

NON-TECHNICAL SUMMARY

Land South of Rover Way, Cardiff CF24 5PH

Harsco Metals Group Limited

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1.0 Introduction

- 1.1 This Non-Technical Summary (NTS) has been prepared by SLR Consulting Limited (SLR) on behalf of Harsco Metals Group ('the client' and 'the applicant') and sets out the results of an Environmental Statement (ES) undertaken for the proposed development at the Celsa Steelworks site on Land South of Rover Way, Cardiff CF24 5PH. This NTS forms part of a full planning application submitted to Cardiff Council which seeks consent for the *"Installation of an Asphalt Batching Plant along with associated infrastructure and works"*.
- 1.2 This NTS seeks to provide a summary of the proposed development and its likely effects on the environment in non-technical language.

Non-Technical Summary

- 1.3 Schedule 4 of The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 ('the Regulations') sets out the information to be included within an ES. In summary, the information requirements include, but are not limited to, the following:
- A description of the development and the proposed location of the development;
 - A description of the reasonable alternatives studied by the developer which are relevant to the proposed project;
 - A description of the relevant aspects of the current state of the environment (baseline scenario) and an outline of the likely evolution thereof without implementation of the development (future scenario);
 - A description of the factors likely to be significantly affected by the development;
 - A description of the likely significant effects of the development on the environment;
 - A description of the forecasting methods or evidence used to identify and assess the significant effects on the environment;
 - A description of the measures envisaged to avoid, prevent, reduce or, if possible, offset any identified significant adverse effects on the environment and, where appropriate, of any proposed monitoring arrangements;
 - A description of the expected significant adverse effects of the development on the environment deriving from the vulnerability of the development to risks of major accidents and/or disasters which are relevant to the project concerned;
 - **A non-technical summary of the information listed above;** and
 - A reference list detailing the sources used for the descriptions and assessments included in the ES.
- 1.4 This document therefore comprises a Non-Technical Summary as required by Schedule 4, Paragraph 9 of the EIA Regulations.

The Applicant & Land Ownership

- 1.5 The application site is within the freehold ownership of Cardiff Council, whilst Celsa Steel (UK) Ltd has a long leasehold interest in the site and operate the existing steelworks located on site. The application will be submitted on behalf of Harsco Metals Group Limited, who will operate the asphalt batching plant on behalf of, and utilising materials provided by, Celsa Steel (UK) Ltd.

The Requirement for an Environmental Impact Assessment

- 1.6 Applications for development that fall to be considered under The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 are required to be supported by an Environmental Impact Assessment. The criteria for considering whether the proposals constitute an 'EIA Development' are defined as either 'Schedule 1' or 'Schedule 2' developments within the Regulations.
- 1.7 It should be noted that the Screening Opinion issued by Cardiff Council (as detailed within Section 1.5.0 below) confirms that the development proposals would fall to be considered under Schedule 2 Class 5 (e) – *'Installations for smelting mineral substances including the production of mineral fibres'*. The applicable threshold for Class 5 (e) under the 2017 EIA Regulations (Wales) are that *'The area of new floorspace exceeds 1,000 square metres'*.
- 1.8 Further information regarding the Screening and Scoping exercises undertaken is provided below.

Screening and Scoping

Screening Opinion

- 1.9 A Screening Request, prepared by Harsco Metals Group Ltd, was submitted to Cardiff Council on 17th January 2019.
- 1.10 The subsequent Screening Opinion (reference SC/19/00001/MJR), which was adopted on 11th April 2019, confirmed that the development falls to be considered under Schedule 2 Class 5 (e) – *'Installations for smelting mineral substances including the production of mineral fibres'*.
- 1.11 The Screening Opinion confirms that:
- "... it is concluded that the applicable thresholds for requiring an Environmental Assessment would be met or exceeded and that the Environmental Impacts of the development as described are potentially to realise such environmental effects as to warrant the submission of an Environmental Statement."*

Scoping Opinion

- 1.12 A Scoping Request Report was prepared by SLR Consulting Limited and submitted to Cardiff Council on 4th April 2019.
- 1.13 The Scoping Request Report related to a proposal for an *"...an Asphalt Batching Plant and associated infrastructure at the Celsa Steelworks site on Land South of Rover Way, Cardiff CF24 5PH."*
- 1.14 A Scoping Opinion was subsequently adopted by Cardiff Council on 17th May 2019 (reference

SC/19/00005/MJR). Notwithstanding the suggested 'scope' detailed within the Scoping Request Report, the Scoping Opinion duly identified that matters pertaining to noise and transport were not considered likely to result in significant effects and would therefore sit outside of the EIA.

- 1.15 Further information relating to the formal Screening and Scoping exercises, the content of the Cardiff Council Screening and Scoping Opinions, along with other consultation undertaken in support of the development, is contained within Chapter 5: Scoping Opinion and Consultation.

Viewing the ES and Representations

Requesting Copies of ES Documents

- 1.16 The ES and associated NTS will be available to view (free of charge) either via the planning applications page of the Cardiff Council website (<https://planningonline.cardiff.gov.uk/online-applications/>) or at the Cardiff Council offices located at County Hall, Cardiff CF10 4UW.
- 1.17 Alternatively, a copy of the ES can be requested from SLR Consulting Limited in either electronic (CD) or hard copy. The cost of duplicating the ES will be charged at cost (i.e. no additional uplift) dependent on the format that the copy is requested. These costs are detailed below:
- Electronic copy via CD - £10; or
 - Hard copy via post - £350 + postage.
- 1.18 Unfortunately, given the size of the ES, it is not possible to disseminate copies of this document via email.
- 1.19 A copy of the NTS can also be requested from SLR Consulting Limited in either electronic (email or CD) or hard copy and is available free of charge. If a hard copy is requested, please send an A4 size stamp addressed envelope to the following address: **SLR Consulting Limited, 3rd Floor, Brew House, Jacob Street, Bristol BS2 0EQ.**
- 1.20 All other requests for copies of the ES documents can be made via email at ebright@slrconsulting.com.

Representations

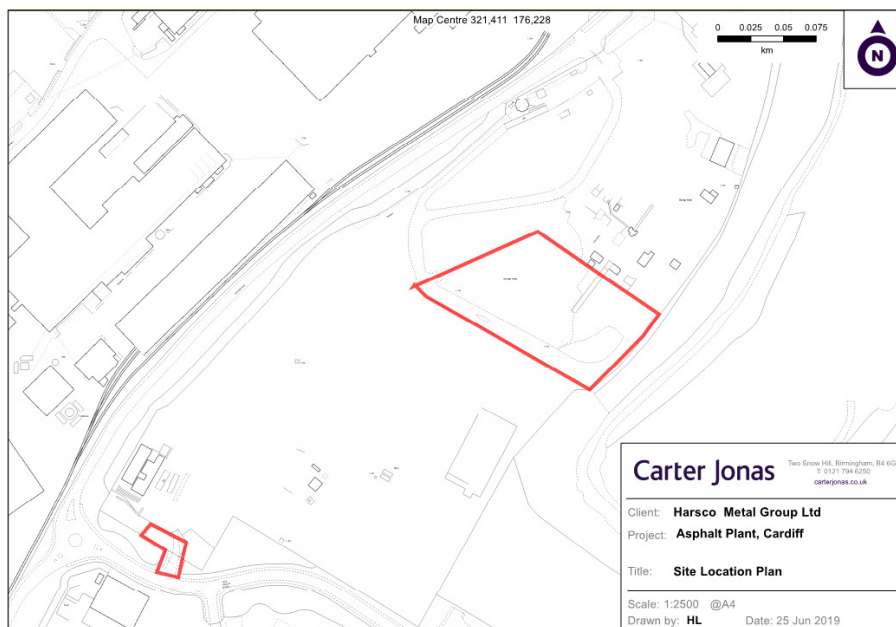
- 1.21 Should you wish to make representations to the application or in direct reference to the ES, these must be made within 30 days of the date that the application has been registered by the local planning authority.
- 1.22 Any such representations can be submitted to the planning department of Cardiff Council via email (developmentcontrol@cardiff.gov.uk), the planning applications page of the Cardiff Council website (<https://planningonline.cardiff.gov.uk/online-applications/>) or by writing to the Cardiff Council Development Management team located at County Hall, Cardiff CF10 4UW.

