

29 September 2025

Via Planning Portal Wales (Ref. PP-14146810)

Ref: TATT3020

Geraint Roberts,
Planning Services,
Planning and Economic Regeneration,
Newport City Council,
Newport,
NP20 4UR

Dear Geraint,

**TOWN AND COUNTRY PLANNING (GENERAL PERMITTED DEVELOPMENT) ORDER 1995 SCHEDULE 2 PART 31 –
APPLICATION FOR PRIOR NOTIFICATION FOR THE PLANNED DEMOLITION OF THE HOT MILL AND ASSOCIATED
EQUIPMENT AND INFRASTRUCTURE ON LAND AT LLANWERN STEELWORKS, LLANWERN, NEWPORT, NP19 4QZ**

On behalf of our client, Tata Steel UK Ltd ('Tata Steel'), we are pleased to enclose an application for prior notification for the demolition of the Hot Mill structure along with associated equipment and infrastructure on land at Llanwern Steelworks, Llanwern, Newport.

The application has been submitted via Planning Portal Wales (PP-14146810) and comprises the documentation set out in the table below.

Document/Plan	Author	Reference/Date
Prior Notification of Demolition Form	Turley	PP-14146810
Site Notice	Turley	September 2025
This Covering Letter	Turley	September 2025
Site Location Plan	Tata Steel	0000.60.20.00.033 Rev.B
Preliminary Ecological Appraisal	RSK Biocensus	2486598-D03 (01)
Bat Emergence Survey Report	RSK Biocensus	2486598-D05 (02)
Preliminary Roost Assessment and Bat Hibernation Survey of the Motor Room	RSK Biocensus	2486598-D01 (00)
Breeding Bird Report	RSK Biocensus	2486598-D02 (01)
HRA Screening Report	RSK Biocensus	2486598-D04 (01)
Summary of Ecological Assessments	RSK Biocensus	2486598-D06 (02)

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Demolition Method Statement (DMS)	Haywood Crushing Demolition Ltd	September 2025
Construction Phase Plan (CPP)	Haywood Crushing Demolition Ltd	September 2025
Demolition Environmental Mitigation Plan (DEMP)	Haywood Crushing Demolition Ltd	September 2025
Project Hazard and Risk Register Report	Haywood Crushing Demolition Ltd	September 2025
Project Quality Plan	Haywood Crushing Demolition Ltd	September 2025
Asbestos Summary Note	Tata Steel	September 2025
Existing Site Layout Plan with Building Names	Tata Steel	September 2025
Demolition Phasing Plan	Haywood Crushing Demolition Ltd	September 2025
Traffic Management Plan	Tata Steel	September 2025
Egress/Access Plan	Tata Steel	September 2025

The requisite planning application fee of £100.00 will be paid direct to Newport City Council via BACS.

SITE DESCRIPTION AND BACKGROUND CONTEXT

The planned demolition works comprise the Hot Mill structure at Llanwern Steelworks, along with its associated equipment and infrastructure. The subject site is located to the western side of the Llanwern Steelworks site, as indicated on the below plan (Figure 1).

