

Green Infrastructure Statement (GIS) – Issued for PAC

Project EAF – Construction of a new Electric Arc
Furnace (EAF) and associated infrastructure

Land at Port Talbot Steelworks, Port Talbot

September 2024

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1. Introduction

1.1 The Green Infrastructure Statement (GIS) has been prepared by Turley (Planning) in collaboration with RSK (Ecology and Landscape teams), JBA Consulting (Drainage), and Lawray Architects (Design). It has been prepared on behalf of Tata Steel Limited UK (the Applicant). It supports a hybrid planning application for the construction of an Electric Arc Furnace (EAF) steel making facility and associated infrastructure on land at Port Talbot Steelworks, Port Talbot.

1.2 The description of development is as follows:

“Hybrid planning application: full planning permission for the demolition of existing buildings and structures, partial infill of the BOS lagoon, and construction of a new electric arc furnace-based steel production facility (1 no. arc furnace, 2 no. ladle furnaces). The development includes an upgraded slag processing facility, chemical/material storage and transfer infrastructure and pipework and cabling (above and below ground), buildings, fume and dust treatment plant, water treatment facility and material handling systems. Electrical control rooms and power infrastructure. Offices and ancillary facilities together with new and amended transport infrastructure, landscaping and green infrastructure, and associated development.

Outline planning permission (with all matters reserved except for access and landscaping) for demolition and the construction of a scrap metal handling facility and associated scrap yards, scrap processing facility, underground and overground electrical infrastructure, and new and amended transport infrastructure, landscape and green infrastructure, and associated development.”

1.3 The Site Location Plan is provided at **Figure 1** below.

Figure 1: Site Location Plan



1.4 This GIS seeks to clarify the approach to the development in line with the updated Planning Policy Wales (PPW) Chapter 6 (February 2024). It demonstrates the green infrastructure provided on site and the step-wise approach followed. The GIS draws on detail already set out in the supporting drainage strategy, ecological reports and assessment, arboricultural note and landscape plans prepared for the application.

1.5 The GIS is structured as follows:

- Background
- Site Selection
- Baseline Data and Surveys
- Step-wise Approach
- Conclusion and Planning Balance

2. Background

- 2.1 Chapter 6 of Planning Policy Wales (PPW) was updated on 18 October 2023. The updates were published in a Chief Planning Officer letter with immediate effect. This included the need for all planning applications to be accompanied by Green Infrastructure Statements (GIS) (paragraph 6.2.5). These updates have subsequently been included in the updated PPW (Edition 12), which was published in February 2024.
- 2.2 The proposal has been developed in a way which responds to the relevant national and local policies. These include Policy BE1 (Design) of Neath Port Talbot Local Development Plan (2011-2026), Policy 9 (Resilient Ecological Networks and Green Infrastructure) of Future Wales: The National Plan 2040 and the placemaking principles set out in PPW (Edition 12).
- 2.3 Extensive pre-application engagement has been undertaken with Neath Port Talbot Council (NPT) and Officers throughout 2024 to develop a proportionate approach to biodiversity at the site and/or on land controlled by the Applicant. The proposed approach to biodiversity, ecology and landscaping at the application site is detailed in full within the supporting Environmental Statement (ES) and the planning application documents.
- 2.4 The GIS clarifies the approach to green infrastructure proposed by the Applicant, taking account of the stepwise approach in a way which is proportionate to the scale and nature of the proposed development.

3. Site Selection

Site Selection Considerations

3.1 Tata Steel has been investigating the most feasible and viable means of decarbonising steel making in Port Talbot for a considerable period. Several key considerations influenced the site selection process, including:

- **Site location** – the Applicant operates several sites in Wales and across the UK. The location of the proposed EAF investment has included due consideration to the sites, including most pertinently at Llanwern, Newport and at Port Talbot.
- **Principle of development** – most of the Tata land holding in Port Talbot is allocated for employment use, with the principle of major industrial development established across the location.
- **Funding and commercial viability** – the project is to be part grant funded by UK Government jointly with Tata Steel investment. The budget is finite and focused on the creation of a viable green steel making business at the Port Talbot site.
- **Operational requirements** – Tata Steel has an order book and commitments to the market that must be met to ensure a viable operation at Port Talbot. This is a vital consideration in the successful transition to EAF steel making.
- **Utilisation of existing buildings** – it is essential that the EAF is located carefully relative to the existing steel making process equipment being retained on site as part of the future configuration in Port Talbot.
- **Proximity to major transport corridors** – scrap metal that is mostly to be delivered to Port Talbot by rail is the primary feedstock for the proposed EAF facility. Utilising existing rail links (with minor modifications) is essential.
- **Ecology and biodiversity** – Tata Steel has worked successfully with NPT and Natural Resources Wales (NRW) over several years to manage its effects on ecology and biodiversity at the site. Although peat is present at the site, it is entirely buried, meaning the deposits are inactive and not sequestering carbon.

Site Options

3.2 The planning investment at Port Talbot and the retention of the location as the principal steel making location for Tata Steel has always been the preferred option. The site selection process in Port Talbot has involved the consideration of multiple major investment proposals and configurations at the site. This has included two primary options:

- **An entirely new build facility** - a wholly new build facility in the undeveloped green fields in the most southern portion of the established steelworks. NPT is aware of the size and location of the alternative, entirely newly built facility owing to confidential pre-application discussions in 2022 and 2023. This approach was not progressed owing to budgetary and other (see below analysis) constraints.

- **Partial new build and partial re-purposing of the existing facility** – the proposal, which includes many design and engineering efficiencies of utilising existing buildings and steel rolling equipment on site. These efficiencies are essential in delivering steel production to meet market requirements within the budgetary constraints of the project. Additionally, peat found in this area is buried deeper than at the undeveloped green fields, making it a less sensitive option for buildings foundations etc by comparison.

Proposed Development Site

- 3.3 The proposed £1.25bn investment in an EAF facility is the outcome of the detailed analysis of the above considerations.
- 3.4 The proposal utilises (as far as possible) previously developed land located in the heart of the existing steelworks site. The decision to repurpose the existing previously developed land and established buildings on site was primarily based on the most efficient and viable means of delivering an EAF facility in Port Talbot. It is the most cost-effective means of progressing the proposal, in line with available UK Government funding as a key element in the commercial model for the development.
- 3.5 The EAF proposal subject to the application is also the most efficient means of utilising previously developed land and buildings at the site. It is the most environmentally friendly approach to the targeted regeneration of the facility using best available decarbonised steel making technologies. The inherent protection of the southern fields portion of the steelworks resulting from this site selection is a significant benefit to the site and its immediate surrounds from a green infrastructure perspective.
- 3.6 The site selection in choosing to repurpose an existing site rather than developing a new one significantly minimises waste and makes the most of the resources already available. This decision aligns with Tata’s environmental goals by reducing the need for new construction materials and avoiding the environmental impacts associated with developing greenfield land. This outcome of the site selection process is environmentally advantageous.
- 3.7 Importantly, this approach does not compromise the amount of steelwork production. The project team has ensured that the operations can continue at full capacity within the existing infrastructure, maintaining Tata Steel’s production efficiency and output. This balance of economic prudence and environmental stewardship demonstrates that it is possible to meet industrial needs while prioritising sustainability.

Temporary Construction Areas (TCAs)

- 3.8 TCAs are required as part of the construction phase of the proposed development. These will be utilised for a period of approximately 2.5 years and until Summer 2027.
- 3.9 Land availability and the need to deliver the EAF alongside the safe decommissioning of the areas of the steelworks site not forming part of the future configuration was the key consideration in selecting TCAs. The areas provide accessible construction laydown, compound, storage and staff facilities for the duration of the construction period.
- 3.10 Each of the TCAs is located to ensure that they:

- are sited on previously developed land and laid to existing hardstanding.
- benefit from existing road access with convenient links to the development.
- are understood through existing environmental information to manage risk.
- have little or no ecological or biodiversity interest.

