



CITY & COUNTY OF SWANSEA

LOCAL IMPACT REPORT

Internal Power Generation Enhancement for Port Talbot Steelworks

PINS REFERENCE: EN010062

CCS REFERENCE: 2014/0138

Economic Regeneration & Planning
Civic Centre
Oystermouth Road
Swansea
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City & County of Swansea

Local Impact Report

Application by Tata Steel UK Limited for an Order Granting Development Consent for the Internal Power Generation Enhancement for Port Talbot Steelworks

1. Terms of Reference

Introduction

- 1.1. This report comprises the Local Impact Report (LIR) of the City & County of Swansea and has been prepared in accordance with s60(3) of the Planning Act 2008 (as amended) and the Planning Inspectorate's Advice Note One, Local Impact Reports(April 2012).

2.0 Purpose and Structure of the LIR

- 2.1 The purpose of the LIR is to provide details of the likely impact of the proposed development on the administrative area of the City & County of Swansea (CCS).

- 2.2 CCS adjoins the host administrative Council area of Neath Port Talbot County Borough Council. The relevant representation made by CCS identified the main potential issues affecting its administrative area to be restricted to:

- Socio economic impacts;
- Landscape and visual impacts;
- Ecological impacts;
- Air quality impacts;

- 2.3 Whilst surface water environment impacts were initially raised, these matters are deferred to the host authority and Natural Resources Wales.

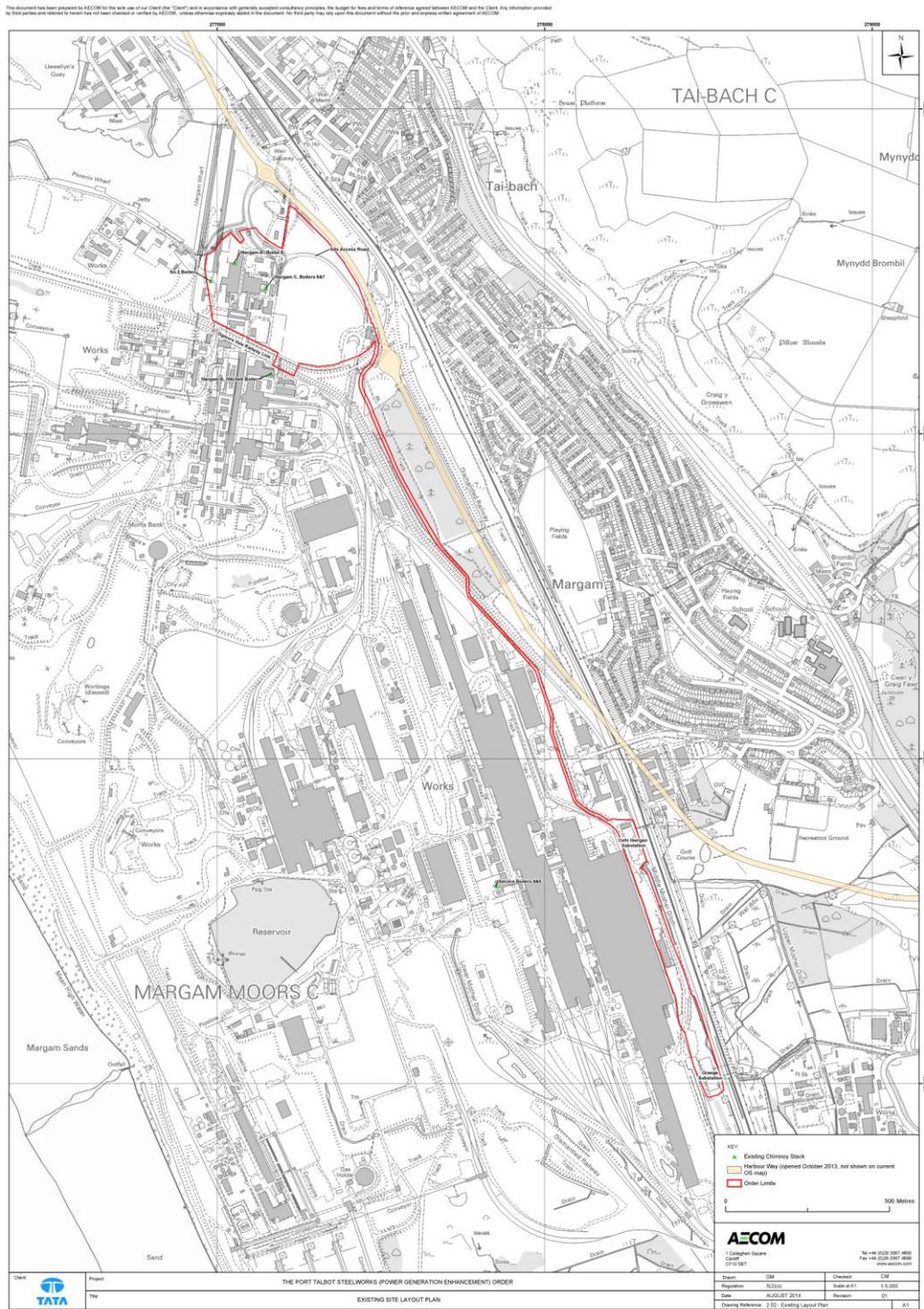
- 2.4 This LIR therefore considers each of the residual issues in turn. In doing this LIR seeks to:

- Identify relevant development plan policy and supplementary guidance;
- Identify relevant local issues where appropriate; and
- Provide a concluding position for each topic area.

- 2.5 The LIR addresses the Inspectors first written questions where appropriate. The vast majority of questions are however directed to the Applicant, NPT and Natural Resources Wales, rather than CCS.

3.0 The Site and its Surroundings

- 3.1 The Port Talbot steelworks are located wholly within the County Borough of Neath Port Talbot (NPT) and extend to a total of 1005.5 hectares, which comprises all of the major components of the steelworks, together with the ancillary structures/buildings. The application site extends to an area of approximately 23 hectares within the northern part of the steelworks site, adjacent to the existing power generation facilities.
- 3.2 The red line boundary (order limits) of the project, encompassing all the elements proposed and the maximum extent of land over which powers are sought, is shown below.



4.0 Description of Development

- 4.1 The description of development is based on the information provided within Chapter 3 of Volume 2 of the Environmental Statement and Section 2 of the Applicant's Planning Statement and the changes to the layout and dimensions of the turbine hall and cooling tower unit detailed in the GVA letter of the 8th December 2014.
- 4.2 The application is for the enhancement of existing power generation facilities (hereafter described as the 'proposed development') at Tata's Port Talbot Steelworks.
- 4.3 This Application for development consent is for the installation of up to two new boilers (nominally 164 Mega Watt thermal (MWth) each) and associated new steam turbine sets with a gross capacity of up to 150 Mega Watt electrical (MWe), which would be connected to the existing process gases (i.e. blast furnace gas, etc) distribution network in order to receive these gases through new pipe work, all to be located within the Order Limits. The proposed development also includes the 66kV electrical connection to the grid (a cable route of around 2.8km in length) and extensions to the existing on-site utility connections (water, nitrogen, natural gas and compressed air).
- 4.4 The proposed development would result in the total on-site power generation capacity at the Port Talbot site increasing up to a maximum of 245 MWe.
- 4.5 The current total on-site power generation capacity of the Port Talbot site is 115.7 MWe. This capacity provides electrical power and process steam to the production processes on-site. However the majority of this existing power generation equipment dates back to the 1950's and is becoming increasingly unreliable and inefficient due to its age.
- 4.6 The iron and steel making process generates by-product gases which, if not utilised or recycled by the site, are burnt through the flare stacks. The current minimum operational flare is approximately 1 Petajoule (PJ).
- 4.7 It is stated that energy represents a large proportion of steel manufacturing costs. In order to remain competitive within the market place, the Applicant has embarked on a series of improvement measures, of which energy efficiency is one.
- 4.8 Although the total on-site power generation capacity is 115.7 MWe, it is advised that the relative age and efficiency of the existing equipment, combined with the variable cycle of process gas production, results in an average power generation of 75 MWe. Combined with the grid import of 50MWe, this meets current site demand of 125 MWe.
- 4.9 It is advised that the Applicant has an ambition to increase production to 4.7 million tonnes of iron per annum at the Port Talbot site. Once production increases to this level, and in the absence of the proposed development and/or any other energy efficiency improvements, the amount of process gas being flared would increase to approximately 7

PJ per annum. With on-going tactical improvements and capital projects, the flare could be reduced by 2.2 PJ to 4.8 PJ per annum and therefore deliver a reduction in reliance on imported fuel (natural gas).