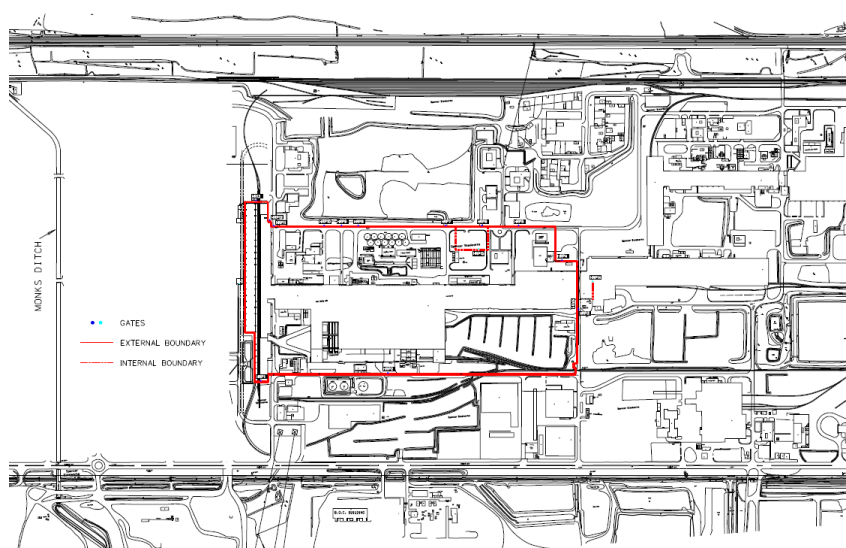


Figure 1: Site Location Plan

The existing Hot Mill buildings, concrete mezzanines, steel-framed structures and associated infrastructure are no longer in operation having been mothballed for a number of years. These structures have deteriorated over time and

are surplus to Tata Steel's operational requirements. While the wider Llanwern works continue to operate 24/7, the Hot Mill itself is currently non-operational and is now subject to demolition.

The Hot Mill is a large, purpose-built steel processing facility that historically formed a central part of the steelwork's operation. It includes an extensive network of heavy structural steel frames, reinforced concrete bases, plant rooms, processing bays, reheat furnaces, rolling equipment and associated pipework. The facility spans multiple levels (including basement levels) and contains a significant amount of mechanical and electrical infrastructure. For ease of reference, a plan is included at Appendix A which sets out the names of the different parts of the building/structures to be demolished (and the adjoining area).

PROPOSED DEMOLITION

Part 31, Schedule 2 of the Town and Country Planning (General Permitted Development Order 1995 as amended) ("GDPO") confirms that the demolition of an existing building may be classified as permitted development, providing that the developer applies to the local planning authority for consideration of whether the prior approval of the authority is required for the method of demolition and any proposed restoration of the site. This application provides the required "prior notification" of demolition as required by the GDPO.

The proposed demolition is essential for improving site safety, reducing ongoing maintenance liabilities and enabling future redevelopment opportunities. The clearance of the site will facilitate the preparation of the land for future use in alignment with Tata Steel's long-term site strategy and regeneration objectives. To clarify, any future regeneration plans for this part of the site will be addressed through a separate planning application (as required).

The planned demolition works involve the removal of the following elements:

- Steel-framed structures
- Internal mezzanine floor
- Above-ground concrete bases
- Other ancillary structures and equipment

Prior to the commencement of demolition works, soft stripping and the removal of all equipment, machinery, and storage tanks will be undertaken.

There are several structures within the redline boundary that accommodate electrical substations/infrastructure, including:

- B25- S1 Sub Station
- B26 - S2 Sub Station
- B29 – Slab Mill Motor Room
- B29A - S33 Sub Station
- B28 B- Slabbing Mill Transformer Pens 2
- B28 C- Slabbing Mill Transformer Pens 3
- B28 D Slabbing Mill Transformer Pens 4

- B11- S34 Sub Station
- B8 - S47 Sub Station
- B4B - S69 Sub Station
- B28 A - S70 Sub Station
- Natural Gas Pipeline
- Cable Tunnels
- Natural Gas PRS Under Ground
- Natural Gas PRS Above Ground

These structures will not be demolished as part of the works.

Following the completion of demolition activities, the site will be left in a safe, clean, and level condition. All basements and below-ground voids will be infilled with site-won crushed hardcore (6F2), placed in compacted layers to ensure a stable and level surface. In addition, two existing settlement ponds will be infilled.

