



21 July 2021

Delivered via Planning Applications Wales (PP-09267512)

Ms N Lake
East Team Leader
Neath Port Talbot County Borough Council
Planning Division
The Quays
Brunel Way, Baglan Energy Park
Neath
SA11 2GG

Ref: TATT3037

Dear Nicola,

FULL PLANNING APPLICATION FOR THE INSTALLATION OF A NEW SECURITY GATE – LAND AT THE MAIN GATE ENTRANCE, PORT TALBOT STEELWORKS

On behalf of our client Tata Steel UK Limited ("Tata Steel"), I am pleased to enclose an application for a new security gate at the Main Gate into Port Talbot Steelworks.

This planning application has been submitted via Planning Applications Wales and comprises the following documents and supporting technical information:

- This Covering Letter, prepared by Turley.
- Application Forms and Certificates, duly completed and signed.
- Site Location Plan, prepared by Tata Steel.
- Site Layout Plan, prepared by Tata Steel.
- Security Gates design plans, prepared by Tata Steel.
- Traffic Management Plan, prepared by Apex.

APPLICATION FEE

The requisite planning application fee of £230 will be paid to the Council by Turley under separate cover.

Commented [JH1]: Tata to confirm site area within the red line

SITE OWNERSHIP

The site is owned by the applicant Tata Steel and has been for more than 21 days.

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"Turley is the trading name of Turley Associates Limited, a company (No. 2235387) registered in England & Wales. Registered office: 1 New York Street, Manchester M1 4HD."

SITE DESCRIPTION AND CONTEXT

The site comprises the Main Gate entrance of Port Talbot Steelworks. This is shown in the accompanying site location plan. The Main Gate entrance is situated adjacent to Tata Steel's Stores Building and accessed from the western arm of the roundabout from Harbour Way.

This is one of two main access points into Port Talbot Steelworks. It is surrounded to the south and west by industrial land and buildings associated with the steel process. To the immediate north and east is Harbour Way.

PROPOSED DEVELOPMENT

The description of development comprises:

"The erection of a 'Major Incident' security gate and associated fencing and works at Port Talbot Steelworks' Main Gate"

The proposed gates are required as an emergency safety mechanism for the Steelworks during the exceptional circumstances of 'major incidents'. The gates will be enforced in the event of two defined major incident scenarios, defined as:

- In the exceptional circumstance of a significant on-site emergency / incident that may pose a threat to the safety of staff and visitors. In the event of a gas incident, these are considered to be a risk for likely no more than an hour.
- In the exceptional circumstance of industrial unrest / protest, targeted at the Steelworks.

The gates will ensure that the Steelworks can be effectively closed off at the main entrance in the interest of safety. The gates will remain open at all other points.

Full details of the proposed fencing and gate are provided in the submitted drawings.

Any proposals for a similar security gate at the West Gate entrance will be dealt with via a separate planning application in due course.

PRE-APPLICATION DISCUSSIONS

Informal pre-applications took place with NPTCBC's planning team on 15 September 2020. They were supportive of the principle of the proposal and requested that details and justification relating to the gate locations, defined use and on-going planning and management were provided with any future planning application.

The comments received from NPTCBC have been taken into account during the preparation of this planning application. The application is supported by a comprehensive Exceptional Circumstances Traffic Management Plan which details the nature, defined use and management of the gates.

PLANNING POLICY CONTEXT

Relevant national and local planning policy and other material planning considerations have been considered and assessed as part of this proposal. A summary of the most relevant considerations for a proposal of this nature are set out below.

Public health and safety is a clear priority and objective set out in both national (Planning Policy Wales, Edition 11) and local (Neath Port Talbot Local Development Plan, 2016) policy.

The Neath Port Talbot Local Development Plan (NPT LDP) seeks to promote public safety, health, and well-being and highway safety. This is highlighted in both the LDP objectives and associated planning policy around design, transport and amenity¹. Proposals should be well designed so as not to adversely impact on highway safety or the amenity of the community². Safe places and public spaces are also promoted.

