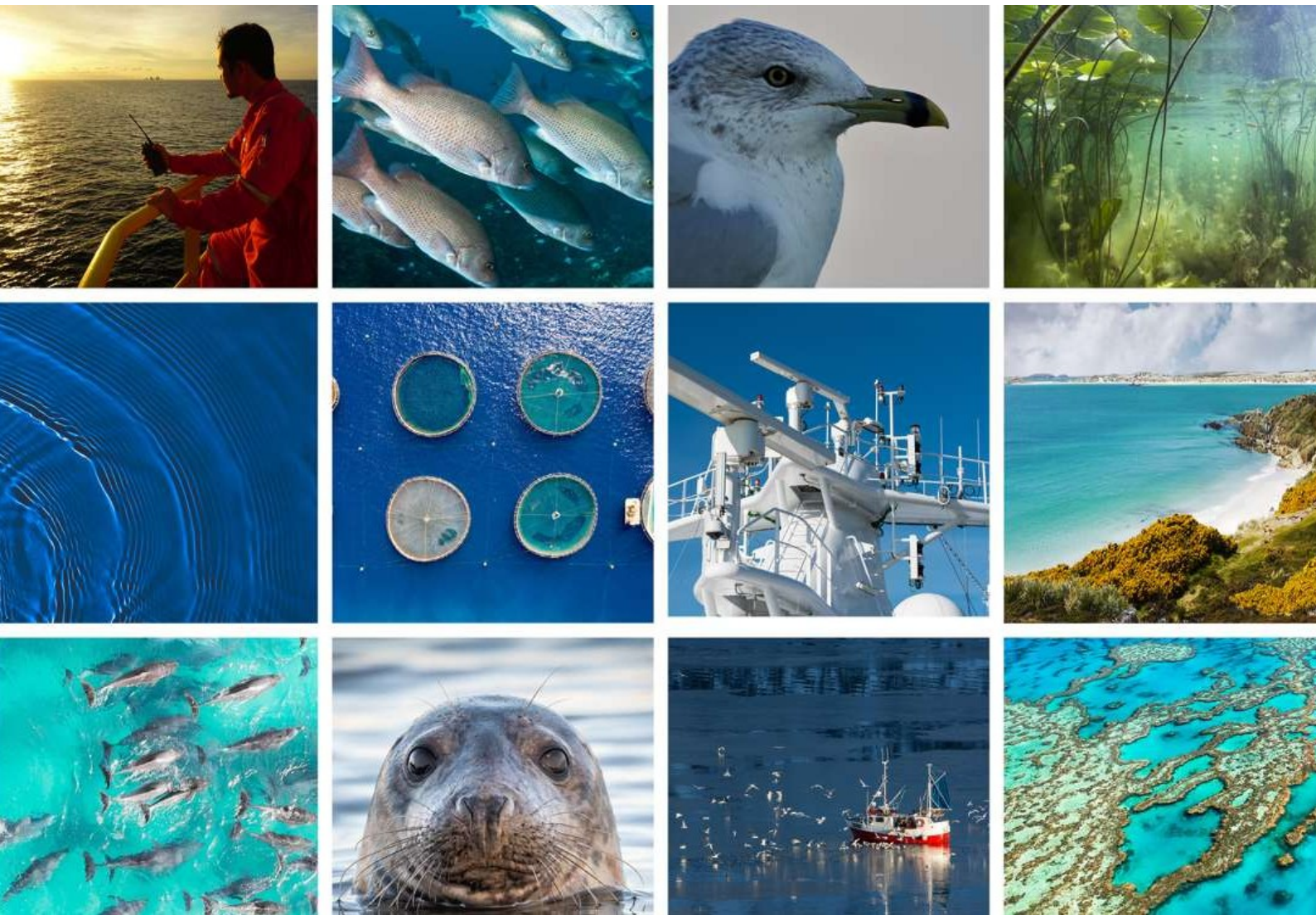




Tata Steel UK Ltd

ABP Port Talbot Jetty Deconstruction

Technical Note

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Where field investigations have been carried out, these have been restricted to a level of detail required to achieve the stated objectives of the work.

This work has been undertaken in accordance with the quality management system of RSK Environment Ltd.

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ACRONYMS AND DEFINITIONS

Acronym	Definition
ABP	Associated British Ports
CEFAS	Centre for Environment, Fisheries and Aquaculture Science
cSAC	Candidate Special Area of Conservation
EAF	Electric Arc Furnace
EPS	European Protected Species
EQSD	Environmental Quality Standards Directive
EU	European Union
GN	Guidance Note
HMWB	Heavily Modified Water Body
HRA	Habitats Regulations Assessment
INNS	Invasive Non-Native Species
LSE	Likely Significant Effects
MCAA	Marine and Coastal Access Act
MHWS	Mean High Water Springs
MLT	Marine Licensing Team
MPA	Marine Protected Area
NRW	Natural Resources Wales
OGN	Operational Guidance Note
pSPA	Potential Special Protection Area
RBMP	River Basin Management Plan
SAC	Special Area of Conservation
SCI	Sites of Community Importance
SPA	Special Protection Area
SSSI	Sites of Special Scientific Interest
UK	United Kingdom
WFD	Water Framework Directive
ZOI	Zone of Influence

1 Introduction

1.1 Purpose of this Report

This Technical Note has been prepared by RSK on behalf of Tata Steel UK Ltd (the Applicant) in support of their application for a Marine Licence to carry out deconstruction works at the Associated British Ports (ABP) jetty (hereafter referred to as the proposed works) within the Port Talbot site, South Wales. The proposed works involve the removal of three large unloader cranes and associated conveyor infrastructure as part of site-wide decarbonisation and demobilisation works. The proposed works are described in more detail in Section 2.

This Technical Report accompanies a Marine Licence application for the proposed works. It presents a Water Framework Directive (WFD) assessment and a summary of the designated sites with potential to be impacted by the proposed works, in order to satisfy the Habitats Regulations Assessment (HRA) requirements. Additional consideration has been given to European Protected Species (EPS) as part of this Report.

1.2 Marine licensing in Wales

A Marine Licence is required for all “licensable marine activities” below Mean High Water Spring (MHWS) tides. “Licensable marine activities” are defined in Section 66 of the Marine and Coastal Access Act 2009 (MCAA). Under this regime the Marine Licensing Team (MLT) administers Part 4 of the MCAA on behalf of the Licensing Authority and the Welsh Ministers. The MLT is responsible for marine licensing and enforcement within the Welsh inshore region extending 12 nm seaward from MHWS to the territorial limit, as defined in Section 42 of the MCAA.

From RSK’s initial review of the proposed demolition methodology, the proposed works are likely to trigger the requirement for a Marine Licence. This is due to Section 66 of the MCAA stating that a licence is required “to construct, alter or improve any works within the UK marine licensing area either – (a) in or over the sea, or (b) on or under the sea bed”.

There are a range of assessments which may be required in support of a Marine Licence application depending on the nature and location of the proposed works.

Under the Water Framework Directive (England and Wales) Regulations 2017, a licensed project or activity seaward of MHWS must demonstrate that it will not cause deterioration of a water body quality or prevent it meeting its objectives. As all marine licence applications, (apart from band 1 low risk activity applications – not applicable to the proposed works), must be accompanied by a WFD assessment, please refer to Section 4.

In addition, the European Union (EU) Habitats Directive (Council Directive 92/43/EEC), transposed in United Kingdom (UK) by the Conservation of Habitats and Species Regulations 2017, requires consideration of potential effects from plans or projects that may affect the integrity of designated sites, please refer to Section 3.

1.2.1 Licence application process

Once the Marine Licence application has been received with all supporting documents and payment, the MLT will check and acknowledge the application within 21 days. Based on information provided to date, it is likely the proposed works will fall within Band 3 of the licencing fee structure. Payment will accompany the application.

