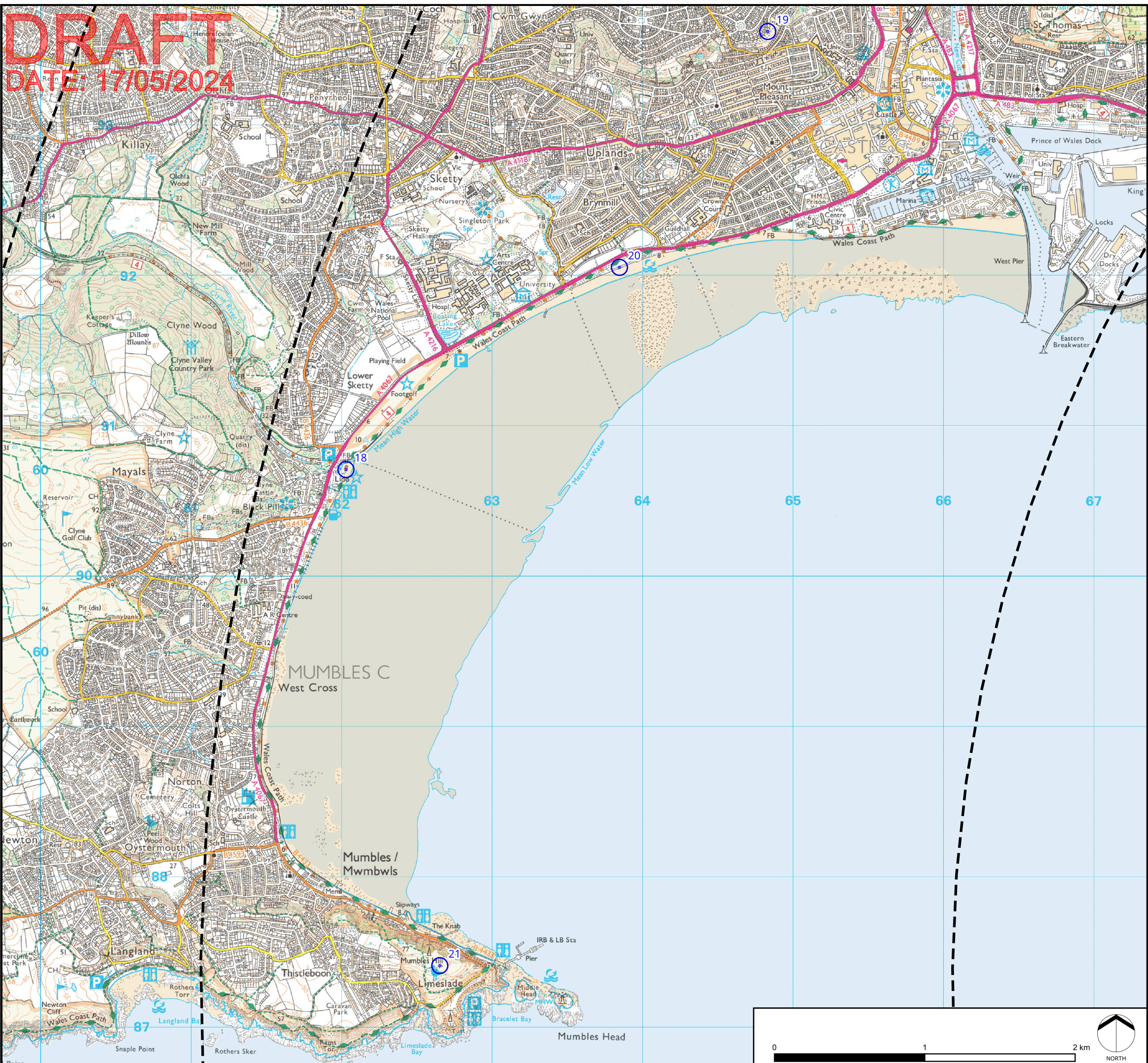


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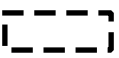


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DATE: 17/05/2024

EAF PORT TALBOT

FIGURE 4
Site Boundary and Viewpoints

KEY

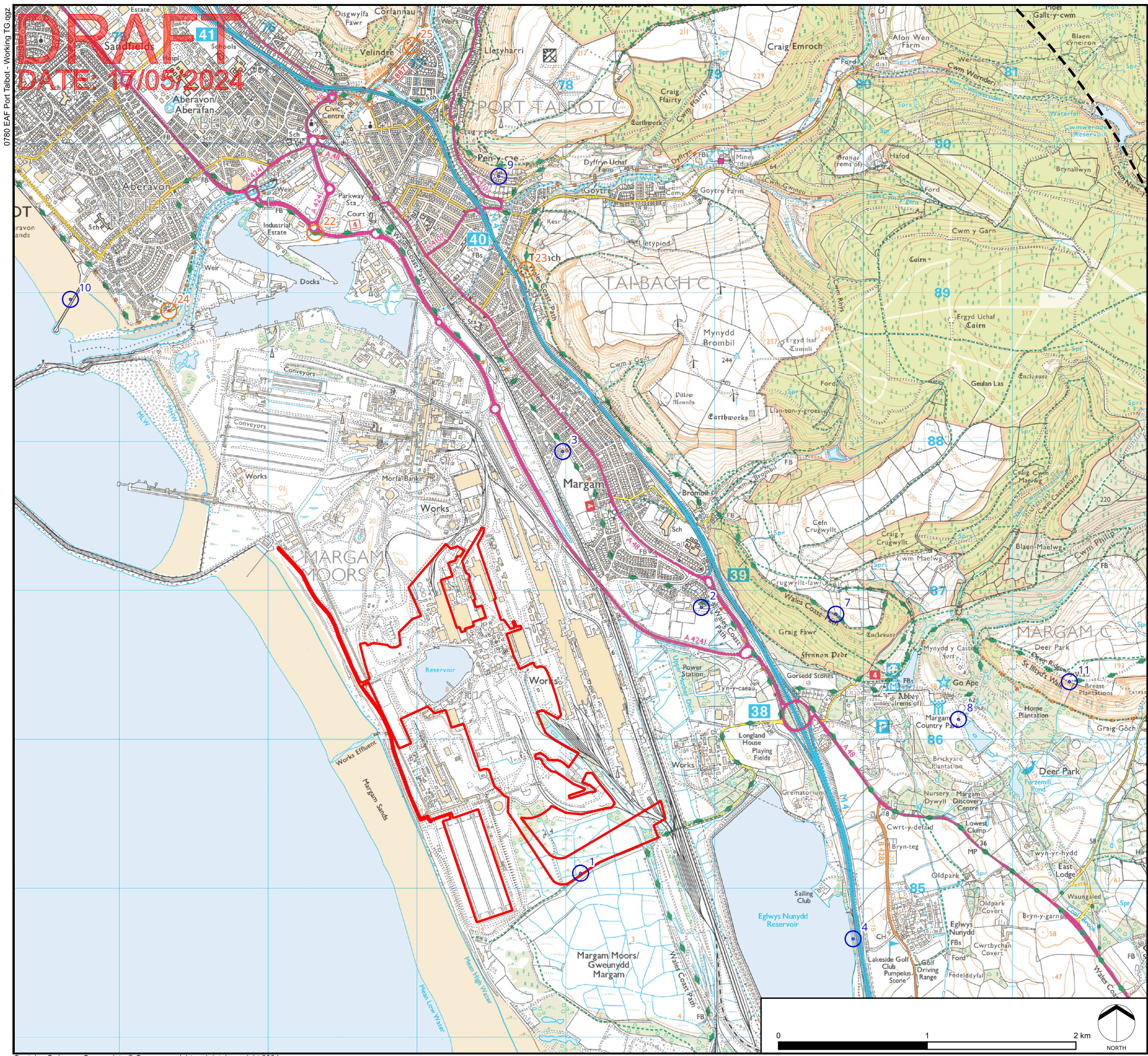
 Distance Radii from Site Boundary (10, 15, 17km)