The proposed demolition works are expected to be phased as follows:

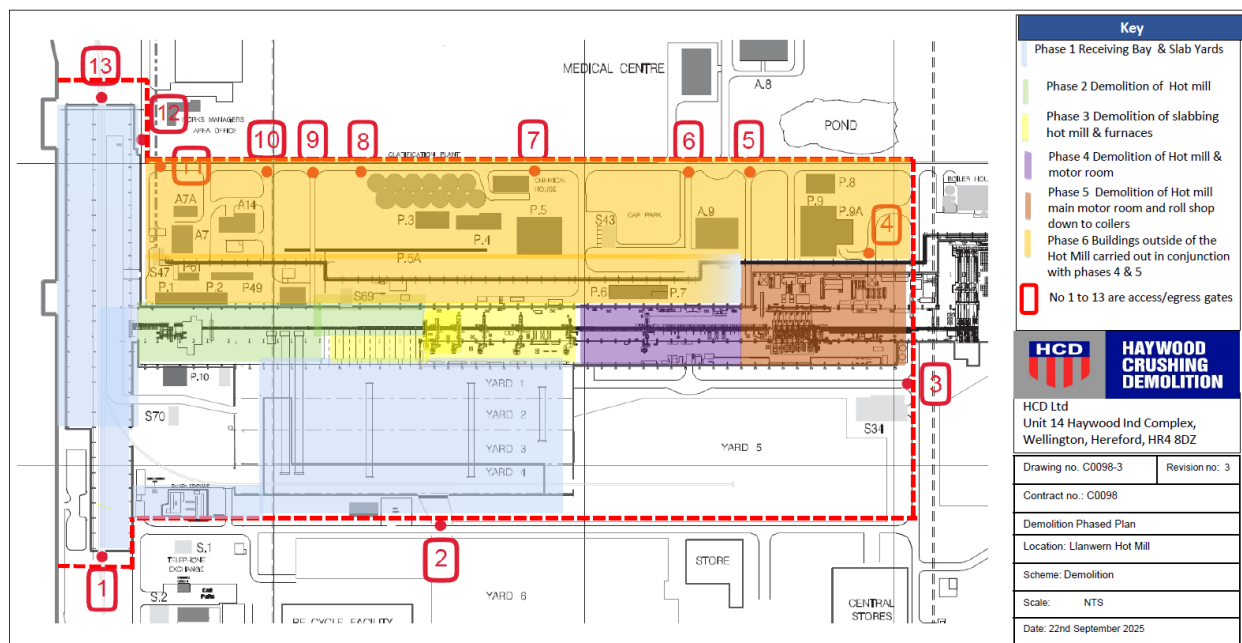


Figure 2: Phasing Plan

Phase 1:

- Start slab discharge receiving bay and slab yard leaving stripper bay as screen between adjacent industrial buildings to the west and TATA for security.
- Clearance of slabbing mill motor room including asbestos removal
- Clearance of main motor room ready for asbestos removal

- Asbestos removal when clear of remaining items
- Removal of rollers and equipment throughout the mill (loose items)
- Removal of outer pipe work north of mill including outside cranes.
- Soft Strip main mill, continue other areas

Phase 2:

- Demolition of Hot mill
- Asbestos removal from slabbing mill to end of reheat furnaces (back of Main Motor room.
- Clearance of basement (loose items) below Main motor room and across the mill
- Environment clean starting at the top and work down into cellars(tanks)
- Soft strip

Phase 3:

- Demolition of slabbing hot mill area and Re Heat Furnaces
- Further asbestos removal down towards the rolling mills
- Demolition of main motor room
- Demolition of structure past the reheat furnaces down to rolling mills

Phase 4:

- Demolition of Hot mill
- Further asbestos removal down to main mill Roll shop
- Further demolition of motor room.
- Demolition of outer buildings

Phase 5:

- Crushing of hardcore ongoing throughout each phase
- Demolition of Hot mill and roll shop down to coilers
- Demolition of all Outer Buildings
- Completion of demolition of main structure

PROPOSED DEMOLITION METHOD

The planned demolition works will be carried out by Haywood Crushing Demolition (HCD), an experienced contractor specialising in controlled industrial demolition. Full details of the demolition approach are set out in the various demolition reports prepared to support the application (including the Demolition Method Statement, Demolition Phasing Plan, Environmental Mitigation Plan and Project Hazard and Risk Register Report). These documents cover a range of key information including:

- Project specifics such as location, scope, phasing, duration and site constraints
- Health and safety controls, resources, site permits and emergency procedures
- Specific activity plans addressing asbestos removal, structural dismantling and waste management
- Environmental mitigation measures targeting noise, dust and vibration

All works will comply with Tata Steel's strict health, safety, and environmental standards, particularly concerning the management of dust, noise, asbestos and other hazardous materials. Prior to commencement, a detailed risk assessment will be completed, informed by comprehensive surveys to identify and safely manage all hazardous materials.

The demolition programme is phased and expected to last approximately 3 years following site establishment. Working hours are planned between 07:00 and 19:00 Monday to Friday, 07:00 and 18:00 on Saturdays and 08:00-16:00 on Sundays, maximising productivity during daylight while managing noise impacts. It should be noted that the demolition works will take place within an operational steel works, which will continue to operate on a 24 hour basis.

As outlined in Table 1 below, particularly noisy activities - such as demolition using an excavator with a hammer attachment - will be restricted to core weekday hours only. This approach has been designed to reduce noise disruption during evenings and weekends while allowing less intensive tasks to proceed during those times.

Task Description	Core Hours*	Evenings and weekends*	Public Holidays**
Demolition with Excavator with shears attachment	X	X	
Demolition with Excavator with hammer attachment	X		
Demolition with Excavator without hammer attachment	X	X	

Table 1: Planned Working Hours

*07:00 – 19:00 Monday – Friday; 07:00 – 19:00 Saturday; 08:00 – 16:00 Sunday

** No work on Public Holidays

Work to be undertaken in a live 24/7 working steel plant

No works outside the permitted hours will be undertaken without the permission of the local planning authority

Demolition plant and equipment will be operated exclusively by certified and experienced personnel holding CPCS or IPAF qualifications. Key equipment includes excavators, Mobile Elevated Work Platforms (MEWPs), dust suppression systems such as water mist cannons, and crushing machinery for recycling demolition materials on site.

The following environmental mitigation measures will be implemented throughout the project:

- **Dust** - soft stripping of structures before mechanical demolition, targeted use of water cannons and continuous monitoring to ensure airborne dust is minimised. Operations will pause if dust thresholds are exceeded.
- **Noise** - preference for hydraulic munchers over impact breakers to reduce noise and vibration, fitting vehicles with broadband “white noise” reversing alarms, and minimising reversing movements wherever possible. Noise levels at the site boundary will be maintained below 70 dB(A) (Leq 10 hours) in compliance with relevant consents.
- **Vibration** - low-vibration working methods, suitable plant selection, and restricted working hours for sensitive operations, monitored in accordance with BS 5228 standards.

Tata Steel will record and respond promptly to any complaints related to dust or noise, ensuring that mitigation measures are reviewed and adjusted as necessary. The contractors will wear appropriate personal protective equipment (PPE) during any activity. A comprehensive suite of emergency procedures is included in the accompanying demolition reports.

All complaints will be handled in accordance with the Tata Steel Complaints Standard, which defines a transparent and accountable process. HCD staff are trained to record and escalate any complaints received and will support investigations as required.

ECOLOGY

A number of ecology surveys have been carried out and accompany the application. A summary of each report is provided below. All recommended mitigation measures outlined within these reports will be adhered to in full.

Preliminary Ecological Appraisal

- While no notable plant species were found, the site offers potential habitat for nesting birds, roosting bats, and (to a lesser extent) reptiles.
- Surveys confirmed the presence of roosting bats and breeding birds within buildings. As such, demolition works must be timed and managed to avoid disturbance. An European Protected Species Bat Mitigation Licence will be required from Natural Resources Wales (NRW), with strict adherence to the licensed method statement (see below for further detail). Ecological supervision is recommended during building dismantling, vegetation clearance, and waterbody drain-down.
- It is considered low risk that reptiles are present due to the isolation of the grassland and lack of connectivity to suitable habitat in the wider area.
- A Habitats Regulations Assessment is recommended to assess potential impacts on nearby European sites. This has now been completed and is addressed below.