2.0 Description of Site and Surroundings

- 2.1 The application site, which is approximately 1.13 hectares (11,300m²) in area, is located entirely within the administrative boundary of Cardiff Council and the electoral ward of Splott. The site is

located within the eastern confines of Cardiff, approximately 2.5km east of the city centre and immediately south of Tremorfa. A scale copy of the site location plan is provided within Appendix 2-1 for your reference.

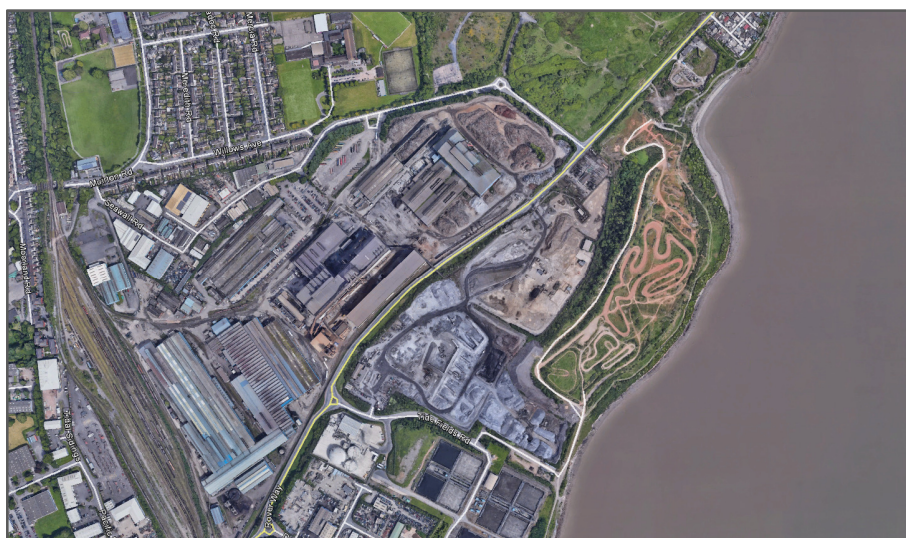
Figure 2-1: Site Location Plan Extract



Existing Site & Surroundings

- 2.2 The site, which is irregular in shape, is located within the southern extent of the wider Celsa Steel UK site on Rover Way. This southern operational area is bound by Rover Way to the north and west, beyond which is the remainder of the Celsa Steel UK site, including the principal smelt shop and other industrial buildings. Tide Fields Road bounds the site to the south, beyond which is a Welsh Water works. Finally, the site is bound by an unnamed track to the east, beyond which is Cardiff Motocross Centre MX and the Severn Estuary. An aerial image of the wider Celsa Steel site and surrounding area is provided within Figure 2-2 below.

Figure 2-2: Existing Celsa Steel Site Layout (Aerial Photo)

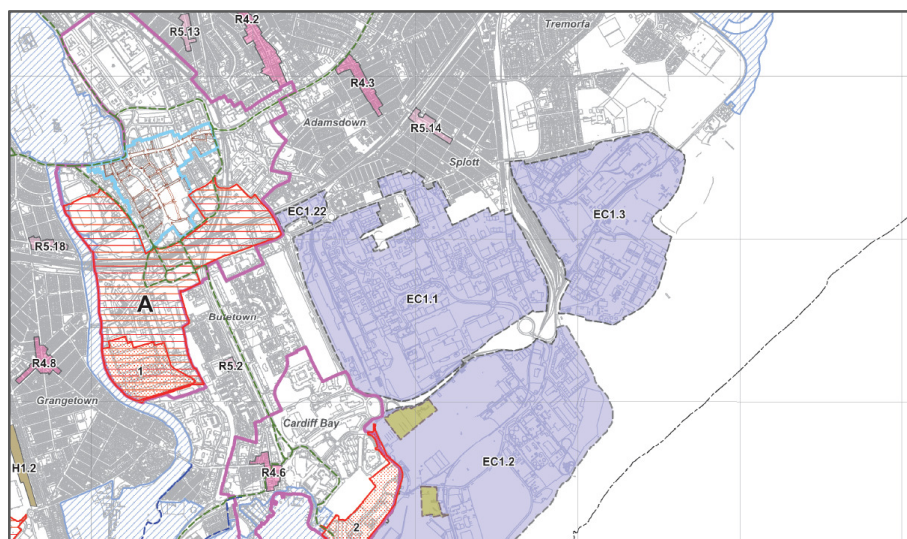


- 2.3 Access into the southern Celsa Steel site is taken either from the northern boundary, via Rover Way, or via the southern boundary, via Tide Fields Road.
- 2.4 The asphalt plant is to be located within a circa 1 hectare (10,022m²) plot within the north-eastern confines of the southern Celsa Steel UK site. This plot is bound by internal haul roads along its north-western and south-western bounds. The asphalt plant area is then bound by further operational waste sorting land to the north-east and scrub land to the south-east, beyond which is the Cardiff Motocross Centre MX and the Severn Estuary.

Planning Designations

- 2.5 The Cardiff Local Development Plan, as adopted in 2006, provides the statutory framework for the development and use of land within Cardiff over the plan period (2006-2026). Within the Proposals Map, an extract of which is provided within Figure 2-3 below, the site is identified as being located within employment allocation EC1.3

Figure 2-3: Extract of Local Development Plan Proposals Map



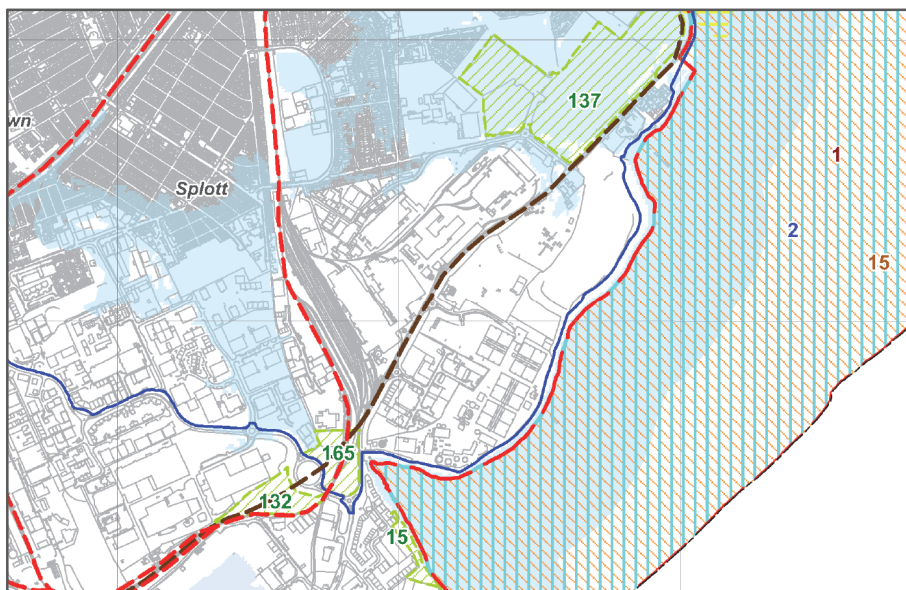
- 2.6 Policy EC1 relates to 'Existing Employment Land' and states that *"The city's existing employment areas outside of the Central and Bay Business Areas (as designated on the Proposals Map) will be protected for B Use Class employment generating uses (together with appropriate ancillary and/or complementary uses and activities as referred to in Policy EC2) as described in the table below"*

