

22 June 2023

Delivered via Planning Applications Wales

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

Ref: TATT3042

Dear Nicola,

PRIOR NOTIFICATION OF DEMOLITION – DECONSTRUCTION OF WATER COOLING TOWER FOR BLAST FURNACE 4, PORT TALBOT STEELWORKS.

On behalf of our client, Tata Steel UK Ltd ('Tata Steel'), we are pleased to enclose an application for Prior Notification for the proposed deconstruction of the Water Cooling Tower for Blast Furnace 4 at the Port Talbot Steelworks. This application is submitted to Neath Port Talbot County Borough Council ('the Council') online via the Planning Application Wales (PP-11160929).

In addition to this covering letter, the application comprises the following documents:

Document / Plan	Author	Reference
Application Form	Turley	PP-11160929
Copy of Site Notice	Turley	N/A
Location Plan	Tata Steel	TCE.11890S-CV-3000-RC-30101
Deconstruction Stages	Tata Steel	TCE.11890S-CV-3000-RC-30102
Deconstruction Method Statement	Tata Steel	N/A

A BACS payment for the requisite application fee of £100 will be made by directly by Turley on behalf of Tata Steel.

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Cardiff
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SITE AND BACKGROUND CONTEXT

The application comprises the Water Cooling Tower for Blast Furnace 4 at the Port Talbot Steelworks. The tower is located in the north of the Steelworks. It lies to the south of the new power plant (energy from steam) development and approximately 370 meters south of the West Gate entrance. The Water Cooling Tower is located within proximity to Blast Furnace 4. The site is comprised of primarily industrial works.

Figure 1: Site location within the wider Steelworks (Google Earth).



The structural elements of the Water Cooling Tower are dated and severely corroded. The tower is in a poor state of repair and has exceeded its design life. Leaving this issue unaddressed is likely to raise safety concerns.

The Water Cooling Tower structure is 10.9 meters in width, 14.6 meters in length and 15.5 meters in height. The proposed works includes the deconstruction of associated piping, utilities and cables. This is detailed further in this covering letter, as well as the Deconstruction Method Statement.

The Tower's concrete basin will not be deconstructed. After deconstructing the Tower structure, handrails and two ladders will be installed around the basin for safety reasons and to ensure the basin can be accessed and maintained in the future. This does not constitute development and does not form a part of this Prior Notification.

Figure 2: The Water Cooling Tower to be deconstructed (Google Earth).



PROPOSED DECONSTRUCTION

Part 31 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 1995 (as amended) (hereafter GPDO) confirms that demolition of an existing building is allowed in certain circumstances, subject to satisfying a range of conditions.

The proposed deconstruction accords with the requirements of Schedule 2, Part 31, Class A of the GPDO (1995) (as amended). In accordance with the condition set out at A.2 (b) (i) of Part 31, this Prior Notification (Demolition) application is made to the Council.

DECONSTRUCTION METHOD

The proposed deconstruction will be conducted by an experienced contractor. Full details of the proposed works can be found in the Deconstruction Method Statement (prepared by Tata Steel). This includes a description of the works, mitigation measures and other relevant safety information. The main elements of the works are the deconstruction of the wooden structural members, utilities (comprising fan and cooling water pumps), hot and cold-water piping, fan motors, cables and cable trays.

Prior to deconstruction, the CDM site will be prepared. This will include works such as, but not limited to, connection with Tata services, electricity and ground cleaning. A site inspection will be carried out by a MEWP prior to the deconstruction. This will assess the strength of the cooling tower frame.

Asbestos has been identified at the site and it will be removed prior to deconstruction. Further details of how the asbestos will be addressed are addressed below.

Access

The structure will be accessed by erection of scaffolding, MEWP (mobile elevating work platforms) or mobile crane.

- **By scaffolding:** The design of the scaffolding will be completed by specialist contractor. The ground level will be accessed to examine whether the leg loading can be safely transferred to the ground. Temporary works documentation will be completed. Site clearance will be required.
- **By MEWP:** Temporary works documentation will be completed to ensure the ground can withstand the loading. Site clearance will be required.
- **By crane:** The area will be accessed to check if any obstructions are in place. A crane lifting plan will be designed by a specialist contractor to ensure that the selected crane can support and lift the deconstructed members safely. Temporary works documentation will ensure all checks on the ground are completed. Site clearance will be required.