- 4.10 As noted, the existing power generation facilities contain equipment dating back to the 1950s and do not have sufficient capacity to convert the available process gases associated with the current and increased iron production.
- 4.11 In terms of demand for electricity, at 4.7 million tonnes of iron per annum the site would require approximately 140 MWe, but the total average site capacity, without the proposed development, would remain the same (at 75 MWe), resulting in electrical imports increasing to 65 MWe from 50 MWe.
- 4.12 In order to improve efficiency and increase generation, the Applicant proposes to enhance the total on-site power generation by installing up to two new boilers (nominally 164 MWth each) and associated steam turbine sets with a gross capacity of 150 MWe. The proposed development would be housed in a new building and would be connected to the existing blast furnace gas distribution network in order to receive fuel gases through new pipe work.
- 4.13 The enhancement of the existing on-site power generation through the development of new facilities will allow the existing inefficient facilities to be decommissioned as part of the proposed development. It is proposed that the decommissioned facilities would be retained in situ on site but would not be operational.
- 4.14 The total on-site power generation capacity, inclusive of the proposed development, would be increased up to a maximum of 245 MWe. This would result in an average power generation of approximately 130 MWe (due to the variable cycle of process gas production on-site). This would result in a reduction of grid import to 10 MWe (a decrease of 55Mwe). The estimated amount of process gases being flared would reduce by 4.3 PJ to approximately 0.5 PJ per annum.
- 4.15 The proposed development comprises the following major components and ancillary buildings:
 - up to two steam boilers and their associated stacks (maximum 80m in height), annexe bay and boiler house;
 - a turbine hall housing turbine sets and associated condensers;
 - cooling tower units;
 - an electrical switchgear station building;
 - a condensate storage tank and additional condensate polishing units;
 - water treatment plant and chemical dosing system skids;
 - administration, workshop, pump house, gas booster house, control buildings and ancillary infrastructure;
 - the extension of existing pipe work connections (for water, nitrogen, process gases, natural gas and compressed air) from the existing on site
 - utilities pipe work infrastructure to the generating station;
 - a 66kV electrical connection up to 2.8km in length to connect the

- generating station to the existing on-site substations on the southeast of
- the site;
- modifications to the two existing on-site substations to accept the electrical
- connection including the installation of new 66kV bays at each substation;
- security infrastructure, including perimeter fencing and site lighting
- infrastructure;
- connections to the existing internal road layout for the provision of site
- vehicular access(es), roads, pedestrian network, parking and cycle
- storage;
- temporary construction compounds; and
- connection to site drainage systems.

4.16 The following table provides the physical dimensions of the above components:

Summary of Project Description Components for Single Phased Build (Option 1)	
Item	Indicative & Maximum Dimensions
Stack(s)	Up to two stacks, both at 80m high
Cooling Tower Units	Up to 22m high x 160m long x 25m wide
Turbine Hall	Up to 25m high x 55m long x 85m wide
Boiler House	Up to 35m high (at apex) x 60m long x 65m wide
Electrical Connection	66kV cables, approximately 2.8km in length to be run underground, off existing above ground infrastructure, on a cable bridge or a combination of both
Switchgear Station Building	Up to 35m long x 55m wide

4.17 There is the potential for a two phase construction approach. Option 1 would involve the full and complete construction of the proposed development. Option 2 would involve half the proposed development (one stack, one boiler and associated turbine sets) being installed (Phase 1) with all foundation and engineering being undertaken in that Phase. Phase 2 of Option 2 would involve the second and complete installation of the second stack, boiler and associated turbine sets. Phase 2 could occur up to 10 years after Phase 1.

5.0 Statutory Development Plan

5.1 The current adopted development plan for the City & County of Swansea is the Unitary Development Plan (UDP), which was adopted in November 2009. It is anticipated that the City and County of Swansea Local Development Plan will replace the UDP in late 2016.

5.2 The adopted UDP can be viewed via the following link:

<http://www.swansea.gov.uk/udp>

6.0 Socio economic impacts

City and County of Swansea Adopted Unitary Development Plan

- 6.1 Policy EC1 allocates land to meet the growth needs of the local economy.
- 6.2 Policy EC2 allocates a major redevelopment area at SA1 Swansea Waterfront for mixed employment and residential development together with supporting leisure, tourism, community uses and ancillary services.
- 6.3 Policy EC3 seeks to encourage the improvement and enhancement of the established industrial and commercial areas, through building enhancement, environmental improvement, infrastructure works, development opportunities and targeted business support. Development at established industrial and commercial areas for non-business uses will not be permitted where proposals unacceptably limit the range and quality of sites available for employment development.
- 6.4 Policy EC15 supports proposals that consolidate the urban tourism resource, by improving the quality and range of attractions, destinations, accommodation and services, at locations including the City Centre, Maritime Quarter, Tawe Riverside Basin, and Mumbles and specific destinations around Swansea Bay.
- 6.5 Policy EC16 states that new or improved recreational and tourism facilities at specific destinations around Swansea Bay are proposed which capitalise on the seafront aspect and contribute towards the regeneration of the Bay. Between these areas of appropriate development, the emphasis is on safeguarding and enhancing the environment of the Bay and other waterfront areas.

