



Tata Steel UK Limited (Tata Steel)

Electric Arc Furnace (EAF)

Statement of Compliance

Reserved Matters: Application No.1 – Preliminary Works and
National Grid Substation Compound

RSK Project No. 664195



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RSK GENERAL NOTES

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Title: Port Talbot, Electric Arc Furnace: Statement of Compliance Reserved Matters: Application No. 1 – Preliminary Works and National Grid Substation Compound

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GLOSSARY

EAF Development (including full and outline planning components)	EAF Development
Reserved matters: electrical works	Proposed Development
Tata Steel UK Limited	The Applicant
The EAF Environmental Statement	EAF ES
EAF Planning Boundary	the wider Site
Reserved matters substation compound	the Site

1 INTRODUCTION

1.1 Background

- 1.1.1 Tata Steel UK Limited ('the Applicant') submitted a hybrid planning application (P2024/0711) in November 2024 for the construction of a new electric arc furnace (EAF) based steel production facility within the existing Port Talbot Steelworks at Margam in South Wales under the Town and Country Planning Act 1990 (as amended).
- 1.1.2 The hybrid planning permission was approved by Neath Port Talbot Council (NPTC) in March 2025. The full description of development was as follows:
- "Full planning permission for the demolition of existing buildings and structures, partial infill of the basic oxygen steelmaking (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."*
- 1.1.3 The hybrid planning permission splits conditions between the full and outline elements of the EAF Development. Conditions 39 onwards of P2024/0711 relate to the outline planning permission and are referenced throughout this reserved matters application. Of particular note is Condition 68 of P2024/0711 which requires the development to be carried out in 'substantial accordance' with the principles and mitigation measures as set out in the EAF ES.
- 1.1.4 The Applicant has begun discharging conditions with all pre-commencement conditions discharged by early July 2025.
- 1.1.5 This Statement of Compliance (SoC) has been prepared to support the first reserved matters application pursuant to P2024/0711, which covers the construction of a new substation and associated infrastructure ('the Proposed Development'). Further detail relating to the Proposed Development is provided in Section 1.2 of this SoC.
- 1.1.6 An Environmental Statement (EAF ES) was prepared and submitted to support the hybrid planning application in November 2024 in accordance with the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 (hereafter 'the EIA Regulations').
- 1.1.7 The purpose of this document is to assess the likely environmental effects of the Proposed Development against the relevant consented parameter plans and wider principles and mitigation measures that formed part of the EAF ES, including the Site, design and size.

This is to determine if the Proposed Development, which was assessed under the outline planning application of the hybrid application, would result in any new or different effects that would change the conclusions of the EAF ES.

- 1.1.8 In undertaking this SoC, the Proposed Development has been compared with the outline elements of the EAF Development, as described in EAF ES Chapter 2 and illustrated in the parameter plans in EAF ES Figure 2.2. The Proposed Development is within these parameters, which were assessed within the EAF ES, and there are no changes in circumstances. Consequently, no additional assessment of environmental effects has been necessary for any of the environmental factors that were scoped into the EAF ES. However, the EAF ES assessment that is relevant to the outline elements of the Proposed Development has been checked in the context of the updated proposals for the reserved matters application, and for each environmental factor confirmation is provided to confirm that the EAF ES still accurately reflects the Proposed Development and adheres to the recommended mitigation measures. This process is summarised for each environmental factor within Chapter 2 of this SoC.
- 1.1.9 It is considered that the environmental factors that were scoped out of the EAF ES (as detailed in EAF ES Chapter 4), including material assets and waste, daylight, sunlight and overshadowing, and heat and radiation, can remain scoped out of assessment for the purposes of this SoC. However for completeness, an assessment of the electric and magnetic fields (EMFs) for the Proposed Development has been included as part of the reserved matters submission. The EMFs assessment concluded that the design of the Proposed Development is fully compliant with the Government policies on EMFs. Specifically, all the fields produced by the Proposed Development are below the relevant exposure limits.

1.2 Description of the Proposed Development

- 1.2.1 The EAF Development requires a new high voltage electrical connection to the National Grid Margam substation which is located outside of the EAF Development boundary. The power distribution upgrades required within the EAF Development boundary are part of the current reserved matters application and were assessed in the EAF ES.
- 1.2.2 The description of the Proposed Development for this first reserved matters application is as follows:

“Application for the approval of reserved matters (appearance, scale and layout) pursuant to planning permission P2024/0711 for the development of preliminary works and a new substation compound. Works to include earthworks, construction of working platforms, surface water management and drainage infrastructure, new electrical infrastructure (including ducting), new and improved internal access roads, 4 no. transformers, 1 no. generator, GIS building, amenity/welfare facility, water tank, storage/workshop buildings, boundary treatments, lighting, CCTV, noise mitigation measures, parking, creation of hardstanding and associated engineering operations.”
- 1.2.3 The overall area of the Proposed Development in this first reserved matters application is 10 hectares.
- 1.2.4 The Proposed Development will comprise of the following:
 - Construction of a 275/33kV substation;

- GIS building with adjoining annex to house 275kV electrical switchgear and ancillary equipment;
- Four 275/33kV transformers 180MVA SGTs;
- 275kV outdoor gas insulated bus bars;
- 33kV air insulated electrical equipment;
- Amenity building comprising office, meeting room and welfare;
- Workshop and Storage buildings;
- Freestanding diesel generator with acoustic enclosure;
- Security fencing;
- Surface water management and drainage infrastructure including internal drainage systems;
- Water storage tank;
- CCTV;
- Creation of designated car parking area (four standards spaces and two accessible);
- Installation of noise mitigation measures; and
- Associated civil works.

1.2.5 Earthworks will be required to create a platform level for the Proposed Development. The final platform level will be circa. 7 m Above Ordnance Datum (AOD) and has been designed to minimise cut and fill volumes. Planning Drawing MARPT-BHK-02-XX-DG-S-162302, which has been submitted with the planning pack to support the reserved matters application, depicts the existing and proposed site levels.

1.2.6 The planning drawings from the reserved matters application planning pack that have been used to inform this SoC are provided are summarised in **Table 1-1**. As highlighted in **Paragraph 1.1.8**, it is considered that there are no changes in circumstances between the Proposed Development as presented within the reserved matters planning pack, and the parameters that were assessed in the EAF ES. Where relevant, any additional detail of proposals provided within these plans is referred to within the appropriate factor section within Chapter 2 of this SoC, to confirm how these relate to the likely significant effects that were identified within the EAF ES, and the conclusions reported.

Table 1-1: Planning Drawings informing the SoC

Drawing Title	Drawing Reference and SoC Reference
Port Talbot GIS Hall - Level 00 General Arrangement Plan Proposed	MARPT-BHK-02-00-DG-A-200211
Level 00 - Fire Strategy Plan & Sections	MARPT-BHK-02-00-DG-A-200611
Port Talbot GIS Hall - GIA Plans	MARPT-BHK-02-00-DG-A-291008
Port Talbot GIS Hall - GEA Plans	MARPT-BHK-02-00-DG-A-291009
Port Talbot GIS Hall - Level 01 General Arrangement Plan Proposed	MARPT-BHK-02-01-DG-A-200212
Port Talbot GIS Hall - Level R2 General Arrangement Roof	MARPT-BHK-02-R2-DG-A-200213

Drawing Title	Drawing Reference and SoC Reference
Port Talbot Proposed External Lighting Layout	MARPT-BHK-02-XX-DG-E-320010
Port Talbot Fencing Details	MARPT-BHK-02-XX-DG-S-162302
Port Talbot GIS Hall - Location plan	MARPT-BHK-02-ZZ-DG-A-130051
Port Talbot GIS Hall - Site Plan Existing	MARPT-BHK-02-ZZ-DG-A-130054
Port Talbot GIS Hall - Site Plan Proposed	MARPT-BHK-02-ZZ-DG-A-130055
Port Talbot GIS Hall - Proposed Site Plan & National Grid Works	MARPT-BHK-02-ZZ-DG-A-130056
Port Talbot GIS Hall - General Arrangement Sections	MARPT-BHK-02-ZZ-DG-A-200310
Port Talbot GIS Hall - General Arrangement Elevations Proposed	MARPT-BHK-02-ZZ-DG-A-200410
Port Talbot GIS Hall - Level 00 Workshop & Storage Unit	MARPT-BHK-02-ZZ-DG-A-200420
Port Talbot GIS Hall - Water Tank	MARPT-BHK-02-ZZ-DG-A-200421
Port Talbot Amenity Building Proposed Fire Strategy	MARPT-BHK-02-ZZ-DG-A-200750
Port Talbot Amenities Building - Ground Floor & Roof General Arrangement	MARPT-BHK-02-ZZ-DG-A-201551
Port Talbot GIS Hall - Proposed Materials	MARPT-BHK-02-ZZ-DG-A-202052
Port Talbot GIS Hall - Context Elevations Proposed	MARPT-BHK-02-ZZ-DG-A-202152
Port Talbot Amenities Building - Elevations - General Arrangement & Materials	MARPT-BHK-02-ZZ-DG-A-202551
Port Talbot Amenities Building - Sections - General Arrangement	MARPT-BHK-02-ZZ-DG-A-203551
PORT TALBOT DRAINAGE LAYOUT SHEET 01 OF 02	MARPT-BHK-02-ZZ-DG-C-181512
PORT TALBOT DRAINAGE OIL INTERCEPTOR DETAILS SHEET 01 OF 01	MARPT-BHK-02-ZZ-DG-C-181530

1.3 Secured Mitigation Measures

1.3.1 The following management plans have been provided in accordance with mitigation measures detailed within the EAF ES are applicable to the reserved matters application and will be adhered to. Details of their implementation have been provided, where relevant, throughout this SoC. These management plans, which are secured by planning conditions through P2024/0711, are listed below and the corresponding condition for each one is provided:

- Construction Environmental Management Plan (CEMP), Condition 50;

- Landscape and Ecological Management Plan (LEMP), submitted with the hybrid application. This is not conditioned through P2024/0711 but is required to be implemented by Condition 68 to be in accordance with the EAF ES principles and mitigation measures;
- Construction Noise and Vibration Management Plan (CNVMP), Condition 49;
- Air Quality Management Plan (AQMP), Condition 52;
- Materials Management Plan (MMP), Condition 53; and
- Soils and Peat Management Plan (SPMP), Condition 54.

1.4 EAF ES Parameters considered within the SoC

- 1.4.1 The outline planning elements of the EAF Development have been assessed on the basis of the parameter plan submitted as Figure 2.2 of the EAF ES. The works for the grid connection cable connecting the Proposed Development to the National Grid Margam substation (which is located outside of the EAF Development boundary) are to be delivered by a third party (National Grid) and are not considered within this SoC.

1.5 Electrical Connection Works

- 1.5.1 **Table 1-2** presents the detailed design information proposed by the Applicant for the reserved matters application.

Table 1-2: Detailed list of proposed development components for the electrical connection works

Component Name	Length (m)	Width (m)	Maximum Height (m)
Substation	26.477	49.623	12.940
Water tank	Concrete slab tank is sat on 6.9m	Concrete slab tank is sat on 6.9m	6.00
Transformer enclosures	5.0	9.1	16.3
Transformers	7.9	10.1	14.7
Storage units	2.591	2.438	6.096
Workshop	2.591	2.438	6.096
Amenity building	7.09	12.346	3.407

2 ASSESSEMENT OF ENVIRONMENTAL EFFECTS

2.1 Landscape and Visual Impact

- 2.1.1 An assessment of the likely significant effects of the proposed EAF facility on landscape and visual amenity was undertaken in ES Chapter 5 of the EAF ES. This SoC should be read in conjunction with ES Chapter 5.
- 2.1.2 The wider Site straddles two neighbouring landscape character areas (LCA): LCA 50: Port Talbot Docks and Margam Works and LCA 1: Margam Marsh, as defined by the Neath and Port Talbot Landscape Assessment (December 2004)¹. LCA 50 comprises large-scale heavy industry which forms the vast majority of the wider Site which includes the Proposed Development. The remaining area of the wider Site is located within LCA 1, which consists primarily of unmanaged marsh grassland and primarily forms the route for the underground electric cable.
- 2.1.3 The substation will be located with the Tata Steel UK Ltd landholdings which forms part of an operational steelworks which is a long-established industrial landmark in Port Talbot and Swansea Bay. The EAF facility will be bounded to the north, east and west by existing and operational industrial development of the steelworks. Major structures of the steelworks include the continuous annealing process line building, to the north and east, the permanent gasholder and Morfa Coke Ovens, to the west, located between the Site and the beach, and the two blast furnaces. A large lagoon is also located to the immediate west within the wider Site.
- 2.1.4 The Port Talbot harbour and docklands, operated by Associated British Ports is located to the north, while to the south Longland Lane access track and public right of way runs from east to west along the southern boundary of the wider Site.
- 2.1.5 Chapter 5 of the EAF ES notes that the operational steelworks is an existing destination and a major industrial landmark in Port Talbot and Swansea Bay. Major industrial buildings of significant scale and mass are common in this location, including large emissions stacks and the two blast furnaces. The buildings and heavy industrial nature of the area within which they operate are integral elements of the character and appearance, and skyline, of Port Talbot.
- 2.1.6 The outline planning elements for the substation compound in the EAF ES were assessed on the basis of maximum parameters with the maximum height of the compound at 15 m. As detailed in **Table 1-2**; the maximum height of the substation will be the GIS Hall with a height of 13.09 m, which is lower than the maximum height assessed in the landscape and visual chapter in the ES.
- 2.1.7 In addition, a Zone of Theoretical Visibility (ZTV) was produced which illustrated a worst-case scenario based on the footprint of the wider Site boundary (Figure 5.1, 5.1a, 5.1b and 5.1c of the ES) to a height of 83.2 m AOD.

