

Sustainability Statement and Energy Assessment

Land at Port Talbot Steelworks

October 2024



Turley
Sustainability

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1. Introduction

This Sustainability Statement has been prepared to demonstrate the sustainability of the Proposed Development at Port Talbot Steelworks.

It has been prepared by Turley Sustainability and ESG, on behalf of Tata Steel UK Ltd. (the applicant), to support the Hybrid 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.

This Sustainability Statement outlines the proposed sustainable design measures, primarily addressing environmental requirements set in the national and local planning policies, while other reports, such as the Environmental Impact Assessment (EIA), cover social and economic aspects of the Proposed Development.

1.1 Tata Steel UK, the Sustainability Champion

Steel has been crucial to the UK's economy for the past two centuries and will remain essential in the future, as the UK economy moves towards a model that is more circular, with near zero CO₂ emissions. Tata Steel UK, (TSUK) is the country's largest steelmaker and the only strip producer supporting advanced engineering sectors.

The company has pioneered several low-CO₂ steelmaking technologies at the global level (for example, the HIsarna smelting reduction technology) and has been active for many years within the steel sector's climate action programme,

supporting in the development of a global standard for reporting CO₂ emissions from steelworks and helping to develop harmonised methodologies for conducting life cycle assessment (LCA). Recognised as a 'Sustainability Champion' by *worldsteel*, TSUK is set to further reduce GHG emissions by moving from the blast furnace/basic oxygen steelmaking process to electric arc furnace (EAF) steelmaking through the Proposed Development.

Against the backdrop of the risks and opportunities arising from climate change, TSUK has responded with a comprehensive suite of actions to reduce its emissions, innovate in the products and services that will enable society to decarbonise and to disclose its performance, plans and progress to all interested parties.

In 2023, TSUK adopted a target to be net zero across the entire Group – including its European entities– by 2045. TSUK established in 2020 a target to reduce its direct emissions by 30% by 2030, compared to 2018, and has since announced the Proposed Development – a plan that will achieve a significant reduction in direct CO₂ emissions from the Port Talbot.

TSUK has set out its intent to establish a science-based target (SBT), which is a medium-term emissions reductions target consistent with the speed and extent of decarbonisation that the steel sector will need to make for the world to meet the 1.5°C goal of the Paris Agreement.

Recognising that the pre-existing methodology for the establishment of steel sector SBTs needed improvement, TSUK took a leading role in the Net Zero Steel Pathway Methodology Project (NZSPMP), a collaboration between steel sector organisations and NGOs. In July 2021, the NZSMP published a detailed report, laying out the foundations for the development of robust guidelines for steel sector

SBTs. The Science-Based Target Initiative (SBTi) subsequently commenced its own project to revise science-based target setting methodologies, tools and guidance for steel companies and other stakeholders. TSUK was represented on the Expert Advisory Group for this project. From November 2022 to January 2023, the SBTi held a two month-long public consultation for its Steel Sector Guidance and Tool, to ensure the criteria and guidance to support steel companies in their decarbonisation efforts are robust, clear, and practical.

TSUK has sought to take an active position in other global initiatives for decarbonisation of the sector and has played a substantial role in the Mission Possible Partnership's Net Zero Steel Initiative, which aims to inspire an accelerated transition to net zero for the steel sector, including essential innovation, investments, policy, and procurement decisions by the broader industry value chain. TSUK is also an active member of ResponsibleSteel™ and has a seat on its governance board.

TSUK is widely recognised for its expertise in LCA. Taking a supply chain perspective allows the organisation to demonstrate how improvements in material utilisation and right-first-time manufacturing can reduce emissions during the production phase. TSUK's LCA models allow it to consider the complete value chain, for instance the impact of the carbon intensity of regional grid electricity (gCO₂/kWh) on the carbon footprint of a vehicle or building. One platform for delivering the output from LCA is Environmental Product Declarations (EPD). EPDs are a recognised method of describing a product's whole life impact, backed by international standards. TSUK was the world's first steel manufacturer to operate an EPD programme and has now produced over one hundred individual EPDs. Along with quantified environmental information, they cover specific aspects of the product life cycle, from raw material extraction, manufacture, and fabrication through to use and end-of-life.

1.2 The Proposed Development

1.2.1 The Site

The site is located south of Port Talbot, bound to the south-west by the Bristol Channel, and to the east by Margam. The Network Rail Swansea to London mainline generally forms the eastern boundary, with some small areas of TSUK owned land between this and the M4 motorway, as shown in **Figure 1**.

Most of the site consists of developed areas used to support the current production of steel. It is currently a large integrated iron and steelmaking facility in which raw materials such as coal and iron ore are conditioned before being charged to blast furnaces where the iron ore is reduced to produce liquid iron. Iron is converted to steel in a basic-oxygen furnace, where relatively small volumes of steel scrap are also recycled. These developed areas contain existing buildings and structures, hardstanding storage areas and infrastructure such as access roads and a rail corridor to the south-east.

To the south of the site is an area of undeveloped open fields, which forms the northern part of the Margam Moors Site of Special Scientific Interest (SSSI).

1.2.2 Proposed Development

The following statement describes the Proposed Development for which planning permission is being sought:

"Full planning permission for the demolition of existing buildings and structures, partial infill of the BOS lagoon, and construction of a new electric arc furnace-based steel production facility (1 no. arc furnace, 2 no. ladle furnaces). The development includes chemical/material storage and transfer infrastructure, pipework and cabling (above and below ground), buildings, fume and dust treatment plant, water treatment facility and material handling systems, electrical control rooms and power infrastructure, offices and ancillary facilities, together with new and amended roads and rail lines,

landscaping and green infrastructure, lighting, hardstanding, CCTV, drainage and associated engineering operations.

Outline planning permission (with all matters reserved except for access and landscaping) for the construction of a scrap metal handling facility and associated scrap yards, scrap processing facility, new substation, underground and overground electrical infrastructure, and new and amended roads and rail lines, landscape and green infrastructure, lighting, hardstanding, CCTV, drainage and associated engineering operations.”

Figure 2 shows the proposed master plan for the Proposed Development.

1.3 Document Structure

Chapter 2 of this Statement sets out the local and national sustainability planning objectives.

Chapter 3 provides a review of the sustainability measures that are proposed during the construction and operation of the Proposed Development.

Chapter 4 summarises the sustainability performance of the Proposed Development and how this accords with planning policy.

