

25 October 2024

Submitted via Planning Portal Wales (P-13211191)

Ms N Lake
Neath Port Talbot County Borough Council
Planning Division
The Quays
Brunel Way
Neath
SA11 2GG

Ref: 01363_PLCD

Dear Nicola,

FULL PLANNING APPLICATION FOR CONSTRUCTION OF HARDSTANDING – LAND AT ‘P’ FIELDS, PORT TALBOT STEELWORKS, PORT TALBOT

On behalf of our client, Tata Steel UK Ltd (“the applicant”), we are pleased to enclose a full planning application for the construction of hardstanding on land at ‘P’ Fields, Port Talbot Steel Works, Port Talbot.

The application proposal is described as follows:

“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.”

The application was submitted via Planning Portal Wales on 25 October 2024 (PP-13211191) and in addition to this covering letter, comprises the following documents:

- Planning Application Forms, prepared by Turley.
- Green Infrastructure Statement (GIS), prepared by Turley.
- Site Location Plan (ref: 90101_P03), prepared by Lawray.
- Existing Site Plan (ref: 90102_P03), prepared by Lawray.
- Existing Site Section (ref: 90103_P03) prepared by Lawray.
- Proposed Site Plan (ref: 90104_P04), prepared by Lawray.
- Proposed Site Section (ref: 90105_P03) proposed by Lawray.
- Design and Access Statement, prepared by Turley.

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- Pre-Application Consultation Report, prepared by Turley.
- Conceptual Drainage Strategy, prepared by JBA.
- Phase 1 Desk Study Report, prepared by RSK.
- Landscape and Visual Appraisal, prepared by Stephenson Halliday.
- Landscape Statement, prepared by Stephenson Halliday.
- Ecological Impact Assessment, prepared by RSK.
- Highways Technical Note, prepared by SCP.
- Coal Mining Risk Assessment, prepared by Wardell Armstrong.

The requisite application fee of £14,030.00 (calculated based on the site area of 60,490sqm) will now be paid directly to Neath Port Talbot Council.

Site Context

The application site comprises a rectangular parcel of land located within the Port Talbot Steelworks, Port Talbot. It is shown on the accompanying Site Location Plan (ref: 90101_P). The land is located to the south of the Morfa Colliery Memorial and to the south-east of the lagoon. The site is owned and managed by the applicant.

The site is currently hard surfaced in grey slag material and is used for the open storage of steel slab as part of the existing steelworks operation. There are areas of vegetation within the site, principally located across the northwest of the site.

The site is located in flood zone B (areas known to have flooded in the past) as per NRW's Development Advice Maps.

The site is not part of a conservation area, world heritage site, historic battlefield site or archaeological priority area. There are no scheduled monuments, Listed Buildings or any Locally Listed buildings on or within the vicinity of the site.

Pre-application Discussions

Informal pre-application discussions took place with NPTCBC's planning team on 13 June 2024. Informal agreement was confirmed on the scope and timing of the application owing to programme pressure associated with the proposed works to decarbonise the facility.

The comments received from NPTCBC have been taken into account during the preparation of this planning application.

Development Proposals

The proposed development is the construction of concrete hardstanding on land at 'P' Fields, Port Talbot Steelworks in Port Talbot. The hardstanding will cover an area of circa 26,600m². No buildings or other structures are proposed as part of the application.

The hardstanding will be comprised of constructed with 300mm fibre / mesh reinforced concrete slab, laid on top of 50mm sand/ dust blinding and a polythene membrane.

Vehicular access to the development site will be provided from within the existing Tata Steel site and accessed predominantly via the existing Main Gate site access off the A4241 Harbour Way. A single access point into the site is proposed, which is wide enough to accommodate HGV movements and will be managed appropriately by Tata Steel.

The hardstanding will continue to be used for industrial purposes by Tata Steel. There will be no change of use of the established industrial land. The application relates only to the proposed engineering operations and does not require a change of use.

Need for the Development

Tata Steel is currently in the process of decommissioning large-scale assets relating to its ongoing closure of the Port Talbot heavy end configuration. This involves a significant amount of physical work requiring extensive laydown spaces. It will use a significant proportion of the existing laydown and compound areas to the northern part of the Port Talbot site. The decommissioning includes the sinter plant, 2 no. blast furnaces, coke ovens, power plant and ancillary infrastructure.

Tata Steel also has a number of critical 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 compound areas. These include maintenance projects within the cold mill and hot mill, and essential site infrastructure.

Tata Steel is already repurposing some of the existing hardstanding in the central section of the Port Talbot site for laydown and compound areas in order to facilitate parts of these projects, but it is necessary to create an additional laydown and compound area in the central section of the site in order for these projects to be carried out at the appropriate time.

Future development aspirations for the site will be covered separately to this application. Any future use of the space and/or development at the site will be subject to a separate planning application.

Planning Policy Context

The Development Plan for the site comprises the NPTCBC Local Development Plan (LDP) and Future Wales: The National Plan 2040. Other planning policy and non-statutory documents of relevance include Planning Policy Wales (Edition 12) and its associated Technical Advice Notes (TANs).