¹ https://www.npt.gov.uk/media/9005/spg_landmap_landscape_assessment_2004.pdf

Construction

- 2.1.8 As depicted in Figure 8.3 of the EAF ES, the Proposed Development footprint comprises of dense scrub, ephemeral/short perennial, bare ground, standing water and hardstanding. These habitats will be lost as a result of the construction of the Proposed Development. Sheet 9 of Figure 2.4 of the EAF ES illustrates the retained vegetation within the immediate vicinity of the Proposed Development including rough grass/mosaic habitat. Habitat creation will be undertaken in accordance with the LEMP.
- 2.1.9 The potential effects during the construction phase are generally assessed as lower in magnitude than the operational phase due to the temporary and short term nature. It was assessed that there would be no significant construction effects on landscape character.
- 2.1.10 Significant moderate adverse visual effects would be limited to users of Longland Lane during the construction phase of the EAF Development (including the Proposed Development). Other short-term moderate adverse effects would be experienced from the Wales Coast Path during construction, however these are considered not significant as they would be viewed as contained within the context of existing industrial development.

Operational

- 2.1.11 Section 5.6.2 of the EAF ES, notes that the proposed EAF facility including the substation compound would introduce a new element into the wider Site that is entirely in keeping with the existing LCA 50: Port Talbot Docks and Margam Works landscape, where the majority of the EAF Development (including the Proposed Development) is located.
- 2.1.12 The substation will be located within the existing industrial area of the wider site and will make use of the existing transport infrastructure. It will largely be perceived as part of the existing Site infrastructure and works, rather than a new development. The scale of the proposals will not extend the working area of the Site and the height and massing of buildings will be subservient to existing plant and buildings.
- 2.1.13 The extent of operational effects upon landscape character would be limited by the topographic containment of the coastal plain by the rising land and forestry on Mynydd Margam to the east, existing industry and urban form to the north and the landfill and Kenfig Dunes to the south. The effects of the Proposed Development on landscapes to the west would be mitigated by the wide expanse of Swansea Bay, which creates significant separation distances to receptors.
- 2.1.14 There were no significant effects reported on landscape character. Moderate/minor (not significant) effects of neutral nature were reported on LCA 50: Port Talbot Docks and Margam Works (where the Proposed Development is located), whilst effects were judged as moderate/minor (not significant) adverse for the LCA 6: Mynydd Brombil, Mynydd Emroch & Mynydd Dinas. These levels of effect would be predominantly contained within a maximum 3 km radius of the Proposed Development to the east, with impacts reducing even further with greater distance and extent of screening.
- 2.1.15 LCA 1: Margam Marsh would experience small scale effects as a result of changes primarily experienced to a neighbouring landscape, which would not markedly change the scale of industrial development in view. These effects associated with the EAF Development would be experienced over an intermediate extent within the landscape, which was assessed as low sensitivity. The operational effects on LCA 1: Margam Marsh would be of moderate to slight magnitude, and minor (not significant).

- 2.1.16 There would be no significant visual effects for visual receptors during operation resulting from the EAF Development (including the Proposed Development), due to the extent of local screening and the extent of existing industrial development on the wider site.
- 2.1.17 The EAF ES included Viewpoint 1 from Longlands Lane (ES Figure 5.9 – Viewpoint 1a-c)) which is representative of walkers on the path and illustrates the most open views available. This illustration includes photomontages with visualisations of the outline proposals. Existing views from this point consist of Margam Moors in the foreground which extend toward the steel works in the middle and longer distance. Established scrub vegetation screens views into the existing brownfield land of the site further to the north. This vegetation would screen or filter the Proposed Development. The illustrations visualised in the photomontage show the parameters that are associated with the construction of the EAF and scrap facility, and views from Longlands Lane will be towards these areas within the wider site. The assessment concluded that, from this viewpoint, the scale of landscape change would be medium/small, and the scale of visual change would be medium for the EAF Development. As the Proposed Development is within the assessed parameters, there would be no change to these conclusions.
- 2.1.18 There would be at most minor (not significant) effects of neutral nature for residents at Broomhill, Port Talbot and minor (not significant) adverse effects for users of the M4. Recreational receptors would experience effects assessed as at most moderate (not significant) adverse as a result of views from Longland Lane in close proximity and from the elevated sections of the Wales Coast Path to the east. Walkers on the Ogwr Ridgeway and Glamorgan Ridgeway Walks would experience up to moderate/minor (not significant) adverse effects from the upper deer park within Margam Country Park. Other recreational receptors would experience reduced effects at greater distances, with none greater than minor (not significant) effect of neutral nature.
- 2.1.19 The EAF Development (including the Proposed Development) would be outwith any designated landscapes. Indirect effects on the locally designated SLA 4: Margam, designated for scenic quality, were assessed as at most minor adverse, hence no significant effects were identified to locally valued landscapes.
- 2.1.20 The EAF ES details that new lighting will be designed to minimise light spillage whilst providing a safe working environment, noting that the existing steel works is already a well-lit feature within the views.
- 2.1.21 As noted in Section 5.7.105 of the EAF ES, it was considered that the EAF Development would not give rise to effects meeting a threshold to be a light nuisance, as described in the Light Pollution Study (submitted as a supporting document within the hybrid planning application).
- 2.1.22 The proposed lighting scheme for the Proposed Development has been designed in accordance with the Light Pollution Study and will be lower than the levels stated in the Light Pollution Study. Therefore the conclusions regarding night-time operational visual effects assessed in the EAF ES remain valid and unchanged.

Conclusion

- 2.1.23 As the Proposed Development would be within the maximum parameters assessed as part of the EAF ES, no new or different effects are anticipated. This section of the SoC has

demonstrated that the landscape and visual assessment conclusions reported in the EAF ES remain valid for this reserved matters application.

2.2 Air Quality

- 2.2.1 An assessment of the likely significant effects of the proposed EAF facility on air quality was undertaken in Chapter 6: Air Quality of the EAF ES. This SoC should be read in conjunction with EAF ES Chapter 6.

Construction

- 2.2.2 Emissions to air from demolition and construction activities, particularly in the form of dust, have the potential to cause a loss of amenity (due to dust soiling) or to affect (vascular) plant species sensitive to dust. The finer fraction of dust in the form of PM₁₀ and PM of finer fractions also has the potential to affect human health. Given the variability of demolition and construction sites and the range of activities undertaken, a qualitative assessment was undertaken to identify best practicable means for mitigating potential emissions.
- 2.2.3 Chapter 6: Air Quality of the EAF ES states that dust emitted by construction activities would result in a negligible effect on receptors when embedded mitigation measures are put in place. The overall dust risk from the wider Site is predicted to be medium, due to potential impacts on ecologically sensitive receptors, such as the Margam Moors Site of Special Scientific Interest (SSSI).
- 2.2.4 A CEMP and AQMP have been produced which include site specific mitigation measures for dust, vehicle, and industrial emissions. These measures will be effective whenever potentially dusty construction activities take place. With these measures in place, effects on receptors are likely to be negligible, with possible short-term minor adverse effects during adverse weather conditions.
- 2.2.5 As detailed in Chapter 6 of the EAF ES; vehicle and industrial emissions including nitrogen dioxide (NO₂), PM₁₀, PM_{2.5}, carbon monoxide (CO) and sulphur dioxide (SO₂) effects from emissions generated from industrial and road traffic are considered likely to remain short- to medium-term, local, and either negligible or beneficial (and thus 'not significant') on air quality at existing human receptor locations and (in comparison to critical levels and for the acid deposition relative to the critical load) designated ecological sites.
- 2.2.6 Additional mitigation (beyond embedded measures) is not considered to be required, owing to the relatively small impact which construction, vehicle movements and plant will have on air quality. No new or different effects are anticipated during the construction phase of the Proposed Development and the conclusions of the EAF ES remain valid and unchanged.

Operation

- 2.2.7 Fugitive dust from the wider Site during operation will be controlled by the existing Air Quality Management Plan for the steelworks site and Proposed Development. The existing operations are regulated by an Environmental Permit issued by Natural Resources Wales, which will require a variation due to the EAF Development. In addition to regulating activities through permits, 'Best Available Technology' will be implemented to control emissions from fugitive dust generated by the EAF and scrapyard. With these mitigation measures in place, the EAF ES concluded that there would not be any potentially significant effects associated with operational fugitive dust.

- 2.2.8 Given the nature of the Proposed Development, no activities resulting in significant emissions to air are anticipated during operation. The following conclusions of the EAF ES remain valid and unchanged.
- 2.2.9 Concentrations of operational vehicle and industrial emissions were modelled for two scenarios: Future Operational without Development (2027) and Future Operational with Development (2027). Modelling demonstrated that emission concentrations would be lower for Future Operational with Development compared to Future Operational without Development scenario. Consequently, the Proposed Development is likely to have medium- to long-term, local predominantly beneficial or otherwise negligible 'not significant' effects on air quality at existing human receptor locations once operational.
- 2.2.10 In addition, these scenarios were modelled at ecological receptors and it was concluded that the EAF Development is likely to have generally beneficial and 'not significant' air quality effects at designated ecological sites once operational.

Conclusion

- 2.2.11 As the Proposed Development would be within the maximum parameters assessed as part of the EAF ES, no new or different effects are anticipated. This section of the SoC has demonstrated that the air quality conclusions reported in the EAF ES remain valid for this reserved matters application.

2.3 Noise and Vibration

- 2.3.1 An assessment of the likely significant effects of the proposed EAF facility on noise and vibration was undertaken in Chapter 7: Noise and Vibration of the EAF ES, including specific reference to Proposed Development (i.e. the Electrical Compound) related to the operation of the EAF. This SoC should be read in conjunction with EAF ES Chapter 7.

Construction

- 2.3.2 Mitigation during demolition and construction of the EAF Development (including the Proposed Development) will include Best Practicable Means (BPM) as defined under Section 72 of the Control of Pollution Act 1974 to minimise noise and vibration impacts, which will be detailed in a Construction Noise and Vibration Assessment (CNVA) and have been detailed in the CEMP and CNVMP.
- 2.3.3 Chapter 7 of the EAF ES assessed the construction noise levels based on the construction noise in isolation, without any contribution from ambient noise levels, in accordance with the methodology in BS 5228+A1:2014. The conclusions were that the effect on residential properties and SSSI receptors would be minor and adverse respectively, which has been assessed as not significant. The construction noise levels for the works associated with the Proposed Development are not predicted to result in any greater effect than assessed within the EAF ES, as the Proposed Development will be required to comply with BPM, the CNVA and CEMP. Therefore, the conclusions of the EAF ES remain valid and unchanged.
- 2.3.4 For the construction vibration assessment within the EAF ES, the setback distance between the vibratory compaction works involving large plant items and the existing residential properties is anticipated to be over 500 m for the closest receptors. On this basis, vibratory compaction works are unlikely to give rise to vibration levels which could result in disturbances for occupants of the adjacent properties i.e. PPV <0.3 mm/s. The effect was determined to be not significant. All construction works required as part of the Proposed Development are within the wider Site boundary assessed within the EAF ES, and therefore the conclusions of this assessment remain valid and unchanged as the closest receptors will remain over 500 m from vibratory compaction works involving large plant items.
- 2.3.5 The construction traffic noise assessment within the EAF ES concluded that there would be a not significant effect on sensitive (residential and SSSI) receptors. Calculations indicate that the change in noise levels due to construction traffic is likely to be below 1dB at all noise sensitive receptors. Based on the description of the Proposed Development provided in **Section 1.2**, construction traffic volumes are unlikely to exceed those assessed in the EAF ES. Therefore, the conclusions of the EAF ES remain valid and unchanged.

Operation

- 2.3.6 An operational Noise and Vibration Management Plan has been produced which details the noise control measures in order to minimise the potential for adverse noise impacts. This section focuses on impacts of the noise generated by the Proposed Development.
- 2.3.7 For operational effects on human (residential) receptors, including that of the operational Proposed Development, the EAF ES concluded that there would be an ambient sound

level change of less than 1 dB levels against the established baseline, which are considered as 'small' in magnitude. Mitigation measures were developed as part of the ES for the wider site, with those measures being developed in more detail for some plant items. This includes the Proposed Development which is being designed to meet the noise emission, and off site contributions, as specified in the ES. Noise control measures at the Proposed Development will be in the form of noise control at source (i.e. through equipment design), and then depending on final noise emissions of transformers (following results of factory acceptance tests of plant), will include localised strategic barriers, or partial transformer enclosures. Measures will be implemented to ensure compliance with agreed noise limits for the EAF Development. Due to the design maturity at the time of submitting the hybrid planning application, these control measures were not included within the EAF ES. The subsequent design process for the Proposed Development was supported by a noise assessment to ensure suitable mitigation measures were incorporated within the reserved matters application, and to ensure that the Proposed Development is in accordance with the assessment and conclusions in the EAF ES.