3.11 A combination of functional and operational requirements for the construction period, close proximity, ready access, land and ground conditions, and ecology factors have shaped the sites selected for the TCAs.

Summary

3.12 It is evident that a wide range of considerations have influenced a very detailed site selection process for the proposed EAF facility. This has included ecology and biodiversity. The proposed location is the most cost effective and environmentally sound option for the planned investment at the existing Tata Steel land holding in Port Talbot.

4. Baseline Data and Surveys

4.1 The following surveys and assessments have informed the GIS:

- Ecological Impact Assessment
- Landscape and Ecological Management Plan (LEMP) & Biodiversity Management Plan (BMP)
- Drainage Strategy
- Environmental Statement

4.2 These documents are drawn upon to clarify green infrastructure detail throughout this Statement.

Operational Factors Affecting Biodiversity and Landscape Design

Multifunctional Design: Sustainable Drainage

4.3 The proposed use, layout, and space constraints across the site create challenges for the use of conventional surface water management assets. In this context, opportunities have been maximised where possible to enhance the ecological potential. SuDS components can enhance the provision of high-quality, attractive spaces which can provide health and wellbeing benefits. The approach aims to improve employee welfare and the climate resilience of the development.

4.4 The site has been classified into 'contaminated' and 'clean' stream for surface water management. The contaminated stream is comprised of a piped system, which conveys surface water directly to on-site wastewater treatment systems prior to being discharged into the Bristol Channel.

4.5 The multi-functional design and benefits are only applicable to the clean water stream. The SuDS scheme seeks to maximise the use of above grounds SuDS where possible within the constrained space available across the site.

4.6 The inclusion of SuDS in the car park and office complex for the development will maximise the amenity benefits these assets can provide. This area includes planted filter strips, rain gardens and tree pits to enhance the aesthetics of this area for all employees and visitors. Permeable paving is used to maximise the multifunctionality of the SuDS assets to provide a useable space whilst also providing a treatment function to surface water in this area.

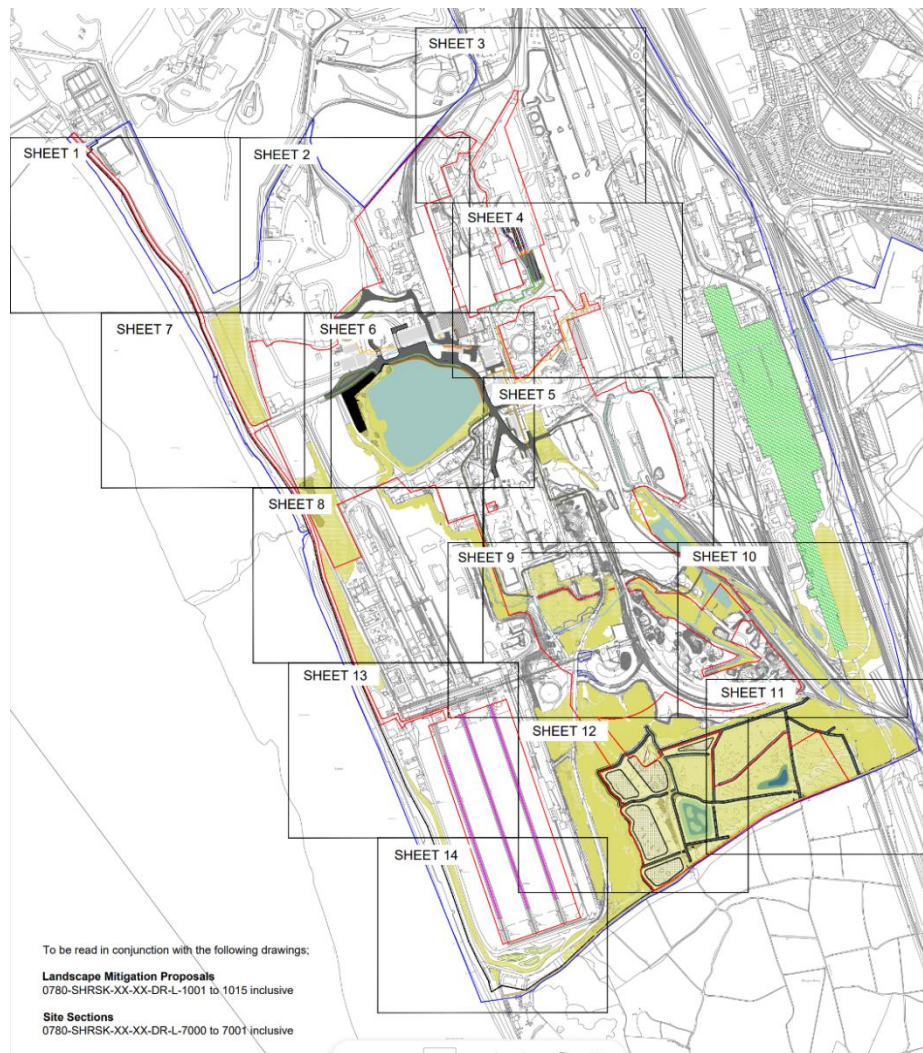
4.7 Care has been taken when considering any vegetated assets to ensure that the proposed planting is suitable for the asset provided, along with its location. The proposal takes into account the potential for overshadowing from adjacent buildings as the key constraint for vegetation in this area of the steelworks. This is a relevant constraint for the development given the need to locate the proposal partly within and in close proximity to existing large buildings.

