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The Planning Inspectorate
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Ein cyf / Our ref: SH/2014/117386/6

Planning Inspectorate ref. EN 010062

Dyddiad/Date: 17 April 2015

Annwyl Syr/Madam / Dear Sir/Madam

**DEVELOPMENT CONSENT ORDER FOR INTERNAL POWER GENERATION
ENHANCEMENT FOR PORT TALBOT STEELWORKS**

**RESPONSE TO THE EXAMINING AUTHORITY'S SECOND ROUND OF
QUESTIONS**

PROJECT REFERENCE: EN 010062

Natural Resources Wales (NRW) submit this response to the Examining Authority's second round of questions, issued on 26 March 2015.

2.5.4 Water Framework Directive

Can Natural Resources Wales confirm whether they are satisfied that the development proposal will not lead to any adverse effects on the achievement of environmental objectives established under the Water Framework Directive (Ref NPS EN-1 para 5.15.5)

The Water Framework Directive (WFD) has been considered, our comments are as follows.

The licensed abstraction ref. 21-58-61-0009 permits Tata to abstract from the Docks Feeder channel at an average rate of 473 l/s.

The abstraction has historically been operated with an uptake of about 60% of this rate (283 l/s). The increase in abstraction to support the power station will result in up to an additional 190 l/s being abstracted up to the total licensed rate of 473 l/s.

The lower Afan has historically experienced extended periods of low flow as a result of flow entering the Docks Feeder Channel for industrial abstraction or navigation within Port Talbot Docks. The 2010 study carried out by Halcrow modelled Afan River flows and compared them with our desired environmental river flow objective to meet WFD standards. The study identified a number of factors that could be addressed to reduce abstraction demand from the river and increase residual flows downstream of Greenpark Weir. Those resulting in the greatest improvement to residual flows were repair to leaking Dock lock gates, installation of a control system to the intake to the Docks Feeder and re-use by Tata of wastewater from the DCWW sewage treatment works. ABP have already replaced the lock gates and are planning installation of the control structures. These actions aimed to increase the efficiency of water use by reducing waste and optimising the benefit of alternative, additional water sources.

As part of our Restoring Sustainable Abstractions Programme that sits within WFD, Halcrow also carried out a cost benefit analysis of the Tata Steel abstraction that compared the economic benefits of increased flows in the lower Afan with the economic value of the water to Tata Steel as an industry and costs of replacing licensed Afan water with alternative sources. The purpose was to see whether we should be seeking to reduce Tata's abstraction licence volumes for environmental benefit. It concluded that it would be disproportionately costly for Tata to develop alternative sources of supply which under WFD is an appropriate justification to not pursue licence changes. The Tata abstraction from the Docks Feeder does influence the rate of residual flow in the Afan and is one of the contributing factors affecting the ability of the Afan to meet WFD flow objectives, although not the most significant. The analysis showed though that economic value of the water to industry is high and that we will not be seeking to reduce licence volumes to meet our WFD objectives.

We have focused our effort on working with the partners in the Afan Water Management group to increase the efficiency of water management in the system by better control and reduced leakage to increase residual Afan flows but also to increase security of supply to both Tata Steel and Port Talbot Docks.

Please contact Louise Edwards, louise.edwards@cyfoethnaturiolcymru.gov.uk or telephone 03000 65 3573 for further advice regarding this submission.

Yn gywir / Yours faithfully



Martyn Evans

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Ein diben yw sicrhau bod adnoddau naturiol Cymru yn cael eu cynnal, eu gwella a'u defnyddio yn gynaliadwy, yn awr ac yn y dyfodol.

Our purpose is to ensure that the natural resources of Wales are sustainably maintained, enhanced and used, now and in the future.

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