- 2.3.8 The EAF ES concluded that there would be a not significant effect on SSSI receptors as a result of the Proposed Development. This was due to the maximum predicted noise levels of between 41 dB $L_{Aeq, T}$ and 48dB $L_{Aeq, T}$ being below the 55 dB L_{AFmax} threshold. The EAF ES also concluded that quiet area receptors are considerably below the adopted 50 dB (A) threshold and consequently considered not significant. It is not predicted that the Proposed Development will result in increases in noise levels that would increase operational noise levels to be above this threshold, therefore the conclusions of the EAF ES due to the Proposed Development remain valid and unchanged.

Conclusion

- 2.3.9 As the Proposed Development would be within the noise and vibration parameters assessed as part of the EAF ES, and with mitigation measures to be adopted, including at source noise control measures for the transformers, there are no new or different effects anticipated. This section of the SoC has demonstrated that the noise and vibration conclusions reported in the EAF ES remain valid for this reserved matters application.

2.4 Biodiversity

- 2.4.1 An assessment of the likely significant effects of the proposed EAF facility on biodiversity was undertaken in Chapter 8: Biodiversity of the EAF ES. This SoC should be read in conjunction with EAF ES Chapter 8.
- 2.4.2 The spatial and temporal extents of biophysical changes likely to be generated during the construction and operation of the EAF Development with the potential to lead to effects upon ecological features are listed in **Table 2-1**.

Table 2-1: Activities likely to generate ecological effects

Activity	Potential effect
Construction phase	
Site clearance and demolition	• Possible loss of roost sites for bats following demolition or renovation of buildings; • Loss of on-site habitats; • Noise/lighting disturbance to vulnerable species; • Individual mortality/injury to species; and • Dust and other pollutants.
Assembly and storage of machines and materials	• Loss of on-site habitats; • Noise/lighting disturbance to vulnerable species; and • Water-borne pollution including the risk of chemical and fuel spills.
Movement of construction vehicles	• Noise/lighting disturbance to vulnerable species; and • Individual mortality/injury to species.
Lighting of works area	• Disturbance to and displacement of vulnerable species.
Drainage	• Change in water quality of existing drainage network.
Earthworks, excavation and piling	• Noise disturbance to vulnerable species.
Erection of new buildings	• Potential disturbance to vulnerable species
Operational phase	
Drainage	• Change in water quality of existing drainage network.
Lighting	• Disturbance to vulnerable species.
Noise	• Disturbance to vulnerable species.
Habitat creation	• Potential positive biodiversity benefit.

- 2.4.3 The biodiversity assessment was based on the following assumptions:
- There would be no large areas of trees removed.
 - There would be a minimum 6 m offset of construction works from all waterbodies where practicable;
 - No additional lighting would be added to areas that are currently dark; and
 - No drainage ditches would be removed, and the grid connection cable route would use temporary short-term over-pumping to allow for the installation beneath them.
- 2.4.4 There are six statutory designated sites covered by nine designations located within 10 km of the wider Site including Margam Moors – SSSI which is located adjacent to the wider Site.
- 2.4.5 There are three non-statutory designated sites within 1 km of the wider Site including Neath Port Talbot Watercourses Site of Importance for Nature Conservation (SINC). All Neath Port Talbot Watercourses are designated as SINC, therefore there are SINC present within the wider Site.
- 2.4.6 As depicted in Figure 8.3 of the EAF ES, the Proposed Development footprint comprises of dense scrub, ephemeral/short perennial, bare ground, standing water and hardstanding.
- 2.4.7 The following receptors were assessed in Chapter 8 of the EAF ES:
- Statutory designated sites (within 1 km of the EAF including the Margam Moors SSSI);
 - Non-statutory sites (including onsite SINC);
 - Coastal floodplain grazing marsh;
 - Open mosaic habitat (scrub and ephemeral);
 - Other habitats (including broadleaved woodland, open water and semi-improved neutral grassland habitats);
 - Invertebrates;
 - Reptiles;
 - Breeding birds;
 - Wintering birds;
 - Foraging/commuting bats; and
 - Invasive non-native species.
- 2.4.8 No additional vegetation is required to be removed as part of reserved matters application than what was previously assessed in the EAF ES. Sheet 9 of Figure 2.4 of the EAF ES illustrates the retained vegetation within the immediate vicinity of the Proposed Development including rough grass/mosaic habitat. Habitat creation would compensate for what is being lost and will have a direct, long-term beneficial effect, and planting will be undertaken through the implementation of the LEMP and the Biodiversity Net Benefit report. It is therefore considered that the conclusions stated in the EAF ES are still applicable, which are summarised below.

Construction

- 2.4.9 There will be no direct habitat loss from any of the statutory sites resulting from the EAF Development (including the Proposed Development).

- 2.4.10 There will be areas of open mosaic habitat (i.e., scrub and ephemeral) lost through the construction of the Proposed Development. Construction will be overseen by an Ecological Clerk of Works (ECoW), as required by Condition 51 of P2024/0711, and a CEMP has been prepared detailing the mitigation measures required throughout construction (Condition 50 of P2024/0711). The habitat creation will compensate for what is being lost and as concluded in Section 8.7.47 of the EAF ES has the potential to result in direct, long-term, permanent beneficial (significant) effect.
- 2.4.11 Approximately 2.54 ha of scrub, semi-improved neutral grassland and open water would be permanently lost as a result of construction of the EAF Development. No additional loss of these habitats is proposed as part of the Proposed Development.
- 2.4.12 The conclusions in the EAF ES regarding the effects on protected species during construction are still applicable. An ECoW would be present during enabling works and throughout the construction period and will ensure that the works are carried out in accordance with the environmental measures detailed in the CEMP and proposed precautionary working method statements. The habitat creation measures outlined in the LEMP will ensure the continued availability of suitable habitat for invertebrates, reptiles, breeding birds, wintering birds and bats (foraging and commuting habitat).

Operation

- 2.4.13 There will be no direct impacts from the operational phase on any of the statutory sites. The impact of air quality at ecological receptors decreases during the EAF operational scenario, representing beneficial impacts.
- 2.4.14 There will be no nitrogen oxides (NO_x) emissions associated with the operation of the Proposed Development, therefore the increase of NO_x will only be related to the operation of the package boilers, which will be removed following the early stages of operation. Once removed, there will be improvements of air quality due to the cessation of the 'heavy end' operation of the steelworks and the resulting reduction of emissions of key pollutants.
- 2.4.15 The Proposed Development will adhere to the LEMP which outlines the long-term management of the retained and created habitats. The LEMP includes lighting design to minimise the lighting of these areas. Low light spill devices will be used adjacent to habitats, minimising the impacts on nocturnal species such as bats using the wider site for foraging and commuting.

Conclusion

- 2.4.16 As the Proposed Development would be within maximum parameters assessed as part of the EAF ES, no new or different effects are anticipated. This section of the SoC has demonstrated that the biodiversity conclusions reported in the EAF ES remain valid for this reserved matters application.

2.5 Surface Water, Flood Risk and Drainage

- 2.5.1 An assessment of the likely significant effects of the proposed EAF Development on surface water, flood risk and drainage was undertaken in Chapter 9: Surface Water, Flood Risk and Drainage of the EAF ES. This SoC is to be read in conjunction with EAF ES Chapter 9.
- 2.5.2 The wider Site is located adjacent to Swansea Bay to the west. There are no Natural Resources Wales Main Rivers within the wider Site. A number of Natural Resources Wales Main Rivers are located within 2 km of the wider Site, including the Afon Cynffig to the south and the Afon Afan and Nantffrwdwyllt to the north. All three of these rivers are used for process water abstraction at the wider Site.
- 2.5.3 The wider Site has a complex network of surface water drainage with several ordinary watercourses crossing the wider. Along with a number of watercourses, the wider Site has an extensive piped drainage network to manage surface water runoff, foul drainage, and process water Site. **Figure 2-1** (a reproduction of Figure 9-3 in the EAF ES) depicts an indication of the surface water drainage within the wider Site.
- 2.5.4 Margam Moors drains in a northerly direction towards the wider Site. The reen network of the moors comprises a SSSI and SINCR, with the extent of the SSSI boundary Heolcae-r Bont, at the southern extent of the Applicant's land ownership. The reen network drains in a northerly direction, through the wider Site, and ultimately drains to the Lower Mother Ditch.

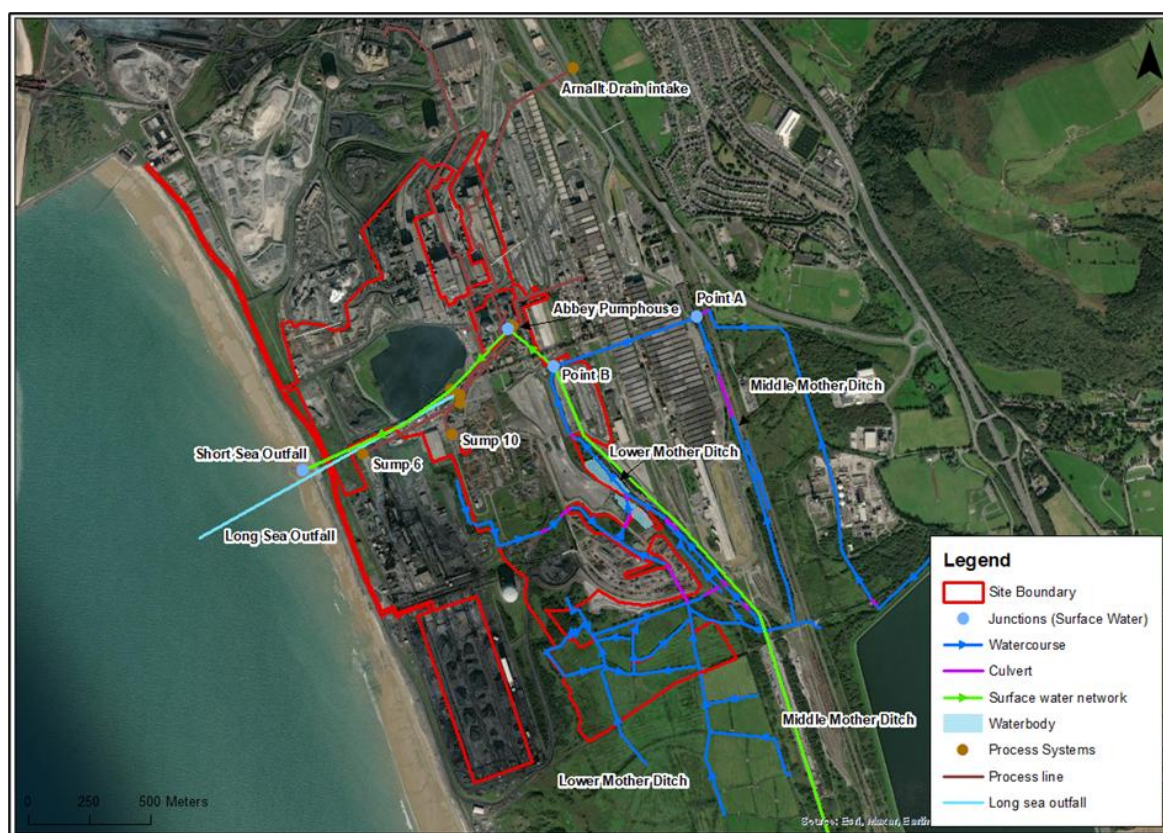


Figure 2-1: Land at Port Talbot Steelworks surface water drainage

- 2.5.5 There is a substantial drainage system in place to process surface water and effluent in a combined network with the Applicant's operational facility. In the south, surface water enters the wider Site from ordinary watercourses (i.e., the Lower Mother Ditch), which is then culverted into the main combined network. There are also other drainage ditches present on-site which connect to the main network.
- 2.5.6 The combined surface/effluent outfall is via the Long Sea Outfall, which discharges approximate 2 km offshore into the Swansea Bay. A second excess surface water outfall discharges via the Abbey Beach outfall (Short Sea Outfall).
- 2.5.7 There is limited water quality data available for the watercourses and wetland/pond areas within the wider Site. As detailed in the EAF ES; the water quality is generally considered to be relatively good in the ditches of the southern portion of the Site, as these flow through areas of coastal floodplain grassland and are fed by watercourses flowing from Margam Moors SSSI.
- 2.5.8 The Proposed Development is not located within Flood Zones 2 or 3.
- 2.5.9 As detailed in the EAF ES (Section 9.6.4), a small section of an unnamed drainage channel will be diverted to accommodate the new substation compound. The channel currently drains the surface water from the land surrounding the Morfa coke ovens and Regen Yard. The watercourse diversion will run around the new facility and will remain largely an open channel with a culverted section beneath the existing carriageway and railway to its eastern extent. The same channel capacity will be maintained as the baseline. Full details of the proposed watercourse diversion is provided in the site drainage strategy which has been submitted in support of the first reserved matters application.
- 2.5.10 Land use within the wider Site will remain the same: as a heavy industry site. There will be an increase in hard standing, where areas characterised by made ground and used for material storage will become hard-standing for process areas or accommodate new buildings.

