

28 March 2024

Submitted via Planning Portal Wales (PP-12803237)

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

Ref: 00647_PLCD

Dear Nicola,

**FULL PLANNING APPLICATION FOR THE INSTALLATION OF PERIMETER FENCING AND ACCESS GATES –
LAND AT PORT TALBOT STEELWORKS, PORT TALBOT**

On behalf of our client, Tata Steel UK Ltd ("the applicant"), we are pleased to enclose an application for the installation of perimeter fencing and access gates on land at Port Talbot Steel Works, Port Talbot.

The application proposal is described as follows:

"Installation of perimeter fencing and access gates."

The application was submitted via Planning Portal Wales on 28 March 2024 (PP-12803237) and in addition to this covering letter, comprises the following documents:

- Planning Application Forms, prepared by Turley.
- Green Infrastructure Statement (GIS), prepared by Turley.
- Site Location Plan (ref: 1005 Rev B), prepared by Turley.
- Existing Site Plan (ref: 1006 Rev B), prepared by Turley.
- Proposed Site Plan (ref: 1007 Rev B), prepared by Turley.
- Photographs of Proposed Fencing and Gates, prepared by Neath Construction.
- Specification of Fencing and Manual Gates – Sheet 1 of 2, by Neath Construction.
- Specification of Fencing and Manual Gates – Sheet 2 of 2, prepared by Tata Steel.
- Specification of Automated Gates, prepared by Tata Steel.

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The requisite application fee of _____ based on the site area of 880sqm will now be paid directly to Neath Port Talbot Council.

Site Context

The application site comprises a linear L-shaped parcel of land associated with the Port Talbot Steelworks, Port Talbot. As shown on the accompanying Site Location Plan (ref: 1005), the site bounds the Steelworks to the west along the coastal path area, and the south along Longlands Lane. The site is owned and managed by the applicant.

The western extent of the site (along the coastal area) is bounded by Margam Sands to the west and Port Talbot Steelwork buildings to the east. The southern extent of the site, along Longlands Lane is bounded by greenfield land to the north and south.

The site is partly located in flood zones A (considered to be at little or no risk of fluvial or coastal/tidal flooding), B (areas known to have flooded in the past) and C2 (without significant flood defence infrastructure).

The site is not part of a conservation area, world heritage site, historic battlefield site or archaeological priority area. There are no scheduled monuments, Listed Buildings or any Locally Listed buildings on or within the vicinity of the site.

Planning History

A review of the Neath Port Talbot County Borough Council (NPTCBC) online planning register confirms that the following planning application is relevant to the proposal:

- Planning permission was approved on 26 August 2021 for the erection of new security gate and fencing at Port Talbot Steelworks (planning reference: P2021/0775).

Pre-application Discussions

Informal pre-application discussions took place with NPTCBC's planning team on 21 March 2024. Officers were supportive of the principle of the proposal, subject to detailed design. The Council preference is for a green weld mesh fence and for continuity in design along the length of the fence if possible. Officers noted the context of the application and the need for urgency.

The comments received from NPTCBC have been taken into account during the preparation of this planning application.

Development Proposals

The proposed development relates to the installation of perimeter fencing and access gates on land at Port Talbot Steelworks in Port Talbot.

The proposed fencing and gate system is designed to provide a robust physical barrier to secure a designated area. It will deter unauthorised access and enhance overall security and safety measures in the event of industrial unrest/protests targeted at the Steelworks. The fencing and gates will ensure that the operational Steelworks is closed off from the public in the interest of safety.

As shown the accompanying Proposed Plan (ref: 1007 Rev B), the fencing will be installed along Longlands Lane to the south of the Steelworks, in parallel with the Public Right of Way (PROW). It will run along the Coastal Path to the west of Tata's buildings. The fencing will extend to the east by the railway lines to include control access gates.

The fencing will be 2.4m high weld mesh fencing. It should be noted that the fence line will not be buried. Further information on the specification of the fencing is summarised below:

Height	2400mm (Installed above ground)
Total post length	3000mm (600mm dig in)
Panel Width	3000mm
Wire Thickness	4mm
Mesh Aperture	200mm H x 50mm W
Weight	14.28kg/panel
Number of V beams	3
Material	Pre-Galvanised Steel to BS10244-2:2001 Class D Standard
Finish	Marine grade green powder coat RAL 6005
Post Size	60 x 40mm

As shown on the Proposed Site Plan (ref: 1007 Rev B), 9no. manual gates and 2no. automatic gates will be installed as part of the proposal. The proposed gates will be constructed with the same materials, design and height as the perimeter fence for consistency. All gates will include bottom and top hinge protection. All gate ground holes for ground holes to include steel tube inserts. Three types of manual gates are proposed, which are summarised below:

Single Gate

Height	2400mm (above ground)
Access Width	1200mm
Total Gate Width	1460mm
Box Sections of Posts	80 x 80mm
Gate Hanging Side	Right Hand Slider Leaf (From Outside Looking In)
Thickness of Wires	[Horizontal: 8mm] [Vertical: 6mm]
Material	Pre-Galvanised Steel (PPC Green)

5 Metre Gate

Height	2400mm (above ground)
Access Width	5000mm
Total Gate Width	5400mm

Box Sections of Posts	100 x 100mm
Gate Hanging Side	Right Hand Slider Leaf (From Outside Looking In)
Thickness of Wires	[Horizontal: 8mm] [Vertical: 6mm]
Material	Pre-Galvanised Steel (PPC Green)

10 Metre Gate

Height	2400mm (above ground)
Access Width	10000mm
Total Gate Width	10600mm
Box Sections of Posts	200 x 200mm
Gate Hanging Side	Right Hand Slider Leaf (From Outside Looking In)
Thickness of Wires	[Horizontal: 8mm] [Vertical: 6mm]
Material	Pre-Galvanised Steel (PPC Green)

The details of the automated gates are summarised in the accompanying 'Specification of Automated Gates'.