Table 2-1: Policy EC1 Designation

Site Ref	Site Name	Primary Use/Activity	Status
EC1.3	Rover Way (Celsa Steel Works, Tremorfa Industrial Estate, Seawall Road)	B2, B8	Primary

- 2.7 In addition to the above, the Local Development Plan also contains a 'Constraints Map' which identifies areas which have been allocated for the purposes of environmental, cultural or heritage related protection. An extract of this 'Constraints Map' is provided within Figure 2-4 below.

Figure 2-4: Extract of Local Development Plan Constraints Map



- 2.8 As can be noted from Figure 2-4 above, the Severn Estuary is designated as a Special Protection Area and RAMSAR, Site of Special Scientific Interest (SSSI) and a Special Area of Conservation (SAC).

Planning History

- 2.9 There is no online planning history available for the application site itself. However, there is a range of planning history associated with the wider Celsa Steel site which has been outlined, in brief, within Table 2-2 below.

Table 2-2: Celsa Steel Planning History

Application Reference	Description of Development	Determination	Determination Date
03/02631/C	Weighbridge, weighbridge cabin and 2 high mast lights	Granted	6 th January 2004
04/01027/E	Construction of new melt shop and associated facilities on the site of the former nail factory	Granted	13 th August 2004
04/02363/R	Amendment of Condition 8 (Construction Traffic Movement) of Outline planning permission 04/01027/E	Granted	19 th November 2004
04/02511/E	Construction of new melt shop and associated facilities	Granted	16 th December 2004
09/00540/E	Erection of elevated covered walkway/access to melt shop offices	Granted	1 st June 2009

Application Reference	Description of Development	Determination	Determination Date
14/01358/DCI	Construction of new entrance road and crossover into car park	Granted	9 th September 2014
14/02560/MNR	Discharge of Condition 3 (Trees) of 14/01358/DCI	Granted	6 th November 2014
18/02065/MJR	Proposed industrial building (Class B2) to house scrap metal sorting machinery, in addition to related works, associated with existing site use	Granted	23 rd November 2018
SC/19/00001/MJR	EIA Screening for Proposed Asphalt Plant	Response Issued	9 th April 2019
SC/19/00005/MJR	EIA Scoping for Proposed Asphalt Plant	Response Issued	17 th May 2019

3.0 Description of Proposed Development

Description of Development

- 3.1 The application submitted to Cardiff Council seeks full planning permission for:
- “Installation of an Asphalt Batching Plant, along with associated infrastructure and works”*
- 3.2 The planning drawings for the proposed development have been prepared by Harsco Metals Group Ltd. These have been prepared following an iterative design process which has been influenced by pre-application consultation with key-stakeholders, including Cardiff Council and Natural Resources Wales. Further information regarding pre-application consultation is provided within Chapter 5: Scoping and Consultation.
- 3.3 In addition, the design has also been guided by the various technical assessments that have been undertaken to support the planning application submission and in collating the EIA. Further information regarding the iterative design process is provided within Chapter 4: Consideration of Alternatives.

Proposed Land Use

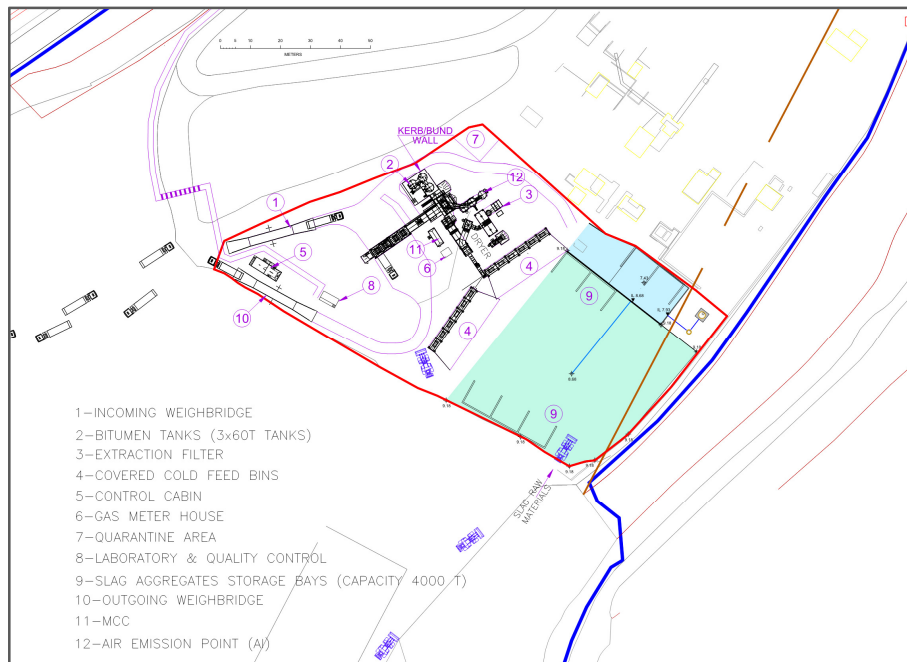
- 3.4 The proposed Asphalt Batching Plant and associated materials storage area will be in keeping with the existing use of the Celsa Steel site and its designation within the Cardiff Local Development Plan (allocation EC1.3). The proposed Asphalt Batching Plant will fall within a Class B2 (General Industrial) use as defined within the Town and Country Planning (Use Classes) Order 1987 (as amended).

Layout and Equipment

Layout

- 3.5 The plant will be located within the central confines of the red line site area, with an area to the west utilised for vehicular access, fill and departure via entry and exit weighbridges. Within the eastern confines of the site, a range of materials storage bays will be located along the boundary, thereby leaving a central manoeuvring area for vehicles.
- 3.6 The bunded materials storage bays will be constructed from large prefabricated concrete blocks which lock together when stacked and covered by way of a pre-fabricated roof to keep materials dry. These are industry accepted materials for the formation of such large materials storage bays and entirely fit for purpose.
- 3.7 To accommodate the new concrete pad and erection of the Asphalt Batching Plant, a settlement lagoon and soakaway is to be constructed along the northeastern boundary of the application site (adjacent to the SIMS Metal site). The settlement lagoon has been designed to accommodate the necessary surface water runoff capacity for the operation of the application site.
- 3.8 There is an existing concrete pad on site and this will be utilised as part of the proposals. This will be upgraded where necessary to support the weight of the Asphalt Batching Plant, weighbridges and associated HGVs. The plant will also be anchored to this pad by way of minor piles and anchor points (i.e. tensile cables to a fixed point).