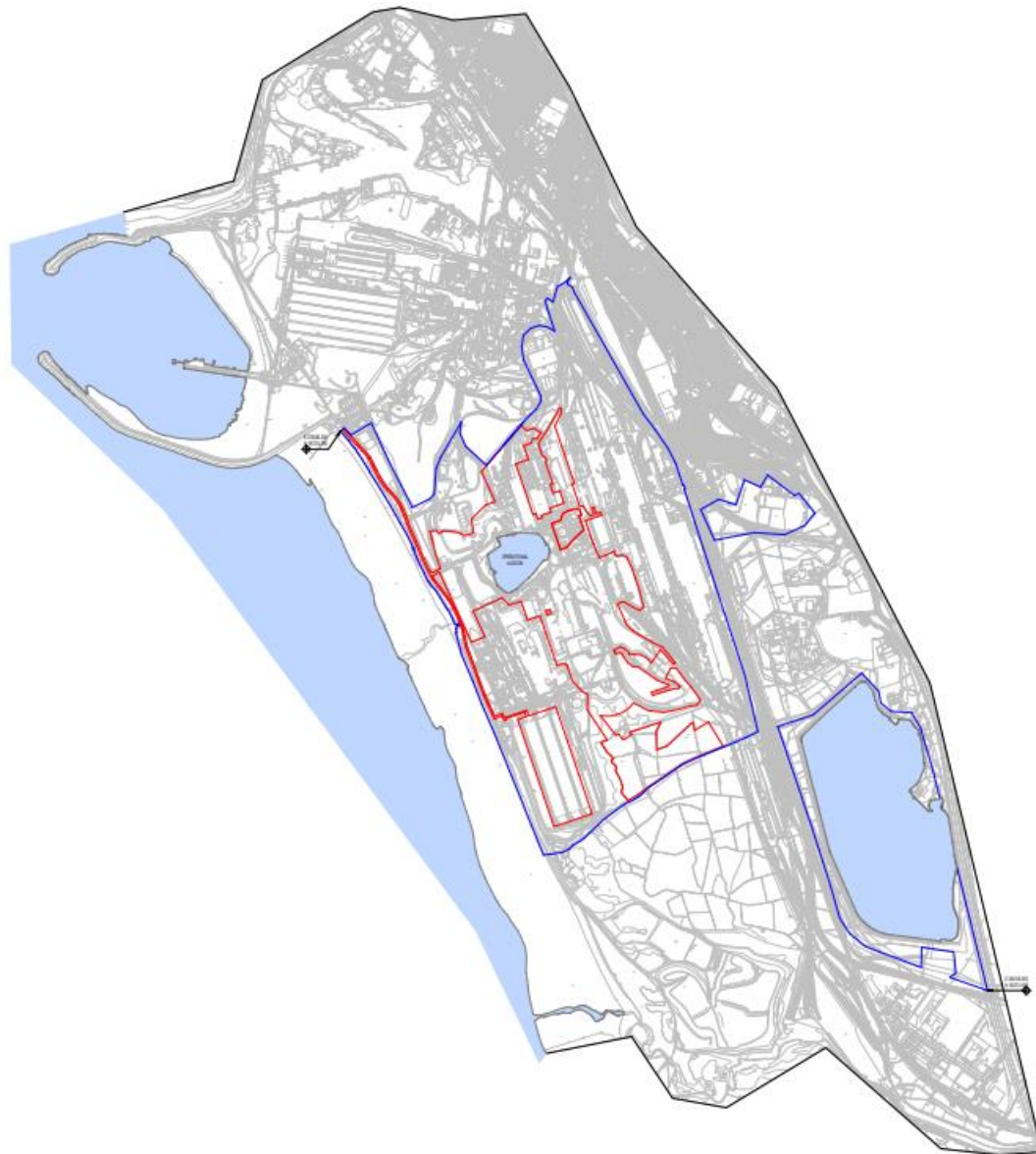
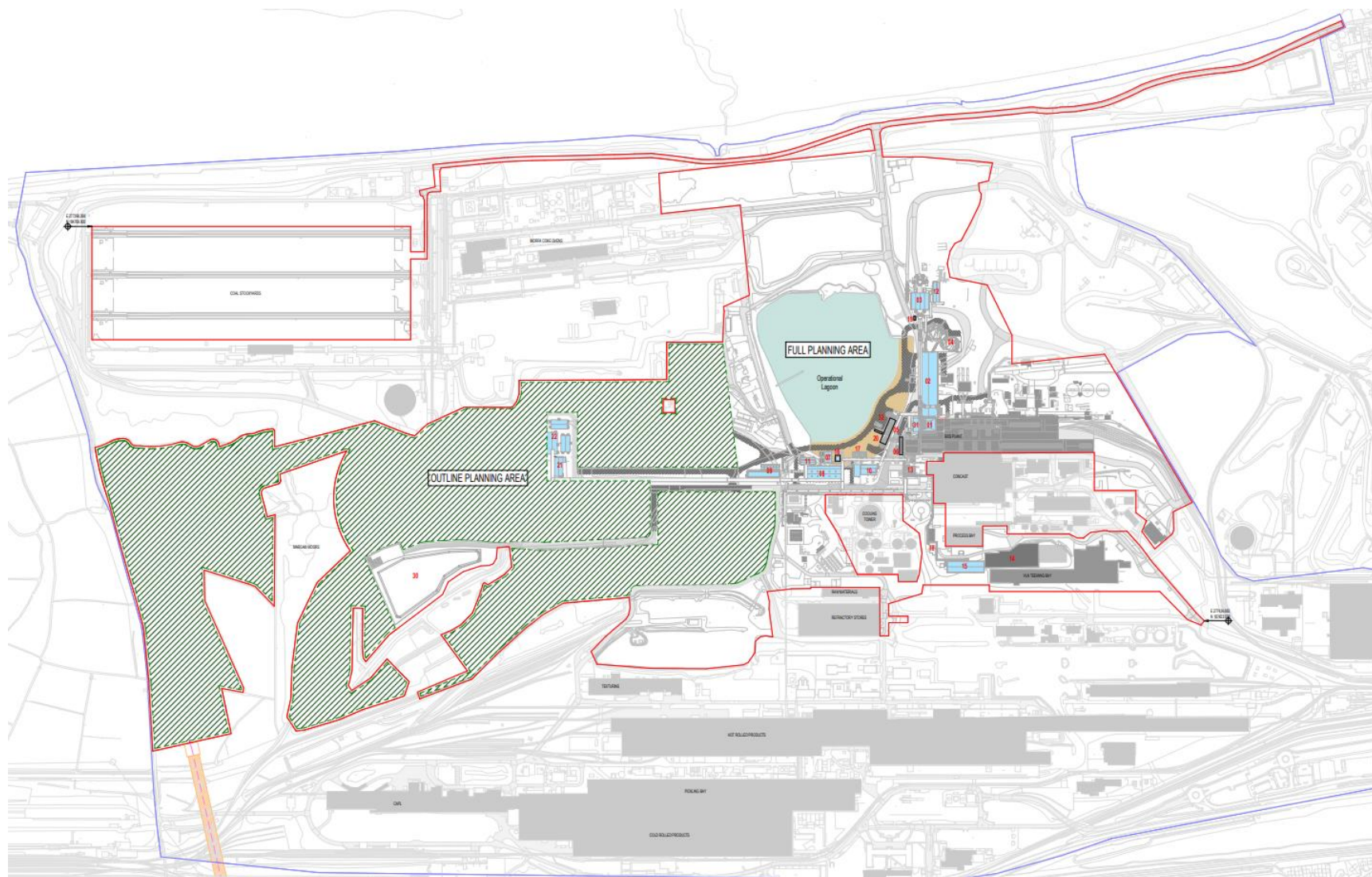


Figure 1: Site Location (Source: Lawray Architects)



 Proposed Planning Boundary
 Other Land Under the Control of the Applicant

2. Policy Context

This chapter provides an overview of the relevant sustainability planning policy and guidance from a national and local perspective.

2.1 Introduction

This chapter sets out the planning policy context relating to sustainable design and construction at the national and local authority levels.

2.2 National Policy and Legislation

2.2.1 Planning Policy Wales

Planning Policy Wales (PPW)¹, issued in 2024, outlines land use planning policies to ensure the planning system supports sustainable development and the well-being of future generations.

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

It integrates social, economic, environmental, and cultural well-being into planning decisions:



Social and cultural Well-being: The policy requires compliance with the Well-being of Future Generations Act, which mandates the pursuance of sustainable development by considering long-term impacts and integrating various aspects of well-being. Developments must align with the seven well-being goals outlined in the Act, promoting a resilient and globally

responsible Wales.



Economic: The policy emphasizes sustainable building design, requiring developments to incorporate high energy performance and decarbonisation measures. Planning authorities are encouraged to require energy reports for major developments, detailing energy efficiency measures and the incorporation of renewable technologies.



Environmental: The policy mandates reducing energy demand and increasing energy efficiency, promoting the use of renewable and low carbon energy sources, with targets such as generating 70% of electricity consumption from renewable sources by 2030. It also requires the sustainable management of natural resources, enhancing ecosystem resilience and minimising environmental risks.

2.2.2 The Well-being of Future Generations Act

The Well-being of Future Generations (Wales) Act² 2015 aims to enhance Wales's economic, social, environmental, and cultural well-being through sustainable development. It sets seven well-being goals, including creating a prosperous, resilient, healthier, and more equal Wales, fostering cohesive communities, vibrant culture, and global responsibility.