Community safety is recognised as fundamental to good design in Technical Advice Note 12³. Security needs must be considered in development and appropriately balanced with other requirements.

The LDP recognises the importance of Port Talbot Steelworks as one of the largest employers in the region. Policy EC2 seeks to protect such existing employment functions and recognises that ancillary services and facilities are appropriate to support such employment estates. Proposals which support the overall function of an employment area and do not unacceptably harm the amenity of neighbouring properties will be supported.

PLANNING ASSESSMENT

Principle of Development

The proposed gates serve an essential safety and operational function for Tata Steel. The gates seek to protect this significant employment site and surrounding areas in the event of the major incidents set out above. In line with policy objectives to support existing employment areas and safety, it is considered that the principle of the proposed new gate and associated fencing is acceptable.

Location of Development (Options Appraisal)

The security team at Tata has considered a series of different locations for the proposed gate and fencing at the Main Gate. This analysis of options has taken into account the purposes of the security gates. In particular:

- The gates will not have a material impact on the operation or safety of the typical operation of the highway network and would not be used day to day.
- Outside of the stated exceptional circumstances, there will be no change to the existing arrangements of vehicle entry / barriers.
- The gates will only be used in the stated exceptional circumstances.

The first priority was to position the gates on private land controlled by Tata Steel. This will ensure that closing the gates will not stop up the highway or impact on pedestrian / cycle routes in the locality. This supported the ability for Tata to comply with pre-application feedback from the Council to minimise any disruption on traffic flow along Harbour Way, where possible.

In this context, it was quickly evident that there are little other options than the proposed siting. The proposed location best balances the essential ability to lockdown the security and operational continuity of the site in exceptional circumstances. It respects the need to allow space for traffic to turn off Harbour Way, and minimise as far as possible any disruption on the road network.

¹ SP20, TR1, TR2, SP21, BE1

² Policy BE1: Design

³ Technical Advice Note 12: Design <https://gov.wales/sites/default/files/publications/2018-09/tan12-design.pdf>

Design

The design of the proposal has been very carefully considered by Tata and delivers the security specification required for the site. Metal palisade gate and green mesh fence match the existing provision in this important gateway into the site. This design continuity is considered the most appropriate approach for a gate structure that is only going to have minimal use. For the majority of the time, the gate will be left open and against the existing fence.

Traffic Management and Operational Matters

In response to pre-application feedback from the Council, the application is supported by an Exceptional Circumstances Traffic Management Plan prepared by Apex Consulting Ltd.

The proposal will only have any impact on traffic management at the site in exceptional circumstances. Tata already has a Major Emergency Response Plan, including significant health and safety and risk management measures. The document forms part of the Off-Site Emergency Plan produced by the Council. The submitted Exceptional Circumstances Traffic Management Plan sits alongside this suite of emergency plans relating to the site.

Tata has committed to the following mechanisms to avoid an unacceptable impact on the highway when an emergency situation is declared and the proposed gates are closed:

- Letting staff/deliveries etc. know not to come to site.
- Using alternative access points.
- Rearranging / cancelling shifts changes, where necessary.
- Emergency sleeping facilities for staff on the site, where necessary.

Tata will also work with the Council and South Wales Police to install an outer cordon at Harbour Way to redirect traffic, when necessary.

When read alongside the existing emergency plans for the site, the proposed provision appropriately addresses any safety and traffic management matters which may occur during the exceptional events for which the gate will be used. The proposal complies with prevailing transport policy.

SUMMARY AND CONCLUSION

In summary, the proposed gate serves an essential safety and operational need for Tata. It responds appropriately to the exceptional circumstances identified. The proposal complies with prevailing development plan policy. Planning permission should be granted on this basis.

We look forward to receiving confirmation of the validation of the planning application in due course. Please do not hesitate to contact us with any queries.

Yours sincerely



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Associate Director

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