Figure 3-5: Proposed Site Layout

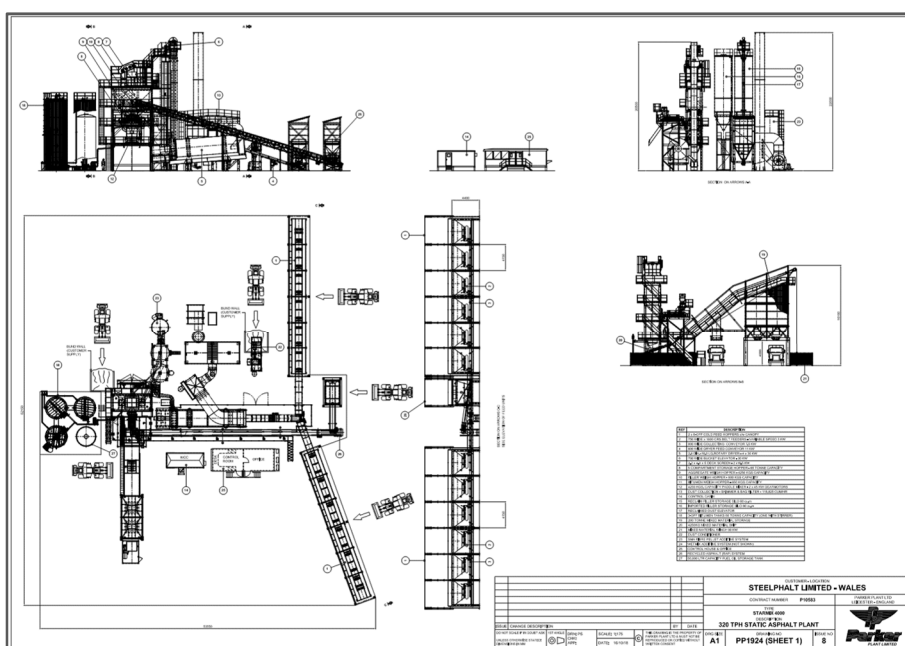


- 3.9 In addition to the above, it has been agreed that the internal haul roads between the Asphalt Batching Plant operational area and Tide Fields Road would be upgraded by way of asphalt surfacing. Notwithstanding, drainage of these internal roads will remain as existing with runoff occurring onto the edge of the roadway.

Equipment

- 3.10 The batching plant itself will comprise of a range of storage silos, feed and weigh hoppers, belt feeders, conveyors, a rotary dryer, bucket elevator, deck screens, paddle mixer, dust collection skimmer and fill bag, bitumen tanks, fibre pellet additive system and a control cabin.
- 3.11 Whilst operating in a set process, the plant is modular to allow for replacement parts and/or 'bolt-on' additions to improve functionality where appropriate. The technical drawings of the Asphalt Batching Plant are shown within Figure 3-2 below and are provided to scale within Appendix 3-3.

Figure 3-6: Technical Drawings of Asphalt Plant



Batching Plant Process

- 3.12 The asphalt plant has the capacity to produce up to 320 tonnes per hour of asphalt materials. The process uses slag (a waste generated on site by Celsa's production process) which has been crushed and screened to remove the metallic fraction leaving a quality aggregate. The arising slag aggregate will be fed into the asphalt plant with the addition of bitumen, Road Asphalt Planning's, cellulose, fibres and filler in varying proportions to produce different specifications of asphalt.
- 3.13 The Asphalt Batching Plant process can be broken down into clear operational stages as detailed below:
- The first step is to feed unheated-raw aggregates into different bins of the cold aggregate feeder bins at the south-eastern most extent of the plant (note that the aggregates are separated into separate bins subject to size and quality);
 - Cold feeder gates on individual bins control the flow of aggregates into the plant itself, with the amount of each aggregate inputted into the plant dependent on the mix specified by the purchaser;
 - The aggregates are then transferred to a rotary drier by way of a charging conveyor and the

aggregates are heat-dried;

- At this stage primary and secondary dust collectors operate to collect settling heavy dust particles to prevent dispersion into the surrounding environment, with discharge via the chimney stack. The dust extraction system includes a pre-skimmer and interconnecting pipework to the rotary drier screen, mixer, elevator and filler silo. The bag filter unit incorporates a collecting hopper to store the collected dust which is used in the asphalt mix. A Continuous Emissions Monitor will be installed, and the plant specification is designed to achieve particulate emissions of less than 25mg/m³;
- Following heating, the aggregates are transferred to the tower unit by way of a bucket elevator;
- At the top of the tower unit is multiple layered screening unit which the hot aggregates pass through to get re-separated and stored into different bins based on their sizes;
- From the hot storage bins, the aggregates are then weighed and discharged in to the mixing unit. In the mixer, aggregates will be mixed with bitumen and filler material;
- The bitumen is stored and heated within separate tanks adjacent to the tower unit. Bitumen is pumped to the weighing hopper prior to discharge. This bucket weighs it before addition into the mixer;
- Filler material is added in a separate container and it is pumped to its weighing hopper for subsequent discharge into the mixing unit;
- After mixing, the hot mix asphalt is either discharged into waiting trucks or into the mixed material storage silos;
- All processes identified above are controlled by way of computerized program and monitoring equipment located within the control cabin. This cabin is manned by a suitably trained member of staff at all times, who can manually override the plant in cases of emergency.

3.14 The asphalt is produced in accordance with the Slag Quality Protocol to a required specification enabling it to achieve 'end of waste status'. The process enables the recovery of slag from the steel making process thus reducing reliance on disposal to landfill. By recovering waste materials, the need to source virgin materials is also reduced. It is intended that Harsco will operate this plant under Celsa's environmental permit.

Figure 3-7: Photograph of similar Asphalt Batching Plant (Rotherham, South Yorkshire)



Site Preparation and Construction

Site Preparation

- 3.15 As identified above, there is an existing concrete pad on site and this will be utilised as part of the proposals. The pad will be upgraded where necessary to support the weight of the Asphalt Batching Plant, weighbridges and associated HGVs. The plant will also be anchored to this pad by way of minor piles and anchor points (i.e. tensile cables to a fixed point).
- 3.16 The pad will be laid as to drain to a settlement lagoon and soakaway which will be constructed on the northern bounds of the application site, adjacent to the SIMS Metal site. The levels changes required to facilitate drainage and the settlement lagoon will require approximately 1,800m³ of cut and 1,870m³ of fill to achieve.
- 3.17 As detailed above the settlement lagoon and soakaway will have a maximum discharge rate of between 5-10 ls-1 and anticipated 0.5m depth of water when fully drained. During periods of excessive rainfall, the materials storage area will be capable of acting as a surface water storage area. This will ensure that runoff from the Asphalt Batching Plant and materials storage area do not disperse onto the surrounding land.
- 3.18 The site preparation works will be undertaken utilising a range of excavation and grading equipment including and not limited to tracked excavators and wheeled loaders.

Construction

- 3.19 The Asphalt Batching Plant will be delivered to site as modular components and subsequently constructed/fitted together on site. This will ensure that the components are easily delivered to site and allows for minor variations to the installation process subject to weather and site conditions.
- 3.20 A number of mobile cranes (no larger than 100 tonne) will be utilised to move equipment from the delivery vehicles to position on site. Given the nature of the wider site, this delivery and erection method will not result in disturbance to the existing operations of either Celsa Steel or SIMS Metal.
- 3.21 All works will be undertaken by Harsco Metals Group Ltd, utilising their own specialist team familiar with erecting and operating such Asphalt Batching Plant equipment. All equipment will be thoroughly tested prior to full operation of the Asphalt Batching Plant.