Adequacy of the Application

- 6.6 Chapter 12 of the Environmental Statement provides a review of the potential economic, public amenity, tourism and recreation and publicly accessible resource effects of the proposed development. The chapter sets out salient planning policy and guidance.
- 6.7 The methodology defines the scope of its assessment as being the consideration of the effects of the construction and operation of the proposed development on socio-economics, tourism and recreation and public access.
- 6.8 Two options are considered for construction of the development: -
- Option 1 (Single Phase Installation).
 - Both boilers and associated turbine sets installed over 36 months, including 6 months commissioning, with an overall construction workforce of 500 (300 at peak);
 - Option 2 (Two Phase Installation).
 - Phase 1 (after the DCO is made) construction over 36 months, with workforce the same as Option 1;

- Phase 2 construction (up to 10 years later) over 24 months, with workforce similar to the first installation but over a shorter period.

6.9 The methodology of the assessment has been informed by: -

- Institute of Environmental Management and Assessment (Guidelines for Environmental Impact Assessment);
- A collaboration of Government agencies including Welsh Government (Design Manual for Roads and Bridges);
- Various UK and Welsh Government guidance and statistical sources;
- Other developments of a similar nature;
- Mapping information (NPTCBC);
- Desk research and professional judgement;
- Consultation on the PEIR.

6.10 Criteria for measuring the sensitivity, magnitude and significance of the proposed development's effects are set out and a baseline of socio-economic conditions has been determined through a desktop analysis of public data from authoritative sources and informed additionally by consultation. The limitations of these data are acknowledged.

Baseline Data

6.11 The Applicant employs approximately 3,500 people at the Port Talbot site, travelling as far as Llanelli in the west, Caldicot in the east and Brecon/Ebbw Vale in the north. The Port Talbot site activities also support other company sites, including Trostre, Llanwern, Shotton and Corby. Together with the secondary supply chain, the company estimates approximately 17,000 people are directly and indirectly employed by the Port Talbot site.

6.12 NPT and CCS each have a number of Lower Super Output Areas (LSOA) in the bottom 10% (most deprived) LSOAs in Wales (as measured by the Wales Index of Multiple Deprivation). Both counties have:

- A lower than average (Wales) Economic Activity rate;
- Lower levels In Employment;
- Lower than average levels of professional occupations; and
- Fewer professional and managerial occupations.

6.13 Tourism contributed £99.6 million to the NPT economy in 2012, supporting 1,637 jobs locally. The equivalent data for Swansea is not given in the Environmental Statement, although the relevant STEAM data for Swansea in 2012 is available, and is estimated at £337.1 million visitor expenditure in the economy, supporting 5,390 full-time equivalent jobs. A significant number of communities, visitor attractions, cycle routes and public rights of way are located within the study area.

Impacts

- 6.14 As noted, two options are considered for the development. For Option 1 (construction), up to 500 jobs will be created over the 3 year construction period, in civil, structural, electrical, mechanical, process and construction management. Local firms will have the opportunity to tender for construction activities. The estimated value of the proposed development is to be confirmed, but initial estimates are between £150 million - £200 million.
- 6.15 Economic effects (direct and indirect) are likely to be temporary and localised and impacts are considered to be of minor beneficial effect.
- 6.16 The Applicant acknowledges the adoption of a similar initiative to CCS's Beyond Bricks and Mortar would have a localised but permanent effect and will seek to promote this programme through proactive tendering and procurement, which is estimated to result in a minor beneficial effect. CCS would wish to see this secured either by requirement of Development Consent Obligation.
- 6.17 There will be no additional job creation during the operation phase. However, the proposed development will increase the competitiveness of the Port Talbot site thereby protecting the long term and sustainable steel making industry in South Wales (currently employing approximately 3,500 workers directly and a secondary supply chain of over 13,500), providing a long-term moderate beneficial effect on the local and regional economy.
- 6.18 Option 2 (construction Phase 1 and Phase 2), direct and indirect Economic Effects are the same as those of Option 1 (minor beneficial). However, the upskilling, employment and procurement opportunities arising during each phase could create a greater benefit than the single phase Option1.
- 6.19 The operation phase is as per Option 1.
- 6.20 On operation, the development will increase competitiveness of the Port Talbot site. There will be increased operational and economic efficiency through cost reduction, with the potential to provide a long-term moderate benefit effect on the local and regional economy. Flared gas is significantly reduced (minor beneficial) and tourism effects are predicted as minor adverse.

Do nothing

- 6.21 The Applicant refers to a "Do Nothing" scenario that presents a major impact to the long term longevity of steelmaking at the Port Talbot site, and therefore potentially a significant impact on the employment levels within the region should the Port Talbot site not be able to maintain a competitiveness within steel markets. The diminution or loss of production at the Port Talbot site would also have secondary impacts to the other Tata Steel facilities it supports across the UK.