Public bodies must adopt long-term thinking, integrating their actions to balance immediate needs with future impacts. They should involve diverse populations in decision-making, collaborate to find sustainable solutions and focus on preventing problems by addressing root causes.

¹ [Planning Policy Wales](#)

² [The Well-being of Future Generations \(Wales\) Act](#)

2.2.3 Technical Advice Note (TANs)

Technical advice notes (TANs)³ provide detailed planning advice. Local planning authorities take them into account when they are preparing development plans. Each TAN covers a specific topic. The following TANs relate to sustainability:

TAN5: Nature Conservation and Planning (September 2009) – Guides how land use planning should protect and enhance biodiversity and geological conservation.

TAN11: Noise (October 1997) – Advises on minimising the impact of noise through the planning system without placing unreasonable restrictions on development.

TAN12: Design (March 2016) – Provides advice on promoting sustainability through good design and planning for sustainable building.

TAN15: Development and Flood Risk (April 2004) – Offers guidance on development and flooding policies.

TAN18: Transport (March 2007) – Aims to improve transport infrastructure and services for better accessibility, road safety, and sustainable communities.

TAN21: Waste (February 2017) – Advises on sustainable waste management and resource efficiency through land use planning.

2.2.4 Environment (Wales) Act

The Environment (Wales) Act⁴, which received Royal Assent in 2016, provides a legal framework for sustainably managing Wales natural resources, aiming to establish a low-carbon, green economy. The key parts of the act are:

Sustainable management of natural resources: Proactively and sustainably managing resources to address challenges and seize opportunities.

Climate change: Setting statutory emission reduction targets, ensuring that the net Welsh emissions account for the year 2050 is at least 100%

lower than the baseline.

Collection and disposal of waste: Improving recycling and energy recovery to reduce pressure on natural resources and benefit the economy and environment.

Biodiversity and ecosystem resilience: Public authorities must seek to maintain and enhance biodiversity as far as consistent with the proper exercise of their functions and in so doing promote the resilience of ecosystems.

2.2.5 Active Travel (Wales) Act

The Act⁵ came into force in 2014. It requires local authorities to map and continuously improve routes and facilities for “active travel” – defined as walking and cycling for a purpose, like accessing work or services, rather than for leisure.

2.2.6 Future Wales: The National Plan 2040

The National Plan⁶, issued in 2021, is a strategic development framework for Wales, guiding development until 2040. It aims to address key priorities such as fostering a vibrant economy, achieving decarbonisation and climate resilience, enhancing ecosystems, and improving community health and well-being through the planning system.

Policy 1: Where Wales will grow – Identifies Swansea Bay and Llanelli area as the focus for growth and investment, that area including Port Talbot.

Policy 8: Flooding – The Welsh Government supports flood risk management for sustainable growth, prioritising nature-based solutions.

Policy 9: Resilient Ecological Networks and Green Infrastructure – The Welsh Government will work with partners to protect and enhance ecological networks and green infrastructure, using nature-based solutions for climate adaptation and sustainable growth. Planning authorities should include these priorities in development plans.

Policy 16: Heat Networks – Planning authorities must identify opportunities for District Heat

³ [Technical advice notes \(TANs\)](#)

⁴ [The Environment \(Wales\) Act](#)

⁵ [Active Travel \(Wales\) Act](#)

⁶ [Future Wales: The National Plan 2024](#)

Networks and promote their implementation in Priority Areas, including Port Talbot.

Large-scale mixed-use developments should, where feasible, include a heat network using renewable, low carbon, or waste heat sources. Planning applications for these developments should include an Energy Masterplan to determine if a heat network is the best energy option and, if feasible, provide a plan for its implementation.

2.2.7 Net Zero Wales

Since declaring a climate emergency in 2019, Wales has legislated to reduce greenhouse gas (GHG) emissions to net zero by 2050.

Wales has established a series of statutory 5-year carbon budgets that define the pathway to meet the target. Net Zero Wales⁷, published in 2021, sets out 123 policies and proposals to meet the second carbon budget (2021-25), whilst also delivering against the seven well-being goals in the Well-Being of Future Generations (Wales) Act.

2.2.8 Building Regulations

Part L, Conservation of Fuel and Power – Whilst not planning policy, the Building Regulations (and specifically Approved Document Part L: Conservation of Fuel and Power) set out the requirements for energy and carbon performance in new buildings.

Periodic updates to these national regulations drive energy efficiency and carbon reduction improvements. The government has stated that developers will continue to have flexibility in how they meet carbon reduction targets; but that the emphasis is on using a ‘fabric first’ approach.

On 29th of March 2023, the Building Regulations for buildings other than dwellings were updated as an interim step towards part of the roadmap to the ‘full’ Future Buildings Standard, due in 2025. The regulations aim to deliver buildings that are of higher quality, with lower energy bills and reduced GHG emissions.

A consultation on the 2025 Future Homes Standard (FHS) and Future Buildings Standard (FBS) for England began in December 2023, proposing a transition from gas to electricity as the primary heat source, a greater use of solar power and higher efficiencies for plants.

Wales has yet to launch a formal consultation on the Future Buildings Standard, but it is likely to follow the outline used in England.

2.3 Local Policy

2.3.1 Neath Port Talbot County Borough Local Development Plan (2011-2026)

The Local Development Plan (LDP)⁸, adopted in 2016, is the development plan for Neath Port Talbot and provides the basis for decisions on land use planning in the County Borough up to 2026.

The LDP sets out objectives to address key issues facing the County Borough, prioritising sustainable development. The main objectives addressing environmental issues are:

Climate Change Mitigation and Adoption:

OB 1 – Minimise the causes and consequences of climate change by reducing greenhouse gas emissions and adapting to its effects.

OB 2 – Reduce people’s exposure to the determinants of poor health and provide an environment that encourages healthy, active and safer lifestyles.

OB 19 – Promote renewable energy to reduce carbon emissions.

Valuing Our Environment:

OB 15 – Conserve landscapes and wildlife habitats.

OB 16 – Address air quality issues and minimise the adverse impacts of noise-generating and polluting activities.

OB 20 – Ensure adequate and appropriate waste treatment and disposal facilities.

⁷ [Net Zero Wales](#)

⁸ [Neath Port Talbot County Borough Local Development Plan \(2011-2026\)](#)

Achieving Sustainable Accessibility:

OB 4, OB 21, and OB 22 – Maximise accessibility, encourage active travel, and manage traffic congestion to create a more sustainable transport network.

Responding to the overarching objectives, the following policies have been set up:

Policy SP1: Climate Change – Response to OB 1 and OB 2, requires developments to enhance settlement efficiency and promote sustainable travel patterns to reduce greenhouse gas emissions. They should also avoid flood-risk areas and minimise habitat fragmentation.

Policy SP2: Health – Response to OB 2, ensures new developments promote healthy, active lifestyles by integrating community facilities and services.

Policy SP15: Biodiversity and Geodiversity – Focuses on OB 15, it requests to protect and manage designated and important biodiversity sites, ensuring developments conserve and enhance natural heritage.

Policy EN8: Pollution and Land Stability – Focuses on OB 16. Proposals causing unacceptable adverse effects on health, biodiversity and amenity due to factors including air, noise, light pollution, contamination, land instability, or water pollution will not be permitted. Mitigation measures are required for proposals that could create or worsen these issues.

Policy SP18: Renewable and Low Carbon Energy – Response to OB 19. It encourages renewable energy and energy efficiency measures in new developments to meet national targets while minimising environmental impact.

Policy RE2: Renewable and Low Carbon Energy in New Development – In relation to OB 19, proposals for large developments with over 1,000 sqm of floorspace must submit an Energy Assessment to explore the feasibility of connecting to renewable energy sources, district heating networks, and incorporating on-site zero/low carbon technologies.