NPTCBC LDP (2011-2026)

A review of NPTCBC's proposals maps shows that the site is located in the following areas:

- Existing Employment Area – Tata Steelworks, Port Talbot (Policy EC2/11).
- Safeguarding Minerals Area (Policy M1).
- Coastal Corridor Strategy Area (Policy SP5).

The key policies relating to the application are summarised below.

- **Policy EC2: Existing Employment Areas** seeks to protect existing employment functions and recognises that ancillary services and facilities are appropriate to support such employment estates. Proposals which support the overall function of an employment area and do not unacceptably harm the amenity of neighbouring properties will be supported. It is also worth

noting that the LDP recognises the importance of Port Talbot Steelworks as one of the largest employers in the region.

- **Policy EC3 (Employment Area Uses)** states that uses are restricted within allocated and existing employment areas. Developments are required to demonstrate that proposals do not cause any adverse impacts on the overall function of the employment area.
- **Policy SP15 (Biodiversity and Geodiversity)** notes how important habitats, species, and sites of geological interest will be protected, conserved, enhanced, and managed.
- **Policy M1: Development in Mineral Safeguarding Areas** confirms that development proposals within mineral safeguarding areas will only be permitted in a number of limited circumstances. This includes temporary development proposals where the development can be implemented, and the site restored within the timescale that the mineral is likely to be needed and where the scale and location of the development would have no significant impact on the possible working of the resource.
- **Policy SP5: Development in the Coastal Corridor Strategy Area** promotes sustainable growth and development in the Coastal Corridor Strategy Areas.
- **Policy TR2: Design and Access of New Development** sets out criteria for new development to comply with. This includes requiring new developments to not comprise the safe, effective and efficient use of the highway network.
- **Policy BE1: Design** sets out design criteria for all development proposals to meet. This includes requiring proposals to respect the context of the site and its place within the local landscape; utilise materials appropriate to its surroundings; not have a significant adverse impact on highway safety and the amenity of local occupiers; and create attractive and safe places.

Planning Assessment

Principle of Development

The site is located within settlement boundary. It forms part of the wider Tata Steelworks Existing Employment Area under Policy EC2/11 of the LDP, which is recognised as one of the largest employers in the region.

The proposed development responds to an 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. The development is a significant investment that will continue to support the existing employment function of the wider steelworks and allocated employment area in accordance with Policy EC2 of the NPTCBC LDP. The development will also maintain the existing use of the site for employment purposes in accordance with Policy EC3 of the LDP.

The adopted development plan policy objectives to support existing employment areas (namely, Policies EC2, EC3 and TR2 of the LDP) directly support the principle of the proposed development at this site.

Design

The design of the proposal has been very carefully considered by Tata Steel. The proposed concrete hardstanding delivers the technical and engineering specification required for the site to carry out its required functions, both now and in the future. Such hardstanding areas closely related to industrial use,

buildings, plant and machinery are an established feature of the steelworks. Its design will be successfully absorbed into the heavy industrial fabric of the steelworks site.

Ecology and Green Infrastructure

The applicant has been working closely with an ecologist at RSK to ensure that no habitats are adversely impacted by the proposal and an Ecological Impact Assessment (EclA) accompanies this application.

RSK's EclA confirms that the proposed development of the site will take place on habitats that primarily include open mosaic (ephemeral) and bare ground. A small area of open mosaic habitat and scrub will be need to be removed. Bespoke habitat creation scheme will see this habitat moved and used in the wider steelworks to create spoil mounds, bunds and fill gabion baskets in order to create new areas of ephemeral habitat. This will ensure that there is no net loss of this habitat within the steel works.

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. Full details of the proposed mitigation will be subject to a Condition which will require the submission of a Landscape Environmental Management Plan (LEMP), to be agreed with Neath Port Talbot County Council.

A precautionary working method statement (PWMS) and ecological clerk of works will be provided to ensure no negative impact on reptiles which are present within the wider steelworks. Retention of the habitat within the wider steel works will ensure the continued availability of foraging habitat for reptiles.

Landscape and Visual Impact

Stephenson Halliday has prepared a Landscape and Visual Appraisal which assesses the nature of the anticipated landscape and visual changes and considers the effects during construction and once works are complete.

The appraisal recognises the site's location within an established industrialised area. In this context, the proposed development would result in a very small perceived increase in industrial development. It would not be viewed as an incongruous new feature within the landscape.

The appraisal goes onto confirm that there would be no effects greater than minor/negligible for landscape and visual receptors. The only exception is walkers on the inland section of the Wales Coast Path, Braided Route, and other nearby associated PRoW. Walkers on these paths would experience effects ranging from minor to minor/negligible significance. Any such effects would initially be adverse in nature in the short to medium term, but becoming neutral in nature as the open mosaic habitat becomes reestablished as part of wider green infrastructure improvements.

No long-term adverse landscape or visual effects are anticipated as a result of the proposed development.

Highways

SCP has prepared a Transport Technical Note which provides an assessment of the associated traffic and transport implications of the proposed development.