Consideration

- 6.22 The methodology adopted and the consideration of the economic impacts and proposed mitigation/enhancement provision of the development are reasonable.
- 6.23 The proposed development will generate investment at the site of an estimated £150-£200 million, creating up to 500 jobs (in a variety of engineering and construction management disciplines) over the 3-year construction phase, representing a minor beneficial economic impact. In addition, operation of the proposed development will have a number of sustainable benefits: -
- Air quality improvements through the reduction in flared process gases;
 - Off-set of approximately 400,000 tonnes per annum of CO₂ through reduction in electricity import from the grid. (Based on electrical generation from coal-fired power stations);
 - Reduced onsite electricity imports (to 10MWe per annum on average) from the grid;
 - Increased operational efficiency and reliability of on-site power and steam production;
 - Increased economic efficiency through cost reduction to protect the long-term future of steelmaking in South Wales.
- 6.24 The Environmental Statement indicates the Port Talbot site operations have a direct or indirect impact on an estimated 17,000 people (3,500 of which are directly employed at the site). The proposed development, therefore, has an economic significance to these people and to the economies of NPT and CCS beyond its immediate benefits, in as much as it contributes to the continued competitiveness of the site's operations.
- 6.25 The Environmental Statement does not refer in its review of salient planning policy and guidance to the Swansea Bay City Region Economic Regeneration Strategy. This Strategy has been adopted by local authorities in the City Region as their economic regeneration policy, and is relevant to an economic development assessment of the application. In particular: -
- The Strategy sets out economic ambitions for the City Region by the year 2030, including being "A leading UK centre for advanced manufacturing and engineering, renewable energy and high-value service delivery...";
 - Its key imperative is to address the City Region's growing productivity deficit with the rest of the UK and help raise regional productivity from 77% of the UK average in 2010 to 90% by 2030;
 - It acknowledges the key contribution large- and medium-sized employers make to the City Region economy and the need to support them to remain rooted and committed to growth in the City Region.
- 6.26 The Applicant's operation and proposed development are consistent with this Strategy. It is a large City Region employer, a leading international steel manufacturer and is committed to maintaining the Port Talbot site's competitiveness and operational productivity by

continued investment in its energy efficiency programme. The company's Port Talbot operations will contribute towards achieving the ambitions of the Swansea Bay City Region Economic Regeneration Strategy.

- 6.27 Tata Steel UK Limited is acknowledged by the Welsh Government as Wales's largest anchor company, and there is significant economic interest within the City Region and elsewhere across the UK in the company's Port Talbot site remaining cost competitive globally and continuing to be a major steel producer, employer and procurer of services.
- 6.28 The proposed development is therefore considered to have significant socio-economic benefits.

7.0 Landscape and Visual Impact Assessment

City & County of Swansea Unitary Development Plan

- 7.1 Policy EV1 sets out the Council's commitment to achieving high standards of design and layout in all new developments. To achieve this, the policy requires proposals to meet a number of criteria, which include:
- Being appropriate to its local context in terms of scale, height, massing, elevational treatment, materials and detailing, layout, form, mix and density;
 - Not resulting in a significant detrimental impact on local amenity in terms of visual impact, loss of light or privacy, disturbance and traffic movements.
 - Promote resource efficient and adaptable buildings and layouts using sustainable design and construction techniques, including the re-use and recycling of construction and demolition waste on site, and energy and water efficiency measures.
- 7.2 Policy EV2 deals with siting and location of new development and gives preference to the use of previously developed land over greenfield sites, having regard to the physical character and topography of the site and its surroundings by meeting criteria, which include the following:
- Avoiding locations that would have a significant adverse impact on prominent buildings, landscapes, open spaces and the general locality, including loss of visual amenity;
 - Effectively integrating with the landscape, seascape or coastline by utilising topography to integrate into the contours of the site and avoiding conspicuous locations on *prominent skylines* and ridges;
 - Retaining important views into and out of the site;
 - Having due regard to the implications of the development for infrastructure and services;
 - Integrating with existing community facilities;
 - Utilising landscape and topography to maximise energy efficiency;
 - Having full regard to existing adjacent developments and the possible impact of environmental pollution from those

developments, as well as the creation of any environmental pollution to the detriment of neighbouring occupiers (including light, air and noise).

- 7.3 Policy EV26 states that within the Gower AONB, the primary objective is the conservation and enhancement of the area's natural beauty. Development that would have a material adverse effect on the natural beauty, wildlife and cultural heritage of the AONB will not be permitted.