Development Programme

- 3.22 The entire development programme is anticipated to take approximately 18 weeks, with the following key elements of work being contained therein:
- Site Preparation – Site Clearance and ad hoc works required to commence construction operations – 2 weeks;
 - Site Preparation – Earthworks to form site levels and settlement lagoon – 3 weeks;
 - Site Preparation – Concrete slab layout & soakaway – 2 weeks;
 - Construction – Delivery and erection of Asphalt Batching Plant, weighbridges and concrete

storage bins – 10 weeks; and

- Post Construction – Safety and operational checks of Asphalt Batching Plant – 1 week.

- 3.23 The exact dates for the undertaking of the above are liable to change given that the necessary consents need to be obtained through both the planning and permitting regimes. Upon completion of the development programme, commencement of operations would commence immediately and asphalt would begin to be delivered to market.
- 3.24 Any subsequent repairs, maintenance or upgrading of the equipment would be undertaken on site and in an ad-hoc manner according to requirements.

Operational Hours

- 3.25 The proposed Asphalt Batching Plant is anticipated to operate for approximately 300 days per annum, during which the plant is proposed to operate between the following hours:

Table 3-1: Hours of Operation (FOR REVIEW)

Day	Period of Operation
Monday to Friday	06:00 to 18:00 Hours (N.B. Hours may be extended as required to fulfil an order)
Saturdays	As required to fulfil an order
Sundays & Public Holidays	As required to fulfil an order

- 3.26 Given the industrial nature of site and the surrounding area, these hours of operation are considered entirely appropriate. Furthermore, these hours of operation are in accordance with the current working hours operated by Celsa Steel and SIMS Metal.

Throughput & Materials

- 3.27 The Asphalt Batching Plant has the capacity to produce up to 320 tonnes per hour of asphalt materials. The process will utilise waste materials from the steel works which would otherwise need to be disposed of as a waste material. As such, there are clear operational and sustainability benefits to the asphalt plant being located within this site. Notwithstanding, there will need to be further materials imported to the site for the operation of the plant and also vehicular movements taking the prepared asphalt away from the site.
- 3.28 It should be noted that, at present, Harsco Metals group import up to 88 ktns of slag from the Celsa steel site for their Asphalt Batching Plant in Rotherham; 27ktns transported by rail and 52ktns by road. As such, the installation of this Asphalt Batching Plant at the Cardiff site will have significant sustainability benefits in terms of reducing haulage movements across the country. This has been duly considered within the submitted Transport Assessment.
- 3.29 The asphalt is produced in accordance with the Slag Quality Protocol to a required specification enabling it to achieve 'end of waste status'. As such, the process enables the recovery of slag from the steel making process thus reducing haulage and a reliance on disposal to landfill. By recovering waste materials, the need to source virgin materials is also reduced.

- 3.30 Some raw materials will be brought on to site which will be incorporated into the asphalt mix. However, the plant will predominantly process the slag which will reduce the need for Celsa to transport slag off site to other outlets.
- 3.31 Table 3-2 below provides details of the materials to be both imported and exported from the site for the operation of the Asphalt Batching Plant. The tonnages per year are approximations and may vary slightly dependent on throughput / demand.
- 3.32 Given that both processed and unprocessed slag will be obtained on site from Celsa's existing operations, the amount of materials for these elements are not able to be quantified at this point in time.

Table 3-2: Materials and Quantum

State	Source / Destination	Material	Year 1 (tonnes / year)	Year 5 (tonnes / year)	Vehicle Type and Size
Input	On-site	Unprocessed slag	TBC	TBC	N/A
Input	On-site	Processed slag	TBC	TBC	N/A
Input	Off-site	Bitumen	5,000	12,500	30 tonne artic tanker
Input	Off-site	Limestone	5,000	25,000	30 tonne artic rigid tipper
Input	Off-site	RAP	Included in Asphalt products number (RAP is produced from returned Asphalt)	Included in Asphalt products number (RAP is produced from returned Asphalt)	20 tonne rigid tipper
Input	Off-site	Filler	1,500	4,000	30 tonne artic tanker
Input	Off-site	SMA Fibre Pellets	50	125	20 tonne artic tanker
Input	Off-site	Additive (No. IBC's)	5	5	7.5 tonne flatbed
Output	Off-site	Asphalt products	100,000	250,000	20 tonne rigid tipper

- 3.33 The following materials are to be stored within the covered storage bays; EAF slag dust, EAF 6mm slag chippings, Limestone dust, Limestone 6mm chippings, and Sand. In addition, the remaining EAF and limestone chipping stock does not need to be stored in covered bays.

Access and Parking

Pedestrian and Cycle Access

- 3.34 Given the nature of the site and the surrounding area, it is considered unlikely that members of staff or visitors would visit the site by either foot or cycle. As such, no supporting infrastructure (i.e. footpaths or cycle parking) are proposed as part of the application.

Vehicle Access

- 3.35 Access into the site will be strictly controlled to operational personnel only.
- 3.36 It is envisaged that operational staff would either use public transport or park in the car park to the south of Rover Way, adjacent to and accessible from the main vehicular access point to the site on Tide Fields Road.
- 3.37 Delivery vehicles and mixer trucks will access the site via the internal haul roads within the Celsa Steel Works site, gaining access to and from the highway via Tide Fields Road which bounds the site to the south. No vehicular access will be available via the access onto Rover Way given that this is utilised by larger vehicles associated with the wider Steel Works operations.
- 3.38 The internal haul roads will be upgraded and laid in asphalt as part of the proposals, albeit drainage of these internal roads will remain as existing with runoff occurring onto the edge of the roadway.
- 3.39 Whilst aggregate and bitumen will need to be imported to site, it is proposed that waste finings (crushed slag) from the Celsa Steel Works would be utilised in the Asphalt Batching Plant process. This ensures that the waste materials located within the wider Celsa Steel Works site have a functional re-use and also reduces the level of highways movements needed to serve the Asphalt Plant.

Landscaping

- 3.40 No landscaping works are proposed as part of the development proposals.

Employment

- 3.41 The proposed Asphalt Batching Plant will be operated by Harsco Metals Group Ltd and will employ up to a total of 10 full time staff, however initially this will be a smaller number and the operation will scale up to meet demand. These will be in addition to those already employed by Celsa Steel UK and will be entirely 'new' jobs created within the Cardiff market.
- 3.42 There will be a split of responsibilities with slag movement continuing to be undertaken by Celsa with the new plant to be controlled and operated by Harsco.
- 3.43 Of those employed, the roles to be undertaken will include the following:
- Operations Manager;
 - Asphalt Plant Operator;
 - Loading Shovel Operator;

- Weighbridge Operator;
- Transport Planner;
- Sales Admin;
- Technical Staff; and
- Maintenance Staff.

4.0 Consideration of Alternatives

4.1 There are three main scenarios for considering alternatives with the site and the proposed development. These three scenarios are:

- A 'do nothing' or 'no change' scenario, which considers no development taking place at the application site;
- An 'alternative sites' scenario, which considers alternative sites for the proposed development (as relevant); and
- An 'alternative designs' scenario, which considers the alternative designs of the proposed development with respect to issues of location, materials, extent, etc. taking into account the environmental effects which influences the design evolution.

4.2 The 'do nothing' scenario would fail to achieve the objectives of the applicant (Harsco Metals Group Ltd) or the aspirations of the Celsa Steel to promote the viable alternate use of waste materials arising from the existing steelworks operations. The 'do nothing' scenario would fail to deliver the proposed Asphalt Batching Plant, infrastructure improvements and sustainability benefits (i.e. reduction in haulage movements) proposed as part of the application submission. Were the proposals not to be brought forward, significant quantities of waste materials from the Celsa site would continue to be transported to Harsco's site in Rotherham. The proposals are also clearly supported by the key thrust of the extant local planning policy and associated allocations which identify the site as being suitable for Class B2 (General Industrial) employment uses (allocation ref. EC1.3).