- 4.8 The majority of proposed highways across the site drain to the clean water stream. Proposals are for the inclusion of gravel-substrate based rain gardens along the highway to intercept and treat flows prior to discharge of surface water to the BOS lagoon, the unnamed watercourse or the Lower Mother Ditch. The rain gardens will be planted with species sympathetic to the wider area, including pioneer vegetation on nutrient poor substrate akin to biodiversity which naturally occurs in the steelworks. Site-won substrates will be used where possible (subject to the results of ground investigations), or alternatively shall be sourced from the wider steelworks area. The vegetation proposed is associated with industrial sites which can support key foodplants for invertebrates and provide sources of pollen and nectar. This habitat type is suitable for periodic disturbance, with low maintenance requirements.
- 4.9 Small areas of highway (medium pollution hazard) are proposed to be drained via a filter strip, prior to surface water entering the gravel-substrate based rain gardens. This allows the additional treatment in the form of a treatment train to manage water quality prior to surface water entering the BOS lagoon.
- 4.10 The proposal for the outline strategy across the scrap storage area involves directing water from the scrap yard through piped network, via a pumping chamber, to the existing water treatment system. From there, the treated water will be discharged into the Bristol Channel.

Wider Green Infrastructure Strategy

- 4.11 The wider landscape and ecological strategy focuses on areas away from the main operational elements of the proposal, where ecology can be enhanced and will thrive.
- 4.12 As shown in Figure 2, the key focus for mitigation and enhancement works is focused on the grazing marshes located towards the southern proportion of the application site; this is complemented by other localised interventions which are proposed around the margins of the lagoon and locations within the wider site boundary.

Figure 2: Landscape and Habitat Mitigation Proposals Location Plan



- 4.13 The southern grazing fields are the focus for most of the mitigation measures along with some areas around the lagoon. These areas are located away from the main plant and will be largely undisturbed once the EAF is fully operational, allowing nature to establish and wildlife to thrive.
- 4.14 The southern grazing fields will be partially affected by the EAF operational works at the construction stage where the new National Grid (NG) electricity cable will be installed, providing power to the new EAF plant. The cable will enter the site from the east and return north through the central area although NG is yet to determine a fixed route. The cable will be laid in an open trench up to 1.5m in depth below ground levels with sections 'threaded' below landscape features such as the drainage ditches and existing vegetation to minimise any potential damage to the existing green and blue infrastructure.
- 4.15 It is acknowledged that the associated cable works will cause some temporary disturbance to the ground along the route including within the NG working zone during the construction phase. The restoration of the cable route forms part of the landscape and ecological mitigation proposals for the southern grazing fields.