1.2.2 Discharge of conditions

Once the licence is issued, it may contain a number of conditions that will require discharge by the licence holder.

1.3 Background to the Water Framework Directive

The Directive of the European Parliament and of the Council 2000/60/EC establishing a framework for community action in the field of water policy (known as the Water Framework Directive, or WFD) was transposed into UK domestic law by the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017.

A WFD assessment is required to identify the potential impact of certain activities undertaken in or around water on the immediate water body and any associated watercourses. This includes:

- identifying activities that could affect WFD waterbodies
- assessment of the potential direct or indirect impacts of the proposed works that may cause or contribute to deterioration of water body status and/or jeopardise the water body achieving its status objectives in the future
- determining the compliance of the project with the requirements of the WFD.

As part of the Marine Licence application to NRW, a WFD compliance assessment is required to be completed for the proposed works.

RSK has undertaken this assessment in accordance with NRW's Operational Guidance Note (OGN) 072 (NRW, 2018), Guidance Note (GN) 078 (NRW, 2024) on WFD assessments, and WFD assessment guidance for estuarine and coastal waters, Clearing the Waters for All (EA, 2016). Publicly available datasets have been used to inform this assessment, including data from Welsh Government, NRW and the Environment Agency, to enable a robust WFD scoping and impact appraisal.

1.4 Background to the Habitats Directive

A network of protected areas for specific sensitive habitats and species of importance (known as designated sites¹) was established by the EU member states under the Habitats Directive and EU Birds Directive (Council Directive 2009/147/EC).

For this report, the relevant sections of the Habitats Directive are Articles 6(3) and 6(4), as implemented under Regulations 48 and 49 of the Conservation (Natural Habitats &c.) Regulations 1994 and similarly under the Conservation of Habitats and Species Regulations 2017 (as amended, known as the Habitats Regulations) in UK law.

¹ Formerly European sites, now part of the UK National Site Network.

Article 6(3) of the Habitats Directive states:

“Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives”.

The Habitats Regulations require consideration of potential effects from plans or projects that may affect the integrity of designated sites; in the UK these sites include Special Areas of Conservation (SACs), candidate SACs (cSACs), Special Protection Areas (SPAs), potential SPAs (pSPAs), Sites of Community Importance (SCIs) and Ramsar sites². This is commonly conducted as part of a HRA process (please refer to Section 3). Sites of Special Scientific Interest (SSSI) are not protected directly under the Habitats Regulations, and as a result do not form a strategic part of the HRA process. SSSI protection is underpinned by the Wildlife and Countryside Act 1981; sites are however noted within this Technical Report for completeness.

Aligned with the UK's withdrawal from the EU in 2020, EU exit legislation was passed to ensure environmental protection with respect to habitats and species is still aligned with EU environmental standards; this saw the implementation of the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. Under this legislation, former Natura 2000 sites (also known as European sites) are referred to as designated sites within this Report as part of the UK National Site Network. As a result, designated sites (coastal and offshore) contribute to the Marine Protected Area (MPA) network. Ramsar sites remain protected in the same way as SAC and SPA sites, however do not form part of the National Site Network.

1.5 European Protected Species

All species of cetacean, some species of marine turtle, otter (*Lutra lutra*) and sturgeon (*Acipenser sturio*/*Acipenser oxyrinchus*) in waters around the UK are considered European Protected Species (EPS) under Annex IV of the Habitats Directive, and associated Habitats Regulations³. Under these Regulations, it is considered an offence to disturb, capture, injure or kill deliberately, or recklessly disturb a single individual of an EPS (including cetaceans). If it is determined that an activity would cause an offence under the above regulations, a licence may be granted which would allow otherwise illegal activities to go ahead in certain specified circumstances.

Under the basis of the provided methodology for the proposed work (Section 2.4), it has been determined that an EPS Licence is not required; nevertheless, a high-level consideration of EPS has been contained within this Technical Report to address this.

² Wetlands of International Importance, designated under the Ramsar Convention.

³ Sturgeon and marine turtle are not considered relevant in relation to the proposed work location and wider area due to a lack of noted sightings. Marine turtles are additionally only occasional visitors to UK waters, hence these species are not considered further.

2 The Project

2.1 Project description

The United Kingdom has committed to reducing industrial carbon emissions as part of its legally binding net zero targets. In support of these national ambitions, Tata Steel UK Ltd (the Applicant) is undertaking a major decarbonisation programme at its Port Talbot steelworks in South Wales. As part of this transition, the Port Talbot Tata Steel UK Ltd site is moving away from traditional blast furnace operations and preparing for the installation of an Electric Arc Furnace (EAF), scheduled for 2027.

As a component of these works, approximately 150 acres of land currently leased from ABP is being returned, necessitating the removal of redundant marine infrastructure. The marine-based deconstruction activities relate specifically to the dismantling and removal of three large unloader cranes and associated conveyor systems located on the ABP jetty situated between the port's breakwaters. These structures formerly supported the steelworks' import operations and are no longer required.

The proposed works will be carried out from a jack-up barge equipped with a 500-tonne crawler crane, which will be stabilised on the seabed using two spud legs, with the main marine activity expected to take approximately two weeks. Demolition will involve the sectional dismantling of the unloaders and conveyor systems, with components cut into manageable sections and lifted by crane. All structural components will be removed for transfer ashore and subsequent recycling or disposal at licensed facilities. No dredging, seabed excavation, or material disposal to the sea is anticipated, and all works will take place within the Port Talbot jetty and in accordance with marine licensing requirements (Section 1.2). Furthermore, there will be no removal of any infrastructure from the seabed and all structural removal activities will be carried out above water.

The Marine Licence application submitted to NRW is supported by this Technical Note, which evaluates the potential for the proposed works to affect the status or objectives of the Swansea Bay coastal water body (GB641008260000) and the integrity of designated sites located in the proximity.

Please refer to Figure 2.1 for the project location.