4.3 No 'alternative sites' to the application site have been considered as part of the development process. The applicant (Harsco Metals Group Ltd) has an existing working relationship with the owner of the land, Celsa Steel UK, and both parties would benefit from a symbiotic relationship of operating the Asphalt Batching Plant in this location. As such, it is entirely unrealistic for the applicant to have considered alternative sites when the application site is suitable, available and viable.

4.4 The true consideration of alternatives within the ES has generally focussed on the options considered for alternative designs, including the layout, massing, density, uses and general arrangement of the site in the context of the site opportunities and constraints. More detailed information regarding the consideration of alternative designs is contained within Chapter: Consideration of Alternatives, whilst further detailed design process information is provided within the Design and Access Statement prepared by Carter Jonas.

5.0 Description of Committed Developments

- 5.1 In accordance with the EIA Regulations, the EIA has included an assessment of any direct and indirect cumulative effects arising from the inter-relationship between different impacts arising from the proposed development when considered alongside any other developments in the area surrounding the site.
- 5.2 In relation to other developments, best practice dictates that cumulative assessments of this nature should have regard to those schemes which are ‘reasonably foreseeable’ (i.e. usually those under construction or with planning permission). It should be emphasised that such assessments are only capable of being carried out based on the information available at the time of assessment.
- 5.3 Whilst the Scoping Opinion adopted by Cardiff Council remained silent on the assessment of cumulative effects and the developments which were necessary to be considered in undertaking the assessment, the submitted Scoping Request Report identified that the cumulative assessment will therefore include a review of the potential for effects when the scheme is considered alongside the following committed developments located within the immediate vicinity of the application site:
- **Land at Rover Way, Pengam (The Cardiff Motocross Centre MX)** – The removal of fill material and the construction of a biomass power plant (up to 9.5MW) and a maximum of 130,000 sq ft of industrial accommodation (B8 Use Class), new access roads and associated landscaping works – **application ref. 17/02130/MJR**;
 - **Land at Rover Way, Pengam (The Cardiff Motocross Centre MX)** – Amendments to Condition 28 to incorporate minor amendments to access layout previously approved under 17/02130/MJR – **application ref. 19/00244/MJR**; and
 - **SIMS Metal UK Metal Recovery Plant, Rover Way, Pengam** – Proposed industrial building (Class B2) to house scrap metal sorting machinery, in addition to related works, associated with existing site use – **application ref. 18/02065/MJR**.

6.0 Planning Policy Context

- 6.1 Chapter 6 of the ES has sought to outline the applicable overarching planning policy position associated with the site and the proposed development. Policies applicable to the various technical assessments included within the ES are contained within the relevant chapters. Where appropriate, the individual ES chapters also outline any legislation or guidance of relevance to their individual assessments.
- 6.2 A more detailed assessment of the relevant national and local planning policy position is contained within the Planning, Design and Access Statement prepared by Carter Jonas and submitted in support of the application. The applicable policy documents relevant to the ES are listed below:
- Planning Policy Wales (10th Edition);
 - Technical Advice Notes;
 - Minerals Technical Advice Notes;
 - Welsh Government Circulars;

- South East Wales Regional Waste Plan;
- Cardiff Local Development Plan; and
- Cardiff Supplementary Planning Guidance.

7.0 Cumulative Impacts

- 7.1 Schedule 4, Paragraph 5 of The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 (the EIA Regulations) states that an (ES) should provide “A description of the likely significant effects of the development on the environment resulting from, *inter alia* –

...

(e) the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources;

...

*The description of the likely significant effects on the factors specified in regulation 4(2) should cover the direct effects and any indirect, secondary, **cumulative**, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the development...”* (emphasis added).

- 7.2 In assessing cumulative impacts, it should be highlighted that the Part 5 Regulation 17 (4) of the EIA Regulations requires an ES to “include information **reasonably required** for reaching a reasoned conclusion on the significant effects of the development on the environment, taking into account current knowledge and methods of assessment” (emphasis added).

- 7.3 Chapter 12 of the ES draws together a summary of the potential cumulative effects of the proposed development together with other committed development identified within the vicinity of the application site. Further detailed information pertaining to the methodology of each technical assessment and the inclusion of likely cumulative impacts is provided within the relevant chapters of the ES and, where appropriate, within the associated technical appendices and supporting statement submitted as part of the planning application.

- 7.4 As detailed within EIA guidance, cumulative effects can be considered as either:

- The combined effect of individual effects arising as a result of the proposed development: i.e. a single receptor experiencing multiple effects as a result of noise, air quality, transport etc.; and
- The cumulative effect of the proposed development in combination with other development schemes in the locality: i.e. effects which on an individual basis are insignificant but in combination with other development schemes would lead to a significant effect.

Assessment of Combined Effects

- 7.5 Chapter 12 has identified that there is no potential for interaction of residual effects to create a combined effect which would be considered significant.

- 7.6 The majority of the adverse effects identified are either minor or negligible, whilst Ground Conditions and Contamination is the only topic which has minor to moderate adverse effects for human health (construction dust and construction personnel). There are also a range of residual effects which have been reduced to none following mitigation.
- 7.7 In addition, there is also a potential beneficial effect for ecological receptors at a local level through the potential implementation of mitigation. This is unlikely to interact with other effects to create a significant adverse effect.
- 7.8 As such, it is considered that the potential for truly significant levels of adverse impact from combined effect is limited as the interaction of these residual effects are unlikely to culminate in more than a moderate adverse impact.

Assessment of Cumulative Effects

- 7.9 The technical assessments contained within the ES consider the potential for cumulative effects of the proposed development in relation to the committed developments of SIMS Metal UK (application ref. 18/02065/MJR) and Land at Rover Way, Pengam (application ref. 17/02130/MJR and 19/00224/MJR). Further information regarding the committed developments is provided within Chapter 7: Description of Committed Developments.
- 7.10 A number of the assessments undertaken have accommodated the committed developments within the assessments undertaken, thereby ensuring that a 'worst case scenario' has been considered during both the construction and operational phases of the proposed development.
- 7.11 It is the basis of these cumulative effects that both the mitigation measures and associated residual impacts are based. A summary of the associated residual impacts of the development for each technical assessment are briefly outlined below.

8.0 Assessment of Effects

Ground Conditions and Contamination

- 8.1 Chapter 8 of the ES assesses the likely effects of the proposed development upon the application site and surrounding area with respect to land quality and ground contamination.
- 8.2 The potential impact of the ground conditions and contamination on the proposed development have been segregated into impacts and effects that relate to the construction and operational phases of the proposed development.
- 8.3 Where a potential pollution linkage is incomplete, or a geotechnical risk is considered to be very low, an environmental impact is unlikely to exist. Where potential pollution linkages or significant geotechnical risks have been identified it is considered likely that an environmental impact may exist. The magnitude of impact has been quantified and the level of effect has been applied.
- 8.4 In this assessment the sensitivity of the potential receptors is designated as follows, based on the review of baseline conditions in Section 8.3:
- Human Health

- Construction/maintenance worker – Medium sensitivity
- Future site users – Low sensitivity
- Off site human receptors – Medium sensitivity
- Controlled Waters
 - Groundwater – Low sensitivity
 - Surface waters – Medium sensitivity
- Buried structures/services – Medium sensitivity
- Ecosystem designations – Medium sensitivity

Construction Phase

8.5 The anticipated potential pre mitigation construction effects are summarised as follows:

- Health impact on construction workers from contact with potentially contaminated Made Ground;
- Health impact on the general public during construction via wind blown dust from contaminated Made Ground;
- Potential impact upon controlled waters from existing land contamination within the site mobilised during construction, for example during piling through contaminated ground into underlying groundwater bearing strata or due to an increase in leaching due to the temporary removal of hardstanding;
- Potential impact upon controlled waters and designated ecosystems from construction work and processes, such as potential spillage of chemicals, fuels and/or construction materials; and
- Potential impacts to built structures, and buried structures and services if laid in direct contact with unstable and/or contaminated Made Ground.

