

7 August 2023

Delivered by Planning Application Wales (PP-12371485)

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

Ref: TATT3034

Dear Nicola,

PRIOR NOTIFICATION OF DEMOLITION – DECONSTRUCTION OF THE HIGHLINE STRUCTURE, TATA 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 Highline Structure at Tata Steel's Port Talbot Steelworks. This application is submitted to Neath Port Talbot County Borough Council ('the Council') online via the Planning Application Wales (PP-09714891).

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

Document / Plan	Author	Reference
Application Form	Turley	PP-09714891
Copy of Site Notice	Turley	N/A
Site Location Plan / Deconstruction Plan	Turley	TCE.11193G-CV-3068-SI-30025
Deconstruction Method Statement	Tata Steel	N/A

APPLICATION FEE

A BACS payment for the requisite application fee of £100 will be made on behalf of Tata Steel upon submission of this application.

SITE AND BACKGROUND CONTEXT

The application site comprises a Highline conveyor structure which is located within the Port Talbot Steelworks, operated by Tata Steel. The Highline comprises of four redundant gallery girders totalling 114.45 meters in length.

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The structure is located in the northern area of the steelworks, adjacent to the new power plant development and approximately 200 meters south of the West Gate entrance. As shown on the figure below, the site is comprised of primarily industrial works, with the Highline located within the vicinity of the Highline towers and the blast furnace complex.

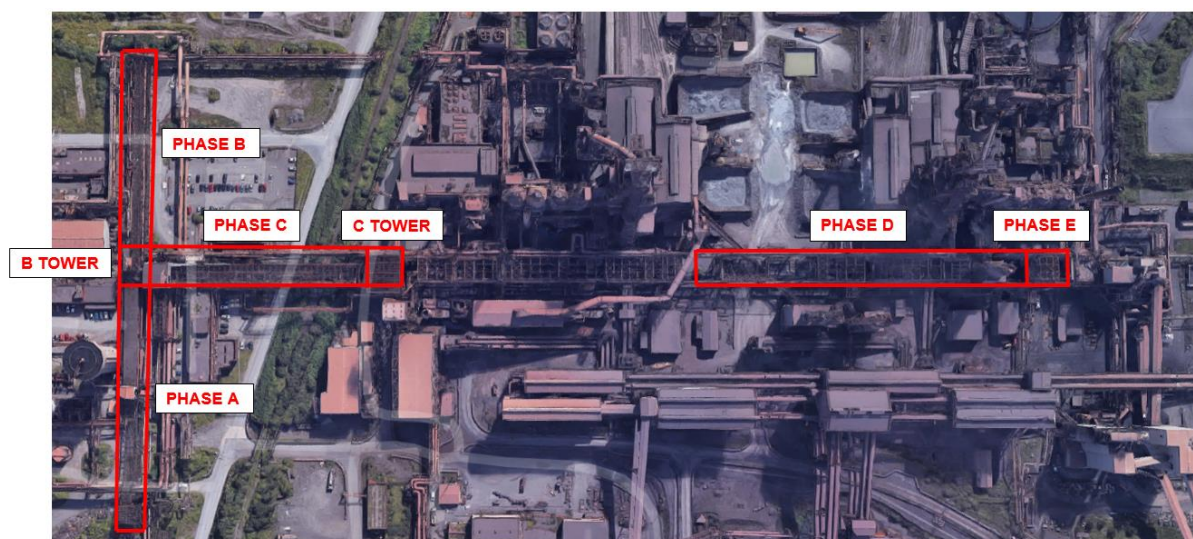


Figure 1: Site Location and Deconstruction Area

The Highline structure is dated. Most of the structural members of the facility are damaged due to ageing and severe corrosion. Not addressing this situation is likely to raise concerns around the safety of the Plant. The structure is in a poor state of repair and is deemed to have exceeded its design life.

Tata is planning to deconstruct the critical structural members to maintain stability of the live services. Whilst the structure is redundant and surplus to requirements, there are many live utility pipes which are supported from the highline gallery structures. These pipes are to be retained either by rerouting or an alternate supporting arrangement using other structures on site.

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/structure is allowed in certain circumstances, subject to satisfying a range of conditions.