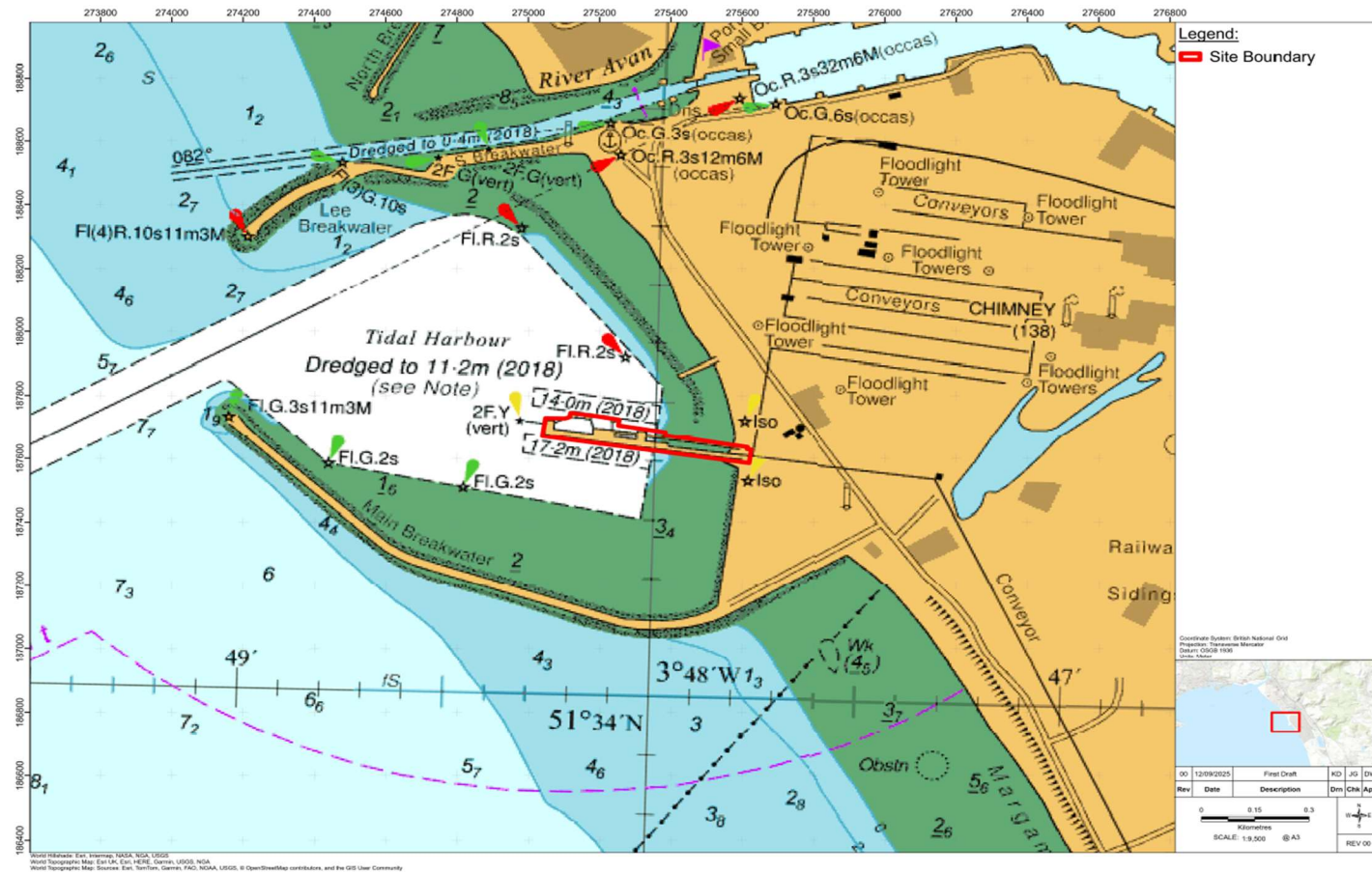


Figure 2-1 proposed works red line boundary

2.2 Site establishment

During the proposed works, the contractor will establish a temporary marine construction set-up consisting of a 500 t crawler crane mounted on a barge with spud legs, positioned adjacent to the ABP jetty within the Port Talbot harbour. The barge will serve as the principal operational platform, supporting crane lifting activities and facilitating the dismantling and safe removal of the jetty cranes and conveyor systems.

Welfare facilities, site office accommodation, plant maintenance, and waste management facilities will be based within the existing onshore Port Talbot Tata Steel UK Ltd site, adjacent to the work location. Scrap metal from the removed structures will be brought ashore for processing and disposal, with a designated laydown area used for temporary material storage.

All fuel and oils used during the works will be stored in secure containers or self-bunded units isolated from drainage channels and open water sources. Refuelling will take place within controlled, bunded areas onshore, away from the marine environment, to minimise the risk of accidental release. The contractor will be required to follow established pollution prevention measures and exhibit familiarity with environmental risk management.

2.3 Access

Access to the marine works site at the ABP jetty will be gained via the existing operational port infrastructure within the Port Talbot Tata Steel UK Ltd site. All land-based access for personnel, plant, and equipment will be managed through established internal site roads and gate controls. No new access tracks or road closures are required.

The barge and crane platform will be mobilised via marine access, with the barge entering the inner harbour through the existing navigation channel. Port access will be coordinated with ABP to avoid disruption to any ongoing commercial activities.

All onshore vehicle parking and materials laydown will occur within designated secure areas within the Port Talbot Tata Steel UK Ltd site boundary.

2.4 Methodology

The proposed works will be undertaken entirely within the jetty at Port Talbot and involve the deconstruction and subsequent removal of three ship unloader cranes and their associated conveyor systems.

Above Mean High Water Springs a contractor compound will be established on the shore to provide welfare facilities, storage and waste management.

A jack-up barge (H-282) equipped with a 500-t crawler crane (SCX 5000) will be mobilised to site and positioned alongside the ABP jetty. The barge will be stabilised by lowering two spud legs to the jetty seabed. This represents the only direct interaction with the marine environment, as there is no dredging, piling, or seabed excavation required for the completion of the proposed works.

Once the barge is secured, demolition will proceed with the sectional dismantling of the three ship unloaders and conveyor systems. Structural members will be cut into

manageable sections and lifted onto the barge deck using the crawler crane. All lifting operations will be controlled, and debris containment measures will be implemented to ensure that no material is accidentally released into the jetty.

The dismantled components will be transferred ashore for subsequent recycling at licensed facilities. No material will be disposed of at sea. Waste will be managed in line with ABP and Tata Steel protocols, with segregation and licensed handling undertaken to ensure compliance with regulatory requirements.

On completion of the demolition, the jack-up barge will be demobilised, with spud legs retracted and the site compound will be removed. The area will be reinstated and handed back to ABP. The overall programme for the marine works is anticipated to take two weeks, subject to prevailing weather and operational conditions. A further 20 weeks will be required for the removal of scrap and associated personnel.

Embedded environmental protection measures include the availability of spill prevention and response equipment on the vessels, with refuelling and maintenance restricted to areas away from sensitive receptors (surface and foul drains) and be undertaken in a designated fenced off area and on hard standing areas wherever possible above MHWS. The sheltered nature of the jetty and the absence of piling, dredging or blasting mean that no impulsive underwater noise or significant seabed disturbance is expected. All activities will be carried out under the control of the ABP Port Talbot Harbour Authority and in accordance with established permitting and safety systems.