Construction

- 2.5.11 Chapter 9 of the EAF ES determined that there would not be a significant effect on water receptors; water quality, flood and water resources as a result of the construction of the EAF Development.
- 2.5.12 During construction, mitigation of potential impacts to surface water will be implemented by adherence to strict protocols relating to the method of construction. As required by Condition 50 of P2024/0711, a CEMP has been developed, agreed with appropriate stakeholders, and monitored for compliance throughout construction.
- 2.5.13 The CEMP uses best practice guidance such as the Guidance for Pollution Prevention and Control of Water Pollution from Construction Sites and incorporate on-going monitoring by the Environmental Clerk of Work throughout the construction phase.
- 2.5.14 The CEMP comprises a detailed plan of the mitigation measures and be divided into construction phase or zone as appropriate to the construction delivery plan.
- 2.5.15 Method statements incorporating the necessary water pollution prevention measures have been produced and incorporated into the CEMP for the drainage channel diversion associated with the Proposed Development.

Water Quality

- 2.5.16 The potential effects of construction include considerable disturbance to existing soils, made ground and superficial deposits. This could increase sediment loads, entrain contaminants, and cause a risk of the uncontrolled discharge of hydrocarbon, hazardous or cementitious pollutants. Water quality and ecology of the onsite ordinary watercourses, Swansea Bay (the downstream receiving waterbody) and the Swansea Carboniferous Coal Measures groundwater body could be impacted.
- 2.5.17 Mitigation of impacts is inherent to the CEMP. This includes pollution prevention and control measures during construction and the proposed ecological mitigation measures. The magnitude of impacts is markedly reduced due to these measures, in addition the impacts will be temporary following the reinstatement of habitats through the LEMP.
- 2.5.18 With this mitigation in place, the effect on water quality is determined to be negligible (not significant).

Flood Risk

- 2.5.19 No built development is proposed within the extents of Flood Zone 2 and 3. In the baseline flood risk assessment within the EAF ES, it is noted that there are no surface water flow pathways which could result in off-site surface water flood risk receptors. Existing surface water flood risk for the Site is low to very low and localised in nature. Mitigation measures will be in place to manage the potential for increased surface water flows, where permanent drainage will be constructed at the earliest onset as possible, or temporary drainage will be put into place.
- 2.5.20 The Proposed Development will comprise surface water management as well as new road drainage and drainage connection infrastructure which will serve the proposed laydown area and substation site.
- 2.5.21 With mitigation measures provided in the existing CEMP to manage the potential for increased surface water flows, and the provision of new drainage infrastructure, the effect of the Proposed Development on flood risk will be negligible (not significant).

Water Resources

- 2.5.22 As detailed in the EAF ES, construction of the EAF Development is predicted to require approximately 250m³ of water per day for construction use (separate to the potable supply) supplied via the existing abstraction licenses defined in the Site Environmental Permit. This is well below the abstraction limits for the wider Site. With the addition of the electrical works, the water requirements are still predicted to be well below these abstraction limits, and therefore the effect on water resources remain the same as reported in the EAF ES (not significant).

Residual Construction Effects

- 2.5.23 Overall, for construction effects on water quality, flood risk, and water resources, the environmental effects were classified as negligible or minor (not significant). With the relevant mitigation measures in place, the conclusions of the EAF ES are considered to be valid and unchanged.

Operation

- 2.5.24 The operational phase of the Proposed Development has the potential for long term and permanent effects on the water environment receptors. The EAF ES concluded that there would be a not significant effect on water quality and water resources and there would be a significant beneficial effect on flood risk with regard to surface water quality at Swansea Bay Water Framework Directive (WFD) waterbody.

Water Quality

- 2.5.25 The EAF ES determined that there would be a change to the volume and contaminant concentration in effluent discharge from site processes when compared to the established baseline. The EAF Development will require a variation to the Site Environmental Permit with Best Available Techniques (BAT) to be applied. The Associated Emissions Limits for key contaminants under BAT will decrease compared to the established baseline. Additionally, the water quality within Swansea Bay WFD is predicted to be improved as a result of the EAF Development.
- 2.5.26 The implementation of Sustainable Drainage Systems (SuDS) will improve the water quality of watercourses within the wider Site compared to operations under the established baseline. The use of above ground SuDS features such as a swale along the proposed highway and filter drains within the substation compound will provide contamination removal efficiency not currently present at the wider Site. Where higher pollution hazards are present, namely within the substation compound, appropriate oil interceptors are applied to the system to mitigate the potential impact on the receiving watercourse.
- 2.5.27 Overall, it is anticipated that the Proposed Development will have a small beneficial effect on water quality. The conclusions of the EAF ES are still considered to be valid and unchanged.

Water Resources

- 2.5.28 The EAF ES demonstrated that the EAF Development will require less water and abstraction than the established operational baseline. The proposed water use represents a 71% reduction from baseline levels. This is expected to result in a small 'beneficial' effect.
- 2.5.29 The EAF Development will include the addition of a new water tank, which will further improve water resource provisions across the wider Site, therefore the conclusion of the EAF ES of not significant effects is still considered to be valid and unchanged.

Flood Risk

- 2.5.30 The EAF ES determined that there would be no impact on flood risk from rivers, sea, groundwater and sewers due to the wider Site being at low risk from these sources.
- 2.5.31 The Proposed Development will contribute to additional areas of impermeable surface, including the substation, GIS building, and supporting buildings for welfare and storage. This will generate increased volumes of surface water runoff to the receiving drainage network, compared to the established baseline. This would result in some increased surface water flood risk on-site. However, this would be mitigated by the implementation of the proposed surface water drainage strategy, to convey flows via swales, filter drains and a piped system to its receptor, designed to convey all flows within the system up to the 1 in 30 year rainfall event.

- 2.5.32 The EAF ES assessed that the predicted consequences of reservoir flooding to the EAF Development are largely within the recommended limits of acceptability for flooding (noting that these only apply to fluvial and tidal sources of risk and not specifically reservoir failure). Margam Moors provide a significant low risk area for the reservoir to drain to relatively safely, with the minimum consequence for the Proposed Development. Even in a combined probability event of high fluvial levels in Margam Moors and a reservoir failure, the large area of the moors (1.3 km²) and relatively low elevation provides a very significant volume of storage.
- 2.5.33 The Proposed Development is not predicted to result in a flood risk higher than assessed in the EAF ES. Therefore with mitigation measures in place including the Site Drainage Strategy (which has been developed, and will be submitted, in support of the reserved matters application), the conclusions of the EAF ES (not significant) are considered to be valid and unchanged.

Residual Operational Effects

- 2.5.34 Overall, the effect on operational water environment receptors is predicted to be negligible or minor (not significant), with the exception of surface water quality at Swansea Bay WFD Waterbody where there is predicted to be a moderate beneficial (significant effect).

Conclusion

- 2.5.35 As the Proposed Development would be within the maximum parameters assessed as part of the EAF ES, no new or different effects are anticipated. This section of the SoC has demonstrated that surface water, flood risk and drainage conclusions reported in the EAF ES remain valid for this reserved matters application.

2.6 Land, Soil and Groundwater

- 2.6.1 An assessment of the likely significant effects of the proposed EAF Development on land, soil and groundwater was undertaken in Chapter 10: Land, Soil and Groundwater of the EAF ES. This SoC is to be read in conjunction with EAF ES Chapter 10.
- 2.6.2 The Proposed Development will be located within the footprints and parameters assessed in the EAF ES, therefore the conclusions stated in the EAF ES are still applicable; which are summarised below.
- 2.6.3 The assessment in ES Chapter 10 was split into two zones: Area 1 which is subject to the detailed planning application; and Area 2 which is subject to the outline planning application (including the Proposed Development). Historical mapping of Area 2 shows that this area was predominantly undeveloped agricultural land and moorland from 1876 to 1965. From 1965, this area was developed through the expansion of the steelworks.

Construction

- 2.6.4 An assessment of soil and groundwater contamination through ongoing intrusive site investigation and the preparation of a remediation strategy will form part of the pre-construction phase, as required by Conditions 45 and 46 of P2024/0711, respectively. The CEMP has included specific mitigation measures relating to land, soil and groundwater. In addition, a MMP and SPMP have been prepared. Adherence to these management plans will ensure land contamination, pollution and soils are appropriately managed throughout each stage of construction.
- 2.6.5 The potential construction pollution sources will be associated with contaminants associated with made ground which could be present in shallow unsaturated soils and/or shallow groundwater/perched groundwater and potential leaks and spills from the current and former use of the wider Site.

Geological units

- 2.6.6 The wider Site is underlain by made ground associated with the historical use as a colliery, and subsequent redevelopment to its current use as a steel works.
- 2.6.7 The EAF ES determined that there may be potential effects arising from construction practices (particularly excavations for buildings and infrastructure, demolition, and piling) such as the extraction of superficial geological units and bedrock, removal of existing buildings and hard standing, and creating a preferential pathway for vertical migration of contaminated groundwater. This may mobilise existing known contamination or the release of unknown contamination, and allow pollution of deeper geological units. The Site Investigation identified the presence of solidified slag as a likely constraint to excavation. Additional geotechnical constraints could include groundwater ingress, running sands, and instabilities in excavations.
- 2.6.8 It is anticipated that construction of the Proposed Development could potentially result in a disturbance to geological units, however with the embedded mitigation measures in place (through the CEMP, MMP, and SPMP), contamination of the geological units will be effectively mitigated. Therefore the conclusions of a minor direct and either medium or long term adverse effect, which is not significant, remain valid and unchanged.

Peat

- 2.6.9 A Peat Technical Note was submitted as part of the EAF ES (Appendix 10.3), following consultation with NPTC to address concerns over peat disturbance during construction. Peat deposits were shown to be present within the wider Site at depths from 4.5 to >18 m below ground level.
- 2.6.10 There is potential for construction of the EAF Development i.e., piling driving and excavations for foundations, to encounter peat deposits. The EAF ES determined that, where peat deposits are present within the wider Site, disturbed and excavated peat could be susceptible to drying out causing the release of stored carbon.
- 2.6.11 Peat depths in the vicinity of the Proposed Development ranges between 5 m – 7.8 m (as depicted in Figure 1 of Appendix 10.3 of the EAF ES). The excavation depth for foundations is noted to be generally shallow, up to 3 m in depth, therefore it is unlikely that peat deposits will be encountered during the construction of the Proposed Development. However, as required by Condition 54; a SPMP has been prepared which provides guidance for peat soil handling and storage. In the unlikely event of peat deposits being encountered.
- 2.6.12 The Proposed Development will be required to adhere to the SPMP. This will ensure the works do not entail any additional potential for disturbance of peat than what was considered and assessed in the ES, and the conclusions of the EAF-ES remain valid and unchanged.

Mineral resources

- 2.6.13 The Proposed Development is located within a Mineral Safeguarding Area for safeguarded coal resources, however given the wider site's legacy for coal extraction and the current use as a steelworks, it is unlikely that any remaining coal reserves would be considered for extraction. Therefore it is not anticipated to be a significant impact as a result of the Proposed Development on mineral resources.

Soil resources

- 2.6.14 The soils within the wider site are not of agricultural value, with much of the wider site occupied by buildings or hardstanding. Mitigation measures in relation to the handling of soils have been outlined in the CEMP. The EAF ES considered 'low' receptor sensitivity for soil resource and a 'minor' impact magnitude for construction phase impacts, which would represent a minor direct and long term adverse effect, which is not significant.

Hydrogeology

- 2.6.15 The hydrogeological context for the wider Site is that the Tidal Flat deposits present across the majority of the wider Site are a secondary (undifferentiated) aquifer, with the Blown Sands on the north-east classified as a secondary A aquifer. The South Wales Lower Coal Measures are also as a secondary A aquifer. There are no licenced groundwater abstractions recorded within 1 km of the wider Site.
- 2.6.16 There is the potential that shallow groundwater may be present within the natural superficial deposits, as well as any shallow granular made ground. It is likely that this water will be contaminated given the history of the wider Site, and this water has the potential to

fill excavations. There may be a short-term increase in infiltration and leaching through potentially contaminated soils exposed during clearance and the early phases of construction.

- 2.6.17 A site-specific ground investigation report (Condition 45), and if required, a remediation scheme (Condition 46) will be prepared, which will determine the mitigation measures required (if any) to ensure that significant adverse effects do not occur. Remedial works (if required) would be expected to achieve target criteria (in soils and or groundwater) which would typically demonstrate an improvement in groundwater quality from baseline conditions. Based on a 'medium' receptor sensitivity for Hydrogeology and a 'minor' impact magnitude for construction phase impacts, this would represent a minor direct and long term adverse effect, which is not significant.