Breeding Bird Report

- Surveys recorded 13 bird species, including six protected or notable species. Significant numbers of nesting gulls (approx. 219 herring and lesser black-backed) were observed on the Hot Mill building. A pair of peregrine falcons, a Schedule 1 protected species, were also recorded using a nesting site on the building’s northern side.
- As all wild birds and their nests are protected under the Wildlife and Countryside Act 1981, demolition works must be carefully timed and managed. Mitigation measures, including alternative nesting provisions (e.g. nest boxes or platforms on nearby undisturbed structures), are recommended.

- Mitigation proposals will include the timing of works and use of deterrents, such as flying kites and hawks.

Bat Activity Survey

- Of the 33 buildings that were assessed, nine have confirmed bat roosts, with several others offering low to moderate potential. Surveys conducted in 2025 (including emergence, dawn, and static monitoring) confirmed small numbers of lesser horseshoe, common pipistrelle, and brown long-eared bats roosting on-site.
- Demolition will result in the loss of seven confirmed roosting buildings, including parts of the former Hot Mill. As bats and their roosts are legally protected, a Bat Mitigation Licence from NRW will be required prior to relevant work starting. An outline mitigation strategy has been developed to ensure compliance and maintain the favourable conservation status of bat species present. This mitigation strategy will form the method statement for the licence. The licence application will be submitted alongside the prior notification application.
- As part of the mitigation strategy, Building B16, which lies outside the CDM boundary and is not within this scheme of demolition, will be enhanced in the interim (prior to its later demolition) to support roosting bats. Measures to B16 include boarding up windows, installing external bat boxes, and improving internal access. Additional bat boxes will also be placed on nearby trees to provide further roosting opportunities. The enhancements to B16 will provide interim mitigation measures to enable the demolition of the hot mill. Medium/ long-term mitigation measures will be agreed as part of the future regeneration and redevelopment of the wider site. This will be dealt with at the appropriate time through an amendment to the NRW licence or through a new licence in due course.
- Additional surveys are scheduled for 2026 on buildings not due for demolition until 2027/28, where no evidence of bats was previously recorded.
- Pre-demolition activities, such as equipment removal from within the Hot Mill, will proceed under ecologist supervision, provided roost risk areas are checked in advance, and the works do not present a risk of disturbance or harm to bats.

Habitats Regulations Assessment (HRA)

- The assessment considered potential impacts on four internationally designated sites within 10 km of the site: the Severn Estuary SAC, SPA, and Ramsar Site, and the River Usk SAC.
- The screening concluded that the demolition works are unlikely to result in significant effects on any of these sites, either alone or in combination with other plans or projects.

SITE ACCESS AND TRAFFIC MANAGEMENT

HCD will ensure safe, unobstructed access to the operational areas of the steelworks throughout the duration of the demolition works. Access to the remaining Tata Steel facilities will be maintained at all times, and site activities, including deliveries, will be carefully managed to avoid any disruption to Tata Steel's internal road network or ongoing operations.

All deliveries will be pre-arranged with Tata Steel's security team and booked a minimum of 24 hours in advance. The Site Manager will liaise directly with the Plant Manager regarding any large or abnormal loads to ensure coordination with Tata Steel's operational requirements and to prevent disruption to either party.

Deliveries will be guided by the Site Traffic Management Plan (please see Figure 2 below), which outlines designated access routes and unloading areas. All unloading will take place within designated site compounds, fully segregated

from other personnel to eliminate risk. A banksman will be present for all delivery operations to oversee vehicle movements and ensure safety, particularly during reversing and unloading.