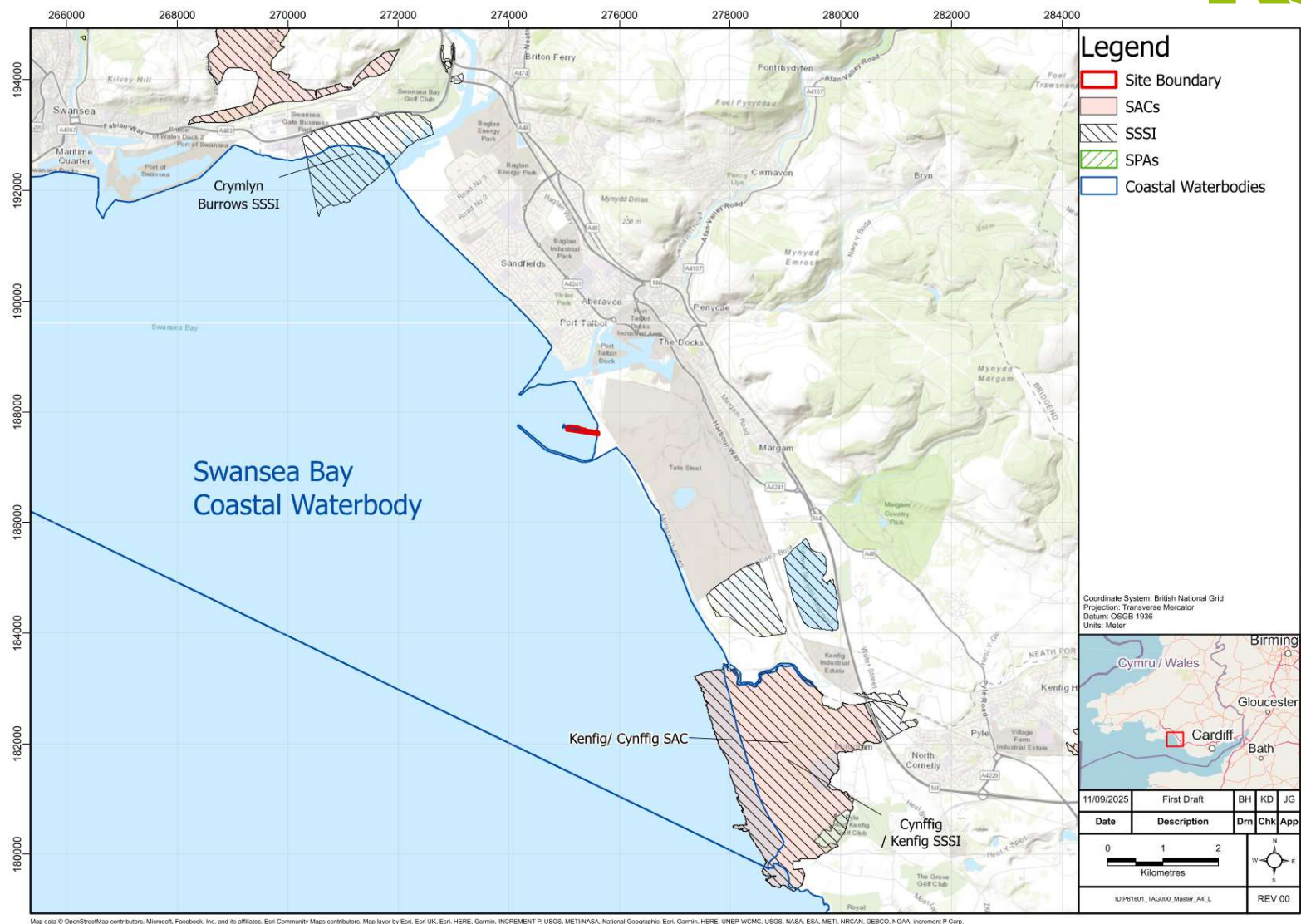


Figure 2-2: Port Talbot work area, WFD designations and designated sites of relevance to the proposed works

2.5 Schedule

The marine phase of the proposed works is currently understood to last approximately two weeks, subject to weather and tidal conditions. However a further 20+ weeks will be required to move scrap and associated personnel accordingly.

The exact scheduling of the marine activities will be developed in consultation with contractors and port operators but will be programmed to avoid adverse tidal or meteorological conditions and to ensure operational safety during lifting operations. As such, tidal cycles and sea states will influence the daily work plan, and it may be necessary for work to occur outside of standard weekday hours, including occasional weekend or extended shifts, depending on conditions.

There are currently no in-water intrusive works (e.g. piling, dredging) proposed and the team will engage with NRW through the marine licensing process to ensure alignment.

Key scheduling considerations include:

- all marine plant and crane operations will be conducted from a barge platform with spud legs—there will be no works on the seabed
- no piling or noise-generating activities beyond crane operation are planned
- all works will comply with standard pollution prevention controls and environmental risk protocols.

3 Habitats Regulations Assessment Screening

3.1 Introduction

The Habitats Regulations Assessment (HRA) is a detailed assessment of the potential effects of a proposed plan or project that tests whether or not it could result (alone or in combination with other projects/plans) in an adverse effect on the integrity of a designated site before the proposed plan or project can be authorised or carried out ('integrity test'). It forms an iterative process with each step informing the next; this Section presents the Stage 1: HRA Screening to enable the Competent Authority to make an assessment on the proposed works in order to satisfy the requirements under the Habitats Regulations.

This high-level, robust assessment has been undertaken in adherence with best practice guidance where relevant (Welsh Parliament Senedd Research, 2022; Welsh Government, 2021).

3.2 Screening boundary and predicted impacts

Based on the proposed work location, associated scope and embedded mitigation, limited interaction with the marine environment is envisaged. Considering this, a precautionary screening boundary of 10 km has been considered in relation to designated sites located in proximity to the proposed works site that have features below MHWS. This distance considered to be highly conservative considering the temporary nature of the proposed works and localised expected Zone of Influence (ZOI) of potential impacts.

Based on the methodology provided in Section 2, Likely Significant Effects (LSE) have the potential to arise as follows:

- loss and/or disturbance of habitat
- underwater noise and vibration
- disturbance and displacement of species
- sediment disturbance and resuspension.

3.3 Identified sites

Based on the 10 km screening boundary, designated sites were identified whereby there is potential for connectivity with the proposed works. These are detailed within Table 3.1.

Table 3.1: Identified designated sites of potential relevance to the proposed works

Designated site	Qualifying features	Distance from proposed works (km)**
Kenfig/Cynffig SAC and SSSI	Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130]* Dunes with <i>Salix repens</i> ssp. <i>argenta</i> (<i>Salicion arenariae</i>) [2170]*	4.8

Designated site	Qualifying features	Distance from proposed works (km)**
	Humid dune slacks [2190]* Hard oligo-mesotrophic waters with benthic vegetation of Chara spp. [3140]* Atlantic salt meadows (<i>Glauco-Puccinellietalia maritimae</i>) [1330] Petalwort [1395]* Fen orchid [1903]*	
Crymlyn Burrows SSSI	Dune and saltmarsh habitats	5.7

Notes: All qualifying features have been noted here, including terrestrial species/habitats for completeness. Only designated sites that are located below MHWS have been included as part of this assessment.

*primary reason for site selection.

**distances are approximate.

It is appreciated that mobile qualifying features (i.e., diadromous fish features, marine mammals and seabirds) have the potential to overlap with the proposed works site at any given time. The Carmarthen Bay and Estuaries/Bae Caerfyrddin ac Aberoedd SAC is the closest site to the proposed works that includes diadromous fish as designated features, being located approximately 25.8 km away. The closest site designated for marine mammals is the Bristol Channel Approaches/Dynesfeydd Môr Hafren SAC, designated for harbour porpoise (*Phocoena phocoena*), located approximately 37.4 km from the proposed works site. The Bae Caerfyrddin/Carmarthen Bay SPA, located 35.1 km away and Skomer, Skokholm and the Seas off Pembrokeshire/Sgomer, Sgogwm a Moroedd Penfro SPA, located 73.9 km away, designated for common scoter (*Melanitta nigra*) and seabird assemblages respectively, are the closest SPA sites in relation to the proposed works site. However, as previously noted the expected ZOI for the proposed works is expected to be highly localised and short in duration. As a result significant impacts to the integrity of the noted designated sites are not foreseen and these sites (and those located further afield, designated for mobile features) are not considered further within this Report.

3.4 Screening assessment

The potential pathways for LSE consequent of the proposed works were identified as:

- loss and/or disturbance of habitat
- underwater noise and vibration
- disturbance and displacement of species
- sediment disturbance and resuspension.

Within the screening boundary a total of three designated sites were identified, including one SAC and two SSSIs. Of these sites, all are designated for coastal habitat features

and as a result disturbance and displacement of species, alongside potential for underwater noise and vibrational impacts are not foreseen. Loss/direct disturbance of these habitats is not predicted due to the lack of physical overlap of the proposed works site with the noted designated sites.

It is acknowledged there is potential for sediment disturbance and associated resuspension that may disperse outwith the footprint of the works. However, the proposed works are temporary, and will be conducted in a well-flushed high energy environment, such that significant impacts to turbidity are not anticipated. Rapid dispersion and dilution is expected to reduce any elevations in turbidity to negligible prior to reaching the noted designated sites.

As a result, it can be concluded that there is no potential for LSE on the Kenfig/Cynffig SAC, SSSI and Crymlyn Burrows SSSI, based on the localised and temporary impact pathways, in-combination with expected rapid dispersion and dilution of suspended sediment.

Therefore, this Technical Report satisfies a Stage 1 Screening Assessment per the Habitats Regulations.

3.5 EPS consideration

As noted as part of HRA Screening, there is likely to be limited potential for impacts to EPS, based on proposed work location, associated scope and embedded mitigation.

Where there is potential for impacts to EPS (i.e., sediment disturbance, disturbance/displacement of species, underwater noise/vibration), the limited duration of the works alongside the highly localised ZOI, limits the potential for significant impacts to cetaceans and otter to occur. Disturbance resulting from work vessel presence and associated underwater noise/vibration impacts are not expected to be above those created by pre-existing background levels of vessel traffic in the Bristol Channel. Sediment disturbance and resuspension is further expected to rapidly fall to background levels due to rapid dispersion and dilution.