- 4.16 The spoil from areas of slag to be cleared for the development will be stored and used to create open mosaic habitat within the wider steelworks site. This will be accomplished via the creation of spoil heaps, roadside bunding and gabion baskets. All of these will be allowed to naturally colonise from the seedbank within the spoil and the retained areas of vegetation across the steelworks.
- 4.17 Peat soil is accorded a high value as a result of its functions as a carbon sink and long-term carbon store. The peat identified at the site is all buried at a depth of 4.5m below ground or deeper, meaning that none of the peat deposits present are 'active' and are not sequestering carbon. Buried peat such as this remains a carbon store while kept undisturbed and not in contact with oxygen in the atmosphere. To avoid the disturbance of peat deposits, the pipeline and cable excavations as part of the proposed development will not exceed 3m in total in depth.

5. Stepwise Approach

Avoidance Measures

- 5.1 The site has been selected to maximise the integration of the proposed development within the existing steelworks. This approach maximises the use of existing buildings and equipment, where possible. It minimises the amount of new building and development. In turn, it minimises the effects on habitats, protected species and green infrastructure when compared to a greenfield site.
- 5.2 The reality of this approach is that the extent of the proposed operational process will require the use of most of the land within the red line boundary. These constraints limit the retention of habitats within the site. Where practicable, habitats will be maintained together with appropriate buffer zones.

Minimisation of Impacts

- 5.3 The landscape and ecological mitigation proposals are focused away from the main operational area of the new EAF development to avoid any potential conflict and to focus on areas where less disturbance to habitat is likely to occur.
- 5.4 Existing on site green infrastructure (beyond the southern grazing marshes) is largely made up of pockets of self-colonised scrub vegetation and open grass mosaic habitat. There are established colonies of both habitats on the many spoil heaps around the operational plant works. This self-colonisation sets the precedent for much of the mitigation proposals.
- 5.5 The proposal includes the retention of onsite seed banks and avoids the use of commercial seed mixes to reinstate grassland or overseed unsightly spoil mounds. Any bare earth or newly created spoil mounds will be left untreated to allow species to colonise and habitat to develop naturally. This will reinforce the unique green infrastructure of this industrial and coastal environment. This approach will encourage the expansion of local species particularly across from the SSSI into the southern grazing fields.
- 5.6 Any additional site won material through excavation works to create the new wetland areas will be retained on site. Tata will utilise the material for further habitat creation in the form of soil and spoil mounds (including levelling where required), and gabion fill around the lagoon area. This will avoid the removal of any potentially contaminated material off site and can also be set aside for future projects. The spoil removed from areas of slag will be stored for use in habitat creation (open mosaic habitat) within the red line boundary and within the wider steelworks.

Peat

- 5.7 Where possible, peat will be left undisturbed and in situ to preserve its long-term carbon storage capacity. Ongoing phase 2 site investigation results, cross-referenced with the proposed site layout, suggest this should be achievable for the significant majority of the site where shallow foundations are anticipated.
- 5.8 While driven pile foundations may interact with peat, they will not require peat excavation. The peat material will be displaced by the piles but will remain buried. If

augered piling is needed, any peat arising from boring will be managed similarly to excavated peat, though such arisings are expected to be minimal.

5.9 The following peat management protocols will help minimise the impact on the peat and its carbon storage capacity:

- Peat will be left in situ wherever possible.
- Any excavated peat will be carefully stored to prevent it from drying out and losing its carbon.
- Peat will be stored for the shortest time possible in stockpiles no higher than 1 metre, with coverings to minimise drying. Water sprays may be used in hot weather to maintain moisture.

5.10 In addition, a Peat Management Plan (PMP) will be prepared for the site once detailed design and all planned ground investigation works are complete. The report will outline areas where construction works are expected to interact with buried peat deposits and will estimate the total volume of peat requiring excavation. Suitable locations for reburial will be identified within the PMP and confirmed by the Environmental Manager during construction. It is proposed that the production of the PMP be secured by planning condition.

