

NOTE TO FILE



JBA Project Code	2024s0432
Contract	Land at Port Talbot Steelworks
Client	Tata Steel UK Ltd
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Subject	Flood Risk Compliance Statement – SAB5 Scrapyards Reserved Matters

1 Introduction

JBA Consulting were commissioned by Tata Steel UK Ltd to provide flood risk support for their decarbonisation plans at their Port Talbot site. This Flood Risk Compliance Statement aims to provide information on matters of flood risk to support the submission of a Reserved Matters application in regard to the Scrapyards. The Reserved Matters submission follow the granting of hybrid planning permission (LPA Ref: P2024/0711) application for the proposed Electric Arc Furnace (EAF) development on land at the Port Talbot Steelworks site.

2 The Development

2.1 Description of Development

The description of development is as follows:

“Application for the approval of reserved matters (appearance, scale and layout) pursuant to planning permission P2024/0711 for the development of a scrap metal handling facility and associated scrap yards. Works to include earthworks, surface water and drainage management, construction of concrete pads for storage of scrap materials, new and improved internal access roads, rail infrastructure upgrades including single track railway and rail receipt facilities, amenity/welfare facility, workshop building, electrical equipment and infrastructure, boundary treatments, lighting, CCTV, noise mitigation measures, parking and creation of hardstanding and associated engineering works.”

2.2 Site Location

The site is located towards the north eastern extent of the wider approved EAF development boundary. The proposed development area, subject to this Reserved Matters Application, is shown in Figure 2-1.