Operational Impact

Gower Area of Outstanding Natural Beauty

- 7.4 Environmental Statement figure 7.14 (Zone of Theoretical Visibility (ZTV) and Landscape Designations Plan) illustrates potential visibility of the proposal from the easternmost parts of the AONB at distances of approximately 14km to 16km. The steelworks are also visible from other elevated parts of the AONB beyond the study area.
- 7.5 The Landscape and Visual Impact Assessment (LVIA) concludes that the magnitude of change upon the AONB would be negligible at this distance across Swansea Bay and therefore the visual effect would be negligible and not significant.
- 7.6 Whilst it is considered that the proposal would add to distant industrialised setting of part of the AONB, the conclusion that the operational impact would not be significant on the purpose of the designation is not disputed.

Registered Parks and Gardens

- 7.7 Located approximately 15km to the west of the proposed development, Clyne Gardens is a Grade 1 Historic Park and Garden that is also located within the AONB.
- 7.8 The assessment concludes that the "sensitivity of the RPG is considered to be medium given the context of the proposed development. The RPG is generally enclosed by tree cover with some views over Swansea Bay from open areas of parkland. Considering the distance and visual enclosure provided by tree cover throughout the gardens the proposed development would not be discernible from the majority of locations amongst other industrial buildings in the distance. The magnitude of change is therefore considered to be negligible with a negligible and not significant visual effect."
- 7.9 Given the open and elevated aspect of the upper parts of the park and the channelled views towards the steel works, the assessment of the impact on this designation was specifically requested by CCS.
- 7.10 On the basis of the Grade 1 status of the registered park and AONB location, it is the view of CCS that the sensitivity has been underestimated. Whilst, due to topography and tree cover, parts of the park would be unaffected, for the aforementioned open upper areas of the park the proposal would add to the industrialisation of the view. On this basis it is considered that the impacts would be minor (adverse),

rather than neutral but in overall terms it is not considered that the impacts would be significant.

Seascape Character Areas

No.46 Mumbles Head to Porthcawl Point (Swansea Bay) Seascape Unit

7.11 Paragraphs 7.6.39, 7.6.41 The assessment states that:

“Based on the seascape character area criteria identified within the baseline condition, the sensitivity of the No.46 Mumbles Head to Porthcawl Point (Swansea Bay) seascape unit to the proposed development in the Port Talbot site is considered to be low. The proposed development would be located at considerable distance from the sensitive landform of Mumbles Head identified in the ‘*Welsh Seascapes and their Sensitivity to Offshore Developments: Method Report.*’ Mumbles Head can be appreciated from many places within the seascape unit, however, views of the proposed development would be barely perceptible from this distance as shown within Viewpoint 11 (Fig 7.29 and 7.47).

The overall character of the coastline along and across Swansea Bay is influenced and dominated by the large industrial facilities in Margam and Baglan Bay located on the seafront. They form prominent vertical elements in the landscape and along with the residential developments in Swansea and Swansea Docks significantly affects the way this seascape character area is perceived as shown within Viewpoint 3 (Fig 7.21 and 7.39), Viewpoint 6 (Fig 7.24 and 7.42), Viewpoint 7 (Fig 7.25 and 7.43), Viewpoint 10 (Fig 7.28 and 7.46) and Viewpoint 12 (Fig 7.30 and 7.48)...”

7.12 Considering the above factors, it is concluded that the overall character of the seascape unit will remain unchanged with the proposed development in place. It is stated that the proposed development would bring about a negligible magnitude of change within the Port Talbot site and therefore the effects upon the low sensitivity No.46 Mumbles Head to Porthcawl Point (Swansea Bay) seascape unit would also be negligible and not significant.

Response

7.13 In the first instance the seascape unit for the purposes of such an assessment is too large and would benefit from being broken down into smaller units. This is borne out by the assessment that the sensitivity of the unit is low, whereas the view of CCS is that the sensitivity would range from low to high and a ‘one size fits all’ approach is not appropriate.

7.14 Within a development plan context, the value of the seascape unit as it relates to CCS is considered to be high as the primary focus of UDP Spatial Strategy is the reinvigoration of the City Centre and waterfront areas. The core element of the Spatial Strategy is to develop a modern, attractive and vibrant waterfront area integrated with a revitalised City Centre. The spatial strategy reflects the Welsh Government’s vision for

the regeneration of Swansea Waterfront, which emanates from the Wales Spatial Plan.