Deconstruction Stages

The deconstruction has been divided into stages. The list below summarises the phased approach, to be agreed with the Council. This should be read in conjunction with the Deconstruction Stages Plan (dwg no. TCE.11890S-CV-3000-RC-30102 Rev A), which provides further detail.

- After the CDM site is prepared and the asbestos is removed appropriately, a pipe (DN300) will be disconnected from the filtration pumps. The return pipe from Blast Furnace 4 (DN750) will be retained.
- All electrical items will be disconnected, except the main pumps. An electrical engineer will be consulted on the remaining disconnections and will be involved regularly during the deconstruction.
- The deconstruction of the main tower will then take place. Riser piper, the staircase and classing will be dismantled one by one.
- The roof deck will be inspected. Rehabilitation work will be performed if the deck is not considered safe.
- The cooling tower fans and motors will be dismantled.
- The deck boards will be removed.
- The remaining structure will be dismantled level by level, working transversely and longitudinally. Low lift cooling pumps and associated piling will also be removed.
- Handrails and two ladders will be installed around the basin for safety reasons and to ensure the basin can be accessed and maintained in the future. As mentioned previously, this does not constitute development and does not form a part of this Prior Notification.

The extent of works will vary with each phase. The deconstruction will be carried out using a top to bottom approach. The deconstruction will accord with the CDM (Construction (Design and Management)) Regulations.

RESTORING THE LAND

An evaluation of the land will take place to assess if a new maintenance plan is required. If, after the risk assessment, the concrete basin is deemed as a risk to people and the surrounding assets, a new plan will be produced.

ENVIRONMENTAL MATTERS

Tata Steel has established working guidelines and strict practices relating to on-site health and safety. Any works on site must comply with these practices. This includes on matters including dust, noise, gas and asbestos. Any work associated with the Water Cooling Tower deconstruction will also comply.

The deconstruction will be risk assessed before any work commences. An asbestos survey has been carried out to assess the requirement of asbestos control during the execution. Any asbestos will be appropriately controlled.

The presence of materials containing asbestos will be disposed of in a safe manner by a licensed contractor at a licensed disposal centre. Scrap steel will be dealt with by Tata Steel. The stagnant water in the cooling tower basin will be treated and removed prior to the deconstruction.

Appropriate controls will be in place to mitigate or prevent environmental hazards such as dust. The contractors will wear appropriate PPE during any activity. Noise can be controlled during the deconstruction, assessing the dBs to ensure the work is within the accepted and permitted levels. Tata Steel will record all dust and air quality complaints and take appropriate measures to reduce emissions in a timely manner.

WORKING HOURS

Deconstruction operations will be limited to 7am - 7pm. No deconstruction operations will take place on Sundays and Public Holidays, unless prior approval is received from the Local Planning Authority.

The deconstruction will take approximately one month to complete. Subject to timescales, the contractor will arrange for the deconstruction to take place during the summer months due to weather conditions.

SITE NOTICE

In accordance with the A.2 (b) (iii) of Part 31 of the GPDO (1995) (as amended), we can confirm that the enclosed site notice will be displayed at the site for a minimum period of 21 days in the period of 28 days from the date of the submission of this application. We can also confirm that notice will be served on the Council under Section 80 of the Building Act 1984 (as amended) prior to any deconstruction works commencing on site.

CONCLUSION

It is considered that the proposed deconstruction accords with the Town and Country Planning (General Permitted Development) Order 1995 (as amended). This application demonstrates that the proposed deconstruction of the Water Cooling Tower will be conducted in a safe and controlled manner and will not give rise to any adverse impacts. The Deconstruction Method Statement sets out the safety measures and procedures that will be followed to manage and avoid potential detrimental impacts.

We trust that the submitted documentation is sufficient for the application to be validated. If you have any queries in the meantime, then please do not hesitate to contact me directly on the details below.

Yours sincerely

Ffion Middleton
Planner