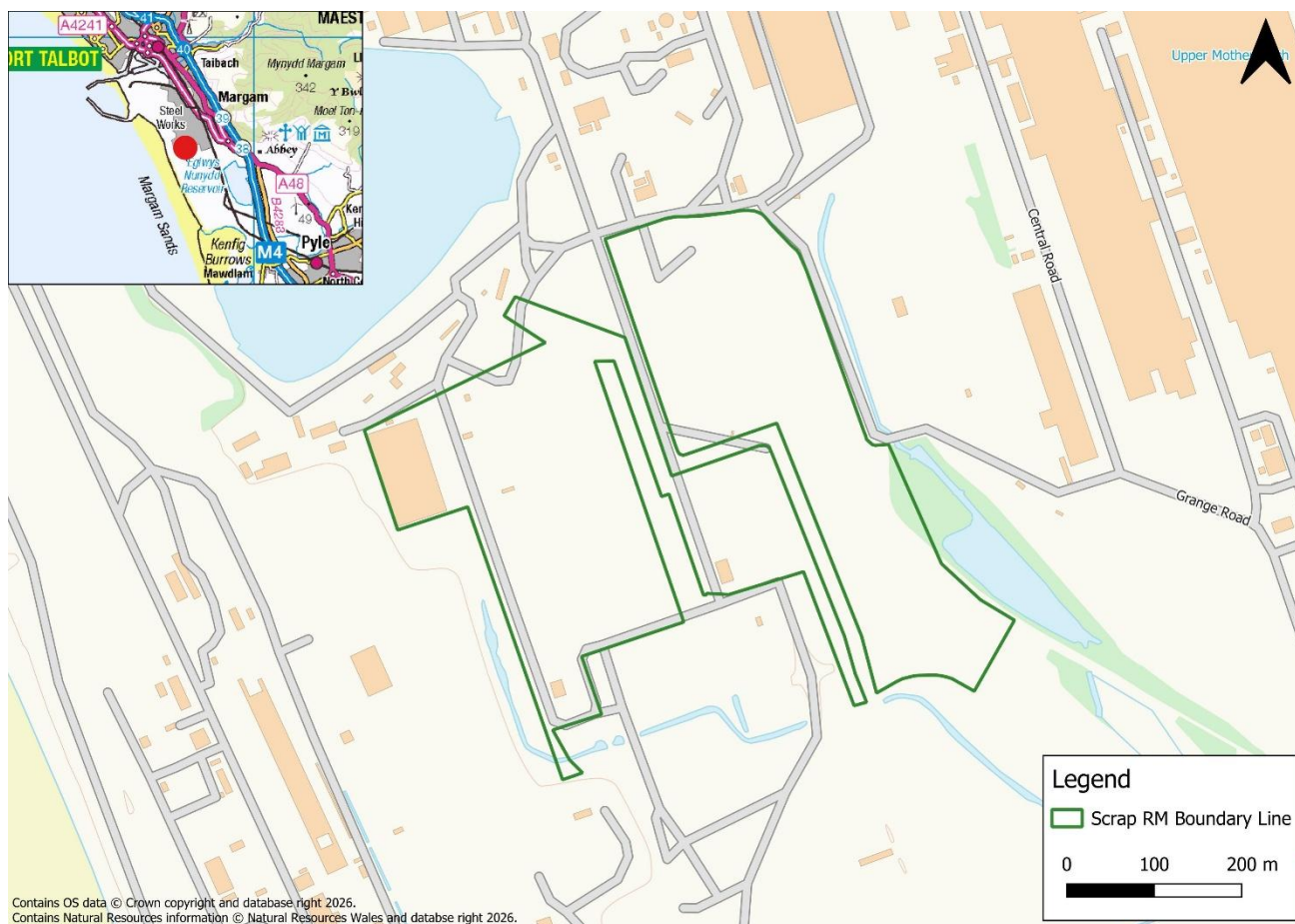


Figure 2-1 Site Location

3 Planning Policy and Flood Risk

Planning Policy Wales (PPW) sets out the land use planning policies of the Welsh Government. It is supplemented by a series of Technical Advice Notes (TANs), Welsh Government Circulars, and policy clarification letters, which together with PPW provide the national planning policy framework for Wales. Technical Advice Note 15 (TAN-15) provides technical guidance relating to development planning and flood risk in Wales. TAN-15 provides a framework within which the flood risks arising from rivers and the sea can be assessed. The approach set out in TAN-15 ensures flooding is afforded appropriate consideration in plan making and development management decisions.

Accordingly, flood risk is a material consideration for the review and approval of development proposals from the outset. Consequently, a comprehensive FCA was submitted, reviewed, and approved for the original planning application (P2024/0711), Ref: 'FCA – EAF Project – TATT3054 – Rev E – 18 October 2024' which includes land within this application boundary. The FCA demonstrates that on the grounds of food risk, the

proposed development meets the requirements set out in TAN-15 (2004) and Planning Policy Wales.

As a Reserved Matters submission, there is no requirement for this application to be supported by an FCA. Nevertheless, a review of flood risk to the Reserved Matters application area has been undertaken for completeness. This document assesses if the development forming the subject of the Reserved Matters application is broadly compliant with the parameters of the hybrid planning permission and relevant conditions. It demonstrates that the proposal is acceptable in flood risk terms on this basis.

It is noted that in the intervening period between submission and approval of application reference P2024/0711 and this Reserved Matters submission, there has been a substantial update to TAN-15, released 31st March 2025. For completeness, this flood risk review has been undertaken against the Flood Map for Planning as the best publicly available source of flood risk information, considering the application of climate change within the indicated flood extents. The conclusions on flood risk are drawn against the TAN-15 (2025) policy document. The updated policy document has very little impact on development proposals within the Port Talbot Steelworks site, generally.

3.1 Flood Map for Planning

The Flood Map for Planning (FMfP) uses flood zones to indicate the degree to which land is at risk from rivers, the sea, surface water and small watercourses. The FMfP displays predicted future flood risk with an allowance made for climate change over a 100 year lifetime of development. It is noted that the wider EAF, and the proposals included within this Reserved Matters application are considered to have a maximum 75 year lifetime of development, in line with TAN-15 (2025) and Welsh Government Climate Change Allowance technical guidance. Consequently, the FMfP represents a precautionary review of flood risk to the site.