Operational effects

- 2.6.18 The wider Site is a Control of Major Accident Hazards (COMAH) upper tier site and is subject to the COMAH Regulations 2015. The wider site currently has an Environmental Contingency Plan and an Environmental Emergency Plan. These will require updating and expansion to incorporate any changes at the Site. In addition, the Site is regulated under an Environmental Permit (EPR/BL7108M) and operation of the Proposed Development would require a variation of the existing environmental permit. This would also require an updated Site Condition Report, a monitoring programme and emergency response plan. Pollution control measures set out in the permit would add certainty that operational activities will not result in significant effects on land, soil and groundwater resources. The Proposed Development will be required to comply with the general provisions of the environmental permit, monitoring programme and plans.
- 2.6.19 The EAF ES determined that proposed activities during the operational phase would be undertaken in a controlled fashion with, for example, extensive hardstanding, materials appropriately stored and closed drainage systems. The function of the Proposed Development, is anticipated to have a much lesser impact than the EAF facility in relation to the associated waste products., Therefore the conclusion in the EAF ES that there would be a not significant effect on land, soil, and groundwater receptors during operation is considered to be still valid.

Conclusion

- 2.6.20 As the Proposed Development would be within the maximum parameters assessed as part of the EAF ES, no new or different effects are anticipated. This section of the SoC has demonstrated that land, soil and groundwater conclusions reported in the EAF ES remain valid for this reserved matters application.

2.7 Cultural Heritage

- 2.7.1 An assessment of the likely significant effects of the proposed EAF Development on cultural heritage was undertaken in Chapter 11: Cultural Heritage of the EAF ES. This SoC is to be read in conjunction with EAF ES Chapter 11.
- 2.7.2 There are no designated assets located within the wider Site. There are three non-designated historical assets located within the wider site, to the north of the Proposed Development, these are:
- Morfa Colliery (421174) is a 19th century colliery in the north-western area of the Site;
 - Morfa Colliery Gas Works (710277) was a private gasworks used to light the colliery buildings; and
 - Theodrics Grange (20041) is a ruined Medieval building which formed part of a monastic grange, possibly of a domestic function.
- 2.7.3 Adjacent to the Site's southern boundary is Margam Warren (24479), a rabbit warren of probable Medieval origin. Although this is recorded as a single point it is likely that it covered land in the immediate vicinity, which may include land within the Site.
- 2.7.4 A desk-based assessment was undertaken as part of the EAF ES which identified that there is:
- A low potential for below ground archaeological remains to be present from the Mesolithic to Early Medieval periods;
 - A medium potential for archaeological remains dating to the Palaeolithic, Post-Medieval and Modern periods likely to be associated with Morfa Colliery and the steelworks respectively;
 - A high potential for archaeological remains dating to the Medieval remains within the wider site, likely to be associated with the grange located within the wider site or associated agricultural activity; and
 - Large areas of the wider site have been disturbed or truncated by Post-Medieval mining and modern development of the steelworks and associated railway tracks. However, borehole records indicate a layer of peat below much of the Site which may contain archaeological potential for remains of low (Local) importance.
- 2.7.5 Historic Landscape Characterisation of the study area defines the south-eastern part of the wider Site as: HLCA002 Margam Moors. This is reclaimed and enclosed salt marsh wetland pasture. There are Medieval and Post-Medieval fields and former Medieval monastic grange land with varied field patterns with typical ridge and furrow, earth bank and drainage features.

Construction

- 2.7.6 The construction heritage assessment in EAF ES Chapter 11: 'Cultural Heritage' identified the potential for disturbance to known and unknown archaeological deposits during construction, however, following the implementation of mitigation measures, there would be no significant effect on archaeology.
- 2.7.7 The Morfa Colliery, Morfa Colliery Gas Works, and Theodrics Grange are non-designated assets of low importance and there is potential for complete or partial removal of previously unknown archaeological remains associated with these historic assets during the construction phase of the EAF Development and Proposed Development. These potential

effects will be mitigated through the adherence of a written scheme of investigation (WSI), as required by Condition 56 of P2024/0711. Works affecting these assets are not associated with, and will not be affected by, the Proposed Development.

- 2.7.8 An discontinuous buried layer of peat with the potential to contain palaeoenvironmental remains is present across the Proposed Development and wider site. Due to the depth of peat deposits it is unlikely that peat will be encountered during construction of the Proposed Development, therefore no new effects on palaeoenvironmental remains are predicted.
- 2.7.9 Through the implementation of the WSI and additional mitigation to offset any direct impacts (if necessary and appropriate), which is to be agreed with Heneb; there is not predicted to be a significant effect on heritage assets as a result of the Proposed Development.

Operation

- 2.7.10 Impacts during the operational phase of the EAF Development have the potential to arise as a result of visual change within the wider site associated with the change in the number of buildings and massing. The Proposed Development falls within the existing steelworks, which already forms an industrial component within each asset's setting. It is therefore considered that there will be no additional impacts that would arise in terms of below ground archaeological remains that have not been considered for the construction phase.

Conclusion

- 2.7.11 As the Proposed Development will be within the maximum parameters assessed in the EAF ES, no new or additional effects are anticipated and therefore the conclusions within Chapter 11 of the EAF ES remain valid.

2.8 Transport and Access

- 2.8.1 An assessment of the likely significant effects of the proposed EAF Development on transport and access was undertaken in Chapter 12: Transport and Access of the EAF ES. This SoC is to be read in conjunction with EAF ES Chapter 12.
- 2.8.2 Due to the end-of-life of much of the heavy end of the steelworks; the coke ovens have recently been turned off and the two blast furnaces have been switched off prior to construction of the EAF Development. This has resulted in the reduction of staff and vehicle numbers. In addition, scrap metal will be delivered to the wider site by rail as delivery by road will no longer be a viable option. On this basis and including the reduction in staff, as well as coal deliveries from the network, the proposed construction and operational phase of the EAF Development will result in a significant reduction in traffic movements when compared to the established baseline.

Construction

- 2.8.3 A transport assessment was undertaken to support Chapter 12 of the EAF ES (Appendix 12.1). This assessment demonstrated that the impact of the construction traffic associated with the EAF Development will not have a material impact on the operation of the local highway network and, through the reduction in vehicle movements, will provide an overall betterment.
- 2.8.4 A Construction Traffic Management and Routing Plan and travel plan have been prepared (as required by Condition 50 of 2024/0711), in order to minimise any construction traffic impacts in Port Talbot. Heavy Good Vehicles (HGVs) will be required to route via the M4 Junction 38, and therefore avoiding Port Talbot. Permitted routes to the M4 will be communicated to all construction contractors (including those associated with the Proposed Development) through displays on site and route plans disseminated to all drivers during site inductions. Signage will also be introduced on exit from the wider site which will remain for the duration of the construction phase.
- 2.8.5 Construction traffic movements Annual Average Daily Traffic and daily HGVs for roads surrounding the wider Site is detailed in Section 12.7 of EAF ES Chapter 12 which demonstrates that there will to be a reduction in staff vehicle and HGV movements when compared to the established baseline. This reduction in traffic is expected to remain applicable with the construction of the Proposed Development.
- 2.8.6 The reduction in vehicle movements will result in:
- A negligible beneficial significance on driver delay and public transport users;
 - For pedestrian delay around Port Talbot and Margam, there will be a negligible beneficial effect;
 - For pedestrian amenity, there will be a reduction in flows of less than -50% on footways and cycleways, which will generate a minor or negligible beneficial effect;
 - There is potential for cyclists and pedestrians to feel fear and intimidation, which is influenced by the volume of traffic, HGV content and the width of the footpath. There are no commonly agreed thresholds for the measurement of fear and intimidation, however none of the links within the study area (consisting of the major road network surrounding the wider Site) have HGV flows of over 2,000 or traffic flows of over 1,200 and therefore the existing degree of hazard would be less than moderate. This would result in a not significant effect;

- For severance, the origins and destinations for the majority of pedestrian trips are likely to be Port Talbot town centre, including the public transport interchange, as well as the bus stops in Margam and therefore the assessment of pedestrian based effects is focused on the routes to these destinations. The EAF Development will result in either no change or a reduction in vehicle movements on all links within the study area during the construction phase, and therefore would be not significant.
- A detailed review of the accident records within the study area for the most recent five year period available (at the time of preparing the EAF ES) is included in the Transport Assessment (Appendix 12.1 of the EAF ES). A total of nine accidents were recorded at M4 Junction 38 during the five-year period. The reduction in vehicle movements at all junctions would result in a negligible beneficial effect which is not significant.

2.8.7 Overall, it has been assessed that the short-term effects associated with the EAF Development construction traffic will not be significant.

Operation

2.8.8 The operational phase of the EAF Development will result in a reduction in staff vehicle and HGV movements when compared to the established baseline. The Proposed Development will be unmanned and will only require maintenance visits.

2.8.9 The EAF Development will not result in an increase in traffic. The potential operational traffic effects are:

- Driver delay – negligible beneficial (not significant);
- Public transport users – negligible beneficial (not significant);
- Pedestrian delay – negligible beneficial (not significant);
- Pedestrian amenity – minor beneficial or negligible beneficial (not significant);
- Fear and intimidation – minor beneficial or negligible beneficial (not significant);
- Severance – negligible beneficial (not significant); and
- Accidents and road safety – negligible beneficial (not significant).

2.8.10 The traffic associated with the operational phase of the EAF Development will not result in significant effects.

Conclusion

2.8.11 The traffic associated with the construction and operational phase of the EAF Development will result in a minor/negligible adverse and minor/negligible beneficial effects. The conclusions in Chapter 12 of the EAF ES remain valid and unchanged for the Proposed Development.

2.9 Climate Change

- 2.9.1 An assessment of the likely significant effects of the proposed EAF Development on climate change was undertaken in Chapter 13: Climate Change of the EAF ES. This SoC is to be read in conjunction with EAF ES Chapter 13.
- 2.9.2 Chapter 13 reported on the likely significant effects relating to climate change are:
- The effect of the EAF Development on climate from greenhouse gas (GHG) emissions / reductions ("climate change mitigation"); and
 - The effects on the EAF Development itself from climate change ("climate change resilience").
- 2.9.3 Steel production at the wider site has, to date, used blast furnaces, which emit significant amounts of greenhouse gases. When fully operational, the Port Talbot steelworks was the largest direct greenhouse emitter in the UK, accounting for around a fifth of Welsh greenhouse gas emissions.
- 2.9.4 Baseline emissions were based on a five-year average between 2020 and 2024 and revealed that the wider site averages approximately 6.25 million tonnes of carbon dioxide equivalent (CO₂e) emissions a year. The assessment predicted a significant emissions decrease from baseline levels in the interim period due to the closure of the operational steelworks and construction of the EAF Development.
- 2.9.5 It is noted that the EAF Development comprises the construction and operation of a new EAF facility, thereby comprising inherent GHG emissions mitigation compared to the steel produced previously by the blast furnaces.
- 2.9.6 The climate change assessment in the EAF ES included both the full and outline planning applications which included the Proposed Development. The calculations and conclusions in Chapter 13 of the EAF ES are therefore still valid and are summarised below.

Construction

- 2.9.1 GHG emissions (CO₂e) from the construction of the EAF Development were forecasted using data provided by the Applicant:
- Construction materials types and quantities (steel, concrete, asphalt, cladding etc); and
 - Forecast daily vehicle movements.
- 2.9.2 The construction climate assessment in the EAF ES determined the total emissions from the production of construction materials were forecast to be 55,055 tCO₂e with the majority of emissions relating to reinforced concrete and structural steelwork. It was determined that there would be a total of 1,344 HGV movements and 7,771 car movements; this is equivalent to 6,414 tCO₂e. Therefore the construction of the EAF Development is expected to emit a total of 61,469 tCO₂e over a period of 3 years.
- 2.9.3 In the context of baseline emissions, the EAF ES summarised that peak annual construction GHG emissions of 30,982 tCO₂e forecast for 2026 which equates to
- 0.495% of 'established baseline' site emissions,
 - 0.494% of Neath Port Talbot Council baseline emissions,
 - 0.115% of Wales baseline emissions, and
 - 0.008% of UK baseline emissions.

- 2.9.4 In relation to carbon budgets, forecast annual construction GHG emissions equates, in 2026, to a maximum of:
- 0.131% of the annual Wales carbon budget and
 - 0.008% of the annual UK carbon budget.
- 2.9.5 The EAF ES concluded that the effect of GHG emissions during construction will be negligible and therefore not significant.
- 2.9.6 It is expected that there will be some variation in the construction emissions as a result of the reserved matters application, due to the availability of the detailed design. However, it is noted that reasonable worst-case assumptions were made for the forecasted material types/quantities and daily vehicle movements. Based on the description of the Proposed Development, it has been determined that similar materials and quantities will be used to those assessed in the EAF ES. Any changes in the construction phase GHG emissions are predicted to be similar to those in the EAF ES and to not be significant.