- 7.15 Indeed, the overall vision for the Council's UDP is to adopt a sustainable approach to the development of a prosperous region focused on a cosmopolitan and multi-cultural City and County, which capitalises on its waterfront location.
- 7.16 Within this context of the dockland areas, UDP Policy EC2 allocates a major redevelopment area at SA1 Swansea Waterfront for mixed employment and residential development together with supporting leisure, tourism, community uses and ancillary services. This waterfront renewal project is of regional significance.
- 7.17 The Spatial Strategy and Policy EC1 also recognise that the extensive area of brownfield land on the eastern approach to the city, south of Fabian Way and east of SA1, offers considerable regeneration opportunities. It is recognised that land within, and adjacent to, the existing Queens Dock may become surplus to operational requirements during the lifetime of the Plan and that the redevelopment of these areas has the potential to create a major mixed use destination. The importance of this area has been heightened in recent years by the approval and the current implementation of the University Bay Campus. This is an area at an important stage of transition and the currently vacant sites have evolved to strategic employment sites and brownfield land of significant importance to the city region going forward.
- 7.18 Policy AS12 relates to the port and docks and states that development proposals that enhance the viability of the port, extend the use of the ferry terminal facilities and increase employment and business opportunities will be permitted provided that such proposals are compatible with adjacent development areas, communities and environmental enhancement schemes.
- 7.19 UDP Policy EC15 seeks to consolidate the urban tourism resource in locations including the, Maritime Quarter, Tawe Riverside Basin, and Mumbles and specific destinations around Swansea Bay. The amplification to the policy explains that the City Centre is intended to be a major attraction for visitors and business tourism. It is envisaged that this attraction will be strengthened when the planned integration with the foreshore to create a "Waterfront City" is more fully realised.
- 7.20 Policy EC16 states that new or improved recreational and tourism facilities at specific destinations around Swansea Bay are proposed which capitalise on the seafront aspect and contribute towards the regeneration of the Bay. Between these areas of appropriate development, the emphasis is on safeguarding and enhancing the environment of the Bay and other waterfront areas.
- 7.21 Policy HC31 of the UDP supports opportunities for the development of water based recreation facilities.
- 7.22 The amplification to aforementioned Policy EC2 also states that a comprehensive policy context for considering proposals within the area

is set out in the Port Tawe and Swansea Docks Supplementary Planning Guidance (SPG). The SPG relates also to all of the area between the River Tawe and the eastern boundary of Swansea, south of Fabian Way. The SPG derives from the premise that Port Tawe (now re-branded as SA1 Swansea Waterfront) is a key element in the next era of the City's development and to the establishment of Swansea's identity as a major "Waterfront City".

- 7.23 Furthermore, Swansea City Centre Strategic Framework was adopted as Council Policy in January 2007 and endorsed as SPG to the adopted UDP in January 2009. The Study Area was defined to encompass all of the main retail and commercial areas of the City Centre and includes the "Maritime Quarter" extending down to the seafront, developed around the old South Dock. The SPG's Vision for the City Centre is of Swansea City Centre as:

"A vibrant, exciting, attractive, sustainable, cultured European Waterfront City Centre, attracting businesses and visitors, driving the economy and enhancing the quality of life of residents of Swansea and South West Wales."

- 7.24 In defining the Vision for the City Centre, four priority themes have been identified, including connecting the City to the Waterfront. It is envisaged that connecting the City to the Waterfront will ensure that the river and the seafront play a far more active part in the life of the City Centre truly establishing Swansea as a distinctive Waterfront City. Its potential will be realised by fully utilising waterfront locations, so as to create new destinations and attractions which allow people to enjoy both City Centre and waterfront activities.
- 7.25 It is therefore evident from the above synopsis of relevant development plan policy and adopted SPG, the focus for CCS is to make Swansea a vibrant, exciting, attractive, sustainable, cultured Waterfront City and proposals which would compromise these objectives will not be supported.
- 7.26 Within a policy context, the sensitivity of this seascape unit as it applies to the administrative area of CCS is therefore considered to be high. The existing waterfront regeneration at SA1 and Swansea Marina reinforces this position as to does the tourism/recreation resource of the promenade, Swansea Beach and Mumbles etc. The beach in particular is considered to be an important feature within the seascape unit that provides both a focus for activity and views. It is considered to be very attractive in terms of scenic quality and of is of high seascape/landscape value. Accordingly the sensitivity to change is also high.
- 7.27 Set against a high sensitivity to change it is considered that the proposal would add to the existing industrialisation of the setting of the seascape unit as it applies to CCS and in overall terms the magnitude of change would likely be minor rather than negligible. It is considered therefore that whilst the significance of effects has been understated and would be minor rather than negligible, it is agreed that the impacts are not likely to be significant adverse so as to unacceptably conflict with the above stated policies.

No.45 Worms Head to Mumbles Head (South Gower) Seascape Unit

- 7.28 Paragraph 7.6.43 of the LVIA concludes that “the magnitude of change brought about by the proposed development upon the No.45 Worms Head to Mumbles Head (South Gower) seascape unit is considered to be negligible, therefore the effects upon this low sensitivity seascape unit are also considered to be negligible and not significant.”