 Existing Viewpoints



Projected Coordinate System: British National Grid					
DATE	BY	PAPER	SCALE	QA	REV
MAY 2024	TG	A3	1:25,000	DL	-

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DATE: 17/05/2024

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FIGURE 2
Site Boundary and Viewpoints

- KEY**
- Site Boundary
 - Distance Radius from Site Boundary (5km)
 - Existing Viewpoints
 - Proposed Additional Viewpoints

15 DAYLIGHT, SUNLIGHT, OVERSHADOWING AND LIGHT SPILL

Introduction

- 15.1 Regulation 17(3) of the Town & Country Planning EIA (Wales) Regulations 2017 sets out in Schedule 4 the information for inclusion in environmental statements 'a description of the development, including in particular... an estimate, by type and quantity, of expected residues and emissions (such as... light)... produced during the construction and operational phases...' and 'A description of the likely significant effects of the development on the environment resulting from...the emission of... light, ...the creation of nuisances ...'.
- 15.2 Whilst daylight, sunlight and overshadowing (DSO) and light spill are not set out as factors of the environment in the aforementioned regulations, a description of the likely significant effects of light emissions/ nuisances is required in the ES.
- 15.3 Light emissions/ nuisances are primarily of concern to residential properties and their associated amenity spaces. A desktop study of the site and surrounding properties has been completed from a DSO and light spill perspective to determine the likelihood of significant adverse effects being caused by the current proposal based on height information and drawings of the proposed development and by reference to the guidance provided in the BRE (2011) Guidelines for daylight & sunlight and to the ILP (2011) Guidance in relation to Light Pollution.
- 15.4 For residential properties the BRE Guidelines state that 'Light loss to existing windows need not be analysed if the distance of each part of the new development from the existing window is three or more times the height above the centre of the existing window'. In other words lighting impacts can be scoped out of the assessment if a residential property is three or more times the distance of the height of a proposed tall building.
- 15.5 The BRE Guidelines do not provide numerical values for commercial properties and state that they may be applied to non-domestic uses where the occupants may have a reasonable expectation of daylight such as schools, hospitals and religious buildings. The nearest non-residential properties to the proposed development i.e. the current steelworks and associated structures, do not fall into this category and so do not need to be considered from a daylight and sunlight perspective.

Baseline Conditions

- 15.6 There are currently a small number of one to three storey warehouses on the existing site. A review of the site and surrounding properties shows that the nearest residential properties, located in Port Talbot, are in excess of 500m from the nearest point of the proposed development site boundary.

- 15.7 With regard to the baseline condition specifically for light spill, the surrounding area is considered to be a mix of rural (E2) and suburban (E3). The existing steelworks are not considered sensitive to light spill.

Potential Impacts

- 15.8 There would not be any adverse impacts in DSO terms to any of the surrounding residential properties or amenity spaces in Port Talbot due to their distance from the proposed development. The proposed development is in excess of 500m from the nearest residential properties. The maximum proposed height of any building or structure within the red line boundary is 80m. Therefore, the proposed development will be over three times the maximum height of buildings proposed in terms of distance to the nearest sensitive receptor. This would easily meet the '25 degree' test and thus be in accordance with the BRE Guidelines' recommendations for daylight and sunlight.
- 15.9 In terms of the potential for light spill from the proposed development, the nearest residential properties are also considered too distant from the proposed development to be materially impacted by light. Nevertheless a lighting assessment will be prepared as part of the planning application and will be used to inform other EIA factors including Biodiversity and Landscape and Visual Impact Assessment.

Summary

- 15.10 The proposed development is too distant from the nearest sensitive receptors to cause a material adverse impact in daylight, sunlight and overshadowing (DSO) terms. Given the distance of the proposed development from the nearest sensitive receptors, no further DSO analysis is required for the proposed development, and so this issue will be scoped out of the EIA.
- 15.11 Similarly residential properties are likely too distant from the proposed development to be materially impacted by light spill from the proposed development. Whilst light spill will be scoped out as a standalone ES chapter, a lighting assessment will be prepared as part of the planning application and will be used to inform other EIA factors including Biodiversity and Landscape and Visual Impact Assessment.

References

- British Research Establishment, 2011. *Guidelines: Site Layout Planning for Daylight and Sunlight, A Guide to Good Practice*, Second Edition.
- Institute of Lighting Professionals (ILP), 2011. *Guidance Notes for the Reduction of Obtrusive Light* GN01:2011.

Electric Arc Furnace Project

Land at Port Talbot Steelworks, Port Talbot

CT/210634/SN01 – 03 May 2024

Introduction

- 1.1 SCP have been appointed to provide transport planning and engineering advice in relation to a planning application for the construction of an electric arc furnace (EAF) steel making production facility with associated scrap metal handling facility on land at Port Talbot Steelworks, Port Talbot.
- 1.2 The intention is for a hybrid planning application to be submitted with full planning permission sought for the EAF steel making production facility and outline planning permission sought for the scrap metal handling facility as well as the underground and overground electrical infrastructure.
- 1.3 Preliminary scoping discussions have taken place with the Highway Officer at Neath Port Talbot Council (NPTC) during a pre-application meeting on Thursday 21st March 2024. These scoping discussions were positive and led to agreements to some of the Transport Assessment (TA) scope. This Scoping Note has been prepared to formally document and agree the scope of the TA and inform the Transport Chapter of the Environmental Impact Assessment.

Background

- 1.4 A TA in support of a similar, albeit larger scheme with 2 no. arc furnaces, was prepared in May 2022 following preliminary scoping discussions with NPTC and the submission of a formal transport scoping note, dated January 2022. The scope of the TA, including the scenarios to be assessed, study area, base traffic flow data and committed developments etc. were all agreed with NPTC and the Welsh Government (WG).
- 1.5 The scheme was proposed to result in a significant reduction in traffic movements when compared to that generated by the existing site operations, associated with the removal of coal deliveries and scrap metal being delivered to/from the site by rail opposed to road in their current operations, resulting in a betterment from a highway perspective during the operational phase of the development. On this basis, it was agreed with both NPTC and the WG that detailed assessments of the construction phase impacts would be undertaken, but assessments during the operational phase were not required.

Site Location and Existing Conditions

- 1.6 The application site is located to the west of the A4241 Harbour Way within the existing Tata Steel Site to the south-east of Port Talbot Town Centre.
- 1.7 **Figure 1** below shows the site location in relation to the local highway network.

Figure 1 – Site Location / Local Highway Network



Proposed Development and Access Strategy

- 1.8 The development proposals consist of the construction of an EAF steel making production facility with associated scrap metal handling facility on land at Port Talbot Steelworks, Port Talbot.