3.1.1 Flood Map for Planning – Rivers

The site area is located within Flood Zone 1 of the Flood Map for Planning for Rivers. Flood Zone 1 represents areas which have less than a 0.1% AEP (1 in 1000) chance of flooding in any given year, including climate change. Flood Zone 1 is shown as a transparent later on the FMfP and therefore no figure has been provided.

All forms of development are acceptable, in principle, within Flood Zone 1.

3.1.2 Flood Map for Planning – Sea

The proposed development site is located within Flood Zone 1 of the Flood Map for Planning for the Sea. Flood Zone 1 indicates that there is a less than 0.1% AEP (1 in 1000) chance of flooding from tidal sources in any given year, including climate change. Flood

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Zone 1 is shown as a transparent later on the FMfP and therefore no figure has been provided.

All forms of development are acceptable, in principle, within Flood Zone 1.

3.1.3 Flood Map for Planning – Surface Water and Small Watercourses

The site is predominantly located within Flood Zone 1 of the Flood Map for Planning for Surface Water and Small Watercourses, as shown in Figure 3-1. Flood Zone 1 indicates that there is a less than 0.1% AEP (1 in 1000) chance of flooding from these sources in any given year, including climate change.

There are localised areas shown to be located within Flood Zones 2 and 3, which are at risk from surface water flooding. Areas shown to be at risk of surface water flooding are associated with small, localised areas of ponding. These areas shall be managed by changes to ground level as a result of natural build-up of material to facilitate development, along with a comprehensive surface water drainage strategy, utilising SuDS features. Further details are contained within 'Surface Water Drainage Strategy Rev A June 2025'.

Flood Zone 2 indicates areas that have between a 1% and 0.1% AEP (1 in 100 – 1 in 1000) chance of flooding from surface water and small watercourses in any given year, including an allowance for climate change.

Flood Zone 3 represents areas that have a greater than 1% AEP chance of flooding in any given year, including an allowance for climate change.