Response

- 7.29 Whilst the sensitivity of the seascape unit has been significantly understated (it is considered that it should be very high in recognition of its AONB status), given the separation and lack of intervisibility, the impact on this character area is not considered significant.

Visual amenity

- 7.30 Of the 18 representative viewpoints assessed, 5 are located within CCS. These are:

- VP10: Swansea Bay parade, Swansea, cenotaph.
- VP 11: Verdi’s on Mumbles Promenade, Mumbles Head.
- VP 16: Nicander Parade, Swansea.
- VP 17: Swansea Bay parade, Blackpill
- VP 18: Olive and Grape, Meridian Tower, Trawler Road, Swansea.

- 7.31 All are assessed to have a high sensitivity to change and this is agreed. All viewpoints fall within the 10-15km range of the ZTV and are categorised as long distance views.

- 7.32 Within this context, paragraph 7.7.62 states that “where views are apparent across Swansea Bay, the proposed development would form a small component of the view and would be barely perceptible from the surrounding steelworks. At distances between 5km and 15km, the steelworks stretching along the coastline between Port Talbot and Margam is backclothed by the steeply rising upland of Mynydd Dinas, Mynydd Emroch and Mynydd Brombil. Collectively these landforms dwarf the scale and reduce the profile of the building mass and stacks when viewed across Swansea Bay. The magnitude of effects from these representative viewpoints would be negligible and considering their high sensitivity would result in minor and not significant visual effects.”

- 7.33 Whilst the proposal would further add to the industrialisation of these viewpoints, in overall terms these conclusions are accepted.

Conclusion

- 7.34 Having regard to the foregoing, taken in isolation, the proposal would adversely impact on the seascape, landscape and visual amenity of CCS. However, in overall terms the impact is considered to be minor adverse and not sufficient to warrant objection, particularly having regard to the planning balance of the proposal and the acknowledged positive socio and economic benefits. Accordingly it is not considered

that the proposal would unacceptably conflict with the design and siting UDP Policies EV1 and EV2 or the aforementioned waterfront policies, including SPG.

8.0 Ecological impacts;

City and County of Swansea Unitary Development Plan

8.1 Policy EV25 states that development, alone or in combination with other plans or projects, which is likely to adversely affect the integrity of a European protected site (SAC, Marine SAC, SPA and Ramsar Sites) and is not directly connected with or necessary to the management of the site, will not be permitted unless:

- I. There are imperative reasons of over-riding public interest, including those of a social or economic nature, which are sufficient to override the reasons for designation, and
- II. There is no alternative solution.

Where such development is permitted, planning conditions and/or obligations will be used to secure all compensatory measures necessary to ensure that the overall coherence of the European Site is protected.

8.2 Policy EV27 states that development that significantly adversely affects the special interests of sites designated as SSSIs and NNRs will not be permitted unless the need for the development is of such significance that it outweighs the national importance of the designation. Where development is permitted, planning conditions and/or obligations will be used to protect and enhance those interests and where necessary provide effective mitigation and compensatory measures.

8.3 Policy EV28 states that within locally designated areas the natural heritage will be preserved and enhanced wherever possible. Development that would significantly adversely affect the special interest of Local Nature Reserves will not be permitted unless the need for the development is of such significance that it outweighs the importance of the designation. Development that would significantly adversely affect SINC's or RIGs, or which would not provide for appropriate compensatory or mitigation measures will not be permitted, unless it can be demonstrated to meet appropriate social or economic needs where the benefits in such terms would outweigh the harm to the feature concerned. Where development is permitted which would damage the nature conservation value of the site, such damage will be kept to a minimum, and appropriate mitigation or compensatory measures sought.

Impacts

8.4 Given the separation it is not considered that there think there will be any direct effect on ecological receptors in Swansea.

8.5 There may though be effects caused by atmospheric pollutants particularly to Crymlyn BOG SAC. CCS considers that a Habitats

Regulations Assessment is required and that it would be useful to see a map showing predicted fall out.

- 8.6 CCS would also question whether there will be discharges of heated water into the sea which might conceivably negatively affect its shore?

9.0 Air Quality

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- 9.1 Policy EV40 states that development proposals will not be permitted that would cause or result in significant harm to health, local amenity, natural heritage, the historic environment or landscape character because of significant levels of air, noise or light pollution.

Impacts

- 9.2 From a human health viewpoint the only peak concentration concerns to CCS would be Sulphur dioxide levels when the wind direction is south easterly. This is due to the very fast response time with the pulmonary system and SO₂. However the power generation proposal should only significantly affect Nitrogen dioxide levels and CCS is more concerned with their longer term average concentrations. Given the prevailing wind directions – this should not pose a problem to CCS residents.
- 9.3 Conflict with UDP Policy EV40 is not therefore anticipated.