- 1.9 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, although the West Gate site access off the A4241 Harbour Way may also be used occasionally for large plant / specialist deliveries etc.

Existing Operations

- 1.10 There are circa 4,500 staff employed with circa 1,500 staff on site at any one time, 5 days a week.
- 1.11 Business operations result in circa 7,000 two-way rail movements per year. Approximately 10,000 two-way HGV movements per year are associated with UK business, with an additional 1,500 to 2,000 two-way HGV movements per year to EU destinations. These movements are spread over 5½ days per week.
- 1.12 In addition to the above, there are circa 26,000 two-way HGV movements per year (spread over 7 days per week between 06:00-20:00) associated with coal deliveries and large quantities (circa 338kt) of scrap metal are currently delivered to/from the site via circa 27,000 two-way HGV movements per year (spread over a 5-day week).

Recent / Proposed Operations

- 1.13 Due to the end of life stage of much of the heavy end, and in anticipation of the proposed development coming forward, the coke ovens have recently been turned off and both blast furnaces are proposed to be switched off by December 2024. There has been a significant reduction in vehicle movements associated with the shutdown of the coke ovens due to the reduction in coal deliveries and there will be a significant reduction in vehicle movements associated with the shutdown of the blast furnaces, with scrap metal deliveries halting until the EAF facility is constructed.
- 1.14 This reduction has been quantified in **Table 1** below and results in a reduction of circa 190 two-way HGV movements per day.

Table 1 – Proposed Reduction in Two-Way HGV Movements

Material	Per Year	Per Month	Per Week	Per Day	Per Hour
Coal	26000	2167	542	77	8
Scrap Metal	27000	2250	563	113	11

- 1.15 Whilst it is acknowledged that coal and scrap deliveries will halt temporarily prior to the planning application submission, which represents the 'interim baseline position', these processes and associated movements have been established for many years. From a planning perspective, the full site with operating coke ovens/blast furnaces represents the established use of the site, against which the impact of the development should be assessed.
- 1.16 Although scrap metal will be delivered to the site post construction, it is intended that the majority of scrap metal will be delivered to/from the site by rail. Delivery by road would no longer be viable and would not support the businesses plan to reduce their carbon footprint. On this basis and having regard to the reduction in coal deliveries from the network, the applicant has confirmed that the proposed operational phase of the development will result in a significant reduction in traffic movements when compared to the established baseline position.

Transport Assessment Scope and Study Area

- 1.17 The TA will include assessments at the following junctions which are also highlighted on **Figure 1** earlier:
- M4 Junction 41
 - A48 Heilbronn Way / Car Park Access / A4241 / Water Street
 - A4241 / Industrial Unit Access / Harbourside Road / Industrial Unit Access (West)
 - A4241 / A4241 Harbour Way / North Bank Road
 - A4241 Harbour Way / Oakwood Road / Llewellyn's Road
 - A4241 Harbour Way / West Gate Access
 - A4241 Harbour Way / Main Gate Access
 - A4241 Harbour Way / A48 Margam Road / Access Road
 - M4 Junction 38
- 1.18 It is understood from our initial scoping discussions that the aforementioned TA study area is acceptable. Written agreement on this position is sought from NPTC.

Traffic Flow Data

- 1.19 Previous traffic surveys were undertaken on Wednesday 20th October 2021 in order to establish the existing traffic flow demand on the local network which were accepted by NPTC.

- 1.20 Notwithstanding the above, more recent traffic surveys were undertaken on Thursday 30th June 2022, in a neutral traffic month, as part of the recent Sustainable Aviation Fuel Production Facility planning application (LPA Ref: P2023/0858), at the Crown Wharf Port Talbot Docks. These surveys were validated with an ATC survey and accepted by NPTC. It is therefore proposed that these 2022 surveys, which are in the public domain and were undertaken when the Port Talbot Steelworks were fully operational, are used in the capacity assessments within this TA.
- 1.21 It is understood from our initial scoping discussions that the use of the aforementioned traffic survey is acceptable. Written agreement on this position is sought from NPTC.

Committed Developments

- 1.22 It is proposed that the following committed developments will be included in the TA:-
- LPA Ref: P2021/1255 - Land off J38 of the M4, Margam - Full planning application of the development of a metal processing facility totalling 28,500sq.m of floorspace
 - LPA Ref: P2023/0858 - Crown Wharf, Port Talbot Docks – construction of a Sustainable Aviation Fuel (SAF) production facility, including the production of green hydrogen and sustainable diesel.
- 1.23 The following development was included as committed in the 2022 TA for the original scheme, however, this planning application was refused by NPTC and the Appeal has since been withdrawn. On this basis, there is no reasonable chance of this development coming forward in the near future and therefore, it can no longer be classed as 'committed' and is not proposed to be included in the TA.
- LPA Ref: A2020/0014 - Tyn-y-caeau, Margam Road - Change of use from dwelling house and annex building into a mixed used development consisting of guest house accommodation consisting of 16 guest rooms, with associated bar, cafe and spa facilities, and truck stop with 21 HGV parking spaces.
- 1.24 NPTC's agreement to the above, along with details of any other committed developments (i.e. those with extant planning permission) in the vicinity of the TA study area that need to be taken into account is sought.

Future Baseline Traffic Conditions

- 1.25 The operational phase of the proposed development will result in a significant reduction in traffic movements when compared to the established baseline operation and the construction phase. Therefore, no capacity assessments are proposed to be undertaken of the operational phase due to the overall betterment from a highway perspective. It is understood from our initial scoping discussions that this is acceptable, although written agreement on this position is sought from NPTC.
- 1.26 The construction phase will represent the worst case traffic impact of the scheme on the local highway network. This will be when construction traffic will arrive and depart the site in conjunction with existing site operations. Construction is anticipated to commence in July/August 2025 and run for circa 30 months.
- 1.27 The construction traffic generation estimates for the site have been derived from the worst case 12-month average, as detailed later. The worst case 12-month period is that of December 2025 to November 2026 and as a result, capacity assessments are proposed to be undertaken in the future assessment year of 2026 which reflects the anticipated construction start date and the last 11 months of the most traffic intensive 12-month period of construction.
- 1.28 National Traffic Model (NTM) growth factors (modified by TEMPRO local growth factors) have been used to quantify the level of background traffic growth that could occur on the local network between the date of the traffic surveys and the future assessment year. This quantification is summarised in **Table 2** below.

Table 2 – Traffic Growth Factors

Period	AM Peak	PM Peak
2022 to 2026	1.0302	1.0294

- 1.29 Agreement on the assessment year / growth rates is sought from NPTC.

Trip Generation – Proposed Construction Traffic

- 1.30 A first principles approach based on information from the applicant and potential contractors is considered the most appropriate method for estimating the level of construction traffic anticipated to be generated by the project. This method is the most robust taking into account the bespoke nature of the proposed development.

- 1.31 The applicant and potential contractors have provided a comprehensive estimate of the level of construction traffic movements anticipated as a result of the proposed development, including the time frame and time lag. This data is summarised in **Table 3** below. It should be noted that the information provided is based on worst-case construction traffic estimates and the calculations are also based on a 4-week month (24 days [Monday-Saturday] and 20 days [Monday-Friday] per month) despite there being an average of 26 days (Monday-Saturday) and 22 days Monday-Friday per month .