A.1 of Part 31 excludes such permitted development rights in the following circumstances:

- a) *the building has been rendered unsafe or otherwise uninhabitable by the action or inaction of any person having an interest in the land on which the building stands; and*
- b) *it is practicable to secure safety or health by works of repair or works for affording temporary support.*

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 application is made to the Council.

METHODOLOGY

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.

This project has been divided into phases due to its complexity. The table below contains a summary of the indicative phased approach, to be agreed with the Council over a 5-year period.

Highline Phase A	From Tower 'A' to Tower 'B'. This structure used to support the conveyor 48 which was deconstructed in 2011 by the Regeneration team. A corroded structure for deconstruction.
Highline Phase B	From Tower East tower to Tower 'B'. This structure used to support the conveyor 49 which was deconstructed in 2011 by the Regeneration team. A corroded structure for deconstruction.
Highline Phase C	From Tower 'B' to Tower 'C'. This area of plant is redundant and has not had any maintenance in several years. This structure (although it supports critical services to the Blast Furnaces) is corroded and will be removed for safety reasons and all critical services supported by new structures.
Highline Tower 'C'	The steelwork remaining of C Tower is in a poor condition. There is corrosion evident to all primary structural members. For deconstruction.
Highline Phase D	This is the Old Bunkers area. The steel work of the Old Bunkers is severely corroded with holes visible. For deconstruction.
Highline Phase E	GCI 'M' Tower. The redundant structure of the old "M Tower" that is located on top of the compressor house roof is in poor condition and will be removed for safety.

The extent of works will vary with each phase. Overall, works will include the deconstruction of some or all of the following as relevant to each phase:

- Redundant pipes;
- Corroded staircase and cage ladder;
- Bracings and ties;
- Roof bracings and ties;
- Internal beams, columns, platforms and portals; and
- Frames and associated platforms.

The deconstruction will be carried out using a top to bottom approach. The sequence will be decided on each phase based on overall stability of the structure. The structure galleries will be safely cut, lifted in pieces and transported to the storage area for further disposal. Temporary steelwork may need to be installed prior to dismantling, in order to support the existing services in case their supports also need replacement. All design and calculations will be done by specialist contractor and temporary works documentation will be in place. All deconstruction of the Highline phases will accord with the CDM (Construction (Design and Management)) Regulations.

Deconstruction Method

The accompanying Deconstruction Method Statement sets out the approach for the Highline. It will include the following steps:

1. Preparation of CDM site including facilities, connection with Tata services, electricity, ground cleaning, barriers, etc. Assess whether the structural members and existing services contain asbestos, risk assess and plan secure deconstruction and correct disposal.
2. Deconstruction of the structural members/defunct pipeworks. Access to the structure could be done by erection of scaffolding, MEWP (mobile elevating work platforms) or mobile crane with men basket.

By Scaffolding: Design to be completed by specialist contractor, access of the ground level to check if the leg loading can be safely transferred to the ground. Temporary works documentation will ensure all checks are done. Site clearance will be required.

By MEWP: Temporary works documentation will check if the ground can take 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 done. Site clearance will be required.

3. The area will be cleared and all temporary works will be removed.

RESTORING THE LAND

As the Highline is above ground and no ground work is proposed, the deconstruction works will not affect ground conditions. Should the ground be affected by the deconstruction, the land will be restored safely and appropriately. If there is any requirement to dismantle column trestles or foundations, the ground will be made safe after the dismantling. The foundations will be covered to be used in the future, if required.

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 Highline deconstruction will also comply.

The deconstruction will be risk assessed before any works commences. An Asbestos Survey followed by asbestos removal (if found) will be carried out in each phase before any deconstruction activity. The presence of materials containing asbestos will be disposed of in a safe manner by a licensed contractor at a licensed disposal centre.

The full Highline is not located by the main access road. Phases A, B, Tower B and C are near the CSI admin offices. 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.

WORKING HOURS

Work will be carried out during weekdays for 8 hours per day. If full isolation of the Plant is necessary, the work can be planned when the Blast Furnaces are shut down and arranged with Plant engineers.

HOW THE MATERIAL WILL BE DEALT WITH

The dismantled structure, plates and pipes along with other debris will be thoroughly cleaned and disposed of appropriately by the Contractor. The materials will be classified hazardous and non-hazardous waste and will be disposed accordingly in line with Tata and the contractor's processes.

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 method 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