8.6 Mitigation measures to address construction effects have been discussed under the relevant sections above. All items above have considered that the application of relevant mitigation measures will reduce residual effects to an effect of negligible, low or moderate significance.

Operational Phase

8.7 The anticipated potential operational effects are summarised as follows:

- Health impact on maintenance workers posed by the presence of potentially contaminated Made Ground;
- Potential impact upon controlled waters and designated ecosystems from processes, such as storage and therefore potential spillage of chemicals, fuels etc. during the

operation of the site; and

- Health impact on future users of the site posed by ground gas and its potential accumulation in confined spaces.

8.8 Mitigation measures to address operational effects have been discussed under the relevant sections above. All items above have considered that the application of relevant mitigation measures will reduce residual effects to an effect of negligible, low or moderate significance.

Decommissioning Phase

8.9 The anticipated potential operational effects are summarised as follows:

- Health impact on site workers posed by the presence of potentially contaminated Made Ground; and
- Potential impact upon controlled waters and designated ecosystems from processes, such as storage and therefore potential spillage of chemicals, fuels etc. during the decommissioning of the site.

8.10 Assuming that all future decommissioning works will be carried out with reference to the relevant standards and best practices at this time, and therefore subject to appropriate working and health and safety practices, the associated effects are judged to be low.

Air Quality

8.11 Chapter 9 of the ES considers the impact of the proposed development on air quality. The proposed development has the potential to affect local air quality during construction and operation due to:

- dust and particulate matter emissions (PM₁₀ and PM_{2.5}) generated during construction activities, for example, site clearance, stockpiling, materials transport and trenching;
- increases in nitrogen dioxide (NO₂)/ nitrogen oxides (NO_x), PM₁₀ and PM_{2.5} concentrations due to exhaust emissions arising from construction traffic and Non-Road Mobile Machinery (NRMM) plant;
- increases in NO₂/NO_x, PM₁₀ and PM_{2.5} concentrations due to exhaust emissions arising from traffic generated by the proposed development once operational;
- increase in PM₁₀ concentrations due to stack emissions associated with the operational phase; and
- increase in fugitive emissions (dust and odour) due to operational activities.

8.12 For both human and ecological receptors, air quality effects can occur as a result of direct exposure to pollution in ambient air, but also as a result of the deposition of pollutants on the surface of the ground and vegetation. Furthermore, effects may arise from the proposed development alone and cumulatively with other developments in the vicinity.

8.13 A qualitative assessment of the potential dust impacts during the construction of the proposed development was undertaken. Through good practice and implementation of appropriate

mitigation measures, it is expected that the release of dust would be effectively controlled and mitigated. All construction dust impacts are considered to be temporary and short-term in nature. In addition, potential construction dust impacts on the Severn Estuary were screened out as not significant. Therefore, there is likely to be a direct, temporary, short-term residual effect on the identified receptors of negligible significance following the implementation of mitigation measures.

- 8.14 Due to the low additional number of HDV trips during the construction phase of the development, there is predicted to be a neutral impact on air quality from road vehicle exhaust emissions. Potential impacts on the Severn Estuary from construction phase traffic and plant emissions have been screen out as not significant. Therefore, there is likely to be a direct, temporary, short-term residual effect on the identified receptors of negligible significance. This also applies to potential impacts from construction plant equipment.
- 8.15 A screening assessment of operational phase PM₁₀ from stack emissions was completed following the Environment Agency's online guidance. The screening assessment concluded that there is no need for detailed assessment as impacts are not significant. The Severn Estuary is not considered sensitive to emissions of PM₁₀. Therefore, there is likely to be a direct, permanent, long-term residual effect on the identified receptors of negligible significance from stack emissions.
- 8.16 A qualitative assessment of operational phase dust soiling was undertaken in accordance with the Institute of Air Quality Management (IAQM) minerals guidance. Potential dust impacts on human receptors were screened out as there were no receptors within 250m from the Site boundary and existing PM₁₀ concentrations were below the threshold defined in the IAQM guidance. An assessment of dust impacts on the Severn Estuary was undertaken and impacts were not significant. Therefore, there is likely to be a direct, permanent, long-term residual effect on the identified receptors of negligible significance from operational dust.
- 8.17 Impacts on local air quality from operational traffic emissions were screened out of further assessment as traffic generated by the proposed development would be below the Environmental Protection UK and the IAQM criteria and therefore considered to be neutral. Potential impacts on the Severn Estuary from operational phase traffic emissions have been screen out as not significant. Therefore, there is likely to be a direct, permanent, long-term residual effect on the identified receptors of negligible significance from operational traffic.
- 8.18 A qualitative assessment of potential odour impacts during the operational phase was undertaken, in accordance with the IAQM source-pathway-receptor model. Due to the designed in mitigation measures, as required under the Permit requirements, and distance between source and existing receptors, impacts from odour are considered to be 'not significant'. Therefore, there is likely to be a direct, permanent, long-term residual effect on the identified receptors of negligible significance from operational odour.

Water Environment

- 8.19 Chapter 10 of the ES considers the impact of the proposed development on the water resources (including both groundwater and surface water), flood risk and drainage at the site of the proposed development and the surrounding area. It also identifies possible hydrogeological and hydrological impacts associated with the proposed development during both the construction and operational phases.
- 8.20 It should be noted that, as an impact assessment, this chapter does not explicitly consider the risk of flooding to the proposed development, but does consider implications with regard to the existing

water environment and surrounding sensitive users.

- 8.21 The principal water environment receptors that could potentially be affected by the proposed development have been identified as the Severn Estuary, which is subject to a number of designations, and the groundwater body underlying the site.
- 8.22 The potential impact on the flood risk to non-specific receptors (generically referred to as 'elsewhere') has also been considered as this is a specific requirement of PPW and TAN15.
- 8.23 As there is no direct identified hydraulic pathway to the Severn Estuary the potential effects during the construction and operational phases are considered 'negligible'
- 8.24 The potential effect of the proposed development on groundwater arises from infiltration of runoff through a considerable thickness of made ground during both the construction and operational phase. However, analysis shows that the leaching potential of the made ground is low and therefore the residual effect following implementation of the mitigation measures is likely to be low to negligible.
- 8.25 The Site is not at significant risk of flooding and sustainable drainage measures are proposed to manage surface water runoff.