Table 3 – Anticipated Construction Traffic Estimates

	Trips	Two-Way Trips	Time Frame
Excavated Material	61 wagons per day	122 wagons per day	6 months (6 days / week)
Imported Fill	20 wagons per day	40 wagons per day	6 months (6 days / week), with a 1-month lag
Concrete	35 wagons per day	70 wagons per day	16 months (5 days / week)
Reinforcement	1-2 wagons per day	2-4 wagons per day	16 months (5 days / week)
Formwork	4 wagons per day	8 wagons per day	2 months (5 days / week), with a 2-week lag
Piling (Pre-Cast)	6 wagons per day	12 wagons per day	4 months (6 days / week), with a 2-week lag
Piling (Bored Insitu)	0-1 wagons per day*	0-2 wagons per day*	4 weeks (6 days / week)
Piling (Rigs)	0-1 wagons per day*	0-2 wagons per day*	2 weeks (6 days / week)
Sheet piling	3 wagons per day	6 wagons per day	2 months (6 days / week)
Bolts / Embedded Steel etc	2 wagons per week*	4 wagons per week*	10 months, with a 2-month lag
Structural	2 wagons per day	4 wagons per day	9 months (5 days / week), with a 4-month lag
Cladding	0-1 wagons per day*	0-2 wagons per day*	8 months (5 days / week), with a 7-month lag
Rail Track	2 wagons per day	4 wagons per day	1 month (5 days / week), with a 5-month lag
Asphalt	5 wagons per day	10 wagons per day	21 months (5 days / week), with a 3-month lag
Road Kerbing	2 wagons per day	4 wagons per day	21 months (5 days / week), with a 2-month lag
Site Cabins	3 wagons per day	6 wagons per day	3 months (5 days / week)
Mechanical Equipment	6 wagons per day	12 wagons per day	6 months (6 days / week), with a 5-month lag
Electrical - Transformers	1 wagon per week*	2 wagons per week*	2 months starting June 2026
Electrical - Cables Containment	1 wagon per day	2 wagons per day	4 months (6 days / week) starting October 2026
Electrical - Cables Drums	1 wagon per day	2 wagons per day	9 months (6 days / week) starting January 2027
Electrical - HVAC - Building Services	2 wagon per week*	4 wagons per week*	5 months starting February 2027
Workforce (Civil)	150 cars per day**	300 cars per day**	23 months
Workforce (Structural)	50 cars per day**	100 cars per day**	19 months, with a 4-month lag
Workforce (Mechanical)	216 cars per day**	432 cars per day**	24 months, with a 5-month lag
Workforce (Electrical)	120 cars per day**	240 cars per day**	19 months, with a 10-month lag

* Assessment will assume 1 wagon (2 two-way) per day to be robust.

** Assumes car occupancy of 2 per car.

- 1.32 The above construction movements have been plotted on a Construction Time Frame Chart in **Appendix A**. This demonstrates that the worst case 12-month period is that of December 2025 to November 2026 where an estimated average of 1,036 daily two-way PCU movements (131 two-way daily HGVs and 775 two-way daily cars) will be generated.
- 1.33 **Table 4** below presents the proportion of construction workers anticipated to arrive and depart during the peak periods. This assumes 25% of construction workers will arrive before 07:00 (a large proportion of staff will start work at 07:00). It also assumes 16% of construction workers will depart before 16:00 and 7% of construction workers will depart after 19:00 because of the anticipated arrival times and shift patterns (20% 8-hour days, 75% 10-hour days and 5% 12-hour days).

Table 4 – Construction Workers Arrival / Departure Proportions

Staff Arrival and Departure Times	Arrive		Depart	
	07:00-08:00	55%	16:00-17:00	22%
	08:00-09:00	15%	17:00-18:00	42%
	09:00-10:00	5%	18:00-19:00	13%

- 1.34 The estimated construction workforce trip generation during the construction peak hours of 07:00-08:00 and 17:00-18:00 is summarised in **Table 5** below. It should be noted that the construction peak hours of 07:00-08:00 and 17:00-18:00 will be assessed as part of the TA.

Table 5 – Construction Workers Trip Generation Estimates

Workforce (PCU)	AM Arrivals	AM Departures	PM Arrivals	PM Departures
	213	0	0	164

- 1.35 The total daily number of HGVs have been divided equally across a typical 10-hour construction working day to estimate the number of HGV moments during the peak hours. This estimation has been converted to PCU, as summarised in **Table 6** below.

Table 6 – HGV Construction Trip Generation Estimates

HGV (PCU)	AM Arrivals	AM Departures	PM Arrivals	PM Departures
	13	13	13	13

- 1.36 The total trip generation estimates during the construction peak hours associated with the proposed construction of the development is summarised in **Table 7** below.

Table 7 – Total Construction Trip Generation Estimates

Total (PCU)	AM Arrivals	AM Departures	PM Arrivals	PM Departures
	226	13	13	177

Trip Distribution

- 1.37 As previously requested/agreed, all HGVs will be routed via the M4 Junction 38, and not through Port Talbot, controlled through the implementation of a Construction Traffic Management Plan. In addition, the previously agreed construction worker distribution, based on a 60-minute drive time gravity model is proposed to be used. Agreement on this position is sought from NPTC.

Traffic Assignment

- 1.38 The construction traffic trip generation estimates associated with the proposed development will be assigned to the network using the previously mentioned distribution methodologies.

Capacity Assessment Scenarios

- 1.39 As detailed earlier, given that the operational phase of the proposed development will result in a significant reduction in traffic movements when compared to the established baseline position and when having regard to the previous agreement reached with NPTC/WG, no capacity assessments are proposed to be undertaken of the operational phase due to the overall betterment from a highway perspective. Notwithstanding this, the reduction in flows associated with the coal and scrap metal deliveries etc. (i.e. the interim baseline) will be quantified. Agreement on this position is sought from NPTC.
- 1.40 It is proposed that the following scenarios are assessed in the TA and agreement on this position is sought from NPTC:
- Established Baseline 2026 = 2022 traffic surveys (when site was fully operational – before coal yard and coke ovens ceased) plus growth to 2026 plus committed development.
 - Construction Phase = Established Baseline 2026 minus reduction in traffic associated with coal and scrap metal deliveries plus construction traffic impact.

TA Structure

- 1.41 The proposed structure of the TA is set out below:-

- **Existing Conditions** – a detailed description will be provided of the site location, surrounding area, local highway network, existing traffic conditions and 5-year road safety record;
- **Proposed Development** – a detailed description will be provided of the proposed development including the access strategy, servicing and car parking arrangements;
- **Accessibility** – the location of the site with regard to the existing local sustainable transport infrastructure will be reviewed / assessed;
- **Future Baseline Traffic Conditions** - the future baseline traffic conditions on the local highway network in relation to committed development traffic flows and traffic growth will be identified, in line with the approach detailed earlier in this note;
- **Trip Generation and Distribution** – estimates of the number of trips generated by the development along with their distribution and assignment will be provided, in line with the approach detailed earlier in this note; and
- **Highway Impact** – assessments will be undertaken of all the junctions within the TA study area, as shown on **Figure 1** earlier.

