough Council as to whether the proposed development proposed constitutes EIA development.

In summary, the proposal constitutes Schedule 2 development – however having regard to the characteristics of the development; the environmental sensitivity of the location; and the types and characteristics of the potential impact (in accordance with the criteria set out within Schedule 3 of the Regulations), it is not

considered that the proposed development is likely to have significant effects on the environment. The development is not of more than local importance; is not proposed for a particularly environmentally sensitive or vulnerable location; and does not have unusually complex and potentially hazardous environmental effects.

Whilst the proposals will include uses identified within class 4 (a – e) all processes are for the creation of materials for research, prototype and investigative purposes, i.e. non-commercial production where materials are processed in the above, and will typically involve kg's of materials per process.

The proposed planning application will be supported by a comprehensive suite of technical reports to cover all of the above-mentioned constraints and impacts.

It is concluded that the proposed development is unlikely to have significant effects on the environment, enough to warrant an EIA. As such, it is considered that EIA is not required.

We would be grateful if you could review this screening request and formally respond within the statutory 21 days of formal receipt. Should you require any further information, require any further information please do not hesitate to contact me.

Yours faithfully,

Barrie Davies
Director – Asbri Planning Ltd