Mitigation and Enhancement Measures

5.11 An ecology led strategy has informed the landscape mitigation proposals across the site. This approach has been discussed and agreed with officers at NPT and NRW. It focuses landscape and habitat enhancements on the southern fields.

5.12 The overall design is based on the original Margam Moors Wetland Project Feasibility Study on the possible enhancement of the southern fields in 2008. The report was authored by Barry Stewart and was commissioned by NPT. It proposes a range of different habitats, including 'ridge and furrow' grazing marsh based on existing field patterns, new seasonal wetland areas, new reed bed habitat, ditch clearance works, spoil mound and gabion baskets filled with site won spoil. A new wildlife tower is also proposed.

5.13 The key principle of the landscape and habitat proposals is to retain and enhance the unique landscape character of the Margam Moors coastal grazing marshes, which feature extensively in this coastal setting (and include an existing SSSI located adjacent to the south of the site). Officers at NPT and NRW have consistently advocated the implementation of the approaches proposed in the 2008 report as a proportionate and highly effective means of delivering green infrastructure enhancement associated with major development proposals at the steelworks.

5.14 The southern grazing fields within the application area are made up of a network of drainage ditches forming field boundaries, each with access for maintenance and in the past, for cattle to graze between the fields.

5.15 The current condition of the fields and the ditch network is unmanaged and overgrown. This is leading to a decline in the quality of the onsite ecology and biodiversity. The key

objective is to restore the southern grazing fields through simple and traditional management techniques of grazing and grass cutting regimes, the longer-term goal being the expansion of the SSSI ecology into the area through natural colonisation. The proposals are set out below:

SOUTHERN GRAZING MARSHES. The southern grazing marshes accommodate approximately 3,400 linear metres of ditch network. Currently overgrown with low grade scrub, making them inaccessible and poor value habitat. The mitigation and enhancement works include to remove overgrown scrub along the internal banks and along the top edges, together with silt removal to improve water flow. Clearance works will create an open ditch network for wildlife, improve waterflow, site wide drainage and management. 7m wide grass field margins will be retained either side of the ditches for maintenance access, field margin habitat and wildlife corridors.

RIDGE AND FURROW. Most of the eastern side of the southern grazing fields are proposed as retained 'ridge and furrow' seasonal wetland grazing habitat covering approx. area of 75,000 m². An example of this is shown in Figure 3. Currently these are unmanaged and overgrown making it difficult to establish the effectiveness of the existing water management system (as referenced in the original Barry Stewart report 2008). Mitigation measures are to undertake an initial grass cut and vegetation clearance to reveal the original field patterns. Grass and weeds will be cleared to a level that can be seasonally grazed for future ongoing maintenance. Habitat monitoring will take place over the initial years to establish the seasonal effectiveness of the existing system. Some minor excavation works may be required following the monitoring to improve the current system for further effectiveness subject to the monitoring reports.

Figure 3: Example of Ridge and Furrow



Low ridges and shallow furrows across the fields providing seasonal wetland habitat, allowing grazing animals to manage the grassland.

SEASONAL WETLANDS. Two new wetland areas are proposed in the grazing fields – one large and one small, with examples images set out at Figure 4. Both are designed to

accommodate a combination wetland habitat. The larger area will have seasonal flooding (Oct to April) and prolonged seasonal flooding (Sept to May) with excavation depths ranging from 150mm to 500mm. The smaller wetland is designed to accommodate a combination wetland habitat with prolonged seasonal flooding (Sept to May) and, permanent wetland. Excavation depths range from 300mm to 1m max depth. Excess soil and subsoil will be used on site to build up levels where possible or used as part of larger spoil mounds across the wider site to encourage self-colonisation and establishment of open grass mosaic habitat.