The proposed fence posts along Longlands Lane will be placed into the gravel road rather than within the fields/greenfield land. A road width of 3.5m will be retained. There will be no adverse impact on the function of Longlands Lane as a public right of way.

Planning Policy Context

The Development Plan for the site comprises the NPTCBC Local Development Plan (LDP) and Future Wales: The National Plan 2040. Other planning policy and non-statutory documents of relevance include Planning Policy Wales (Edition 12) and its associated Technical Advice Notes (TANs).

NPTCBC LDP (2011-2026)

A review of NPTCBC's proposals maps shows that the site is located in the following areas:

- Existing Employment Area – Tata Steelworks, Port Talbot (Policy EC2/11).
- Safeguarding Minerals Area (Policy M1).
- Coastal Corridor Strategy Area (Policy SP5).

The NPTCBC LDP seeks to promote public safety, health, and well-being. This is highlighted in both the LDP objectives and associated planning policy around design and amenity. The key policies relating to the application are summarised below.

- **Policy EC2: Existing Employment Areas** seeks to protect 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. It is also worth noting that the LDP recognises the importance of Port Talbot Steelworks as one of the largest employers in the region.
- **Policy M1: Development in Mineral Safeguarding Areas** confirms that development proposals within mineral safeguarding areas will only be permitted in a number of limited circumstances. This includes temporary development proposals where the development can be implemented, and the site restored within the timescale that the mineral is likely to be needed and where the scale and location of the development would have no significant impact on the possible working of the resource.
- **Policy SP5: Development in the Coastal Corridor Strategy Area** promotes sustainable growth and development in the Coastal Corridor Strategy Areas.
- **Policy TR2: Design and Access of New Development** sets out criteria for new development to comply with. This includes requiring new developments to not comprise the safe, effective and efficient use of the highway network.
- **Policy BE1: Design** sets out design criteria for all development proposals to meet. This includes requiring proposals to respect the context of the site and its place within the local landscape; utilise materials appropriate to its surroundings; not have a significant adverse impact on highway safety and the amenity of local occupiers; and create attractive and safe places.

Future Wales: The National Plan 2040

The National Plan acknowledges the urgent actions and changes in behaviour that were introduced in response to the Covid-19 pandemic and how they will emerge as permanent features of life. It is a development plan with a strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, achieving decarbonisation and climate-resilience, developing strong ecosystems and improving the health and well-being of our communities.

Planning Policy Wales (PPW) (Edition 12)

Community safety is a key theme interwoven throughout PPW. At Paragraph 3.11, it states:

“Local authorities are under a legal obligation to consider the need to prevent and reduce crime and disorder in all decisions that they take. Crime prevention and fear of crime are social considerations to which regard should be given in the preparation of development plans and taking planning decisions. The aim should be to produce safe environments that do not compromise on design quality in accordance with the cohesive communities well-being goal.”

Technical Advice Note (TAN) 12 (March 2016)

TAN 12 provides advice on design considerations and states that local planning policies and guidance should promote development which encourage community safety and accessibility.

Planning Assessment

Principle of Development

The site is located within settlement boundary and forms part of the wider Tata Steelworks Existing Employment Area under Policy EC2/11 of the LDP, which is recognised as one of the largest employers in the region. The proposed fencing and gate system serves an essential safety and operational function for Tata Steel. The proposed fencing and gates seek to protect this significant employment site and surrounding areas in the event of industrial unrest/protest, targeted at the Steelworks.

In line with policy objectives to support existing employment areas and safety (namely, Policies EC2, TR2 and BE1 of the LDP, and PPW and TAN12), it is considered that the principle of the proposed new perimeter fencing and access gates is acceptable. This was also confirmed via informal pre-application discussions with NPTCBC's Planning Officers on 21 March 2024.

Design

The design of the proposal has been very carefully considered by Tata Steel and delivers the security specification required for the site. Green weld mesh fencing and access gates in RAL 6005 conforms with the existing provision in this area. This detail is informally agreed with officers at the Council. It balances the safety requirements with the need to utilise materials and colours appropriate to its surrounding context, in accordance with Policy BE1 of the LDP. The design of the proposed fence is both appropriate and policy compliant.

Amenity

As there are no residential properties found within close proximity of the application site, the proposals would not have a detrimental impact on neighbouring amenity.

Ecology / Trees

The applicant has been working closely with an ecologist at RSK to ensure that no habitats are adversely impacted by the proposal.

RSK's desktop survey of the site established that there is an outlier badger sett located circa 990m from the site. It is important to ensure that badgers can continue to migrate between the sett and the adjacent Margam Moors SSSI to the east. The proposed fence ensures this will be the case through the inclusion of badger access point wherever a field boundary intersects the fence along Longlands Lane. The access gate will be a steel plate lined gap in the fence with a minimum of 225mm in diameter, as specified by the ecologist.

The posts will be installed into the gravel road rather than the fields/greenfield land. No trees will be removed or adversely affected by the proposed development. The proposal will not have any adverse effects on the surrounding biodiversity of the area, including any habitats or protected species.

Conclusions

This application seeks full planning permission for the installation of perimeter fencing and access gates on land at Port Talbot Steel Works, Port Talbot.

The proposed fencing and gate system serves an essential safety and operational need for Tata Steel. It responds appropriately to the ongoing risk of industrial unrest/protest targeted at the Steelworks. The proposal complies with prevailing development plan policy. The positive health and safety benefits of the proposal weigh heavy in favour of granting planning permission for the proposed development.

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

Mared Jones

Planner