If viable, these schemes must be implemented.

Policy W3: Waste Management in New Development – Proposals for new developments must show plans for waste design, layout, storage, and management during construction and occupancy. Site Waste Management Plans are required for industrial/commercial developments generating over 1,000 tonnes of waste annually or development that would generate hazardous waste.

Policy TR2: Design and Access of New Development – In response to OB 2, OB 21 and OB 22 development proposals will only be permitted if they meet the following criteria:

- Do not compromise highway safety or efficiency, and do not generate excessive traffic.
- Provide appropriate parking, cycling facilities, and safe access for service vehicles.
- Are accessible by various travel means, including public transport, cycling, and walking.
- Include Transport Assessments and Travel Plans for developments likely to generate significant traffic.

Policy BE1: Design – All development proposals must demonstrate high-quality design that respects the natural, historic, and built environment. They should use appropriate materials, retain important local features, create safe public spaces, have effective drainage, and ensure accessibility for all.

2.3.2 Replacement Local Development Plan

The current Local Development Plan covers 2011-2026. The Council is developing a new Replacement Local Development Plan (RLDP)⁹ that will guide development from 2023-2038 to ensure appropriate development, community benefits, economic growth, and area protection.

The development of the RLDP is still in its initial stages, and the preferred strategy has not yet been drafted. The adoption of the RLDP is expected to occur in 2027.

⁹ [Replacement Local Development Plan \(RLDP\)](#)

2.3.3 Supplementary Planning Guidance (SPG)

Supplementary Planning Guidance (SPG)¹⁰ provides detailed guidance on how Local Development Plan (LDP) policies should be applied in specific circumstances or areas. While only LDP policies have legal status in planning decisions, SPGs can be material considerations.

Biodiversity and Geodiversity SPG (2018) – guides how to meet the requirements of related policies in the LDP, including Policy SP15 Biodiversity and Geodiversity. It clarifies the fundamental principles, outlines a step-by-step approach, and specifies the necessary information needed for compliance with these policies.

Pollution SPG (2016) – Supports the relevant policies, such as EN8 Pollution and Land Stability in the LDP. It discusses each pollution type, identifying key considerations and outlining the necessary steps for complying with these specific policies.

Renewable and Low Carbon Energy SPG (2017) – Responds to policies SP18 Renewable and Low Carbon Energy and RE2 Renewable and Low Carbon Energy in New Development.

It specifies the Policy RE2 requirements regarding the energy assessment, and outlines the information that should be included in the assessment:

- The likely energy demand of the development;
- The potential for renewable/low carbon energy generation on the site;
- The availability and potential to connect to existing sources of renewable/low carbon energy;
- The potential for incorporating or being part of a District Heating System; and
- The potential to share renewable/low carbon energy generated on the site.

Design SPG (2017) – provides guidance on implementing Policy BE1 concerning Design and SP21 which focuses on the Built Environment and Historic Heritage within the LDP.

2.4 Planning Policy Summary

Both local and national policy aims to ensure the delivery of sustainable and well-designed developments which mitigate and adapt to the impacts of climate change.

The latest national planning policy framework and legislation in Wales foster long-term thinking and collaboration for sustainable solutions to ensure that new buildings are well-designed and reduce emissions in line with the Net Zero Wales carbon targets.

The Neath Port Talbot County Borough LDP confirms the Council's commitment to the creation of sustainable new developments in the borough. It requires development to consider a range of sustainable design measures to ensure development is resilient to climate change, incorporates low carbon renewable energy systems, as well as measures to enhance biodiversity value.

The following sections of this Sustainability Statement set out the measures incorporated into the design of the development to ensure the delivery of a sustainable development and address the policy requirements.

Approach to GHG Emissions:

The World Steel Association (ISO14404:2013) approach to assessing carbon dioxide emissions intensity from iron and steel production, which has been used for this assessment, is focused exclusively on CO₂ emissions, not on other greenhouse gases (GHG). Regarding non-CO₂ GHGs, the most relevant to the existing operations and the Proposed Development are nitrous oxide (N₂O) and methane (CH₄), the Applicant has estimated annual mass emissions of N₂O and CH₄ from the integrated iron and steelworks using emission factors taken from

¹⁰ [Supplementary Planning Guidance \(SPG\)](#)

credible reference sources. These estimates are used in the Applicant's annual Pollution Inventory reporting in accordance with its environmental permit, not consistent with local authority emissions by end-user (kt CO₂e)' of UK Local Authority & Regional CO₂ Emissions National Statistics: 2005 to 2022 (Ref. 13.18).

The applicant has also performed some non-accredited direct measurement of N₂O and CH₄ which has confirmed the broad suitability of the emission factors as the basis for ongoing estimates of emissions of the respective pollutants. As a result, the Applicant has confidence from these two independent streams of evidence that N₂O and CH₄ account for approximately 0.5% of total CO₂e emissions from the Port Talbot installation in its current configuration, with CO₂ emissions therefore accounting for 99.5% of operational GHGs on a CO₂e basis. As a result, accounting only for CO₂ emissions from the operational facility in this assessment does not materially under-represent total GHG emissions. When Scope 3 emissions are accounted for, then the contribution of non-CO₂ GHGs to the inventory of integrated steelmaking GHG emissions does increase, primarily attributable to methane emissions from raw material mining. Even accounting for Scope 1, 2 and 3 emissions, CO₂ contributes approximately 95% of all GHG emissions after the application of GWP (100 years) factors.

3. Sustainability Strategy

This chapter summarises the sustainability strategy for the Proposed Development at Port Talbot Steelworks, Wales, demonstrating how it responds positively to both national and local planning policy requirements.

The Proposed Development aims to incorporate sustainable design measures aligned with national and local planning policies focused on social, economic, and environmental factors.

While other reports, such as the Environmental Impact Assessment (EIA), address the social and economic aspects, this Sustainability Statement and Energy Assessment will demonstrate how the Proposed Development meets environmental requirements following the objectives of the Neath Port Talbot County Borough Local Development Plan (LDP) and national policy.

3.1 Climate Change Mitigation & Adaptation

Climate change will lead to warmer temperatures in the UK, increased winter precipitation, and reduced summer rainfall. Adapting to these changes will significantly influence the design, construction, location, cost, and operation of all new buildings over the coming decades.

Wales has committed to achieving Net Zero emissions by 2050 and is moving towards developing the Future Buildings Standard. One of the core principles of Wales planning policy framework is to ensure that development considers both adaptation to and mitigation of climate change in the planning process. The adopted LDP emphasises high-quality, inclusive, and sustainable design principles for all developments.

In this context, the following sections outline the key climate change mitigation and adaptation measures that are deemed suitable for this Proposed Development, guided by the latest national and local directives. The numbers presented here are on a reasonable worst case basis.

3.1.1 Climate Change Mitigation

The steel sector emits around 8% of anthropogenic GHG emissions worldwide. It is regarded as being a 'hard to abate' sector because existing technology requires that coal be used as a chemical reductant to extract iron from iron ore in blast furnaces. The reduction process produces a gas rich in both carbon monoxide and carbon dioxide. When this gas is combusted, the carbon monoxide is further oxidised to carbon dioxide.

The Port Talbot site is the largest single point emitter of CO₂ in the UK. It is responsible for around

1.5% of the UK's emissions and 20% of Wales's emissions.

Several approaches to decarbonising the iron production process have been developed to varying degrees of technology readiness level, including (i) replacing coal with biomass, (ii) replacing carbon with other reductants such as hydrogen and, (iii) retrofitting integrated steelworks with carbon capture, storage and use (CCUS) technologies. Whilst development of these technologies continues, they have a low adoption rate or are in their infancy.

Another option for reducing the CO₂ emissions associated with steelmaking is to increase the use of steel scrap in the production process, which is the technology that forms the basis of the Proposed Development.