Figure 4: Examples of Seasonal Wetland Scrapes



A large seasonal wetland scrape during the summer months



Examples of smaller seasonal wetland scrapes during the winter months

REED BEDS. New reed bed habitat covering an area of approx. 32,200 m² is proposed in the western half of the southern grazing fields. A similar example is shown below, at Figure 5. Each area will be graded to create a shallow end and deep end to further support a range of wetland habitats. Excavation depths will range from 150mm to 500mm max. Excavated soil will be spread to the edges where levels do not exceed 150mm. Any excess soil will be removed and used to create soil mounds or for gabion fill to replace habitat loss. Reed planting will be generated from onsite seed collection and restricted to sowing around the dryer edges to allow successful establishment. Natural colonisation will prevail over time and will be monitored to ensure areas of open water will be maintained within the reed beds to support a wider range of seasonal wetland species visiting the site.

Figure 5: Examples of Reedbed Habitat



Examples of reedbed habitat during the winter season (top) and summer season (bottom)

COASTAL SCRUB. New pockets of coastal scrub habitat are proposed to replace vegetation removed through the ditch clearance works. These are shown at Figure 6. As the existing vegetation is considered low quality habitat, there is an opportunity to improve the on-site biodiversity with pockets of new species rich scrub mix planting. This mix could include the following species: Coastal Marsh Scrub Mix - Species suggestions:

- **Trees – upper layer**
 - (i) Alder – *Alnus glutinosa*
 - (ii) Birch – *Betula pendula*
 - (iii) Hawthorn – *Crataegus monogyna*
 - (iv) Grey Willow – *Salix cinerea*
- **Shrubs – middle layer**
 - (v) Broom – *Cytisus scoparius*
 - (vi) Juniper - *Juniperus communis*
- **Ground Layer**
 - (vii) Sea beet - *Beta vulgaris*

(viii) Sea purslane - *Atriplex portulacoides*

Figure 6: Examples of Scrub Planting - Tree and Shrub Species



Alder - Alnus glutinosa



Silver Birch - Betula pendula



Hawthorn - Crataegus monogyna



Grey Willow – Salix cinerea



Broom - Cytisus scoparius

Juniper - Juniperus communis

These species can support a range of wildlife from birds to beetles thus further supporting and encouraging wildlife to the area through green infrastructure interventions.

Additional pockets of species rich coastal scrub are proposed around the lagoon to the north of the site as further compensation for loss in the southern grazing marshes. This will expand bio-diversity across the wider site and all new scrub planting will be monitored and managed to control any signs of encroachment.

GRASSLAND. Any existing grassland removed, or ground disturbed through site clearance works will be made good but will not be reseeded with commercial seed mixes. Instead, the preferred method of grassland re-establishment is to allow natural colonisation, expanding the species diversity of the Margam Moor SSSI.

In addition to the 7m wide field margins adjacent to the drainage ditches, large wide areas of grassland will be left to establish as additional wildlife habitat corridors, further enhancing the green infrastructure network across the site.

SPOIL MOUNDS AND GABIONS. Excess soil and spoil from the wider site works will be retained on site (as far as the Applicant is able) and utilised for habitat creation. This will be as soil / spoil mounds formed around the site and left to be colonised naturally. Additional site won material including site ballast and other spoil will be mixed with excavated soil and used to fill gabion baskets located around the lagoon edge. Examples are shown at Figure 7. The mixed fill will create unique habitat for plants, and invertebrates, further expanding habitat provision and biodiversity across the northern area of the site. This will mitigate for the loss of ephemeral and scrub habitat within the red line boundary. The retained spoil will contain the existing seedbank and the retained habitat will provide a supplementary source of seeds to allow the colonisation of the spoil heaps, road side bunds and gabion baskets.

Figure 7: Example of Gabions and Spoil Heap Habitats



Site won material will fill gabions and form spoil mounds to create additional 'brownfield' habitat across the site.



Soil and spoil heaps will be created across the wider site using site won material, allowing open grass mosaic habitats to establish similar to the image shown above.

On-site Biodiversity Compensation and Enhancement

- 5.16 The condition of the retained habitats will be enhanced through management practices. The landscape strategy seeks to provide locally appropriate habitat opportunities for a range of species.