1.42 SCP welcome NPTC's comments/acceptance of the proposed scope of the TA as previously agreed.

S|C|P

APPENDIX A

Two-Way Vehicles Per Day (Worst Case)	2025					2026												2027											
	August	September	October	November	December	January	February	March	April	May	June	July	August	September	October	November	December	January	February	March	April	May	June	July	August	September	October	November	December
EXCAVATED MATERIAL	122	122	122	122	122	122																							
IMPORTED FILL		40	40	40	40	40	40																						
CONCRETE	70	70	70	70	70	70	70	70	70	70	70	70	70	70	70	70													
REINFORCEMENT	2	4	4	4	4	4	4	4	4	4	4	2	2	2	2	2													
FORMWORK	8	8	2																										
PILING PRE CAST	12	12	12	12	4																								
PILING BORED INSITU	2																												
PILING (RIGS)	2																												
SHEET PILING	6	6																											
BOLTS / EMBEDDED STEEL etc			2	2	2	2	2	2	2	2	2	2																	
STRUCTURAL					4	4	4	4	4	4	4	4	4	2															
CLADDING							2	2	2	2	2	2	2	2															
RAIL TRACK						4																							
ASPHALT				10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10					
ROAD KERBING			4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4						
SITE CABINS	6	6	6																										
MECHANICAL						12	12	12	12	12	12																		
ELECTRICAL - TRANSFORMERS											2	2																	
ELECTRICAL - CABLES CONTAINMENT															2	2	2	2											
ELECTRICAL - CABLES DRUMS																		2	2	2	2	2	2	2	2	2			
ELECTRICAL - HVAC - BUILDING SERVICES																			2	2	2	2	2						
WORKFORCE (CIVIL)	80	160	200	300	300	300	300	300	300	300	300	300	300	300	160	100	50	40	10	10	10	10	10						
WORKFORCE (STRUCTURAL)					40	70	100	100	100	100	100	100	100	100	80	80	60	60	40	10	10	10	10						
WORKFORCE (MECHANICAL)						100	200	432	432	432	432	432	432	432	432	432	432	432	432	432	432	432	432	150	100	40	40	40	
WORKFORCE (ELECTRICAL)											20	40	80	160	240	240	240	240	240	240	240	240	240	240	160	80	40	40	
TOTAL HGV	230	268	262	264	260	272	148	108	108	108	110	96	92	90	88	88	16	18	18	18	18	18	18	12	2	2	0	0	
TOTAL CAR	80	160	200	300	340	470	600	832	832	832	852	872	912	992	912	852	782	772	722	692	692	692	692	390	260	120	80	80	
TOTAL PCU	540	696	724	828	860	1014	896	1048	1048	1048	1072	1064	1096	1172	1088	1028	814	808	758	728	728	728	728	414	264	124	80	80	

Briefing

EAF Project Sustainability and GHG Emissions

April 2024

1. Introduction

Turley has been appointed to provide sustainability services for the proposed EAF project. There are three main elements to the work:

- Sustainability Statement
- EIA Climate Change Chapter
- Informing broad communication around sustainability and GHG emission changes in particular

2. Policy

A policy review was carried out as part of the previous project and the following were considered relevant, albeit in some cases needing information from other disciplines:

- UK Net Zero 2050 targets
- Net Zero Wales
- Future Wales: The National Plan
- Well-being of Future Generations Act
- Planning Guidance TANs
 - TAN5 – Nature Conservation and Planning (September 2009)
 - TAN11 – Noise (October 1997)
 - TAN12 – Design (March 2016)
 - TAN15 – Development and Flood Risk (April 2004)
 - TAN18 – Transport (March 2007)
 - TAN21 – Waste (February 2017)
 - TAN23 – Economic Development (February 2014)
 - TAN24 – The Historic Environment (May 2017)
- NPT County Borough LDP – (2011-2026)
 - Policy SP1 – Climate Change
 - Policy SP2 – Health
 - Policy SP3 – Sustainable Communities
 - Policy SP4 – Infrastructure
 - Policy SP5 – Development in the Coastal Corridor Strategy Area
 - Policy SP6 – Development in the Valleys Strategy Area
 - Policy SP11 – Employment Growth

- Policy EC2 – Existing Employment Areas
- Policy EC3 – Employment Area Uses
- Policy EC4 – Protection of Existing Employment Uses
- Policy TO4 – Walking and Cycling Routes
- Policy SP14 – The Countryside and the Undeveloped Coast
- Policy SP15 – Biodiversity and Geodiversity
- Policy SP16 – Environmental Protection
- Policy SP17 – Minerals
- Policy EN6 – Important Biodiversity and Geodiversity Sites
- Policy EN7 – Important Natural Features
- Policy EN8 – Land Stability
- Policy SC1 – Settlement Limits
- Policy M1 – Development in Mineral Safeguarding Areas
- Policy I1 – Infrastructure Requirements
- Policy OS1 – Open Space Provision
- Policy SP16 – Environmental Protection
- Policy EN8 – Pollution and Land Stability
- Policy SP18 – Renewable and Low Carbon Energy
- Policy SP19 – Waste Management
- Policy SP20 – Transport Network
- Policy SP21 – Built Environment and Historic Heritage
- Policy TR2 – Design and Access of New Development
- Policy W3 – Waste Management in New Development
- Policy BE1 – Design
- Policy RE2 – Renewable and Low Carbon Energy in New Development

3. Approach

Sustainability Statement

The Sustainability Statement will be developed in collaboration with the broader team addressing the policy issues. The main work at this stage is to work with Tata to develop the change in greenhouse gas emissions.

Tata and Turley have met to discuss the proposals and calculations around GHG emissions. The Planning policy on the issue does not set any specific targets, but the importance of demonstrating the substantial GHG emissions reductions the project will deliver.

- Review Tata data – Initial data has been provided
- Discuss mitigation opportunities
- Agree the methodology for calculation, which will vary for the Sustainability Statement, EIA CCC and public communications.
- Undertake calculations and produce specific outputs for each of the uses with explanation

EIA Climate Change / GHG Emissions

The proposed approach to considering climate change / GHG effects as part of the EIA and reporting in the Sustainability Statement is to establish its net GHG effect and its contribution to NPT, Wales and UK

net zero trajectories in line with IEMA's EIA Guide to Assessing GHG Emissions & Evaluating their Significance (2022).

This will comprise an estimate of GHG emissions during demolition and construction, and a more detailed assessment of operational GHG emissions / savings, to derive the project's net GHG effect over a given timeframe.

These GHG emissions and savings will be reported in the context of baseline emissions at the Site, NPT, Wales and UK levels, future carbon budgets set for Wales and the UK and proposed for NPT, as well as UK Government's projections of GHG saving from the electrification of steel production set out in the Carbon Budget Delivery Plan (2023).

A conclusion of significant beneficial climate change / GHG effect is anticipated.

Turley Sustainability will also coordinate with other relevant team specialists (flood risk, drainage, ecology etc) regarding the consideration of climate resilience for the ES in line with IEMA's EIA Guide to Climate Change Resilience and Adaptation (2020).

Communications

The project's high profile data from the GHG emissions analysis will feed into communications on the project for other aspects of the Planning submission and in public. Presenting the data is complicated by emission factors used, timelines, what is included in the calculation and other factors.

Our work will ensure there is reasonable transparency, subject to commercial sensitivity, on the process and consistency in what is being communicated in this area.