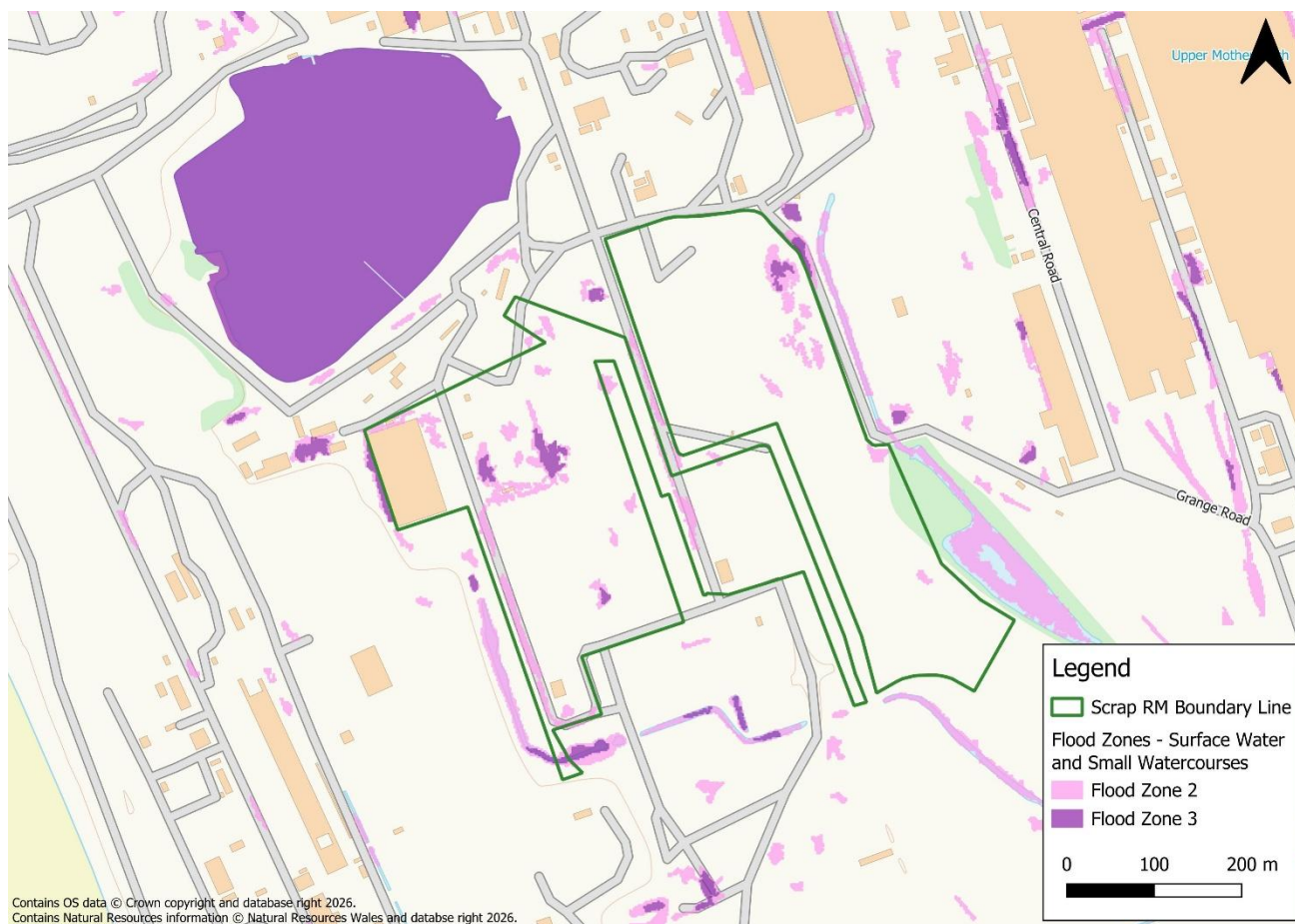


Figure 3-1 Flood Map for Planning - Surface Water and Small Watercourses

3.2 Risk of Flooding from Reservoirs

The FCA submitted with the original planning application (P2024/0711) was supported by Appendix A 'Reservoir Flood Risk Assessment' (RFRA). The RFRA details the predicted flood extent and an indicative flood level in the unlikely event of a breach of the Eglwys Nunydd Reservoir, concluding that whilst ground levels are proposed to be amended over the scrap yard area, the predicted flood extent is unlikely to be changed to any great extent.

Should ground raising result in a change in flood extent as a result of the development proposals, a negligible increase in flood depths is likely to be seen across Margam Moors. The proposed ground levels are higher than the adjacent Margam Moors. The Margam Moors, which cover an area of approximately 1.3km², are therefore likely to receive and store the vast majority of flood water from any failure of Eglwys Nunydd reservoir. The Moors therefore provide a significant low risk area/volume for the reservoir to relatively safely drain to with minimum consequence for the Tata works.

TAN-15 (2004) provided little information on how reservoir flood risk should be considered other than to recognise that they present a residual flood risk and that "A *precautionary*

approach should be adopted at vulnerable locations and the precautionary methodology applied in consultation with the canal operator or dam/reservoir owner.” The updated TAN-15 (2025) provides the same advice, with some additional mention specifically for LPA’s in their consideration for Development Plans. It is consequently considered that the updated TAN-15 has no impact on the development proposals in relation to flood risk for the scrapyards area.

4 Conclusions

The site is shown to be at low to very low risk of flooding from surface water and small watercourse sources. The site is not at risk of fluvial, tidal, groundwater, or sewer flooding, and low risk of flooding as a consequence of reservoir failure.

Areas indicated to be at risk from localised surface water flooding shall be managed by a comprehensive surface water drainage strategy for the site.

It is concluded that the proposed detailed development in the Reserved Matters submission is broadly compliant with the parameters and conditions on the EAF planning permission. It is acceptable in flood risk terms on this basis. The proposal also meets the principles and requirements set out in TAN-15 (2025) and the aims of Planning Policy Wales.