As a result, there is considered to be limited potential for interaction of the proposed works with EPS based on the identified impact-pathways and therefore an EPS licence is not considered to be required.

4 WFD Screening

A WFD assessment is not required if the proposed activity is considered “low risk”. The “Clearing the Waters for All” guidance (EA, 2016) defines low risk activities as follows:

- any self-service marine licence activity or an accelerated marine licence activity that meets specific conditions
- maintenance of pumps at pumping stations if carried out regularly, avoiding low dissolved oxygen levels during maintenance and minimising silt movement when restarting the pumps
- removal of blockages or obstacles like litter or debris within 10 m of an existing structure to maintain flow
- replacement or removal of existing pipes, cables or services crossing over a waterbody but not including any new structure or supports, or new bed or bank reinforcement
- ‘over water’ replacement or repairs to, for example bridge, pier and jetty surfaces if bank or bed disturbance is minimised
- any activity carried out during 2009 to 2014 (when evidence was collected for the 2015 River Basin Management Plans (RBMP)) that has an existing WFD assessment, does not need repeating unless:
 - there have been changes to how the activity is performed, including method, size or scale, volume, depth, location or timings
 - there’s been a pollution incident since the activity was last carried out.

Since the proposed works do not fall within the above criteria, a WFD scoping assessment and impact assessment for WFD waterbodies, protected areas, and their respective features are provided within this Report, to support the Marine Licence application.

Due to the potential for impacts to extend beyond the immediate proposed work footprint, a precautionary screening radius of 5 km has been employed, this radius incorporates the applied 2 km buffer of the proposed work site (Figure 2-2), to capture direct and indirect effects on those receptors within scope.

5 WFD WATERBODIES – BASELINE INFORMATION

Screening has identified a total of four WFD water bodies within a 5 km radius of the proposed works site. These include one coastal water body and three surface water river or estuarine bodies. The water bodies are listed in Table 5.1 and shown in Figure 2-22.

Table 5.1: Waterbodies of relevance to the proposed works

Waterbody Name	ID	Type	Location	Inclusion in Assessment	Summary of Justification
Swansea Bay	GB 641 008 260 000	Coastal	0 km (on site)	YES	The proposed works, including barge operations and crane dismantling, are located entirely within this water body. Full assessment is required – screened in.
Afan Estuary Including Docks	GB 541 005 800 600	Transitional	~0.8 km	NO	Although adjacent to the proposed works site, there is no direct interaction or disturbance proposed within this water body. It is hydrologically separated by harbour infrastructure – screened out.
Ffrwd Wylt – Headwaters to Tidal Limit	GB 110 058 026 100	Surface Water (River)	~ 2.5 km	NO	An upstream freshwater river body with no physical or hydrological connectivity to the marine works. No in-river activity is proposed – screened out.
Afan – Confluence with Pelenna to Tidal Limit	GB 110 058 026 110	Surface Water (River)	~3 km	NO	A minor tributary to the River Afan, discharging upstream of the estuary. It lies outside the zone of influence of the marine works – screened out.

The Swansea Bay coastal water body (GB641008260000) encompasses the proposed works footprint (including barge operations, crane use, and structure removal) and it is therefore screened in for full WFD assessment.

The remaining water bodies have been screened out, for the following reasons:

- Afan Estuary Including Docks (GB54100580060): Although this water body lies adjacent to the proposed works site, the deconstruction works are physically and

functionally separated from the estuary by the harbour infrastructure. There is no direct discharge, excavation, or hydromorphological linkage between the works and the estuarine environment, and therefore no viable pathway for WFD-relevant impact.

- Afan – Confluence with Pelenna to Tidal Limit (GB11005802611): This freshwater water body lies upstream of the Afan Estuary and is not hydrologically connected to the proposed works. As no in-river works, abstraction, or surface water interaction is proposed, it is excluded from further assessment.
- Ffrwd Wyllt – Headwaters to Tidal Limit (GB110058026100): This minor tributary of the River Afan discharges into the estuary well upstream of the proposed works site. The proposed works do not overlap or interact with this water body spatially or hydrologically and no cumulative effects are anticipated.

Section 5.1 summarises the baseline characteristics of Swansea Bay, compiled using data from NRW, the Environment Agency Catchment Data Explorer, and the MAGIC Maps database.

5.1 Swansea Bay (GB641008260000) – Baseline information

Table 5.2 provides a summary of information on Swansea Bay water body.

Table 5.2 Swansea Bay Water Body

Water body	Description, notes or more information
WFD water body name	Swansea Bay
Water body ID	GB641008260000
River basin district name	Western Wales
Water body type (estuarine or coastal)	Transitional
Water body total area (ha)	11,000 ha (110 km ² .)
Overall water body status (2021 Cycle 3)	Moderate
Ecological status	Moderate
Chemical status	Moderate
Target water body status and deadline	Good 2027
Hydromorphology status of water body	HMWB
Heavily modified water body and for what use	Swansea Bay is a designated 'Heavily Modified Waterbody' as a result of extensive coastal defence measures
Higher sensitivity habitats present	Polychaete reef and Mussel beds, including blue and horse mussel
Lower sensitivity habitats present	Cobbles, gravel and shingle; Intertidal soft sediments like sand and mud; and Rocky shore
Phytoplankton status	Good
History of harmful algae	Not assessed

Water body	Description, notes or more information
WFD protected areas within 2 km	Swansea Bay (East) and Swansea Bay (South) Shellfish Waters Aberafan Bathing Water

Swansea Bay is a dynamic coastal waterbody influenced by tidal flows, sediment transport, and the interaction of estuarine and coastal processes. The bay receives inputs from several major rivers including the Tawe, Neath, and Afan, resulting in variable salinity and high natural turbidity. The inner harbour area at Port Talbot, where the proposed works will occur, is a sheltered environment that has been substantially altered to accommodate navigation and industrial activity.

The bay supports subtidal sediment habitats, intertidal mudflats and sandflats, and artificial hard substrate colonised by opportunistic benthic communities. These habitats are important for various marine and estuarine species, including migratory fish such as Atlantic salmon (*Salmo salar*), sea trout (*Salmo trutta*), European eel (*Anguilla anguilla*), river lamprey (*Lampetra fluviatilis*), and sea lamprey (*Petromyzon marinus*). The bay also provides important feeding grounds for seabirds and commercially important fish species.

Hydrodynamic processes are driven by a semi-diurnal tidal cycle, with extensive sediment suspension and redistribution occurring naturally.

Swansea Bay is a Heavily Modified Water Body (HMWB), designated for coastal defences. The water body is subject to strong tidal dynamics and sediment mobilisation, with ecological potential classified as Moderate and chemical status classified as Fail due to the presence of persistent pollutants such as Polybrominated Diphenyl Ethers (PBDEs) and mercury compounds consistent with broader national trends in transitional waters (Environment Agency, 2019a & 2019b; Natural Resources Wales, 2022).

There are no MPA or National Site Network sites located within the immediate footprint of the works, although designated Bathing Waters and Shellfish Waters exist elsewhere within Swansea Bay. These are not expected to be affected given the limited scale, duration, and containment of the proposed works.

6 WFD Scoping

This scoping assessment follows the scoping template provided within NRW (2024). It identifies the potential risks to receptors including hydromorphology, biology (habitats and fish), water quality, protected areas and INNS.