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17 MAJOR ACCIDENTS AND DISASTERS

Introduction

- 17.1 Regulation 4(2) of the Town & Country Planning EIA (Wales) Regulations 2017 requires that the EIA must include ‘the expected effects deriving from the vulnerability of the proposed development to risks of major accidents and disasters that are relevant to that development’.
- 17.2 Regulation 17(3) additionally requires in Schedule 4 ‘Information for inclusion in environmental Statements... A description of the likely significant effects of the development on the environment resulting from, inter alia—...the risks to human health, cultural heritage or the environment (for example due to accidents or disasters); ...’.
- 17.3 Pursuant to these regulations the purpose of this scoping note is to set out the proposed methodology for the assessment of potentially significant risks to the environment associated with the vulnerability of the Proposed Development to major accidents and disasters.
- 17.4 This requirement is interpreted as requiring the consideration of low likelihood / high consequence events which would result in serious harm or damage to environmental receptors. This includes accidents or disasters originating from a Proposed Development as well as external events (man-made or natural).
- 17.5 In considering the potential for significant effects from the Proposed Development as a result of accidents and disasters, it is important to note that the UK already has a structured framework of risk management legislation in place. Vulnerability to major accidents and / or disasters for infrastructure and other built environment developments is covered by a wide range of other safety and non-safety-related legislation. The mitigation in place is generally sufficient to manage vulnerabilities to major accidents and / or disasters without the need for secondary mitigation in most circumstances.

Relevant Guidance

- 17.6 There is no statutory guidance for the assessment of major accidents and disasters as an EIA topic, however an advice note produced by the Institute of Environmental Management and Assessment (IEMA) entitled Major Accidents and Disasters in EIA: A Primer (IEMA, 2020) provides guidance based on current EIA practice within the UK.
- 17.7 Key definitions relevant to the topic are as follows:
- A **major accident** is an event (for instance, train derailment or major road traffic accident) that threatens immediate or delayed serious environmental effects to human health, welfare and/or the environment and requires the use of resources beyond those of the client or its appointed representatives (i.e. contractors) to manage. Major accidents can be caused by disasters resulting from both man-made and natural hazards; and

- A **disaster** is a man-made/external hazard (such as an act of terrorism) or a natural hazard (such as an earthquake) with the potential to cause an event or situation that meets the definition of a major accident.
- 17.8 The IEMA Primer identifies that consideration be given to whether a Proposed Development has a vulnerability to major accidents and/or disasters and to consider whether the development alone or in conjunction with an externally driven incident could cause or result in a significant effect.
- 17.9 In line with general EIA practice on the assessment of major accidents and hazards; the following are excluded from the scope of major accidents and disasters assessment:
- Events that have a high likelihood of occurring and that would be of high consequence: these events would be high risk and would be considered unacceptable for any development and would be required to be designed out;
 - Low-impact events whatever the likelihood, such as minor spills: these would be of low risk and would be dealt with under environmental management systems; and
 - Occupational health and safety (risks to construction and operational workers). Various legislation is in force to ensure the protection of workers in the workplace including the CDM 2015 Regulations; The Management of Health and Safety at Work Regulations (1999); The Workplace (Health, Safety and Welfare) Regulations 1992; and Health and Safety at Work etc. Act 1974 (HSWA).
- 17.10 An assessment of major accidents and hazards should focus on low likelihood but potentially high consequence events.
- 17.11 The IEMA Primer notes that in order for there to be potential for major accidents and / or disasters to occur there needs to be an impact pathway applying the source ⇒ pathway ⇒ receptor model. Similarly major accidents and/or disasters can be scoped out of the EIA as a standalone Environmental Statement (ES) chapter if it can be clearly demonstrated that all possible major accidents and / or disasters are adequately covered elsewhere in the assessment or are covered by existing design measures or compliance with legislation and best practice.
- 17.12 Other factors of EIA being assessed elsewhere within the EIA already cover lower magnitude risks of the Proposed Development to human health, cultural heritage or the environment. For example, ES chapters are proposed for Socio Economics and Health, Ecology Landscape and Visual Impact, Air Quality and Odour, Noise and Vibration, Biodiversity, Surface Water, Flood Risk and Drainage, Ground Conditions, Cultural Heritage, Traffic and Transport, Climate Change, Daylight Sunlight and Overshadowing (if required) and Waste (if required). As required by the EIA regulations the interaction between the factors of the environment will also be assessed in the EIA. These assessments are based on an assessment of current baseline conditions, but will also consider potential for risk of significant effects to receptors associated with future baseline conditions, such as a change in carrying capacity of the natural environment or changing climatic conditions.

Statutory Requirements Affecting the Existing Site (Baseline Conditions)

- 17.13 The UK's National Risk Register of Civil Emergencies (2020) provides an overview of the key risks that have the potential to cause significant disruption in the UK. These risks include consideration of environmental hazards such as flooding and severe weather, and major industrial accidents.
- 17.14 At a local level, the NPTCBC Local Risk Register highlights risks that could impact on the local area. Potential risks include industrial accidents, transport accidents and severe weather. NPTCBC is a partner in the South Wales Local Resilience Forum (SWLRF). The Forum is made up of organisations working together to ensure that preparations and plans are in place to respond to emergencies.
- 17.15 At a site level, the existing Tata steelworks site is a Control of Major Accident Hazard (COMAH) Upper Tier site. This is due primarily to gas storage on site for the blast furnaces. The COMAH Regulations 2015 implement Directives 96/82/EC and 2003/105/EC on the control of major accident hazards involving dangerous substances. The aim of the COMAH Regulations is the prevention of major accidents and limitation of their consequences for people and the environment. The competent authority for the purposes of the COMAH Regulations in Wales is the Health and Safety Executive (HSE) and Natural Resources Wales.
- 17.16 Under the COMAH Regulations, the applicant is required to:
- Take all measures necessary to prevent major accidents and limit their consequences for persons and the environment;
 - Prepare an on-site emergency plan;
 - Demonstrate to the competent authority that all measures necessary to comply with the COMAH Regulations are in place; and
 - Notify any major accidents to the competent authority.
- 17.17 The applicant is obliged to hold and maintain a 'Safety Report' for the current site under the COMAH Regulations. The Port Talbot Safety Report (2018) sets out evidence to confirm the safety and integrity of the activities within the Port Talbot site. One of the requirements of the Safety Report is to describe on-site and off-site resources which can be mobilised by the operator to show that the necessary measures have been taken to limit the consequences of a major accident to people and the environment.
- 17.18 The arrangements and guidance for emergency arrangements for environmental incidents / scenarios are outlined in an Environmental Contingency Plan (ECP) / Environmental Emergency Plan (EEP) which documents the steps to be taken in the event of an incident that has the potential to cause environmental harm. The ECP / EEP also describes general guidelines for evaluation of significance and identifying the appropriate level of action and communications that should be adopted in the event of an incident. In addition to this, a Major Emergency Plan (MEP) and Local Emergency Plans (LEP) are in place as part of emergency planning and require liaison and interface with local authority services.
- 17.19 The existing steel works is also covered by an Environmental Permit (EPR/BL7108IM).