The UK Steel Association (UK Steel) report on Net Zero Steel¹¹ explains that approximately 1.85 tonnes of CO₂ are generated for every tonne of steel produced as a global average (albeit that the precise amount depends upon the individual configuration of a given steelworks, the choice of raw materials and a range of other factors). The report proposes EAF as part of the answer for steel sectoral decarbonisation. The UK Committee on Climate Change also recognises electric arc furnaces as a major pathway for decarbonisation.

The UK and Wales have carbon budgets to tackle climate change. The UK Government's Carbon Budget Delivery Plan (March 2023)¹² outlines policies to meet these budgets, including Policy 69 Steel Sector Decarbonisation, which targets the electrification of UK steelmaking (using EAF) by 2035, with emissions reduction forecasts provided for the 4th, 5th, and 6th Carbon Budgets.

The switch to an EAF will reduce GHG emissions immediately and support continued emission improvements as the electrical grid decarbonises.

An EAF allows steel to be made from scrap, cutting energy use and reliance on raw materials. Although the UK has a surplus of scrap steel, much of it is

exported – often to countries with lower environmental standards.

The GHG emissions from most construction projects stem from construction and operation. It is normal that for new development there is a net increase in GHG emissions from the development.

For the Proposed Development, the main emissions come from the process of steelmaking and there are very few occupied buildings proposed. The net result of the proposal is a substantial reduction in GHG emissions against the established baseline.

Because most planning policy is focused on new occupied buildings, this section covers the overall results of the Proposed Development and the occupied building elements separately.

The Timeline and Changes

Baseline

The baseline assessment for the site has been the calendar years 2019-2023 (financial year April 2019 to March 2024) when the Port Talbot blast furnaces were fully functional. During this period, the site's average annual production level was 3,175,000 tonnes of crude steel with Scope 1, 2 and 3 CO₂ emissions averaging 6,894,057 tonnes per year.

TSUK report on a financial year, running from April to April. This report references calendar years, so financial year running from 2022-2023 is referred to as 2022.

From now to the EAF operating, it is proposed that the blast furnaces, their ancillary processes and the BOS plant will be switched off and that there will follow an interim period during which steel will not be produced on the Port Talbot site. During this period, steel slabs and steel hot rolled coil products will be purchased to serve as the feedstock for the TSUK's remaining steel processing activities at Port Talbot and other steel processing sites around the UK. The process of constructing the EAF will commence during the interim period, followed by commissioning and then ramping up production until reaching full output by around 2029. The established timeline and stages of the proposed

¹¹ [UK Steel – Net Zero Steel](#)

¹² HM Government (March 2023). Carbon Budget Delivery Plan

development are set out in the table below:

Table 1 - Timeline

Scenario	Description & Timeline
Established Baseline	Operation of the steelworks with 'heavy end' up to early 2024, based on averaged data for the period April 2020 to March 2024.
Interim Baseline	Operation of the steelworks from October 2024 following closure of the 'heavy end' when substrate is imported, until the EAF becomes operational by the end of 2027.
EAF Construction	EAF construction is scheduled to commence in mid-2025 and be completed by the end of 2027.
EAF Operation	EAF operation is scheduled to commence by end of 2027, and operational GHG emissions have been forecast to March 2031.

When calculating and reporting GHG emissions it is standard to divide them into Scopes:

Scope 1 – Emissions directly from the site, for example, gas burned on the site and in chemical reactions in the production of iron, steel and intermediate products such as coke and sinter.

Scope 2 – Emissions indirectly, such as the emissions from the generation of electricity imported for use on the site.

Scope 3 – Emissions related to upstream or downstream activity, for example, the mining of iron ore. Scope 3 emissions here are limited to upstream activity.

As an example, the established baseline emissions Scope 1, 2 and 3 GHG emissions from the site (based on the World Steel Association ISO 14404:2013 methodology described above) are as follows:

Table 2: Established Baseline GHG Emissions (2019-2023)

	Scope 1	Scope 2	Scope 3
MtCO ₂	6.08	0.18	0.64

The total emissions reduction achieved by the implementation of the Proposed Development will be substantial, with ~90% reduction in the Scope 1+2 emissions. Though the majority of the feedstock

will be scrap purchased from the UK's surplus, there will be an increase in Scope 3 emissions compared to the existing case because there will be a need to purchase what is expected to be around 25% virgin iron to supplement the steel scrap component of the proposed EAF feed mix. A large number of alternative sources exist for virgin iron procurement and TSUK will maintain flexibility of its procurement to ensure it benefits from optimal commercial and logistical arrangements. Whilst the precise tonnage and source of virgin iron remains uncertain, a conservative approach has nevertheless been taken in the estimation of projected emissions reductions.

The analysis is set out to show both the before, during and after change in Scope 1 and 2 emissions and the corresponding changes in Scopes 1, 2 and 3. The CO₂ performance forecasts undertaken as part of this assessment are conservative and based on a 'reasonable worst case' basis. Actual CO₂ performance levels are expected to be greater than 50% for scopes 1, 2 and 3 and are visualised in Figure 3.

Scopes 1 & 2

The emissions from the processes on site are largely associated with the combustion of natural gas and, in the current configuration, with (i) the combustion of process arising gases such as coke oven gas and blast furnace gas, and, (ii) chemical reduction of iron ore. These can all be considered as scope 1 emissions. The scope 2 emissions mainly occur beyond the boundary of the site and are associated with the generation of electricity supplied to the National Grid that is then purchased for use on the site. Table 2 shows how CO₂ emissions will go from just over 6Mt in 2023 to less than 1Mt in 2030, at which point the EAF plant is expected to be in steady state operation, after which the emissions will remain broadly stable, except for the continued improvement in emissions due to the continuing decarbonisation of the UK's national grid.

The construction emissions have not been added to these tables but are addressed below.

Scopes 1, 2 and 3

The interim period between closure of the integrated steelworks and commissioning of EAF steelmaking will be characterised by purchasing of 3rd party steel slab and hot rolled coil. During this transitional period, there will be an increase in Scope 3 emissions. These will peak during the interim period where steel is imported purely for processing and reach a steady state for a small amount of imported iron to serve the EAF. Table 3 shows how Scope 1, 2 and 3 CO₂ emissions will improve from just under 7Mt to less than 4Mt in 2030, at which point the EAF is expected to be fully operational and emissions broadly stable. Figure 3 shows the broader TSUK strategy.

The construction emissions are included as Scope 3 emissions and occur in 2025 - 2027. The total impact is small as the CO₂ emissions from the construction

process are estimated to be 61,469 tonnes, in total <1% of annual Scope 1, 2 and 3 emissions over that period.

Results

By the end of 2030, CO₂ emissions are predicted to have reduced from the established baseline by 87% in Scopes 1 and 2 and 44% in Scopes 1, 2 and 3. This assumes a reasonable worst case scenario and it is anticipated actual CO₂ emission savings (scopes 1, 2 and 3) will be in excess of 50%.

In the future, there are further decarbonisation options across scopes. These include lower carbon metallic inputs, using low-carbon hydrogen and using lower carbon coatings and alloys on the steel. An illustration of the options is provided in Figure 4.