Table 6.1 Summary scoping information

Your activity	Description, notes or more information
Applicant name	Tata Steel UK Ltd.
Application reference number (where applicable)	
Name of activity	ABP Jetty Deconstruction
Brief description of activity	Deconstruction of three large ship unloader cranes and associated conveyor infrastructure at the ABP jetty, Port Talbot. Works will be undertaken using a barge-mounted 500 t crawler crane operating from spud legs. No piling, dredging, or seabed excavation is proposed. The works form part of Tata Steel UK Ltd's wider site decarbonisation and land return programme.
Location of activity (central point XY coordinates or national grid reference)	Grid Ref 3.8007441°W, 51.5740178°N
Footprint of activity (ha)	The area of contact with the seabed through the works will be limited to two spud legs with a combined area of 2.334m ² (0.0002 ha)
Timings of activity (including start and finish dates)	Marine works expected to last approximately two weeks below MHWS, with an additional 20 weeks for the associated clearance and management. Scheduled to commence in October 2025, subject to licence approval and tidal/weather conditions.
Extent of activity (for example size, scale frequency, expected volumes of output or discharge)	Localised to the existing jetty infrastructure within the harbour area. No seabed disturbance beyond spud leg contact. Estimated marine activity duration: ~2 weeks.
Use or release of chemicals (state which ones)	It is possible that disturbed sediments could contain Environmental Quality Standards Directive (EQSD) list substances and contaminants above Centre for Environment, Fisheries and Aquaculture Science (Cefas) Action Level 1.

6.1 Hydromorphology

The proposed works are confined to the jetty in Port Talbot. The deployment of the supporting spud legs may give rise to temporary and localised alterations to seabed morphology and the potential disturbance of sediments. Any such impacts are anticipated to be temporary and confined to the immediate vicinity of the works, with the disturbance footprint limited to the deployed spud legs, or very slightly broader in the unlikely event of accidental debris falling into the water during lifting operations.

Given the localised and temporary nature of the seabed disturbance and the absence of large-scale sediment mobilisation, it is not anticipated that the works activities will cause any significant or lasting changes to the hydromorphology of the Swansea Bay waterbody. This includes no expected alterations to depth profiles, intertidal zone structure, or sediment composition beyond the immediate working area. Furthermore, tidal patterns, freshwater inputs, and wave exposure within Swansea Bay are not expected to be influenced by the proposed works.

Table 6.2: Hydromorphology risk scoping

Consider if your activity:	Yes	No	Hydromorphology risk issue(s)
Could impact on the hydromorphology (for example morphology or tidal patterns) of a waterbody at high status	Requires impact assessment	Impact assessment not required	No
Could significantly impact the hydromorphology of any waterbody	Requires impact assessment	Impact assessment not required	No
Is in a waterbody that is heavily modified for the same use as your activity	Requires impact assessment	Impact assessment not required	No (coastal defences)

6.2 Biology: habitats

For the purposes of a WFD assessment, there are predefined higher and lower sensitivity habitats. Higher sensitivity habitats are considered to have a low resistance to, and a low recovery rate from, human pressures, and therefore require inclusion in the impact assessment if located within 500 m of proposed works. Lower sensitivity habitats generally demonstrate medium to high resistance and a greater capacity for recovery and are also assessed where disturbance exceeds threshold levels. Table 6.3 presents a list of such habitats.

Table 6.3: WFD higher and lower sensitivity habitats

WFD higher sensitivity habitats	WFD lower sensitivity habitats
Chalk reef	Cobbles, gravel and shingle
Clam, cockle and oyster beds	Intertidal soft sediments like sand and mud
Subtidal kelp beds	Rocky shore
Intertidal seagrass	Subtidal boulder fields
Maerl	Subtidal rocky reef
Mussel beds, including blue and horse mussel	Subtidal soft sediments
Polychaete reef	-
Saltmarsh	-
Subtidal seagrass	-

Within 500 m of the proposed works, the following higher sensitivity habitats have been identified:

- polychaete reef
- mussel beds.

Due to their known sensitivity to physical disturbance and smothering, these habitats are carried forward to the WFD impact assessment. While the direct footprint of the works is expected to be distant from these features, the potential for indirect impacts, including sediment resuspension and redeposition, is evaluated to assess whether significant degradation of habitat quality or extent could occur.

Lower sensitivity habitats also present within 500 m of the works include:

- cobbles, gravel, and shingle
- intertidal soft sediments (sand and mud)
- rocky shore.

The proposed works activities may result in accidental debris falling into the water during lifting operations; however, the potentially affected area constitutes less than 1% of their total extent within the Swansea Bay waterbody. Given the dynamic sedimentary environment of Swansea Bay and the nature of the pressures involved (mainly temporary mechanical disturbance and minor sediment mobilisation), impacts to these lower sensitivity habitats are expected to be short-term and recoverable.

The inclusion of both higher and lower sensitivity habitats within the 500 m assessment zone confirms the requirement to carry habitats forward to the WFD impact assessment stage.

Table 6.4 presents the habitats risk scoping for the proposed works

Table 6.4: Habitat risk scoping for the Swansea Bay Waterbody

Consider if the footprint of your activity is:	Yes	No	Biology habitats risk issue(s)
0.5 km ² or larger	Yes to one or more – requires impact assessment	No to all – impact assessment not required	No – footprint of activity on the seabed is 2.334m ² (0.0002 ha).
1% or more of the water body's area			No.
Within 500 m of any higher sensitivity habitat			Yes – activity is within 500 m of polychaete reef and mussel beds, including blue and horse mussel.
1% or more of any lower sensitivity habitat			No – footprint of activity covers less than 1% of present lower sensitivity habitat.

6.3 Biology: fish

The proposed works are not expected to delay or prevent fish from moving through the area or significantly affect migratory patterns. They further do not involve in-water piling or other high-energy activities typically associated with acoustic disturbance.

However, localised and temporary behavioural responses from fish species may occur due to physical disturbance and vessel activity. These impacts are likely to be short-term and confined to the immediate vicinity of the works.

The deployment of spud legs may result in minor sediment resuspension; however, no changes to dissolved oxygen levels, turbidity, or water chemistry are anticipated that would be sufficient to adversely affect fish health or behaviour beyond the local area. The Swansea Bay water body does support a range of fish species, including migratory species such as Atlantic salmon (*Salmo salar*), sea trout (*Salmo trutta*), and European eel (*Anguilla anguilla*), and these species are therefore considered in this assessment.

Given the temporary and localised nature of the activity, any impacts on fish are expected to be minor and reversible. However, to ensure a precautionary approach, fish are carried forward as a receptor within the WFD impact assessment. Table 6.5 presents the risk to fish species as a result of the proposed works using the NRW WFD scoping table.

Table 6.5: Fish risk scoping

Consider if your activity:	Yes	No	Biology – Fish risk issue(s)
Is in an estuary and could affect fish in the estuary, outside the estuary but could delay or prevent fish entering it or could affect fish migrating through the estuary	Continue with questions	Go to next section	No
Could impact on normal fish behaviour like movement, migration or spawning (for example creating a physical barrier, noise, chemical change or a change in depth or flow)	Requires impact assessment	Impact assessment not required	Vessel activity and deployment of spud legs may cause temporary disturbance.
Could cause entrainment or impingement of fish	Requires impact assessment	Impact assessment not required	No

6.4 Water quality

If a proposed activity has the potential to affect water clarity, temperature, salinity, dissolved oxygen levels, nutrient concentrations, or microbial communities continuously for longer than a spring-neap tidal cycle, or has the potential to release substances listed under the EQSD or chemical concentrations exceeding Cefas Action Level 1, a detailed WFD impact assessment is required.

Table 6.6 outlines the risk to water quality consequent of the proposed works using the NRW WFD scoping table.