The proposed area of hardstanding will continue to operate as part of the existing Tata Steel site. On this basis, SCP confirm that the development will not generate any new traffic to the local highway network post construction.

The proposed development is estimated to generate 45 two-way Passenger Car Units (PCU) in both the AM and PM peak hours during the construction period. This equates to less than 1 additional two-way PCU per minute. This level of generation is not anticipated to result in a material intensification of the local highway network, particularly when distributed across the wider highway network. SCP conclude that no further assessment is required, particularly given the traffic impacts are of a temporary nature during the construction period only.

The traffic impacts of the scheme are confirmed to be acceptable in planning terms.

Site Investigation

A Phase 1 Desk Study Report has been prepared by RSK.

Made ground is expected to be present across the site. The made ground generally comprises reworked natural strata with anthropogenic materials of slag, brick, concrete and metal.

The report identifies the following potential environmental constraints relating to the development:

- Localised pollutant linkages associated with the former land uses. However, the proposed concrete slab will be an effective barrier to mitigate the direct contact of contaminants to the end user.
- There is a potential source of mine gases associated with the former colliery works. However, no buildings are proposed and therefore the risk of ground gas is considered to be low.
- There are off-site sources of contamination associated with the active steelworks within the wider site. However, there is an emerging proposed redevelopment of the surrounding area (to be subject to a separate planning application) as part of the proposed transition of the steelworks. Mitigation measures will be adhered to in order to ensure risks to end users are low.
- There are minor off-site contamination risks associated with the former railway sidings that may include localised metals and hydrocarbons but the risk is considered to be low in the context of the development.

Overall, the Phase 1 report demonstrates that there is little risk of contamination in the area and the development will not increase that risk. The proposed development is a sealed concrete slab, which will sever the pathway for any contaminants to affect human health but also prevent any activities on the slab from potentially impacting on controlled waters. Tata Steel consider that the work carried out to-date is sufficient to demonstrate that there is no risk to either human health or controlled waters given the limited nature of the construction. Pre-commencement and pre-occupation conditions (as suggested by NRW within their Pre-Application Consultation response) are therefore considered to be unnecessary and would result in a significant delay to this important part of the safe decommissioning of the steelworks. As suggested by NRW, Tata Steel would welcome a condition relating to unknown contamination that may potentially be encountered during construction.

Several geotechnical constraints are also identified. However, the report confirms that given the low loads of the proposed concrete slab, the geotechnical risks identified are considered to be relatively low.

Flood Risk and Drainage

JBA Consulting has prepared a Conceptual Drainage Strategy to support this application and for submission to the SuDS Approval Body for pre-application consultation.

The report confirms that the site is located within Flood Zone B within the Development Advice Map. A Flood Consequence Assessment for the site is not required. The site is also confirmed to be at very low/low risk of surface water flooding and very low risk of flooding from rivers and the sea.

The site's highly industrial location within the wider steelworks and the resulting risk of water contamination dictates that the management of surface water is an important consideration.

The potential for contamination and use of the existing surface water system on the steelworks has been the key consideration in devising the drainage strategy. The future aspirations for the steelworks drainage system is proposed to have two main surface water systems across the site: the contaminated stream; and the clean stream. The proposed development for the P Fields area shall ultimately be part of the contaminated stream. Surface water shall be directed within a piped system to the onsite wastewater treatment works, prior to being discharged into the Bristol Channel.

The proposed site use and layout constraints makes the use of SuDS difficult. 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. Amenity and biodiversity benefits are not obtained via the contaminated Stream. However, discussions are ongoing with the Council on wider configuration of the steelworks site. This will maximise amenity and biodiversity benefits across the site through the use of SuDS features via the clean stream.

As the site shall retain in single ownership, long term management and maintenance shall be undertaken by Tata Steel UK Ltd. The system shall not be offered for adoption by the SAB.

Fire Safety

Tata Steel in Port Talbot has its own private fire fighting service. The proposed site is currently a slab stockyard with a compacted steel slag surface, there are multiple vehicle entrances into this area that would allow any fire fighting equipment needed close access to the construction area. It should be noted that the proposed use of this area is a laydown area for decommissioning with potential for temporary welfare facilities and no buildings are proposed.

Temporary water bowzers with pumps will be in place during the construction period and there are several non-potable water sources in close proximity to the site that could be used in case of a fire, including the Mother Ditch and the Works Lagoon. Fire hydrants associated with the water treatment compound are also located approximately 200m to the west of the works area and approximately 100m to the east.

Conclusions

This application seeks full planning permission for the installation and retention of concrete hardstanding for use as a storage and lay down area on land at Port Talbot Steel Works, Port Talbot.

The proposed hardstanding will serve an essential operational need for Tata Steel and will support ongoing operations across the wider steel works. The proposal complies with prevailing development plan policy and the supporting technical information demonstrate that there will be no negative impacts that cannot be appropriately mitigated. The positive benefits of the proposal relating to supporting to the ongoing operations at the wider steelworks weigh heavily in favour of granting planning permission for the proposed development.

We look forward to receiving confirmation of the validation of the planning application in due course.
Please do not hesitate to contact us with any queries.

Yours sincerely

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