Table 3: Operational EAF GHG emissions and savings (tCO₂)

Year	2027	2028	2029	2030
'Established baseline' emissions				
Scope 1	6,079,449	6,079,449	6,079,449	6,079,449
Scope 1+2	6,256,137	6,256,137	6,256,137	6,256,137
Operational EAF emissions				
Scope 1	39,757	538,678	702,134	702,134
Scope 1+2	48,588	627,991	802,597	792,872
Operational emissions minus 'established baseline' emissions				
Scope 1	-6,039,692	-5,540,771	-5,377,315	-5,377,315
Scope 1+2	-6,207,549	-5,628,146	-5,453,541	-5,463,265

Table 4: Scope 1, 2 & 3 operational EAF GHG emissions and savings

Year	2027	2028	2029	2030
'Established baseline' emissions (tCO₂)				
Scope 1, 2 & 3	6,894,057	6,894,057	6,894,057	6,894,057
Operational EAF emissions (tCO₂)				
Scope 1, 2 & 3	187,111	2,265,079	3,888,635	3,878,894
Operational EAF emissions minus 'established baseline' emissions				
Scope 1, 2 & 3	-6,706,947	-4,628,978	-3,005,422	-3,015,163

Figure 3: TSUK Plan for CO₂ Neutral Steelmaking

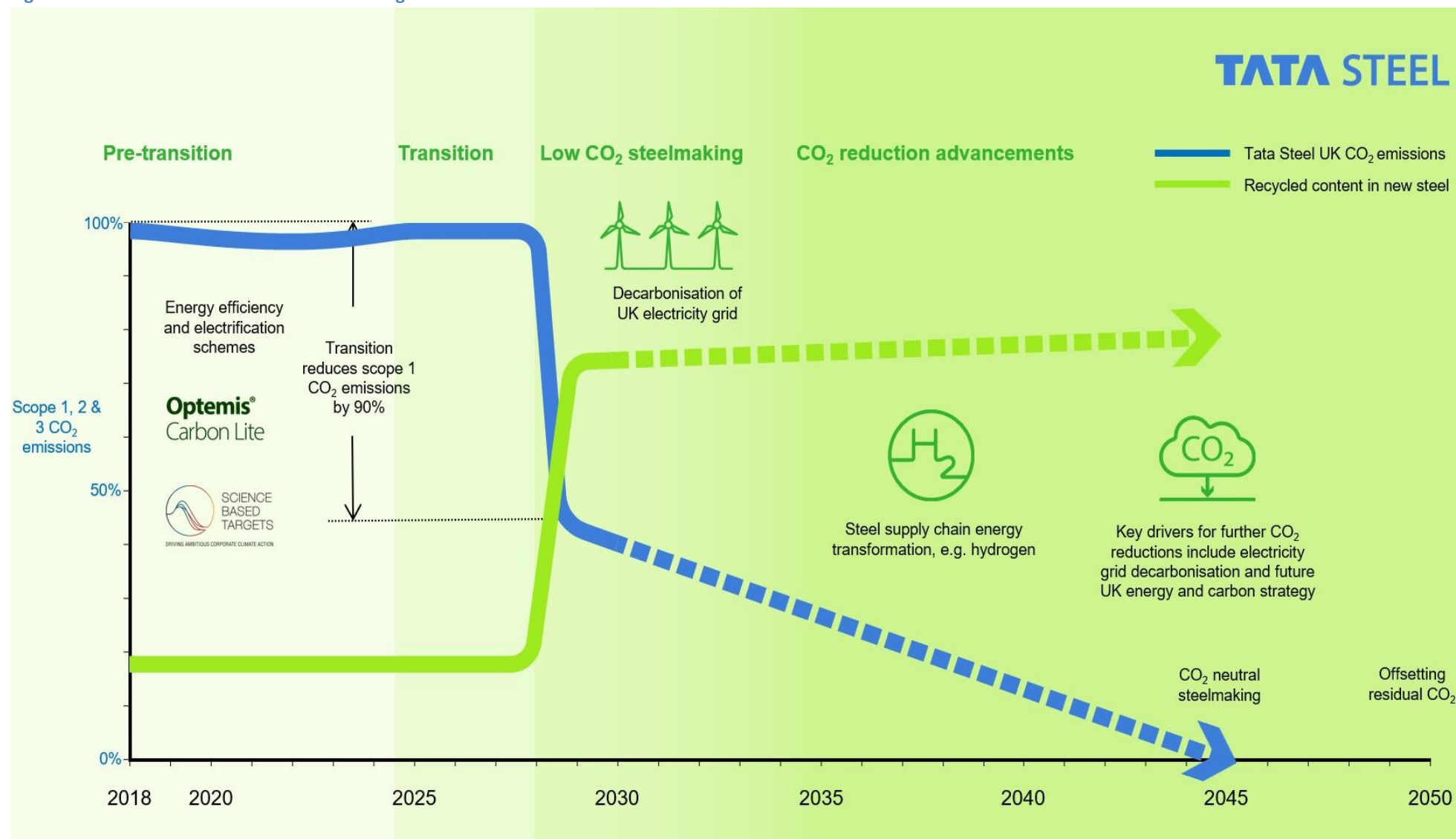


Figure 4: Decarbonisation Options after Electric Arc Furnace (EAF) Transition

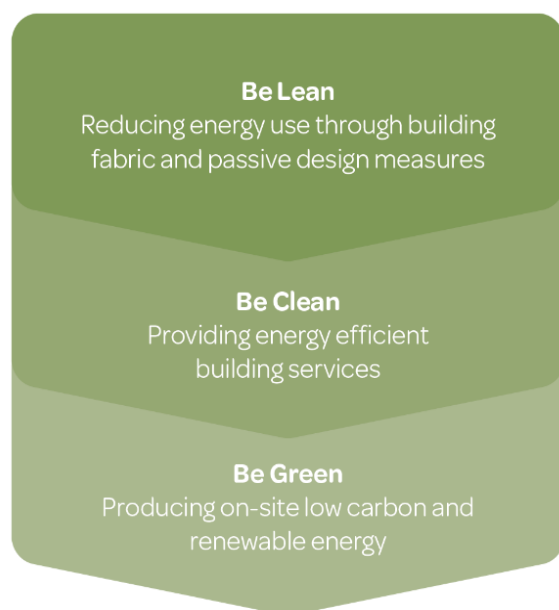


The Buildings

Most of the new development will comprise buildings which do not fall under Part L of the Building Regulations, because they will not be heated or ventilated. In addition, many of the existing administration, training and control buildings will continue to provide these services for the Proposed Development, once operational.

Of the new development, only one of the new buildings is expected to be occupied as an office and changing facilities. The analysis below is expected to be valid even if there are minor changes to the design and addresses the policy requirement for an energy assessment. For buildings, it is standard to follow an energy hierarchy.

Figure 5: Energy Hierarchy



Neath Port Talbot, (NPT) policies are supportive of this approach with low carbon and renewable energy technologies encouraged. Detailed modelling will be conducted during the detailed design phase, but the proposed principles are laid out below.

Be Lean

The UK government has released a consultation on the “Future Building Standard.” This sets out anticipated regulations due to take effect in England from 2025. This outlines higher standards for plant efficiency and reduced air permeability and is set to ensure all new buildings are “net zero ready.” A consultation on the same standard is due in Wales which is expected to be similar. In lieu of its publication, it is proposed that the new office and any other building that falls under Building Regulations will meet these standards, once confirmed.

Be Clean

Policy RE2 of the LDP and **Policy 16** of the Future Wales: The National Plan requires new developments to consider the use of heat networks. A heat network serves buildings from a central point. As the Proposed Development will consist of one new small, occupied building a heat network will not be appropriate.

It is proposed that the new building(s) will be all-electric, using no fossil fuels on-site. This will reduce air pollution and CO₂ emissions. It will align with the net zero agenda, allowing the building(s) to decarbonise as the grid does so.

Be Green

There are several renewable energy generation technologies that could be deployed as part of the Proposed Development in line with the **Policy SP18** of the Local Development Plan:

Heat pumps – Heat pumps use electricity to upgrade low grade sources of heat to a usable temperature for heating buildings and water. Because they deliver several units of heat for each unit of electricity input, they are highly efficient and release no CO₂ emissions at the point of use. Heat pumps will be used for all new occupied buildings for space heating, cooling and providing hot water.

The sizing and heat generated will not be known until the buildings are in detailed design.

Solar power – Solar power or photovoltaics (PV) generates electricity from light. Systems can be deployed on roofs of buildings and connected to provide renewable electricity to the building or exported beyond. It is expected the new office will have roof space, but due to issues of shading, electrical networks on-site, safety and dust issues, solar is not proposed at this stage. TSUK plan to review this once the new Proposed Development is operational.