Table 6.6: Water quality risk scoping

Consider if your activity:	Yes	No	Water quality risk issue(s)
Could affect water clarity, temperature, salinity, oxygen levels, nutrients or microbial patterns continuously for longer than a spring neap tidal cycle (about 14 days)	Requires impact assessment	Impact assessment not required	Yes – temporary, and localised impacts from increased sediment suspension may arise from the deployment of spud legs or in the unlikely event of accidental debris falling into the water during lifting operations.
Is in a waterbody with a phytoplankton status of moderate, poor or bad	Requires impact assessment	Impact assessment not required	No – water body have a 'null' status, which is assumed 'Good' as per GN.
Is in a waterbody with a history of harmful algae	Requires impact assessment	Impact assessment not required	Unknown No – no known mention of harmful algae
If your activity uses or releases chemicals (e.g. through sediment disturbance or building works) consider if:	Yes	No	Water quality risk issue(s)
The chemicals are on the Environmental Quality Standards Directive list	Requires impact assessment	Impact assessment not required	Yes – There is potential for EQSD list substances to be present in the sediment disturbed.
It disturbs sediment with contaminants above Cefas Action Level 1	Requires impact assessment	Impact assessment not required	Yes – It is possible that disturbed sediments could contain contaminants above Cefas Action Level 1.
If your activity has a mixing zone (like a discharge pipeline or outfall) consider if:	Yes	No	Water quality risk issue(s)

Consider if your activity:	Yes	No	Water quality risk issue(s)
The chemicals released are on the Environmental Quality Standards Directive list	Requires impact assessment	Impact assessment not required	N/A

6.5 WFD protected areas

If a proposed activity is located within 2 km of any designated WFD protected area, that protected area must be included within the WFD impact assessment for the activity. The proposed works are located approximately 900 m from the Swansea Bay Shellfish Waters, a designated WFD protected area. Therefore, this protected area has been included within the scope of the WFD impact assessment.

As a conservative measure, designated sites requiring HRA consideration have also been assessed using the same 2 km screening distance applied to WFD protected areas. No designated sites of relevance (i.e., SAC, SPA, SSSI or Ramsar sites) have been identified within this screening distance.

A separate HRA was undertaken for the proposed works; this assessment is contained within Section 3.

Table 6.7 outlines the risk to WFD protected areas consequent of the proposed works using the NRW WFD scoping table.

Table 6.7: WFD protected area risk scoping

Consider if your activity is:	Yes	No	Protected areas risk issue(s)
Within 2 km of any WFD protected area	Requires impact assessment	Impact assessment not required	Shellfish Waters: - Swansea Bay (East) - Swansea Bay (South). Bathing Waters: - Aberafan (36800).

6.6 Invasive, Non-native Species

As there is a risk that the proposed works could introduce or spread INNS via the vessel, plant and construction equipment which may have been used or travelled through other water bodies these receptors will be included within the WFD impact assessment.

Table 6.8 outlines the risk to INNS consequent of the proposed works using the NRW WFD scoping table.

Table 6.8: Invasive, non-native species risk scoping

Consider if your activity could:	Yes	No	INNS risk issue(s)
Introduce or spread INNS	Requires impact assessment	Impact assessment not required	Yes – Potential for INNS to be introduced from vessel and machinery.

6.7 Summary

Table 6.9 summarises the scoping assessment to satisfy WFD requirements.

Table 6.9: Summary of the results of the scoping assessment

Receptor	Potential risk to receptor / to be included in Impact Assessment?	Note the risk issue(s) for impact assessment	Impact assessment presented in section
Hydromorphology	No	Swansea Bay is a designated heavily modified coastal defences which is a different purpose to the proposed works.	N/A
Biology: habitats	Yes	Polychaete reef and mussel beds are present at the location of the site works.	Section 7.2
Biology: fish	Yes	The work activities may cause temporary and localised elevated noise and vibration levels.	Section 7.3
Water quality	Yes	The proposed works have the potential to resuspend sediments that could be reasonably expected to contain Cefas listed substances, possibly at levels above Cefas Action Level 1, and/or EQSD list substances which could impact water quality.	Section 7.4
Protected areas	Yes	There are shellfish and bathing water protected areas within 2 km of the site works.	Section 7.5
Invasive non-native species	Yes	Potential for INNS to be introduced from machinery/vessels.	Section 7.6

7 WFD Impact Assessment

7.1 Introduction

This Section focuses on the potential risks to the five receptors (biology – habitats, biology – fish, water quality, protected areas and invasive non-native species) identified within the scoping assessment (Section 66). The impact assessment determines the pressures on these receptors from the proposed works utilising the pressures-activities database (JNCC, 2025) developed by the Joint Nature Conservation Committee (JNCC) and Natural England⁴. Where necessary, it also identifies ways to avoid or minimise impacts, and shows if the proposed works may cause deterioration or jeopardise Swansea Bay (GB641008260000) from achieving good potential. The overall purpose of a WFD impact assessment is to ascertain whether the proposed activities will cause a significant non-temporary effect on the scoped-in receptors. The proceeding sections provide this assessment alongside consideration of temporary effects to ensure a comprehensive appraisal of environmental impacts and identification of any required mitigation.

7.2 Biology: habitats

The proposed works are located within 500 m of several WFD higher sensitivity habitats, including polychaete reef and mussel beds. These features are known to be sensitive to physical disturbance, sedimentation, and smothering. However, based on current site information, these habitats are not directly located within the works footprint and are not anticipated to be physically impacted by the removal activity.

Potential impacts on these higher sensitivity features relate primarily to indirect effects such as sediment resuspension during the deployment of the spud legs. The marine works are anticipated to be of short duration (approximately 2 weeks), are localised, and will be carried out in a highly dynamic sedimentary environment where natural wave and tidal action contribute to frequent seabed disturbance. Any sediment released into the water column is expected to be dispersed and settle rapidly, with resuspension effects remaining within the natural background range for Swansea Bay. .

The footprint of spud legs is 2.334 m² and does not directly overlap mapped polychaete reef or mussel bed areas. Consequently, no significant or non-temporary impact is anticipated to these higher sensitivity habitats as a result of the proposed works (either from routine activities or accidental events such as debris falling into the water during lifting operations).

Lower sensitivity habitats are also present within the 500 m zone, including cobbles, gravel and shingle, intertidal soft sediments (sand and mud), and rocky shore. As previously outlined in Section 6.2, the proposed works footprint represents less than 1% of the total area of any of these habitat types within the Swansea Bay water body. Given the temporary and spatially limited nature of disturbance, combined with the high recoverability of these habitats, no significant impacts to lower sensitivity habitats are anticipated.

⁴ This has been used in absence of Welsh specific guidance

Overall, the proposed works are not expected to have a significant adverse effect on WFD biological quality elements relating to benthic habitats within Swansea Bay.

7.3 Biology: fish

Migratory and estuarine fish species are known to inhabit Swansea Bay and the nearby rivers, including the Afan and Tawe, utilising the area as important corridors for movement between marine and freshwater environments. Relevant regional species include Atlantic salmon, sea trout, European eel, river lamprey, and sea lamprey—all of which are WFD biological quality element species and of conservation interest under the Habitats Directive.

The proposed works are located within the intertidal and shallow subtidal zone adjacent to Port Talbot jetty, within 900 m of the Afan Estuary, and within the Swansea Bay coastal waterbody. Although the work site is not a known spawning ground, the location falls within key migration routes for these species. Potential impacts could arise from physical disturbance, increased turbidity, and temporary noise and vibration generated during removal operations and vessel activity, though impacts from these pressures are anticipated to be of short duration, minor and localised.

Additionally, no significant reduction in dissolved oxygen or long-term water quality deterioration is anticipated. Any sediment resuspension will be highly localised and short-term, well within the natural variability of this dynamic environment, and not of a magnitude that would cause physiological stress to fish.

The proposed deconstruction works will not involve piling, blasting, dredging, or the use of geophysical survey equipment, acoustic deterrent devices, or multibeam echosounders. The activities are limited to the dismantling and removal of above-water structures using a barge-mounted crawler crane. The only in-water interaction will be the temporary placement of barge spud legs on the seabed. While typical construction vessel operations (e.g. engines, thrusters, barge positioning) will generate low-level operational noise, this is comparable to existing vessel traffic within Port Talbot harbour. No impulsive or continuous noise sources of concern under the WFD are expected.

Given the ecological importance of the Swansea Bay waterbody for migratory species and the proximity to estuarine features, fish have been included within the WFD impact assessment. However, due to the temporary, small-scale, and managed nature of the activity, impacts to fish are expected to be minor, localised, and reversible with no significant deterioration of fish quality elements under the WFD.

