

LATE SCOPING CONSULTATION RESPONSES

Consultation bodies have 28 days to respond with any comments, stating either the information that they consider should be included in the ES or that they do not have any comments.

Any responses received after the deadline will not be considered within the scoping opinion but are forwarded to the applicant for consideration in accordance with the policy set out in Advice Note 7: Environmental Impact Assessment, Screening and Scoping.

The following EIA scoping consultation responses were received after the consultation deadline specified under legislation and therefore did not form part of the Secretary of State's scoping opinion.



GIG
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Bwrdd Iechyd Prifysgol
Abertawe Bro Morgannwg
University Health Board

ABM Headquarters
One Talbot Gateway,
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SA12 7BR

Our Ref:
Your Ref:

Date: 28 October 2013

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The Planning Inspectorate
2/18 Eagle Wing
Temple Quay House
2 The Square
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BS1 6PN

FAO MR RICHARD KENT

Dear Mr Penfold

**INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT) ASSESSMENT
REGULATIONS 2009 SI 2263 (AS AMENDED) (THE EIA REGULATIONS) RE:
TATA STEEL
APPLICATION REFERENCE: 130927_EN010062_2036374
ADDRESS: TATA STEEL, PORT TALBOT STEEL WORKS, ABBEY WORKS, PORT
TALBOT SA13 2NG**

We have consulted our technical advisers within Public Health Wales as well as PHE CRCE – Wales, and our comments are based on the information contained within the application documentation.

The Health Board wishes to make the following comments in relation to this development. We would also remind you that, in Wales, the statutory function for public health is delivered through Health Boards with specialist support from Public Health Wales as necessary. Public Health England does not have the primary public health remit in Wales.

TATA Steel has asked the Planning Inspectorate for its opinion on the recommended structure and contents of an Environmental Statement for generation enhancement for Port Talbot Steel Works, Abbey Works, Port Talbot SA13 2NG. The request for assessment of the environmental opinion is a precursor to an intensive and detailed independent impact of the proposed development.

Bwrdd Iechyd ABM yw enw gweithredu Bwrdd Iechyd Lleol Prifysgol Abertawe Bro Morgannwg
ABM University Health Board is the operational name of Abertawe Bro Morgannwg University Local Health Board
Pencadlys ABM / ABM Headquarters, 1 Talbot Gateway, Port Ta bot, SA12 7BR. Ffon / Tel: (01656) 752752

The attached appendix outlines generic considerations that we advise are addressed by all promoters when they are preparing environmental statements for nationally significant infrastructure projects. We have adopted the same framework as Public Health England. In terms of detail to be included in environmental statements, we recognise that the differing nature of projects is such that their impacts will vary. Our view is that the assessments undertaken to inform the environmental statement should be proportionate to the potential impacts of the proposal. Where a promoter determines that it is not necessary to undertake detailed assessment(s) (e.g. undertake qualitative rather than quantitative assessments), the rationale for this should be fully explained and justified within the application documents.

Specific Comments Relating To Submitted Documents

The Welsh Government regards the inclusion of a Health Impact Assessment within the scoping and environmental assessments as a best practice requirement. The applicant is therefore advised that any subsequent application for a Development Consent Order must include a detailed Health Impact Assessment.

It is noted that section 5.1 of the Environmental Impact Assessment Scoping Report (Cumulative Assessment) outlines the intention to take into account the potential cumulative impact the plan will have on local air quality and sensitive receptors. The applicant is advised that any other sources of local air pollution (existing or planned) should be included in the assessment and in any air dispersion modelling undertaken as part of the application process.

In addition, we make the following specific comments

- You confirm that an air quality assessment (modelling) is to be undertaken. We recommend the inclusion criteria for sensitive receptors and model specifications should be agreed with the local authority prior to any assessment being undertaken.
- The PM10 Air Quality Objective has previously been exceeded in the vicinity of the proposed development and consequently the local authority has identified that cumulative impacts on air quality must be assessed as part of the application process. The Health Board is in agreement with this approach.
- Your submission identifies that consideration should be given to the cumulative impacts arising from the Swansea Bay Tidal Lagoon Scheme, the proposed wind farm at Mynydd Brombil and other cumulative developments. We agree with this approach and recommend that any assessments, risk assessment, conclusions or mitigation proposals are agreed with Natural Resources Wales and the Local authority prior to the submission of your application for a development consent order.

Should you have any queries, please do not hesitate to contact me.

Yours sincerely



Director of Public Health