

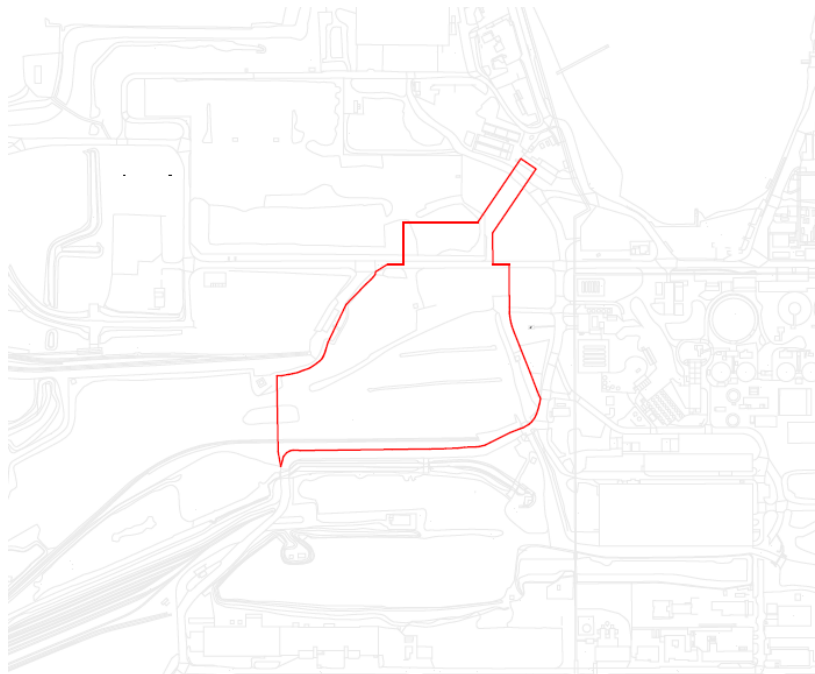
Green Infrastructure Statement (GIS) – P Fields Application

October 2024

Introduction

- 1.1 This Green Infrastructure Statement (GIS) has been prepared by Turley in collaboration with RSK (Ecology and Landscape teams) and JBA Consulting (drainage team). It has been prepared on behalf of Tata Steel Limited UK ('the Applicant'). It supports a full planning application for the construction of hardstanding on land at Port Talbot Steelworks, Port Talbot.
- 1.2 The description of development is as follows:
- 1.3 *"The installation and retention of concrete hardstanding for industrial use associated with the continued operations of the steelworks, and landscaping, green infrastructure and drainage works."*
- 1.4 The Site Location Plan is provided at **Figure 1** below.

Figure 1: Site Location Plan



- 1.5 This GIS seeks to clarify the approach to the development in line with the updated Planning Policy Wales (PPW) Chapter 6 (February 2024). It demonstrates the green infrastructure provided on site and the step-wise approach followed. The GIS draws on detail already set out in the supporting drainage strategy, ecological report and landscape note prepared for the application.

1.6 The GIS is structured as follows:

- Background;
- Site Selection;
- Baseline Data and Surveys;
- Step-wise Approach; and
- Conclusion and Planning Balance.

Background

1.7 Chapter 6 of Planning Policy Wales (PPW) was updated on 18 October 2023. The updates were published in a Chief Planning Officer letter with immediate effect. This included the need for all planning applications to be accompanied by Green Infrastructure Statements (GIS) (paragraph 6.2.5). These updates have subsequently been included in the updated PPW (Edition 12), which was published in February 2024.

1.8 The proposal has been developed in a way which responds to the relevant national and local policies. These include Policy BE1 (Design) of Neath Port Talbot Local Development Plan (2011-2026), Policy 9 (Resilient Ecological Networks and Green Infrastructure) of Future Wales: The National Plan 2040 and the placemaking principles set out in PPW (Edition 12).

1.9 This GIS seeks to clarify the approach to Green Infrastructure proposed by the Applicant, taking account of the stepwise approach in a way which is proportionate to the scale and nature of the proposed development.

Site Selection

Site Option Considerations

1.10 Tata Steel is currently in the process of decommissioning assets relating to its heavy end configuration. This involves a significant amount of physical work and will use a significant proportion of the existing laydown and compound areas to the northern part of the site.

1.11 Tata also has a number of maintenance projects which need to be carried out relating to existing and ongoing operational assets in the central area of the site. Some of these will also require laydown and/or compound areas. Tata Steel has repurposed some of the existing hardstanding in the central section for laydown and compound areas to facilitate these projects, but it will be necessary to create an additional area in the central section for these projects to be carried out at the appropriate time.

1.12 The proposed development responds to this urgent requirement for concrete hardstanding space for industrial use associated with the continued operation of the steelworks. This operational requirement is focussed on the transition period in the evolution of the steelworks, including the closure of the heavy end.

- 1.13 The site has been identified following a search exercise by the operational team at Tata Steel UK across the whole of the steelworks. The location of the site, accessibility to incoming materials by sea and on rail, and to works areas across the site is ideal for the function of the proposed hardstanding. The site is existing deteriorated hardstanding and used as a storage yard. This combination of established use and location dictates that the site is the optimum location for the proposed use.

Baseline Data and Surveys

- 1.14 The following surveys and assessments have been prepared and submitted in support of the planning application:
- Ecological Impact Assessment, prepared by RSK Biocensus (Ref. 2487033 P&C P Fields)
 - Preliminary Geo-environmental Constraints Report, prepared by RSK (Ref. 315609 TN01 (01))
 - Landscape and Visual Appraisal, prepared by RSK
 - Drainage Strategy, prepared by JBA
 - Transport Technical Note, prepared by SCP Transport (Ref. CT/210634/TN02)
- 1.15 These documents are drawn upon to clarify Green Infrastructure detail throughout this Statement.