Operation

- 2.9.7 Once operational, the EAF Development is expected to reduce greenhouse gas emissions. Subtracting the forecasted net operational greenhouse gas emissions from the established baseline greenhouse gas emissions, the savings are as follows:
- 6.2 million tonnes in 2027;
 - 5.6 million tonnes in 2028;
 - 5.4 million tonnes in 2029; and
 - 5.4 million tonnes in 2030 (the latest year for which a forecast of the operational EAF emissions has been made).
- 2.9.8 The receptor of the greenhouse gas assessment is the global climatic system, which has a high sensitivity. The magnitude of change is large in terms of the contribution of the Proposed Development to Wales and the UK Government's steel sector decarbonisation projections. The operational phase's level of impact is therefore considered to be major beneficial, which is significant.
- 2.9.9 The savings from the operational EAF Development equate to a minimum 23.1% of the annual carbon budgets estimated for Wales, and 1.6% of the annual carbon budgets estimated for the UK. Regarding UK Government's projection of annual average GHG savings that can be achieved through electrification of the UK steel industry, the operational EAF is forecast to meet a minimum 71.8% of this projection between 2027 and 2030. This level of effect is expected to be major beneficial, significant.
- 2.9.10 The Proposed Development supports the beneficial effects of the EAF Development through providing a new high voltage electrical connection to the National Grid Margam substation.
- 2.9.11 The EAF Development has included a number of embedded mitigation measures to ensure resilience against climate change in relation to major accidents and disasters, physical risks, ground conditions, flood risk and biodiversity. Following implementation of these mitigation measures it was concluded that there would be no significant effects anticipated in relation to wind speed, water availability, ground conditions, flood risk and water resources.

- 2.9.12 No significant construction stage effects are anticipated on other habitats or species including internationally or nationally designated sites, badger, reptiles, breeding birds, wintering birds, or bats. Significant beneficial effects are predicted in relation to bats and invasive non-native species through adherence to the LEMP.
- 2.9.13 The potential for major accidents and disasters is actively managed on the Site to comply with the relevant health and safety regulations as set out in ES Chapter 15: Major accidents and disasters.
- 2.9.14 The Proposed Development has incorporated the embedded mitigation measures described in Chapter 13 of the EAF ES, therefore the conclusions made in relation to climate change resilience remain valid and unchanged.

Conclusion

- 2.9.15 The climate change assessment included all aspects of the full and outline planning applications which included the Proposed Development. The Proposed Development will be within the maximum parameters as stated in the EAF ES therefore the conclusions in Chapter 13 of the EAF ES remain valid and unchanged.

2.10 Socioeconomics and Health

- 2.10.1 An assessment of the likely significant effects of the proposed EAF Development on socioeconomics and health was undertaken in Chapter 14: Socioeconomics and Health of the EAF ES. This SoC is to be read in conjunction with EAF ES Chapter 14.
- 2.10.2 As the established baseline, the wider site currently support approximately 3,690 Full Time Equivalent (FTE), with a total of 3,730 full and part-time roles.
- 2.10.3 It is estimated that the wider site's established baseline supports a total of approximately 9,790 direct, indirect and induced FTE jobs across the UK, inclusive of 6,710 jobs in the wider impact area (WIA i.e., Wales), 5,020 jobs in the sub-regional impact (SRIA, based on the combined local administrative areas of NPTC, Swansea Council and Bridgend County Borough Council) and 2,890 jobs in the local impact area (LIA; administrative area of NPTC).
- 2.10.4 The EAF Development forms part of a £1.25 billion investment, which is the largest in South Wales industry for many decades. The proposal will secure steelmaking in Port Talbot for the foreseeable future. If the investment does not proceed and the EAF Development does not go ahead, steelmaking will eventually cease at the wider Site.
- 2.10.5 The Applicant indicates that c. 300 direct FTE jobs could be supported by new operations at the EAF Development once completed, of which 100 shift-based employees will be retained to facilitate transformation works prior to the EAF coming online.
- 2.10.6 The socioeconomics and health assessment in the EAF ES included both the full and outline planning applications which included the Proposed Development. The conclusions in Chapter 14 are therefore still valid and which are summarised below.

Socioeconomics

Construction

Change in direct, indirect and induced employment

- 2.10.7 Construction workers are anticipated to work across the EAF Development and their scope of work in most cases will not be confined only to the Proposed Development components, therefore changes in employment that were considered within the EAF ES have been provided in terms of the EAF Development as a whole.
- 2.10.8 Evidence provided by the Applicant indicates that an average of 550 FTE jobs could be supported by demolition and construction during the construction phase of the EAF Development (including the Proposed Development). Based on the application of appropriate sector-based multipliers, it is estimated that the construction of the EAF Development could support a further 620 FTE jobs.
- 2.10.9 Therefore, demolition and construction activities as a result of the EAF Development could support 1,030 FTE jobs in the UK, inclusive of 730 in the WIA, 570 in the SRIA and 290 for residents of the LIA.
- 2.10.10 There will be a net reduction of 3,590 FTE jobs as a result of the EAF Development at the scale of the UK during the construction phase, with 2,520 jobs being lost in the WIA, 1,880 in the SRIA and 1,140 in the LIA.

2.10.11 This is to be mitigated by Tata Steel UK by offering the following:

- A voluntary redundancy package;
- Internal advertisement of future jobs; and
- Package of support and funding delivered by UKSE.

2.10.12 The Applicant's objective is for the construction workforce and construction contractor organisations to be as locally-based as possible, and therefore the construction phase is not anticipated to generate significant impacts with regard to non-local workers seeking temporary accommodation during construction.

2.10.13 EAF ES Chapter 14: Socioeconomics and health, Section 14.7 reports the average number of jobs being supported by construction and demolition during the construction phase. This data is based on traffic figures reported in EAF ES Chapter 12: Transport and access, specifically Appendix 12.1. Given that there has been no changes to this traffic data, due to no changes in circumstances resulting from the reserved matters application, the conclusions of EAF ES Chapter 14 are considered to still be valid.

2.10.14 Overall, the estimated net reduction of FTE jobs across the different scales is a magnitude of change that is considered to be large. Therefore, there is likely to be a direct, temporary, medium-term, adverse effect on the labour force as a result of the change in direct, indirect and induced employment during the construction phase which is considered to be major, significant.

Change in education, skills and training provision

2.10.15 Jobs and activity created within the construction sector is likely to improve the ability of workers to access related employment and training opportunities. There is an identified need for roles in the construction sector, with 2,220 individuals in Wales unemployed and seeking employment in this sector, 85 of whom are in the LIA. The Applicant is making a £20 million contribution to the £100 million transition fund which will fund activities and initiatives as embedded mitigation. The transition fund will provide support in the form of training, accreditation, mental health, and outplacement support.

2.10.16 Whilst the creation of jobs will provide new opportunities for people seeking roles in the construction sector (particularly in the LIA and SRJA) to access employment it is anticipated that a proportion of roles created, which will be taken up by such groups, likely represent a relatively low proportion of the total jobs created. The transition fund is expected to be ongoing during the construction phase. There is likely to be a direct, temporary, medium-term, beneficial effect which is considered to be minor.

Operation

Change in direct, indirect and induced employment

2.10.17 There will be a reduction of approximately 1,930 direct FTE jobs from the established baseline as a result of the ceasing of the heavy end works. Employment once the EAF Development is completed and operational will total 2,060.

2.10.18 It is estimated that new operations following delivery of the EAF Development could support 3,660 FTE jobs across the UK via indirect and induced effects, inclusive of 1,840 in the WIA, 1,240 in the SRJA and 580 in the LIA.

- 2.10.19 There will be a net reduction of 4,070 FTE jobs will occur at the scale of the UK once the EAF Development is complete and fully operational in comparison with the established baseline, with 2,830 jobs being lost in the WIA, 2,130 in the SRIA and 1,230 in the LIA.
- 2.10.20 The net reduction of FTE jobs as a result of the EAF Development is expected to be mitigated by the following:
- Internal advertisement of future jobs; and
 - Package of support and funding delivered by UKSE
- 2.10.21 The transition fund will also be continued through the operational phase to enable affected employees to secure new roles in a range of industries.
- 2.10.22 The sensitivity of the workforce is considered to be high, for the same reasons as for during the construction phase.
- 2.10.23 Overall, the estimated net reduction of FTE jobs across the different scales is a magnitude of change that is considered to be large. Therefore, there is likely to be a direct, permanent, long-term, adverse effect on the labour force as a result of the change in direct, indirect and induced employment during the operational phase which is considered to be major significant.
- 2.10.24 It is noted that the Proposed Development will not directly create any operational FTE roles. The Proposed Development will be unmanned and will only require maintenance visits.

Change in employee expenditure

- 2.10.25 As set out in the EAF ES, the baseline estimated annual average retail and leisure expenditure by adults living in the LIA equates to £10,350 per annum. The established baseline worker expenditure supported by the current Port Talbot site within the SRIA totals £58.0 million annually.
- 2.10.26 It is likely that a notable proportion of direct employees who will no longer work at the current Port Talbot site following the EAF Development are likely to retire. Others could find new jobs or, as a worst-case scenario, remain unemployed. For the purposes of assessment, a worst case scenario was assumed that the expenditure profile of those holding jobs that are to be lost as a result of the EAF Development will revert to that which is consistent with a person who is unemployed. Therefore, applying this to the total net reduction of direct (1,300) and indirect/induced (830) employment in the SRIA (totalling 2,130), it is estimated that expenditure in the area could reduce by approximately £12.0 million, representing a 21% reduction against the established baseline.
- 2.10.27 Embedded mitigation relating to education, skills and training provision will help to improve the employability of individuals seeking work in the LIA and SRIA, with the potential to lessen the expenditure effects. The package of support for job creation to be delivered by UKSE will also help to create opportunities for employment and earnings over the operational phase.
- 2.10.28 There is likely to be a direct, permanent, long-term, adverse effect on businesses and associated labour force as a result of the change in employee expenditure during the operational phase which is considered to be moderate significant.

2.10.29 Overall, the Proposed Development will not fundamentally change the socioeconomic characteristics assessed in the EAF ES, and are considered to be the same as in the EAF ES and the conclusions of Chapter 14 remain valid.

Health

Construction and operation

2.10.30 The following chapters should be referred to for construction and operational phase health related effects relating to that environmental factor; no significant effects in the context of human health were reported for the following EAF ES chapters:

- ES Chapter 5: Landscape and visual impact assessment;
- ES Chapter 6: Air quality;
- ES Chapter 7: Noise and vibration;
- ES Chapter 8: Biodiversity;
- ES Chapter 9: Surface water, flood risk and drainage;
- ES Chapter 10: Land, soil and groundwater;
- ES Chapter 12: Transport and access; and
- ES Chapter 13: Climate change.

2.10.31 The health profile for Neath Port Talbot indicates a high sensitivity to changes in local health outcomes. There is a worse life expectancy for males compared with the Wales average, attributed to alcohol consumption and premature death from heart disease and suicide, with education and unemployment being key determinants of an individual's health. Given these health inequalities, there is potential for an impact pathway between any levels of increased unemployment as a result of job losses and increased mortality.

2.10.32 The Applicant is making a £20 million contribution to the £100 million transition fund which will fund activities and initiatives which provide embedded mitigation during the operational phase. There are four priority uses for the Transition Fund which will contribute to mitigation to health effects including:

- Skills and learning accreditation;
- Outplacement support;
- Mental health support; and
- A re-skilling and re-training scheme

2.10.33 The overall effect on health outcomes during the construction phase of the wider Development is considered to be moderate adverse effect, which is significant. As the Proposed Development only forms a proportional component of the wider Development, and as there are no changes in circumstances to the Site, design and size with the reserved matters application, the Proposed Development will not result in any new or different effects, therefore the ES conclusions remain unchanged.

Conclusion

2.10.34 The socio-economic and health assessment included both the full and outline planning applications, which included the Proposed Development, therefore the conclusions made in the EAF ES are considered to be valid and unchanged.

2.11 Major Accidents and Disasters

- 2.11.1 An assessment of the likely significant effects of the proposed EAF Development on major accidents and disasters was undertaken in Chapter 15 of the EAF ES. This SoC is to be read in conjunction with EAF ES Chapter 15.

Construction and Operation

- 2.11.2 The major accidents and disasters assessment in EAF ES Chapter 15 assessed the potential effects of both the construction and operational phases within a risk assessment matrix (refer to Table 15.3 in the EAF ES), following hazards being identified in a local context from the UK National Risk Register of Civil Emergencies (Cabinet Office, 2023)² and the Neath Port Talbot County Borough Council Local Risk Register (Neath Port Talbot County Borough Council, 2017)³, to understand which risks were more likely to be significant locally.
- 2.11.3 Embedded mitigation measures will be implemented to contribute to the mitigation and management of major accidents and disasters, including:
- Construction activities have the potential to cause contamination of water and/or land and soils due to runoff from diffuse or point source pollution events. This may potentially result in significant effects on water receptors and/or land and soil receptors. Pollution prevention and control measures have been included within the CEMP;
 - The EAF Development is subject to COMAH Regulations, which includes the preparation of an on-site emergency plan and a 'Safety Report' that identifies evidence to confirm the safety and integrity of on-site activities. COMAH related documentation will be required updating to incorporate changes to the wider Site;
 - The EAF Development will be subject to the Environmental Permitting Regulations 2016. The environmental permitting process imposes restrictions and monitoring requirements for waste handling and emissions (to land air or water), thereby minimising the risk of major environmental accidents and hazards. A variation of the existing Environmental Permit will be required;
 - A hazardous substances consent (if required) will be important in the control of major hazards. Full assessment of the Planning (Hazardous Substances) Regulations 2015 will be completed once a full inventory of process substances and quantities is available;
 - The Applicant operates a business-wide Health & Safety Management System, which includes Emergency Preparedness principles that must be applied across the business. This management system includes the requirements for a host of emergency plans, ensuring that all reasonably practicable measures are taken to prevent major accidents involving hazardous substances and limit their consequences to people and the environment.
- 2.11.4 The Proposed Development will include the construction of the GIS Hall and battery room. The GIS Hall will have Gas Insulated Switchgear which will utilise g³ gas (an alternative to sulphur hexafluoride). No oil based equipment will be present. The gas will be inert and non-combustible and therefore would be classified as a medium hazard. A fire strategy has been prepared, which included assessing the means of escape (i.e., measuring the

² Cabinet Office (2023). National Risk Register 2023. Available at: [National Risk Register 2023 - GOV.UK](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/115555/national-risk-register-2023.pdf)

³ Neath Port Talbot County Borough Council (2017). Local Risk Register. Available at: [npt_local_risk_register_2017.pdf](https://www.npt.gov.uk/media/10000/Local_Risk_Register_2017.pdf)

travel distances throughout the building). The GIS Hall will be unmanned, with staff to be located in a separate building unless carrying out maintenance activities.