Ecology

- 8.26 Chapter 11 of the ES has been prepared by SLR Consulting Limited and assesses the likely effects of the proposed development upon the application site and the surrounding area with respect to ecology and biodiversity.
- 8.27 The Chapter describes the methods used to assess the effects, the baseline conditions currently existing at the application site; the mitigation measures that could be required to prevent, reduce or offset any significant negative effects and the likely residual effects after these measures have been adopted.
- 8.28 The Chapter has been written on the basis of the findings contained within the following supporting documents:
- Preliminary Ecological Appraisal, Land South of Rover Way, Cardiff prepared by SLR Consulting Limited (SLR) (ref: 416.09604.00001_HarscoMetals_RoverWayEcologyPEA_JH_MPM_AW_vf June 2019); and
 - Shadow Habitats Regulations Assessment, Land South of Rover Way, Cardiff prepared by SLR (ref: 416.09604.00001_HarscoMetals_ShadowHRA_MPM_vf).
- 8.29 The Preliminary Ecological Appraisal (PEA) is provided as Appendix 11-1, and the Shadow Habitats Regulations Assessment (sHRA) is provided as Appendix 11-2.
- 8.30 A summary of potential impacts, proposed mitigation and residual effects is provided for each important ecological feature included in the assessment in Table 11-5. Table 11-5 also includes a summary of proposed biodiversity enhancements.

Table 8-1: Summary of Impacts

Ecological Feature	Potential Impacts	Significance of Impact	Proposed Mitigation	Means of Delivering Mitigation	Residual Effects
Severn Estuary Natura 2000 site (SPA/Ramsar) overwintering bird populations.	Disturbance of overwintering bird populations from construction noise.	Potential temporary minor negative effect.	Avoidance of demolition and loud construction noises in winter and within the three hours of high tide at all times.	Planning Condition	Not significant.
Severn Estuary SAC qualifying habitats. (estuaries; subtidal sandbanks; intertidal mudflats and sandflats; Atlantic salt meadows and reefs).	Potential impacts from operational dust emissions.	Not significant.	Standard industry practice dust control.	-	Not significant.
-	Creation of species-rich wildflower banks, installation of bird boxes and invertebrate boxes as a biodiversity enhancement.	Minor positive effect at the local level	-	Planning condition	Minor positive effect at Local Level

9.0 Mitigation and Monitoring

9.1 Chapter 13 of the ES draws together a summary of the mitigation and monitoring measures proposed within the various technical chapters with regard to the proposed development, whilst more detailed information relating to the proposed mitigation measures is provided within the relevant technical chapters of the ES.

9.2 The proposed mitigation measures include, but are not limited to, the following:

- **Ground Conditions and Contamination:**
 - Use of appropriate Personal Protective Equipment (PPE) and training on how to use this correctly and effectively.
 - Use of dust suppression techniques, including water spraying of access roads and stockpiles in dry weather;
 - Avoiding the stockpiling of contaminated materials, where possible;
 - Covering of stockpiled materials on the Site;
 - Vehicles used to transport materials and aggregates will be enclosed; and
 - Provision of fuel spill kits on all site plant, and appropriate chemical spill kits in the area where chemicals are both used and stored.

- The effective management of stockpiled soils would also reduce leaching of any contaminants and reduce the potential effects to controlled waters and designated ecosystems
 - Working in accordance with appropriately robust method statements during the construction phase to minimise the risk of significant leaks or spilled or stored hazardous liquids;
 - The storage of any fuels and other hazardous substances associated with operation of the proposed development in adherence of an Environmental Permit;
 - The selection of an appropriate drainage strategy supported by routine monitoring of any licensed discharges from the site;
 - Selection of an appropriate piling technique to reduce the risk to controlled waters; and
 - An assessment of the risks posed by hazardous ground gases that is supported by a robust programme of monitoring.
- **Air Quality:**
 - Construction Dust Management, including recording all dust and air quality complaints and remedial measures, daily inspections, effective dust suppression, imposing a speed limit of 10mph on unpaved roads, switching off of vehicle engines when stationary, etc.
 - Avoid double handling of materials and ceasing operations during high winds in the direction of sensitive receptors;
 - Avoid scrabbling (roughing of concrete surfaces) if possible and storage of aggregates within bunded areas;
 - Use of water assisted dust sweepers on the access and local roads, avoidance of dry sweeping large areas and covering of all vehicles entering or leaving site;
- **Water Environment:**
 - Potential use of a site-specific Construction and Environmental Management Plan;
 - Management of construction works so as to comply with the necessary standards and consent conditions to be identified by Natural Resources Wales (NRW) and Cardiff Council;
 - Consideration will be given to the appropriate storage of materials in wet weather and certain site activities may be postponed during heavy rainfall to prevent pollution entering surface water runoff;
 - Any oil, fuel lubrication and other potential pollutants shall be handled on the site in such a manner as to prevent pollution of any watercourse or aquifer. For any liquid other than uncontaminated water, this shall include storage in suitable, bunded tanks;
 - No extraction, tipping or temporary storage of materials shall take place within an

agreed distance of any gully or other surface water drainage component unless part of the approved works. Under no circumstances shall tipped material enter any drain without prior consent;

- **Ecology:**

- All measures to reduce noise should be taken in line with best practice principles, for example ensure equipment is fitted with exhaust silencers, pneumatic breakers are fitted with sound insulation, and plant is not left idle with the engine running, etc.
- Avoiding demolition or construction activities during the winter;
- avoiding concrete breaking, pile-driving, or any other activity creating noise levels over 90dBa at 10m during the three-hour period around high tide;
- the external lighting scheme should still be designed to be bat friendly: kept to a minimum, low level and directional in order to minimise light spill. Cows and hoods should be used to minimise the amount of lighting shining upwards;
- A Construction Environmental Management Plan should be produced and agreed with the Local Authority.
- If space permits, the inclusion of a bank of species-rich wildflower grassland, ideally south-facing;
- Installation of bird boxes on buildings, trees and boundary fencing within application site and/or the wider metals recycling facility; and
- Inclusion of two invertebrate boxes within the landscaping to provide over-wintering and nesting sites for a range of invertebrates.

10.0 Conclusion

- 10.1 This Non-Technical Summary (NTS) outlines the conclusions reached in the ES that accompanies the planning application submitted by Harsco Metals Group for the proposed development at the Celsa Steelworks site on Land South of Rover Way, Cardiff CF24 5PH. To reiterate, the full planning application seeks consent for the *“Installation of an Asphalt Batching Plant along with associated infrastructure and works”*.
- 10.2 The proposed development has been assessed for potential environmental effects through the undertaking of an Environmental Impact Assessment (EIA), the results of which are presented within this ES and the technical assessments contained herein. In accordance with the EIA Regulations, the proposed development has been assessed for potential effects during both the construction and operational phases of the development, whilst effects have been analysed in terms of residual and cumulative; temporary and permanent (short and long term); and beneficial, negligible and adverse.
- 10.3 It is acknowledged that for Ground Conditions and Contamination there are a number of minor to moderate adverse residual effects on Human Health (construction workers and dust) associated with the development. However, these are all related to the construction and potential subsequent decommissioning of the development itself and are therefore temporary short-term residual effects. On this basis, they are not considered significant.

- 10.4 All residual effects associated with Air Quality are considered to be negligible, whilst there will be no residual effects associated with Water Environment. No significant residual effects have been identified with regard to Natura 2000 sites (Severn Estuary), whilst the implementation of the ecological enhancements would result in a minor positive permanent residual effect on ecological receptors at a local level.
- 10.5 On this basis, the conclusion reached by the ES is that there are adequate mitigation measures available to ensure that the proposed development could proceed without giving rise to unacceptable environmental effects, even in combination with other committed developments in the immediate vicinity.
- 10.6 The mitigation measures proposed would ensure to minimise any adverse residual effects on the existing environment or local amenity, whilst any adverse effects are either temporary in nature (i.e. Ground Conditions and Contamination effects during the construction phase) or can be actively managed through ongoing monitoring (i.e. Ground Conditions and Contamination, Ecology etc.).

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