7.4 Water quality

Although the proposed works are non-intrusive and do not involve dredging, piling, or sediment excavation, there remains a potential for minor, localised sediment disturbance during positioning of the barge's spud legs or in the unlikely event of accidental debris falling into the water during lifting operations.

As identified during scoping ((Section 6), Swansea Bay coastal water body (GB641008260000)) there is the potential for resuspended sediment to contain Cefas Action list substances, possibly at levels above Cefas Action Level 1 and/or EQSD list substances which could negatively impact the water quality of Swansea Bay. In this

context, it is also important to note that this waterbody has a chemical status of “Moderate”, primarily due to the presence of ubiquitous priority substances including PBDEs and mercury compounds. While no sediment sampling has been undertaken specifically for these proposed works, existing contamination is likely confined to deeper or undisturbed sediments. Given that no excavation proposed, the risk of mobilising contaminants above background levels is considered minimal.

The project design incorporates embedded avoidance measures, including:

- no in-water works other than barge spud leg deployment
- controlled lifting procedures to avoid material dropping into the water
- spill prevention protocols for all marine operations.

Resuspension of sediment will be reduced as far as possible by undertaking careful and considered deployment of the spud legs, consequently reducing the likelihood of releasing significant chemicals or nutrients into the waterbody, including via sediment disturbance, above natural levels that are to be expected under the area’s hydrological regime action. Any contaminants that are released into the water column due to resuspension of sediments will be low in volume and quickly diluted and dispersed into the large and dynamic transitional and coastal waterbodies. Any minor water quality impacts will therefore be temporary in nature and are not envisaged to have a significant non-temporary effect on any WFD water quality elements. Furthermore, as the sediments being disturbed are of a small volume (in a large volume waterbody) with no evidence or reason to suspect contamination with faecal material (which could affect Shellfish Waters and Bathing Waters), no significant WFD effects are foreseen upon the Shellfish Waters or Bathing Waters either.

Given the dynamic hydrodynamic regime of Swansea Bay, any minor sediment mobilisation within the jetty area is expected to be rapidly diluted and dispersed within the water column by flushing, and anticipated to be well within natural background variation. No release of nutrients, hydrocarbons, or faecal matter is expected, and there is no anticipated impact on nearby Bathing Waters or Shellfish Waters, which are located outside the immediate harbour area.

Any potential effect on WFD water quality elements is considered to be temporary, low magnitude, and highly localised, with no significant or non-temporary deterioration expected. The activity is therefore not predicted to cause failure of any WFD water quality standards.

WFD chemical compliance of Swansea Bay is therefore unlikely to be affected.

7.5 Protected sites

The proposed works are located approximately 900 m from the Swansea Bay Shellfish Waters, a designated WFD protected area. No other WFD protected areas are within 2 km. Loss/direct disturbance of these shellfish waters is not anticipated due to there being no physical overlap from the proposed work site. Minor sediment resuspension may occur during the deployment of the spud legs of the barge, but any sediment will be rapidly diluted and dispersed, due to the well-flushed high energy environment in which the works will take place. This environment will therefore reduce any elevations in turbidity prior to reaching the protected site.

The project design incorporates embedded avoidance measures which minimise impacts on water quality, including:

- no in-water works other than barge spud leg deployment
- controlled lifting procedures to avoid material dropping into the water
- spill prevention protocols for all marine operations.

As a result of the proposed mitigation measures, dynamic environment and limited in-water activities, it is concluded that there is no potential for deterioration of the WFD status of any protected sites from the proposed activities.

7.6 Invasive, Non-native Species

The introduction or spread of INNS is a risk for any project, when vessels and equipment have been used in other waterbodies. Species can be transferred between work sites and be “harmful and invasive in locations where they do not naturally occur” and “where material used in the development originates from outside of the site, organisms within the substrate may be introduced into the site” (JNCC, 2022). Natural England’s evidence standards advise that the pressure will increase with the spatial/temporal scale and intensity of works. The proposed works will cover a limited spatial area, due to the nature of the works being restricted to the jetty footprint. Therefore, the spread of INNS via the works vessel and machinery are anticipated to be highly unlikely.

In addition to vessel and equipment movements, the works will involve the dismantling and removal of three redundant ship unloader cranes and associated conveyor structures from the ABP jetty. As all elements of the structures are located above the waterline, there will be no removal of seabed infrastructure or associated sediments. This therefore limits the potential release or mobilisation of invasive non-native species that may otherwise be present within submerged foundations or sediment. All dismantled components will be lifted directly onto the barge and transferred ashore for licensed recycling, ensuring that no materials are left in situ which could act as future vectors for colonisation.

Furthermore, in the event that the barge or support vessels contain ballast water, no ballast water exchange will take place within the project area; as stated in the International Convention from the Control and Management of Ships’ Ballast Water and Sediments (Maritime and Coastguard Agency, 2004), ‘Ships undertaking ballast water exchange should conduct it at least 200 nm from the nearest land and in water at least 200 m in depth; or in cases where the ship is unable to conduct ballast water exchange in accordance with the above, as far from the nearest land as possible, and in all cases at least 50 nm from the nearest land and in water at least 200 m depth’.

Like many other areas of the UK’s coastline, INNS are already present within the proposed work site. There are numerous ways in which INNS can arrive in UK waters including being carried in ballast water tanks and on the hulls of vessels traveling from one international harbour to another. It is therefore reasonable to assume that some INNS may already be present within the proposed work site.

8 CONCLUSION

This Technical Report has been prepared to satisfy the requirements laid out within the Habitats Directive and Water Framework Directive.

In relation to HRA, this Report concluded that there was no potential for LSE on the identified designated sites. As such the integrity of the identified sites are not expected to be impacted by the proposed works. This is largely attributed to the highly localised nature of the impacts and short-duration of activities. Hence this Technical Report presented a Stage 1 assessment with regard to the Habitats Regulations. It was further determined negligible disturbance to EPS is expected, and on this basis an EPS Licence is not required.

With regards to the WFD assessment, this Report concluded that no significant effects on the Swansea Bay coastal waterbody are predicted to occur as a result of the proposed works, assuming best practice environmental controls are implemented to limit sediment resuspension and prevent pollution incidents.

The Swansea Bay coastal waterbody is currently at 'Moderate' ecological status, with a target of achieving 'Good' status by 2027. The proposed works are temporary, spatially restricted, and will be conducted in a well-flushed, high-energy marine environment, which supports rapid dispersion of suspended material and minimises the potential for accumulation or long-term impact.

Potential pressures such as habitat disturbance, temporary fish behavioural effects, and short-term changes in water turbidity have been assessed and are not anticipated to lead to any significant or non-temporary changes to any biological, hydromorphological or physico-chemical quality elements. The nearby Swansea Bay Shellfish Water Protected Area and northerly Aberafan Bathing Waters have been considered within the assessment. No deterioration in water quality is anticipated that could compromise the protected area's ability to support shellfish populations or jeopardise their WFD objectives.

The works are not within 2 km of any other WFD Protected Areas or UK National Site Network designated sites, and as such, there is no perceivable pathway for in-combination or cumulative effects in relation to the WFD.

Furthermore, the proposed works do not conflict with the measures set out in the Western Wales River Basin Management Plan for Swansea Bay, which are largely aimed at reducing pollution from wastewater, urban runoff and diffuse sources. The works are short-term and do not interact with these existing pressures or associated improvement measures.

It can therefore be concluded that the Port Talbot proposed works will not cause a deterioration in the current WFD classification of the Swansea Bay waterbody, nor will they compromise the ability of the waterbody to achieve Good Status by 2027. The removal works will further not impede the integrity of the identified designated sites whereby a Stage 1 HRA has been satisfied.

The proposed works are therefore considered compliant with the objectives and requirements of the Water Framework Directive and Habitats Directive.

9 REFERENCES

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