Statutory Requirements affecting the Proposed Development

- 17.20 With the Proposed Development the site may continue be a upper tier COMAH site. Where this is the case, Safety Report requirements will still apply.
- 17.21 As part of the project, studies will also be undertaken to determine whether Hazardous Substances Consent (HSC) may be required for the Proposed Development under the Planning (Hazardous Substances Regulations) 2015.
- 17.22 The Proposed Development will also require a new Environmental Permit. The environmental permitting process aims to protect the environment and to ensure best practice in the operation of regulated facilities. Emergency response plans and contingency measures will be a requirement of the Environmental Permit.
- 17.23 Various risk management legislation will also apply to the Proposed Development including the CDM Regulations 2015. As part of the detailed project design, risk assessments will be undertaken including hazard identification studies (HAZID) and hazard and operability studies (HAZOP) to ensure that potential hazards are recorded and actioned in order that they can be avoided, mitigated or highlighted for further risk reduction measures during detailed design.
- 17.24 The Applicant has a number of internal standards relating to safety risk management which will apply to the Proposed Development. These include a standard on 'Process Safety Risk Management' which commits the company to a high level of performance with regard to Major Accident Hazard control, such that all reasonably practicable measures are taken to prevent major accidents involving dangerous substances and to limit their consequences to people and the environment. The applicant's 'Major Accident Prevention Policy' recognises that the nature of the applicant's activities could give rise to major accident hazards for employees, contractors, visitors, members of the public, and the natural and built environment, and details obligations that will apply to the Proposed Development.

Conclusion

- 17.25 The potential for major accidents and disasters is actively managed on the site to comply with the aforementioned regulations. Reports and consents that will be required for the Proposed Development include updates to the Safety Report and ECP/EEP, a Hazardous Substances Consent (if required), an Environmental Permit (including emergency response plans), and CDM requirements (HAZID and HAZOP).
- 17.26 Given these statutory requirements are intrinsic to the design and operation of the Proposed Development, and in accordance with the EIA Regulations, it is proposed that a statement is provided in the ES setting out the measures proposed for the management of vulnerabilities to major accidents and / or disasters. They would include reference to relevant parts of the ES or planning application where lower magnitude risks of the Proposed Development to human health, cultural heritage or the environment are addressed. In the interest of proportionality it is therefore proposed that major accidents and / or disasters is scoped out of EIA as a standalone ES chapter.

14 SOCIO-ECONOMICS

Introduction

- 14.1 Regulation 4(2) of the Town & Country Planning EIA (Wales) Regulations 2017 requires that the EIA '*must identify, describe and assess... the direct and indirect significant effects of the Proposed Development on [inter alia]... population and human health...*'. The Regulation goes on to set out the other factors, and that the EIA must include '*the interaction between the factors*'...
- 14.2 The purpose of this scoping note is to set out the proposed methodology for the assessment of potential effects on the population resulting from the Proposed Development.
- 14.3 As set out within the EIA draft scoping note relating to the topic of 'Human Health', the topic of 'Population' may be assessed separately or in combination with 'Human Health' factors, as set out below:
- Where Population is assessed *separately* as a factor, there is greater emphasis on socio-economic impacts, such as employment, education or crime.
 - Where Population is assessed *in combination* with Human Health factors, this concerns the impact on health outcomes of the population as a group sharing certain characteristics, including their distribution.
- 14.4 Population is to be considered separately from Human Health within the EIA.
- 14.5 A separate assessment focusing on Human Health impacts is being prepared in relation to the Proposed Development. Nevertheless Human Health is being presented alongside socio-economics in a Socio-economics and Health ES chapter, so there will be some overlap in the baseline.
- 14.6 This EIA chapter focuses on socio-economic impacts in relation to the Proposed Development. As such, 'Socio-economics' is considered the relevant overarching term that suitably describes the range of potential social and economic impacts of the Proposed Development on population groups and communities.
- 14.7 Socio-economics as an EIA topic evaluates the positive and negative impacts of a Proposed Development on the social and economic environment (Glasson, Therivel and Chadwick, 1994). It is considered that relevant socio-economic factors for consideration within EIA can include effects such as those related to employment opportunities and access to infrastructure and services (e.g. housing, health, education). Community structures, life-styles and values may also be affected (Glasson, Therivel and Chadwick, 1994).

Legislation and Policy Context

- 14.8 Whilst published guidance advises on potential nature of socio-economic effects that can be generated by development (as identified above), there is no statutory guidance setting

out the means by which to assess the potential socio-economic impacts of a development.

- 14.9 The socio-economic assessment will be based on nationally recognised best-practice methodological guidance and will draw on a number of reputable data sources. Relevant guidance includes the UK Government's Homes and Communities Agency's (HCA, the body now known as Homes England) 'Additionality Guide (HCA, 2014)¹. Statistical evidence published by organisations such as the office for National Statistics (ONS) is also of particular relevance to the assessment of economic impacts.
- 14.10 Further details regarding the methodology and application of data and guidance are set out below under 'Preliminary Baseline Conditions' and 'Proposed Scope and Methodology of Assessment'.
- 14.11 In addition, reference is made to relevant national and local legislation and policy relating to socio-economics and development, including:
- Future Wales: The National Plan 2040 published by Welsh Government in February 2021 (FW).
 - Neath Port Talbot County Borough Council Local Development Plan 2011-2026 adopted in January 2016 (LDP).
 - Planning Policy Wales Edition 12 published by Welsh Government in February 2024 (PPW).

Preliminary Baseline Conditions

Existing socio-economic profile

- 14.12 The existing socio-economic context of the local area surrounding the Proposed Development is profiled using publicly-available data. This provides a baseline of the socio-economic characteristics of the local population against which the potential for significant socio-economic impacts can be assessed.
- 14.13 The baseline data takes account of relevant local (Neath Port Talbot), sub-regional (Neath Port Talbot, Swansea and Bridgend) and national (Wales and wider UK) statistics taking account of the current conditions (i.e. the steelworks as they currently operate).
- 14.14 In defining appropriate study areas, consideration is given to the geographical scale of publicly available socio-economic statistics. Whilst statistics in relation to some socio-economic characteristics – such as that sourced from the ONS's 2021 Census and Business Register and Employment Survey (BRES) – are available at the 'Lower Super Output Area'² scale, the nature of labour markets and the existing operations at the Site and the Proposed Development means that the local socio-economic profile (and

¹ Note that whilst the UK Government advises that this guidance has been officially "*withdrawn as it is no longer current*" (on the basis that "*the Homes and Communities Agency now operates as Homes England*"), this remains the most suitable published UK guidance regarding best-practice for modelling economic net additionality.

² LSOAs are a geographic hierarchy designed for the reporting of statistical data in England and Wales. They comprise between 400 and 1,200 households and have a usually resident population between 1,000 and 3,000 persons.

subsequent assessment of effects) primarily focuses on Neath Port Talbot local authority as a whole, as well as the wider national baseline context.

14.15 Relevant data sources to inform the establishment of the baseline include:

- Local authority ONS data (including publications related to employment skills and training, such as: 2021 Census; BRES; Claimant Count; Jobseekers Allowance by Occupation).
- Welsh Government data (including publications related to employment, skills and training).
- Extant and emerging local plans and any associated employment, skills and training evidence base documents and/or 'topic papers'.
- Data regarding local expenditure trends (sourced from organisations such as Experian).

14.16 Data on baseline levels of employment on site (direct) along with supply chain expenditure will be sourced from the Applicant.

