



NEATH PORT TALBOT COUNTY BOROUGH COUNCIL

WRITTEN REPRESENTATIONS

Power Generation Enhancement scheme at
Port Talbot Steel Works, Margam.

PINS REFERENCE: EN010062

NPT REFERENCE: P2014/0898

Planning Department
The Quays,
Brunel Way,
Port Talbot
SA11 2GG

Tata Steel UK Limited, Power Enhancement Project at Port Talbot Steelworks

(NPT reference P2014/0898)

1. These written representations are based on the information provided within the submitted application documents and are made without prejudice to any subsequent comments the Council may wish to make with regard to any additional information submitted.
2. As with any significant infrastructure project there are likely to be a number of potential impacts. It is accepted that the submitted ES has to a large extent adequately assessed a number of these potential impacts, however there are a number of areas of concern.
3. The Authority is concerned about the final design of the buildings associated with the proposed development bearing in mind the prominent location adjacent to Harbour Way (the PDR). Within this context the Council wishes to emphasise its highest aspirations that the development will adopt the highest standards of design in respect of the quality of new development, especially having regard to the prominence of the site at the gateway to the Harbourside Strategic Regeneration Area and Port Talbot Town Centre. This reflects the importance of Harbour Way as a key gateway to Port Talbot, and as a catalyst for economic and physical regeneration.
4. In this regard, the Council is concerned that the illustrative drawings and photomontages submitted with this application to date do not demonstrate the clarity of design thought expected for a scheme of such magnitude, with such potential for significant landscape and visual impact, or reflect the acknowledged recognition in the ES that good design of the buildings associated with the development is an essential requirement.

5. Accordingly, providing extensive and detailed consideration is given to a scheme of the highest quality in terms of design, use of materials and landscaping, (whether as two distinct phases or a single proposal), and that the applicant is able to demonstrate that commitment through additional submissions, it is considered that the proposed development would be unlikely to result in any significant detrimental impact in terms of visual amenity and has the potential to become a key landmark building which could enhance the appearance of this area of Port Talbot.
6. As well as producing electricity from currently waste gases – which is fully supported - it is understood that the plant will contribute to the continued improvement in local air quality. The effects upon air quality are a key concern of the Authority in this area. The application site lies adjacent to the Taibach Margam Air Quality Management Area (AQMA) which was declared by the Council on 11th May 2000 and was in force effective from 1st July 2000, with air quality monitoring having continued since this date. The Council welcomes the predicted positive impacts on air quality as a result of the project. However, the resulting impacts cannot be confirmed until the results of the air monitoring regime contained within the Draft DCO have been implemented and assessed.
7. The Authority considers that further ground condition surveys prior to the start of works would help to establish further baseline information, in order to facilitate a better understanding of monitoring information once the development has begun. It is understood that works are currently underway. As noted in the consultation report section 7.45 the site investigation should include a specific petroleum hydrocarbon analysis in order to provide an accurate indication of human health risk.
8. With regard to land contamination it is noted that until the results of further site investigation works have been submitted to the Council there are no further comments that can usefully be made. As previously stated the Council reserves the right to make further comment with regard to this issue as additional assessments are submitted.

9. The Council supports the continuing work being carried out with regard to ecological issues. Ongoing surveys and mitigation are being carried out in co-operation with the Council's biodiversity section which should result in the successful translocation of species and the creation of sustainable habitats.
10. The Authority welcomes the beneficial effects that the development would bring in particular with regard to the continued production of steel at the site and the significant contribution to both the local and regional economies.
11. With respect to noise issues during the construction phases it is acknowledged that the proposed development is close to established residential areas and as such the Council will carefully consider the Code of Construction Practice and the implementation of construction mitigation plans required within the Draft Development Consent Order (DCO) in order to minimise any detrimental effect upon residential amenity in the area. In addition mitigation and monitoring during the operational phase, in conjunction with any Permit issued by Natural Resources Wales, will be required in order to record regulate and control noise emissions.
12. Providing the applicant is able to provide greater certainty in respect of their commitment to the quality of the final design for the structures and wider site, and appropriate controls are in place through the DCO to ensure no adverse impact on matters primarily including local Air Quality, the Council is supportive of the proposal having regard to the local economic benefits of continued production of steel at the site and the positive benefits of producing electricity from waste gases.
13. The Welsh Government has placed significant emphasis on the voluntary payment of community benefits for energy projects, including the recent launch of the 'Register of Community and Economic Benefits' in respect of onshore wind farms. This includes an online statement that "Energy offers opportunities to bring wealth and benefits to Wales, helping protect the future of our communities. We, the Welsh Government, want Wales' energy developments

to involve communities and to help people understand the benefits they bring”.

14. Within this context, the Authority will be liaising with the applicants to confirm that there is a desire for a community benefits scheme to be created to contribute directly towards the communities affected by the proposal. This is a well-established principle for energy generation, helping to offset the harm caused while also creating essential links between developments and the communities in which they are located.
15. While acknowledged to be outside of the planning process, the Authority will be requesting the developer’s commitment to such a scheme for the above reasons.