Biomass – Renewable biomass, normally in the form of wood pellets can be burned to provide heating for buildings and hot water. An advantage is that they can provide large amounts of heat and work comparably to a gas boiler. Biomass boilers require storage for the pellets and regular deliveries of fuel. In addition, they emit air pollution. For these reasons, and the very low thermal demand of modern offices, biomass heating is not considered beneficial.

Wind power – Large scale ground mounted wind turbines generate electricity and are cost effective. Neath Port Talbot council is supportive of renewable energy generation.

They require a site with good average wind speeds and a large clear area. Although the site appears to have reasonable wind speeds, there is not a clear area of sufficient size to deploy.

Smaller scale, building mounted wind turbines are available, but performance is generally poor and the buildings on site are arranged in a manner that will cause disruption of wind flows.

The analysis indicates that:

- Heat pumps are feasible for the Proposed Development and will be used for occupied buildings.
- Solar power will be considered once the Proposed Development is operational, considering shading, safety and dust.

Although the contribution at a building level will be significant, in terms of the functional site post-EAF,

it will be far less than 1% of the GHG emission savings from the EAF.

3.1.2 Climate Change Adaptation

To ensure the Proposed Development is resilient to climate change, it will incorporate measures based on the UKCP18 projections. These projections indicate that the UK will experience increased summer and winter temperatures, with significantly higher maximum temperatures, reduced summer rainfall, increased winter rainfall, and more extreme weather events.

The UK Climate Change Risk Assessment (2021) highlights key risks for the built environment, including reduced summer water availability, increased winter rainfall, and higher summer temperatures.

This section outlines the key measures that will be integrated into the design of new buildings and the overall Proposed Development to adapt to these climate changes.

Flood Risk and Drainage

In line with **Policies SP1 and BE1** of the LDP, the Flood Consequence Assessment (FCA) and Outline Drainage Strategy have been prepared by JBA Consulting. The FCA confirmed the Proposed Development is classed as less vulnerable development by Technical Advice Note 15: Development and Flood Risk (TAN-15). The Outline Drainage Strategy contains a Sustainable Drainage System (SuDS) strategy for SuDS Approval Body (SAB) approval by Neath Port Talbot Council.

The Proposed Development is at little or no risk of flooding from tidal, groundwater, sewer, or reservoir sources. The Proposed Development meets the Justification Test and Acceptability Criteria, ensuring compliance with TAN-15 and Planning Policy Wales, thus demonstrating that the flood risk for the Proposed Development is low.

The Proposed Development is mostly located in Flood Zone 1, indicating a low risk of flooding from rivers. Flood Zone 1 represents areas which have less than a 0.1% AEP (1 in 1000) chance of flooding in any given year, including climate change.

Only the southern part of the Proposed Development falls within Flood Zones 2 and 3, but no construction is planned in this higher-risk area.

Small areas of the Proposed Development may be at risk of surface water and small watercourse flooding, associated with existing waterbodies and localised ponding. These ponding areas will be managed by SuDS features across the Proposed Development.

3.2 Valuing Our Environment

This section shows measures to conserve landscapes and wildlife habitats, minimise air, noise and other pollution impacts, and provide adequate waste treatment and disposal facilities.

3.2.1 Ecology

The Proposed Development aims to positively affect the local ecology through measures designed to protect and enhance biodiversity, in alignment with **Policy SP15** of the LDP.

RSK Group assessed the potential ecological impacts of the Proposed Development. Surveys were conducted from September 2021 to May 2024, covering habitats and various species. The surveys were comprehensive and followed industry guidelines, including existing site data and records.

The site features diverse habitats like scrub and grassland, supporting various species. Surveys recorded forty-three bird species, including Cetti's warbler, highlighting local importance. Some invertebrates present have national significance, indicating regional importance. The site also hosts low-activity badger setts and bat populations, suggesting local ecological importance.

The assessment shows that the Proposed Development may lead to habitat loss and impact protected species through construction activities and pollution. Although close to two Sites of Special Scientific Interest (SSSI) and a Special Area of Conservation (SAC), the assessment predicts no significant adverse effects on these areas.

To minimise ecological impacts, several measures will be implemented:

- **Construction Environment Management Plan (CEMP)** – This plan will provide guidelines to reduce the environmental impact during construction.
- **Species Protection Plan** – This will protect wildlife during construction by minimising disruption to their habitats.
- **Environmental Clerk of Works (ECOW)** – An appointed individual will oversee adherence to these plans, ensuring environmental standards are met.

Additionally, a Habitat Management Plan (HMP) and a Green Infrastructure Statement (GIS) will be developed to support biodiversity enhancement, aligning with the **Environment (Wales) Act** for net biodiversity benefits.

Overall, while the Proposed Development is near important ecological sites, thorough assessments predict no significant adverse effects, and strong mitigation measures are in place to enhance local biodiversity and achieve a net biodiversity benefit.

3.2.2 Pollution

In line with **Policy EN8** of the LDP, the Proposed Development will aim to minimise any negative impacts on the natural environment considering the impacts of water, noise, materials and air quality.

Water – Throughout construction water quality will be protected by the following measures:

- A CEMP will be developed, following best practices and guidelines, and monitored for compliance;
- Temporary drainage will align with permanent works, using filter drains and channels to manage surface runoff;
- Habitat restoration post-construction for areas affected by construction activities;
- Strict controls on potential pollutants, proper storage, and handling of hazardous substances will be implemented; and
- Additional controls for high-risk activities like dewatering and piling and ongoing monitoring by the Environmental Clerk of Works.

Noise – RSK Acoustics has undertaken noise and vibration impact assessments for the Proposed Development.

With the implementation of recommended mitigation measures, such as a CEMP, noise and vibration during construction are expected to have no significant impact at the nearest sensitive receptors. Any initial concerns have been addressed, and the design will include further noise reduction features, such as noise barriers or enclosures to ensure minimal impact during the operational phase.

Sustainable Materials – The material in the construction is expected to combine retained/reused materials from the specialist contractors developing the EAF design.

The retained and reused materials will reduce embodied carbon and the need for transport, but the OEM material will be dictated by design requirements.

Air Quality – The Proposed Development is expected to result in significantly improved air quality. There will be a significant reduction in emissions of pollutants including oxides of nitrogen (NO_x), fine particulate matter (PM₁₀ & PM_{2.5}), sulphur dioxide (SO₂), carbon monoxide (CO), PAHs and dioxins between the established baseline and when the EAF is operational. Road traffic volumes from the Proposed Development are also expected to reduce, as are emissions of NO_x, PM₁₀ and PM_{2.5} from road traffic. Consequently, the Proposed Development will result in a substantial reduction in emissions.

Temple Group conducted an air quality assessment, to examine existing air quality and potential effects on human and ecological receptors. Notably, NO_x emissions from the Proposed Development are projected to decrease significantly, with an 85% reduction expected once the EAF is operational compared to 2017 levels.

Fugitive dust from demolition and construction activities will be managed through mitigation

measures, resulting in non-significant residual effects.

Construction traffic, plant operations, and the operational phase generally showed negligible or beneficial effects on air quality for human receptors, and mostly beneficial impacts for ecological receptors.

Best Available Techniques (BAT) and a pre-existing Air Quality Management Plan (AQMP) will control operational dust emissions. These measures will be updated during the Environmental Permit application process.

3.2.3 Waste Management

TSUK has prepared a Waste Management Plan. The report sets out the strategy to minimise waste and store hazardous substances in line with **Policy W3** of the LDP.

The Proposed Development plans to manage waste sustainably through several measures:

EAF (electric arc furnace) Slag – This is a byproduct of the steelmaking process. About 255,000 tonnes will be produced each year.

The slag will be treated and primarily used to make road stones after a period of weathering.