Operational Factors Effecting Biodiversity and Landscape Design

Multifunctional Design

- 1.16 RSK Biocensus, as ecological consultants, is working in conjunction with RSK Landscape, as landscape consultants and JBA, as drainage consultants, to provide a holistic approach to advising Tata on the emerging reconfiguration of the wider steelworks site.
- 1.17 The proposed development site is highly industrial. The risk of water contamination dictates the management of surface water shall need to reflect the industrial setting.
- 1.18 Future development aspirations for the site are covered separately to this application and are therefore not explicitly covered within this report. However, it should be noted that the general principles for surface water drainage design for the future development aspirations have been consulted upon with the SAB and received in-principal approval to the proposals. It is important to consider the future development aspirations in context of this proposal for a concrete slab for a site compound and industrial uses associated with the operation of the steelworks, which will then ultimately be re-used to support future development.
- 1.19 It is considered that works should be effective, purposeful and cost-effective to minimise abortive works and unnecessary construction. The wider development site is proposed to have two main surface water systems across the site, comprised of the

Contaminated Stream and the Clean Stream. The proposed development for the P Fields area shall ultimately be part of the Contaminated Stream, and therefore surface water shall be directed within a piped system to the onsite wastewater treatment works, prior to being discharged into the Bristol Channel.

- 1.20 The proposed site use and layout constraints makes the use of SuDS impractical. As earlier outlined, the Contaminated Stream is comprised of a piped system conveying surface water directly to on-site wastewater treatment systems prior to being discharged into the Bristol Channel. Therefore, amenity and biodiversity benefits are not directly achievable via the Contaminated Stream.

Wider Strategy

- 1.21 Appropriate locations for the P Fields spoil will be identified in collaboration with the Council during the determination of the application and/or via an appropriately worded planning condition. The proposed locations include:
- To fill gabion baskets with a mix of site spoil from P Fields to form modular biodiversity baskets.
 - To create some roadside bunds to provide some mitigation to road verges preventing damage from site vehicles. There is precedent for this within the wider operational area and this will further expand the open grass mosaic across the site.
 - To create open mosaic scrapes in suitable locations across the steelworks site and on land controlled by Tata Steel UK.
- 1.22 The proposed approach will relocate the excavated material and the associated seed bank successfully within the wider steelworks. Its targeted relocation in consultation with officers at the Council will deliver appropriate enhancement. This is particularly the case when the material is included in a programme of targeted re-greening and biodiversity enhancement across the steelworks.

Stepwise Approach

Avoidance Measures

- 1.23 The site was selected as an area with the size required and the smallest amount of vegetation. The area of priority habitat (Open Mosaic (Ephemeral)) is only present in the western extent of the site and retention of the habitat and its condition would not be possible with any potential development layout.
- 1.24 The boundary of the P Fields site is defined by a railway line, a memorial and existing embankments / industrial operations. The extent of the operational process will require the use of the majority of the land within the P Fields red line boundary. These constraints also prevent the partial retention of habitats within the site.
- 1.25 Consequently, there are no viable options for protecting any of the exiting habitats. There is an unavoidable need to remove all existing vegetation / habitats during the works.

Minimisation of Impacts

- 1.26 The vegetated spoil that needs to be removed from the P Fields site will be stored for use in habitat creation (Open mosaic habitat) within the wider steelworks.

Mitigation Measures

- 1.27 The use of the vegetated spoil from the P Fields site to create Open Mosaic habitat within the wider steelworks will mitigate for the loss of ephemeral and scrub habitat within P Fields. The retained spoil will contain the existing seedbank and the retained habitat within the wider steelworks will provide a supplementary source of seeds to allow the colonisation of the spoil heaps, road side bunds and gabion baskets.

On-site Biodiversity Compensation and Enhancement

- 1.28 The nature of the proposed facility doesn't allow for any vegetation establishment within the site boundary. This constraint has driven innovation in the landscape strategy for the wider steelworks which seeks to provide locally appropriate habitat opportunities for a range of species.

Wider Biodiversity Compensation and Enhancement

- 1.29 The habitats to be created in the wider steelworks will include the creation of spoil heaps, road side bunds and gabion baskets.
- 1.30 Establishment will be secured through a combination of self-seeding, active control of negative indicator plants through monitoring and management actions, and supplementary seeding of a few target positive indicator species appropriate to the ground conditions.

Management and Monitoring

- 1.31 The created open mosaic habitats will be subject to annual monitoring for a minimum of five years from the start of operation to assess the extent to which plant populations are establishing in the green space.
- 1.32 The status of the created habitats will be documented and reviewed against the biodiversity objectives. Negative trends affecting biodiversity value will be identified

through monitoring. The Habitat Management Plan will include formal commitments to implement remedial actions to ensure the biodiversity value assigned during design is achieved in practice.

Conclusion and Planning Balance

- 1.33 As evidenced above, a step-wise approach has been followed during the site selection and design process of the proposal.
- 1.34 While the site offers limited ecological value, the vegetated spoil that requires removal from the site will be stored for use in habitat creation (Open mosaic habitat) within the wider steelworks. The retained spoil will contain the existing seedbank and the retained habitat within the wider steelworks will provide a supplementary source of seeds to allow the colonisation of the spoil heaps, road side bunds and gabion baskets.
- 1.35 The created open mosaic habitats will be subject to annual monitoring for a minimum of five years from the start of operation to assess the extent to which plant populations are establishing in the green space.
- 1.36 The mitigation, compensation and enhancement will ensure a positive biodiversity outcome in the context of achieving a net benefit for biodiversity (NBB) meeting the requirements of Environment (Wales) Act 2016 and Planning Policy Wales (PPW 12).

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