Wider Biodiversity Compensation and Enhancement

- 5.17 The mitigation and enhancement measures for the Southern fields outlined above will also encompass the wider southern fields area (within the blue line boundary).
- 5.18 Establishment will be secured through a combination of self-seeding, active control of negative indicator plants through monitoring and management actions, and supplementary seeding of a few target positive indicator species appropriate to the ground conditions.
- 5.19 Key landscape design principles in respect of biodiversity conservation and enhancement are to:
- Improve site wide habitat value and increase biodiversity and connectivity through means of landscape restoration and habitat creation.
 - Have a particular focus on the southern grazing fields for the landscape and habitat enhancement (the fields located south of the EAF main operational area and associated steel processing site infrastructure). Currently unmanaged, these fields have become overgrown with low value scrub which has encroached into the extensive network of drainage ditches in this area, making them inaccessible for wildlife and for management.

- Use a place and context-based landscape design approach, informed by the landscape character and ecology of the Margam Moors SSSI and expansive coastal grazing marshes which feature extensively in the wider coastal landscape setting beyond the application boundary.
- Expand the ecology of the Margam Moors SSSI by creating conditions that will accommodate species of open mosaic grasslands through natural colonisation. Restoration and creation of wetland habitats to further support a range of wildlife and to enhance site biodiversity.
- Further extend the principle of self-colonisation habitat to cover other areas of the site through additional habitats interventions including around the lagoon to the north and through 'rain garden' style drainage along roadside edges as part of the wider integrated landscape, ecology and drainage strategy.

Management and Monitoring

- 5.20 The created and enhanced habitats will be subject to annual monitoring for a minimum of five years from the start of operation to assess the extent to which plant populations are establishing in the green space.
- 5.21 The status of these habitats will be documented and reviewed against the biodiversity objectives. Negative trends affecting biodiversity value will be identified through monitoring. The Landscape and Environmental Management Plan (LEMP) will include formal commitments to implement remedial actions to ensure the biodiversity value assigned during design is achieved in practice.

Delivery and Responsibility

- 5.22 The detailed measures will be subject to a planning condition requiring implementation of all approved landscaping. The works will be delivered in a single phase post the NG cable installation works. Within this, anticipated sequencing of the landscape works would be as follows.
- **Earthworks:** It is assumed that cable trenching will take place first, followed by reinstatement to proposed levels together with excavations to create reed beds, scrapes and ditch clearance and creation of gabions, earth mounds and rain gardens.
 - **Soft Landscape:** Planting of scrub/trees and establishment of reed beds.
 - **Management:** To encourage establishment of self-seeded and wind-blown material from the SSSI, to control any harmful weed species and, inter alia, for continued ditch maintenance

6. Conclusion

- 6.1 A stepwise approach has been followed during the site selection and design development process for the proposed EAF facility at Port Talbot Steelworks.
- 6.2 The development and funding context, operational constraints and green infrastructure assets on the site have been integral considerations in this site specific step-wise approach. This has included considerable weight to buried peat at the site.
- 6.3 Minimisation and mitigation have been adopted on a proportionate basis. Net biodiversity benefit will be achieved through the proposal. This includes through the holistic approach to maximising on-site green infrastructure through the careful co-ordination of drainage, landscape and ecology considerations.
- 6.4 Immediate off-site green infrastructure delivered on land owned and controlled by the Applicant complements this approach entirely.
- 6.5 As outlined in the accompanying LEMP and BMP, long-term management and maintenance of all green infrastructure will be conducted by the Applicant.
- 6.6 The proposals maximise the potential long-term biodiversity that can be achieved on-site and immediately off-site on land controlled by the Applicant. The avoidance, mitigation, compensation and enhancement measures will ensure a positive biodiversity outcome. They will achieve net biodiversity benefit. The proposal is fully compliant with the requirements of the Environment (Wales) Act 2016 and Planning Policy Wales 12.

Turley Office

Cardiff

Client

TATA Steel UK Limited

Our reference

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Turley