- 2.11.5 The battery room will have plante-type batteries. The room will be subject to hydrogen build up therefore will be equipped with appropriate sensors and alarms and will be subject to additional risk assessments, including under The Dangerous Substances and Explosive Atmosphere Regulations 2002. Escape routes i.e., travel distances have also been accounted for
- 2.11.6 Details of these proposals were not considered within the EAF ES as the details were not available at the time of submitting the hybrid application. Measures to manage and control accidents and disasters have been considered throughout the design process and incorporated into the Proposed Development, details of which have been submitted with the planning pack as required. It is therefore considered that there are no changes in circumstances in relation to major accidents and disasters for the reserved matters application, therefore the Proposed Development will not result in any new or different effects, and the ES conclusions remain unchanged.
- 2.11.7 Potential construction and operational effects on major accidents and disasters were presented in Table 15.3 of the EAF-ES. A summarised version of Table 15.3 is provided as **Table 2-2** which describes the potential hazard, whether the residual level of risk is significant and if this changes as a result of the Proposed Development.

Table 2-2: Significance of hazards as identified within the EAF ES

Hazard	Significance as reported in the EAF ES	Change in significance resulting from the Proposed Development
Environmental hazards		
Flooding	Not significant. With implementation of mitigation measures such as raising of ground levels, the introduction of a SuDS system, correct storage/handling/use of hazardous substances and adherence to the Site Drainage Strategy the risk of coastal flooding on the EAF Development, and as a consequence of the EAF Development is considered to be as low as reasonably practicable.	No change. The Proposed Development is within the wider Site assessed as part of the EAF ES, and therefore it is not predicted to be any change in the risk of flooding.
Severe weather (extreme hot or extreme cold)	Not significant. With implementation of mitigation measures (such as the CEMP/travel plan and regular maintenance and performance checks) and legislative	No change. The risk of severe weather will not change as a result of the Proposed Development, which is contained within the same wider Site assessed within the EAF ES.

Hazard	Significance as reported in the EAF ES	Change in significance resulting from the Proposed Development
	requirements, the risk of severe weather on the EAF development, and as a consequence of the EAF Development is considered to be as low as reasonably practicable.	
Human and animal health		
Pandemic	Not significant. With implementation of mitigation measures (such as site safety inductions, the EAF Development can remain operational on skeleton staff as key workers) and legislative requirements, the risk of a pandemic on the EAF Development and the spread of pandemic-related disease as a consequence of the EAF Development is as low as reasonably practicable.	No change. The need for interactions between permanent and temporary site workers, contractors and visitors, which could cause the spread of disease is not predicted to change as a result of the Proposed Development.
Animal diseases	Not significant. Not anticipated to be an issue given the nature of the raw materials required in the EAF process. The risk of major accidents and disasters caused by animal diseases is not significant.	No change. The Proposed Development will not handle any raw materials and therefore will not result in the accidental introduction of animal diseases.
Major accidents		
Coastal pollution	Not significant. With implementation of mitigation measures (such as treatment of contaminated water before its discharge into Swansea Bay), the risk of coastal pollution as a result of the EAF Development or as a consequence of the EAF Development is as low as reasonably practicable, lower than that of the established baseline.	No change. The Proposed Development electrical works are not predicted to result in the potential for the uncontrolled release of contaminants and will be required will be built in accordance with the SuDS system and Site Drainage Strategy.

Hazard	Significance as reported in the EAF ES	Change in significance resulting from the Proposed Development
	It is noted that the operation of the EAF facility compared to the existing steelworks will result in a significant reduction in effluent volume and contaminant mass.	
Transport incidents	Not significant. With implementation of mitigation (the inclusion of a travel plan in the CEMP), the risk of transport incidents as a result of the EAF Development or as a consequence of the EAF Development is as low as reasonably practicable, lower than that of the established baseline. It is noted that the introduction of EAF technology will eliminate the need for coal delivery which will reduce the number of vehicle movements associated with the wider Site.	No change. There will not be an increased risk of transport related incidents as a result of the Proposed Development. The Proposed Development will be unmanned and will only require maintenance visits, therefore will generate very low volumes of traffic.
Industrial accidents (fire/ explosion)	Not significant. With implementation of mitigation, industrial accidents (fires and/or explosions) as a consequence of the EAF Development is expected to be as low as reasonably practicable.	As detailed in Section 2.11.4, the GIS Hall and Battery Room are classified as a medium and high hazard respectively. A fire strategy has been prepared (MARPT-BHK-02-00-DG-A-200611), which details travel distances within the building. The GIS Hall will be predominately unmanned, unless for maintenance, The battery room will be equipped with appropriate sensors and alarms. The battery room will be subject to additional risk assessments, including under the Dangerous Substances and Explosive Atmosphere Regulations 2002. With the implementation of mitigation measures, industrial

Hazard	Significance as reported in the EAF ES	Change in significance resulting from the Proposed Development
		accidents (fires and/or explosions) as a consequence of the Proposed Development is expected to be as low as reasonably practicable.
Industrial accidents (pollution incident)	Not significant. With implementation of mitigation, industrial accidents (major pollution events) on the EAF Development or as a consequence of the EAF Development is expected to be as low as reasonably practicable.	No change. During construction the Proposed Development will be required to adhere to best practice control measures in the event of a pollution incident as required by the CEMP.
Societal risks		
Loss of critical infrastructure	Not significant. With implementation of mitigation measures, the effects of a loss of critical infrastructure of the EAF Development, and as a consequence of the EAF Development is considered to be as low as reasonably practicable.	No change. The mitigation measures put in place in the event of loss of critical infrastructure, will ensure that there are no significant effects.
Malicious attacks		
Malicious attacks	Not significant. With implementation of mitigation measures (such as a gated security entrance and automated safety alerts and controls), the risk of a malicious attack on the EAF Development, and as a consequence of the EAF Development is considered to be as low as reasonably practicable.	No change. The Proposed Development will introduce mitigation measures to ensure the risk of malicious attacks are as low as reasonably practicable.

Conclusion

- 2.11.8 Overall, it can be concluded that the Proposed Development will not result in any new or different risks and effects of major accidents and disasters. Therefore, the conclusions of the EAF ES are valid and unchanged.

2.12 Cumulative Effects

- 2.12.1 An assessment of the likely significant effects of the proposed EAF Development on cumulative effects was undertaken in Chapter 16: Cumulative Effects of the EAF ES. This SoC is to be read in conjunction with EAF ES Chapter 16.

Intra-project cumulative effects

- 2.12.2 Intra-project cumulative effects assessment is an assessment of the interaction and combination of multiple effects as a result of a proposed development. The assessment in Section 16.5 of the EAF ES is based upon residual (i.e., post-additional mitigation) adverse effects considered to be 'significant' and only those residual effects that have the potential for effect interactions or combinations are considered. An overall assessment of the intra-project combined effects on identified common sensitive receptors has been made using professional judgement on the basis of the information provided in EAF ES Chapters 5 to 14.
- 2.12.3 The following factors of the environment were identified both within the EAF ES and this SoC as having the potential for effect combinations and interactions, and are included within the cumulative effects assessment:
- Landscape and visual; (construction only); and
 - Socio-economics and human health (construction only).
- 2.12.4 Table 16.5 within the EAF ES presents the likely effects during the construction phase for individual receptors identified within the above factors. **Table 2-3** provides a summary of Table 16.5 and whether the Proposed Development would result in a change to these conclusions.

Table 2-3: Intra-project combined effects

Receptor	Corresponding Chapter of the EAF ES	Effect conclusions of the EAF ES	Effect conclusions for the Reserved Matters: Electrical Works
Users of Longland Lane	ES Chapter 5: Landscape and Visual	No common receptors identified and therefore there is no potential for effect interaction.	No change to the conclusions of the EAF ES.
Labour force	ES Chapter 14: Socio-economics and health	No common receptors identified and therefore there is no potential for effect interaction.	No change to the conclusions of the EAF ES.
Human health	ES Chapter 14: Socio-economics and health	No common receptors identified and therefore there is no potential for effect interaction.	No change to the conclusions of the EAF ES.

- 2.12.5 The intra-project cumulative assessment detailed that no specific single receptor is anticipated to experience significant residual effects from multiple environmental factors as a result of the EAF Development. There is potential for local residents to fall into the category of users of Longland Land and to be part of the local labour force, and/or to also experience effects in relation to human health. Nevertheless, it is noted these effects are not likely to be experienced in the same way and are not likely to be cumulative. In addition, the human health assessment is based on the labour force effects therefore is not a combined effect.
- 2.12.6 As the Proposed Development was included within the intra-project assessment and is within the maximum parameters assessed in the EAF ES, the intra-project conclusions of the EAF ES remain valid and unchanged.

Inter-project cumulative effects

- 2.12.7 An inter-project cumulative effects assessment was undertaken in Section of the EAF ES and assesses the combined effects of the EAF Development and other committed development projects on commonly shared receptors. The assessment of inter-project effects is based upon the residual (post-additional mitigation) effects, as well as publicly available environmental information for the other committed developments.
- 2.12.8 The short list of committed developments is provided in Table 16.4 of Chapter 16 of the EAF ES and is reproduced as **Table 2-4**. There are no changes to the status of the committed developments with the exception of National Grid Margam substation extension and cable connection. A Screening Opinion was issued by Neath Port Talbot Council on 22 May 2025, which determined that the development is not an EIA development, and therefore an ES is not required in support of the application. **Table 2-4** has been amended to include the update to the National Grid Margam substation status.

Table 2-4: Short list of committed developments

ID	Application Reference	Planning Regime	Details	Distance from the Proposed Development (km)	Status
Projects that are under construction but that will not be completed prior to the EAF project commencing					
37	P2018/0493	Town and Country Planning Act 1990 Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017	<u>Land At Pen Y Bryn Croeserw Cymmer Port Talbot</u> Outline planning application by Afan Valley Ltd (including access) for a proposed adventure resort comprising 600 no. lodges/apartments, 100-bed hotel with associated spa, central plaza containing restaurants, leisure activities and shops, adventure activities and associated buildings, restaurants and associated administration and maintenance buildings and parking for approx. 850 cars, plus associated landscaping, drainage and engineering operations including re-profiling of land, boundary treatment, retaining structures, external lighting and CCTV, and diversion of public rights of way.	11 km north	Approved 18.01.2022
38	P2021/0327	Town and Country Planning Act 1990 Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017	<u>Land at and surrounding the Nant Helen Surface Mine site, Powys and Onllwyn Distribution Centre, Neath Port Talbot</u> Outline planning application for the development of a Global Centre of Rail Excellence by GCRE Ltd (Welsh Gov company), comprising of two test tracks of loop configuration including an electrified high speed rolling stock test track of 6.9km in length and an electrified low speed infrastructure test track of 4.5km.	25 km north	Approved 28.07.2021
Projects with planning permission granted (within the last five years) but not yet implemented					
3	P2022/0470	Town and Country Planning Act 1990 Town and Country Planning (Development	<u>Land At Baglan Way Port Talbot</u> Erection of an industrial unit (use class B2) (GIA 25,545sqm) with associated works including sustainable drainage, car parking, cycle storage and landscaping.	4.5 km north	Approved 12.10.2022