Red Dust – Generated from the electric arc furnace (EAF) and Ladle Furnace (LF) operations, this dust will be captured using a new fume extraction system, totalling around 83,000 tonnes annually.

This dust will be recycled to recover useful materials like zinc and iron, a standard practice in red dust management.

Refractory Bricks – These bricks line the furnaces and wear out over time. Every year, 3,000 tonnes of these bricks will need replacing. Most of them will be regenerated and reused, with only a small amount going to the landfill.

Electrodes – The electrodes create the arc between them that melt the metal. They wear out regularly and can be recycled into new electrodes or other materials.

Foreign Materials in Purchased Scrap – Scrap metal bought for the furnace often contains unwanted materials like plastics, metals, and glass.

Up to 135,000 tonnes of these materials will be separated and recycled each year, reducing landfill waste.

Process Water – The Proposed Development will reduce water discharge and improve water quality. Switching to an EAF will significantly lower the volume of trade effluent compared to current integrated steelworks operations. The hot and cold mills will continue as usual, but the EAF will discharge far less water than the established baseline, and much of this will be lost through evaporation. Discharges will still go through TSUK's effluent treatment system to the Long Sea Outfall (LSO) under existing and future permits. The current discharge of 2,000 m³ per hour at the LSO will drop to less than 1,000 m³/hr, with fewer contaminants from coke production.

The Proposed Development will store hazardous substances properly in line with regulations:

Lubricating Oils – Stored in compliance with the Oil Storage Water Resources (control of Pollution) (Oil Storage) (Wales) Regulations 2016. Used oils will be recovered whenever possible, with the remainder sent to Energy from Waste facilities.

Fuel (Diesel) – Stored at refuelling facilities compliant with the Oil Storage (Wales) Regulations, ensuring the safe refuelling of vehicles used for moving steel and scrap.

Water Treatment Chemicals – Required for cooling towers to prevent bacterial growth. These chemicals will be stored and managed according to established procedures already in place.

This waste management plan emphasises recycling and reusing materials, reducing water discharge and contamination, and ensuring hazardous substances are stored according to regulations.

More details regarding waste management plans are in the Waste Management report that accompanies the planning application.

In line with **Policies TR2 and BE1** of the LDP, SCP has conducted a Transport Assessment. The assessment demonstrates that the Proposed Development will significantly reduce traffic movements due to lower staff numbers and the elimination of coal deliveries, leading to lower traffic congestion. The Proposed Development will benefit from the good existing site condition and effective construction traffic management, aligning with local policies to ensure reduced environmental impact and improved accessibility for sustainable travel options.

Walking/Cycling Services – The site already has a well-established active travel route, with shared footways and cycleways connecting to key local residential areas and transport hubs.

Pedestrian/cycle access to the Proposed Development will continue to be provided via the existing Main Gate Access off the A4241 Harbour Way.

Bus Services – The Proposed Development is also well placed to encourage travel by public transport.

The closest bus stops are located on both sides of the A48 Margam Road, less than 0.5 miles from the Main Gate Access. These bus stops offer convenient access to nearby towns and cities.

Rail Services – Port Talbot Parkway Railway Station is within a walkable distance to encourage existing and prospective staff to travel by train, offering regular services to major destinations such as Swansea, Cardiff, and London.

Accessibility – There is already an existing, well-established steel manufacturing facility on the site which benefits from good levels of accessibility by sustainable modes and proximity to a large residential population and local amenities. Access to the Proposed Development on foot and by cycle is of a good standard and there are transport connections, providing access to local destinations.

Vehicular access will be primarily through the existing Main Gate site access, with occasional use of the West Gate for large deliveries. This minimises the impact on the local highway network.

3.3 Achieving Sustainable Accessibility

Traffic Management – During construction, a Construction Traffic Management and Routing Plan will ensure minimal disruption and traffic congestion by directing traffic along routes with greater capacity and implementing disciplinary measures for non-compliance.

The Proposed Development is designed to enhance sustainable travel options, reduce traffic congestion, and comply with local planning policies. More detailed information on transportation issues is contained in the Transport Assessment and Travel Plan that accompanies the planning application.

4. Conclusion

This Sustainability Statement has been prepared to demonstrate how the proposed development makes a positive contribution to national and local policy and legislation, incorporating measures to deliver environmental benefits.

The sustainable design measures incorporated at this stage and to be considered during the detailed design of the Proposed Development are summarised as follows:

Climate Change Mitigation and Adoption – The Proposed Development will incorporate a range of mitigation measures to reduce carbon emissions, and adaptation measures to ensure the long-term resilience of the Proposed Development to the effects of climate change. Measures include:

- **Decarbonisation of steelmaking** – Transition from integrated iron and steel making to EAF to reduce emissions per tonne of steel produced. Even based on a reasonable worst case scenario, there is expected to be a reduction of 87% in Scope 1 & 2 emissions and 44% Scope 1, 2, & 3 emissions by 2030, compared to the established baseline.

There will also be a benefit in the recycling of British scrap steel, much of which is exported currently.

This aligns with the core principles of **Wales planning policy framework** and **Policy SP1** of

the LDP, ensuring Proposed Development considers the mitigation of climate change during the planning process.

- **Buildings and Energy Efficiency** – The new building will comply with Building Regulations and the Future Building Standard, if in place. Any heated buildings will be all-electric with a heat pump.

Adoption of an Energy Hierarchy to optimise energy demand and consideration of renewable energy generation in line with **Policies SP18 and RE2** of the LDP.

- **Flood Risk and Drainage** – Proposed Development located mainly in Flood Zone 1 (low flood risk); areas with higher risks are managed with Sustainable Drainage Systems (SuDS).

The design complies with **Policies SP1 and BE1** of the LDP to ensure minimal flood impact.

- **Building Resilience** – The design will incorporate UK Climate Projections (UKCP18) for resilience against higher temperatures, altered precipitation patterns, and extreme weather events.

Valuing Our Environment – In line with **Policies SP15, EN8 and W3** of the LDP, the Proposed Development aims to protect and enhance the local environment, minimise any negative impacts on the natural environment through a range of design measures, including:

- **Biodiversity Enhancements** – Implementation of a CEMP and Species Protection Plan to safeguard local wildlife.

Plans for a HMP and GIS to ensure biodiversity net gain, in line with the **Environment (Wales) Act**.

- **Air Quality** – The Proposed Development is expected to improve local air quality. It will

significantly reduce emissions of various pollutants, including oxides of nitrogen (NO_x), fine particulate matter (PM₁₀ & PM_{2.5}), sulphur dioxide (SO₂), carbon monoxide (CO), PAHs and dioxins between 2023 (the baseline) and once the EAF is operational.

The project will also reduce traffic-related emissions. Both during construction and operation, the Proposed Development is anticipated to have minimal negative impacts and mostly beneficial effects on air quality for both human and ecological receptors.

- **Noise** – RSK Acoustics' assessments show that with proper mitigation measures, the Proposed Development's construction and operational phases the noise and vibration levels will be at a similar level to the established baseline.
- **Sustainable Materials** – The design will incorporate retained and reused material where possible. Otherwise, the materials used will be dependent on original equipment manufacturer specifications.
- **Waste Management** – Operational waste, including EAF slag, red dust, refractory bricks, electrodes and others, will be reduced and recycled wherever possible.

Hazardous substances will be stored and managed properly, complying with regulations, and reducing environmental risks.

Achieving Sustainable Accessibility – Through a range of design measures the Proposed Development aims to enhance sustainable transportation, as requested by **Policies TR2 and BE1** of the LDP, including:

- **Traffic Reduction** – Traffic will be reduced due to fewer staff and no coal deliveries. A Construction Traffic Management Plan will be incorporated to reduce congestion.
- **Active Travel and Public Transport** – Pedestrian and cycling paths adjacent to the development.

Access to public transport, with nearby bus stops and Port Talbot Parkway Railway Station within walking distance.

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