Proposed Scope and Methodology of Assessment

Impact Areas

14.17 The socio-economic baseline as described above is based on defined areas, termed the Local Impact Area (LIA, Sub-Regional Impact Area (SRIA), Wider Impact Area (WIA) as well as the UK as a whole.

14.18 The LIA is based on the administrative boundary of Neath Port Talbot County Borough Council (NPTCBC), recognising local labour market geographies and the scale at which relevant statistical data is reported. This baseline is then used to identify and assess impact 'pathways' and 'receptors' (discussed in more detail below) as a result of the Proposed Development on local socio-economic outcomes.

14.19 The SRIA constitutes the area of high labour force containment comprising the local authority areas of NPTCBC, the City and County of Swansea Council (CCSC) and Bridgend County Borough Council (BCBC).

14.20 The WIA is based on the country of Wales; it is considered that the majority of direct socio-economic effects will be contained therein. Effects at the scale of the UK as a whole are also presented so as to ensure that the full scale of impacts are captured within the assessment.

Consultation

14.21 A consultation meeting is proposed with the relevant officer(s) at NPTCBC in order to confirm the scope of the assessment, and to finalise the list of potential socio-economic impacts that should be considered within the ES chapter. This meeting will ensure that the key socio-economic issues and priorities of the local area are understood and considered throughout the assessment process.

Describing and assessing socio-economic impacts

- 14.22 Potential for impacts with regard to socio-economics are assessed by judging likely outcomes with respect to relevant socio-economic effects, in conjunction with site-specific conditions and the local baseline context. This judgement applies the source ⇒ pathway ⇒ receptor model. Only where there is potential for a pathway between an impact (a change in baseline conditions) and a likely socio-economic outcome (on the local population i.e. the receptor), will an impact pathway be considered possible.
- 14.23 There are various pathways to impacts on socio-economic outcomes which may be controlled or influenced by other factors or decisions made, as the impact pathway may be indirect or complex. Nevertheless, for the purpose of EIA a judgment of the potential of individual impact pathways is useful as it helps to break down some of the complexity and allows for a proportionate assessment of the likelihood of significant effects as required by the EIA Regulations.
- 14.24 Best practice and methodological guidance will be drawn upon as appropriate to inform key elements of the assessment, including the HCA Additionality Guide. With regard to quantifiable effects (such as number of jobs), net additional economic impacts will be presented where possible, accounting for a range of economic additionality factors such as leakage³, displacement⁴ and multiplier⁵ effects.
- 14.25 The sensitivity of receptors will be determined by way of observed change in receptors locally compared to local and national trends. Through observation of a receptor's capacity for change relative to wider comparator areas and/or national standards, the sensitivity of receptors locally will be observed. Consideration will also be given to the priority attributed to specific receptors in strategy and policy terms, particularly in the case of qualitative receptors and those where quantitative evidence is not available. The assignment of sensitivity will be based on professional judgement.
- 14.26 Once the sensitivity of the receptor has been identified, the change attributable to the Proposed Development will be benchmarked against the observed rate of change in the corresponding socio-economic baseline context. This will allow a relative assessment of the magnitude of change that is attributable to the Proposed Scheme to be conducted.
- 14.27 The assessment of likely significant effects to sensitive receptors will consider the sensitivity of the receptor and the magnitude of change to determine the level of beneficial or adverse effect. Significant effects will be determined following this process through application of professional judgment.

³ 'Leakage' is defined by the HCA Additionality Guide as "*The proportion of outputs that benefit those outside of the intervention's target area or group*". For example, the number of jobs which would be held by those living outside of the respective impact areas.

⁴ 'Displacement' is defined by the HCA Additionality Guide as "*The proportion of intervention outputs/outcomes accounted for by reduced outputs/outcomes elsewhere in the target area*".

⁵ 'Multipliers' are defined by the HCA Additionality Guide as "*Further economic activity (jobs, expenditure or income) associated with additional local income and local supplier purchases*".

Limitations and Assumptions

14.28 To ensure transparency within the EIA process, the following limitations and assumptions have been identified:

- The assessment is desk-based and therefore reliant on data and information obtained from a variety of official published sources (including the ONS, NPTCBC and the Welsh Government). No further verification of these sources will be undertaken (unless otherwise stated in the ES). Each data source has methodological limitations related to data collection and surveys only represent the socio-economic context at a specific point in time.
- Data on baseline scenarios and Proposed Development operational employment levels and supply chain expenditure will be supplied by the Applicant. Baseline scenarios will be defined as:
 - The 'established baseline' (i.e. the steelworks with 'heavy end' as operating in early 2024 and for the majority of the preceding 50+ years).
 - The 'interim baseline' (i.e. the steelworks as they will operate at the time of planning determination with closure of the 'heavy end').
- Where necessary, professional and realistic assumptions will be made and applied, such as those relating to the economic additionality factors of leakage, displacement and multiplier effects. These will be fully justified within the ES.

Potential impacts

14.29 **Table 14.1** below considers the potential for impact pathways for socio-economic effects and associated receptors in relation to the Proposed Development. This is informed by and reflects relevant guidance regarding the scoping of potential socio-economic effects (Glasson, Therivel and Chadwick, 1994).

Table 14.1. Potential for impact pathways on health outcomes associated with the Proposed Development.

Socio-economic effect	Potential impact pathway	Justification
Change in direct, indirect and induced employment during the interim stage	Yes	The Proposed Development will result in a change to the number of demolition/construction jobs supported at the Site during the interim stage. This will impact on the labour force as the relevant receptor.
Change in education, skills and training provision during the interim stage	Yes	The Proposed Development will result in a change to the provision of education, skills and training opportunities through demolition/construction during the interim stage. This will impact on the labour force as the relevant receptor.
Change in direct, indirect and induced employment during the operational (completed development) stage	Yes	The Proposed Development will result in a change to the number of operational jobs supported at the Site once the development is complete. This will

Socio-economic effect	Potential impact pathway	Justification
		impact on the labour force as the relevant receptor.
Change in employee expenditure during the operational (completed development) stage	Yes	The Proposed Development will result in a change to employee expenditure during the operational (completed development) stage. This will impact on businesses and the associated labour force as relevant receptors.
Provision of housing	N/a	The Proposed Development does not result in a change in the provision of housing.
Provision of local services	N/a	The Proposed Development does not result in a change in the provision of local services (health, education, police etc.)
Crime during the interim and operational (completed development) stages	N/a	The Proposed Development site is not publicly accessible. Security fencing will be erected during demolition/construction associated with the interim stage to ensure that the site is not publicly accessible. During subsequent operations (completed development), access will be permitted only to those with the relevant security clearances.

14.30 As noted above, the Proposed Development is considered likely to generate a number of Significant socio-economic effects.

14.31 It is therefore proposed that Socio-economics is scoped in to the EIA as an ES chapter.

Mitigation

14.32 Suitable and relevant mitigation (specific, as required, to each respective socio-economic effect) will be identified within the Socio-economics chapter. For example, it is understood that mitigation in relation to employment-related effects is likely to include support packages for affected employees, community programmes, skills training and job-seeking initiatives and these will be taken into consideration.

References

- Glasson, J., Therivel, R. & Chadwick, A. (1994). *Introduction to Environmental Impact Assessment*.
- Homes and Communities Agency. (2014). *Additionality Guide (4th Edition)*.