		Management Procedure) (Wales) Order, 2012			
39	P2014/0825	Town and Country Planning Act 1990 Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017	<u>Foel Trawsnant Bryn Port Talbot</u> Full planning permission for Pennant Walters (FoelT) Ltd to install 11 wind turbines with a maximum tip height of 145m, together with ancillary development including substation and control building, on site underground electrical cables, stone site access tracks, temporary construction compounds, turbine foundations and temporary crane pads.	7 km north	Approved 25.11.2021
40	P2021/1255	Town and Country Planning Act 1990 Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017	<u>Land off J38 of the M4, Margam</u> Full planning application by Sandvik Osprey Ltd for a metal processing facility totalling 28,500sq.m of floorspace comprising a powder processing plant, warehouse and store, office building, amenity building, laboratory, services building, substation, phase 2, CCTV, storage tanks and plant, parking, servicing and roads and associated works.	850 m north	Approved 13.01.2023
Submitted but not yet determined planning applications					
41	P2021/1193	Town and Country Planning Act 1990 Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017	<u>Former Oil Refinery Llandarcy Neath SA10 6FG (Coed Darcy Llandarcy Neath)</u> St. Modwen Developments Ltd have submitted an outline planning application, with all matters reserved except for strategic access, for residential uses (C2 & C3 use class), including land for education (D1 use class) with associated public open space, commercial uses (A1, A2, A3, B1, D1 & D2), commercial/employment (B2 & B8) uses, public open space, highway works, sustainable drainage, ecological mitigation and enhancement, landscaping, ground remediation, and associated engineering and infrastructure works.	10 km north	Awaiting decision (validated 23.02.2022)
42	P2023/0858	Town and Country Planning Act 1990 Town and Country Planning (Environmental	<u>Crown Wharf Port Talbot Docks Port Talbot SA13 1RA (Project Dragon)</u> LanzaTech Ltd has submitted an application for the demolition of existing structures and erection of a Sustainable Aviation Fuel (SAF) production facility, including the production of green	1.3 km north-west	Awaiting decision (validated 13.11.2023)

		Impact Assessment) (Wales) Regulations 2017	hydrogen and sustainable diesel, enclosed ground flare, storage tanks, installation of pipework and electrical, processing and utility equipment, administration, warehouse and laboratory buildings, new access, car parking and transport infrastructure including a truck loading area and associated works, hard and soft landscaping, areas for temporary construction laydown, and associated development on land at Crown Wharf Port Talbot Docks Port Talbot SA13 1RA.		
44	2023/1748/FUL	Town and Country Planning Act 1990 Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017	<u>Land At Kilvey Hill And Landore Park And Ride Facility Swansea</u> New leisure development comprising gondola stations with gondola and associated infrastructure, multi-purpose visitor building including the sale of food and drink with associated outside seating and hardstanding, together with luge tracks, chairlift, skyswing, mountain bike trails, access routes, zipline and supporting infrastructure, ancillary buildings for staff and maintenance, ground profiling works, landscaping, temporary construction access and compound, drainage works, plant, highway works, parking, demolition of park and ride terminal and associated works.	12 km west	Awaiting decision (validated 10/11/2023)
46	2023/2671/FUL	Town and Country Planning Act 1990 Town and Country Planning (Development Management Procedure) (Wales) Order, 2012	<u>Land To The South Of Glanffrwd Road Pontarddulais Swansea</u> Hybrid application comprising: A) full application for residential development of 504 homes, community facility, highway, drainage and green infrastructure and associated works and the demolition of identified farm buildings and B) an outline application for a new primary school and associated works (within local development plan)	24 km north-west	Awaiting decision (validated 23/01/2024)
60	DNS/3264571	Planning (Wales) Act 2015	<u>Y Bryn Wind Farm</u> Y Bryn Wind Farm Ltd (owned by ESB and Coriolis Energy Ltd) has submitted a DNS application for the installation of up to 18 wind turbines (ranging between up to 206m, up to 230m and up to 250m to tip) with associated infrastructure on land at Bryn and Penhydd forests, located between Port Talbot and Maesteg. Y Bryn Wind Farm is expected to generate up to 129.6MW.	1 km north-east	Accepted (03/07/2024) - Inspector Report submission estimated by 17/02/2025

PF	N/A	Town and Country Planning Act 1990	<u>P Fields</u> Tata Steel UK Limited (Tata Steel) is submitting a standalone full planning application in relation to laying concrete in the P Fields area (within the extent of the EAF Site boundary) to create a site compound. The P Fields project is therefore included in the CEA shortlist.	Within the wider Site boundary	Application submitted
EIA development not yet submitted but subject of EIA scoping request					
47	2023/0740/SC O	Town and Country Planning Act 1990 Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017	<u>Land At Pantlasau Farm Clasmont Road Morriston Swansea</u> SCOPING OPINION for Hybrid planning application comprising A) Outline planning application with all matters reserved for residential led mixed use development of up to 460 residential dwellings in total to be developed in phases: two form entry primary school and nursery; provision of commercial hub, public open space/play provision, highways, drainage, ecological mitigation, landscaping and engineering works; B) Full application for the erection of 140 dwellings and associated works as part of phase 1 of the development alongside phase 1B comprising temporary commercial units and associated works	16 km north-west	Pre-application – EIA scoping
62	DNS CAS-03018-G7G6H7	Planning (Wales) Act 2015	<u>Mynydd Ty-Talwyn Energy Park</u> Galileo 03 Ltd has submitted a Scoping Direction Request in relation to the proposed construction and operation of up to 10 wind turbines, ground mounted solar photovoltaic modules, Battery Energy Storage Systems, substation, permanent anemometer mast, ancillary infrastructure works, habitat management, and works to facilitate vehicular access to the site on land approximately 4km north-west of Bridgend.	5.5 km east	Pre-application – EIA scoping (Scoping Direction received 11.04.2024)
64	DNS CAS-01977-L5K6R7	Planning (Wales) Act 2015	<u>Eirlys Solar Farm</u> Octo Partners Ltd has submitted a Scoping Direction Request in relation to a proposed solar farm and energy storage project with an installed generation capacity of approximately 79 MW on agricultural land to the south of Moel Ton-mawr and west of Mynydd Margam.	4 km north	Pre-application – EIA scoping (Scoping Direction received 16.06.2023)

Other development					
NG	P2025/0309	Town and Country Planning Act 1990 Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017	<u>National Grid Margam substation extension and cable connection</u> Following project-related discussions with National Grid, it is understood that an application will be forthcoming in relation to the extension of the National Grid Margam substation and construction of a cable route outside of the Site. The National Grid project is therefore included in the CEA shortlist.	Directly adjacent (to the east)	Pre-Application – EIA Screening (Screening Opinion received 22 May 2025 determined non-EIA

2.12.9 At the time of writing the EAF ES, limited information was available to assess the National Grid Margam substation extension and cable connection and a worst case scenario was assumed. The development was included for completeness due to its close proximity to the EAF Development. Given the results of the Screening Opinion, it is likely that the effects of the development may not be as significant as what was assessed in the EAF ES

2.12.10 A summary of the potential inter-project cumulative effects is provided in **Table 2-5**.

Table 2-5: Inter-project cumulative effects

Environmental Factor	Committed development with potential for cumulative interactions	Conclusions
Landscape and visual	ID 40 (Land off J38 of the M4, Margam)	The metal recycling facility would not result in significant cumulative effects as a result of the addition of the EAF Development.
	ID 60: Y-Bryn Wind	The EAF Development would not further influence views within the coastal plain. There is predicted to be no significant effects as a result of the addition of the EAF Development to the consented windfarm.
Air quality	ID 41: Former Oil Refinery Llandarcy Neath SA10 6FG (Coed Darcy Llandarcy Neath)	There are therefore no other known stationary combustion plant or industrial sources with the potential to generate emissions which could adversely affect air quality in-combination with the EAF Development.
Noise and vibration	ID 3 (Land At Baglan Way Port Talbot)	None of the other committed developments listed above are anticipated to have the potential to act cumulatively with the EAF Development. This is mainly due to the distance of the other committed developments from the EAF Development, low project noise emissions, and the lack of common receptors. The potential for cumulative effects as a result of the EAF Development and other committed developments is negligible, and therefore not significant.
	ID 40 (Land off J38 of the M4, Margam)	
	ID 42 (Crown Wharf Port Talbot Docks Port Talbot SA13 1RA (Project Dragon))	
	ID 60 (Y Bryn Wind Farm)	
	ID PF (P Fields)	
	ID 62 (Mynydd Ty-Talwyn Energy Park)	
	ID 64 (Eirlys Solar Farm)	
	ID NG (National Grid Margam Substation extension and cable connection construction)	

Environmental Factor	Committed development with potential for cumulative interactions	Conclusions
Biodiversity	ID 39 (Foel Trawsnant Bryn Port Talbot)	Given that the other committed developments to be considered do not have any other potential impact pathways for biodiversity to result in cumulative effects, no significant cumulative effects are anticipated.
	ID 40 (Land off J38 of the M4, Margam)	
	ID 41 (Former Oil Refinery Llandarcy Neath SA10 6FG (Coed Darcy Llandarcy Neath))	
	ID 42 (Crown Wharf Port Talbot Docks Port Talbot SA13 1RA (Project Dragon))	
	ID 60 (Y Bryn Wind Farm)	
	ID PF (P Fields)	
	ID 62 (Mynydd Ty-Talwyn Energy Park)	
	ID 64 (Eirlys Solar Farm)	
	ID NG (National Grid Margam substation extension and cable connection)	
Surface water, flood risk and drainage	ID 40 (Land off J38 of the M4, Margam)	Proposals for the site incorporate SuDS as required under legislation, which would mitigate the risk of increased surface water flows and associated impacts are negligible. Not significant.
	ID 42 (Crown Wharf Port Talbot Docks Port Talbot SA13 1RA (Project Dragon))	While the two waterbodies are linked and discharges from Port Talbot Docks enter Swansea Bay waters, the significant dilution potential of Swansea Bay means the cumulative effects of the two discharges is considered negligible. Not significant.
	ID PF (P Fields)	The implementation of the SuDS and Site Drainage Strategy will adequately manage the surface water impacts from the P Fields development and is likely to provide a minor improvement when compared to the baseline scenario. Negligible, not significant.
	ID NG (National Grid Margam substation extension and cable connection)	As both areas of cable laying (within Land at Port Talbot Steelworks site boundary and outside of the wider Site boundary) would be managed by National Grid, it can be assumed

Environmental Factor	Committed development with potential for cumulative interactions	Conclusions
		that the project would be managed holistically and coordinated suitably. Negligible, not significant.
Land, soil and groundwater	ID 40 (Land off J38 of the M4, Margam)	Potential for cumulative effects (if any) is likely to be restricted to the pre-construction works. These effects are likely to be short term and have limited significance as site-specific ground investigations for each development will likely require the consideration of groundwater as a receptor. No significant effects predicted.
	ID 60 (Y Bryn Wind Farm)	
	ID PF (P Fields)	
	ID NG (National Grid Margam substation extension and cable connection)	
Cultural heritage	ID 60 (Y Bryn Wind Farm)	There would be a negligible effect on all cultural heritage receptors. Not significant.
	ID NG (National Grid Margam substation extension and cable connection)	This committed development is located adjacent to the Site and will not impact any heritage asset or part thereof identified within the site or vicinity. Not significant.
Cultural heritage	Developments including IDs: 3, 37, 38, 39, 40, 41, 42, 44, 46, 47, 60, 62, and 64 for construction and operation.	It is likely that the construction and operational timescales of the committed developments may overlap with the construction and operational phases of the EAF Development however this is not considered to produce significant effects.
Major accidents and disasters	ID 40 (Land of J38 of the M4, Margam)	Risk of fires, explosions or environmental contamination. This expected to be adequately mitigated through legislation, and hazards prevention and control measures. Not significant.
	ID 42 (Crown Wharf Port Talbot Docks Port Talbot SA13 1RA (Project Dragon))	

2.12.11 For the environmental factors of transport and access, and climate change; these are assessed on an inherently cumulative basis and therefore specific other developments were not identified as having potential for interactions. There is not anticipated to be a significant effect for these environmental factors.

Conclusion

2.12.12 Overall, the Proposed Development is within the parameters assessed within the EAF ES when undertaking the intra and inter-project cumulative effects assessments. Therefore the conclusions of EAF ES Chapter 16: Cumulative Effects are considered to be valid and unchanged.

3 CONCLUSION

- 3.1.1 The design of the Proposed Development comprising the first Reserved Matters application has been informed by the project description and plans detailed in **Section 1.2**. The Proposed Development is compliant with proposals for the outline planning application as described in Chapter 2 of the EAF ES and the corresponding plans in EAF ES Volume 4: Figures. These outline proposals were subsequently assessed as part of the EAF ES. Where there have been new or changed proposals since outline planning permission was approved, this SoC has demonstrated that these would not result in any new or different significant adverse effects to those reported in the EAF ES.
- 3.1.2 The Proposed Development shall be carried out in substantial accordance with the principles and mitigation measures as set out within the EAF ES accompanying the hybrid application, in compliance with Condition 68 of P2024/0711.
- 3.1.3 Further supporting documentation such as a CEMP have been formally submitted to NPTC for approval. Where necessary, this SoC has referred to adherence to any mitigation measures that are required to control adverse environmental effects, and that are required by the planning conditions within P2024/0711.
- 3.1.4 In undertaking this SoC, the Proposed Development has been compared with the outline elements of the EAF Development to ensure that it is within the parameters that were assessed within the EAF ES. For all environmental topics that were considered in the EAF ES, this SoC concludes that, in the context of the reserved matters application, there are no changes in circumstances to either the Site, size or design as a result of the Proposed Development, no additional assessment of environmental effects has been necessary, and no other new or different significant environmental effects have been identified. For each environmental factor, the EAF ES still accurately reflects the Proposed Development and adheres to the recommended mitigation measures, including relevant management plans that have been secured through planning conditions within P2024/0711.