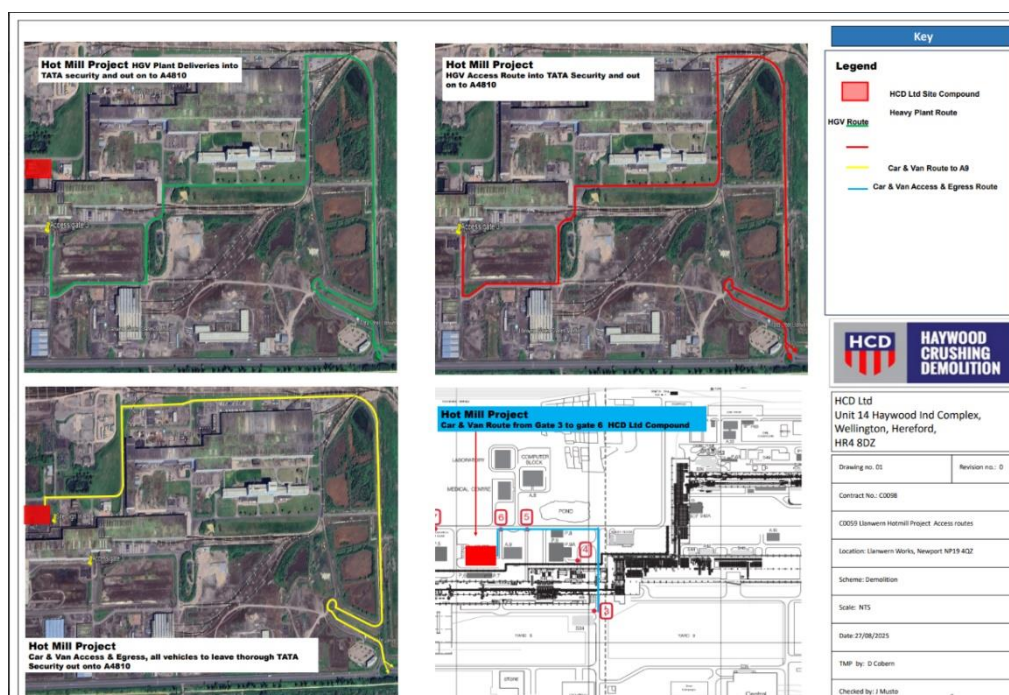


Figure 3: Traffic Management Plan

Access to the HCD working area will be via Tata Steel's existing main security gate, with vehicles following the approved traffic routes outlined in the Traffic Management Plan. No mechanical plant or vehicles will be permitted to leave the designated, fenced-off working area. HCD will also maintain protection measures for the access road adjacent to the Hot Mill and will enforce a strict 'no reversing' policy unless under the supervision of a banksman.

HCD and its subcontractors will manage on-site movements to ensure the safety of both pedestrians and vehicles. The Traffic and Logistics Management Plan will coordinate all traffic activity, with designated access/egress points and clearly marked vehicle and pedestrian routes shown on the Project Layout Plan. Where practicable, pedestrian routes will be segregated from vehicular traffic to enhance safety.

All site users, including personnel, delivery drivers, and visitors, will follow the designated traffic routes and comply with all on-site signage. Drivers must observe Tata Steel's site traffic rules, the Highway Code, and the 10-mph speed limit within the CDM area. Extra care must be taken near pedestrian zones, active plant, and shared access areas.

All suppliers will receive a copy of the Delivery Driver Project Rules and the Project Plan, which must be issued to their drivers prior to delivering materials to site.

DRAINAGE

The Llanwern steel works (including the Hot Mill) benefits from long established existing foul and surface water drainage systems serving the site. These systems will continue to be in operation and fully maintained by Tata Steel throughout the duration of these demolition works.

The wider steel works site is drained by an existing network of ditches that surround the site and feed into a private pumped drainage system operated by Tata Steel. The wider steel works is ringed by a double interception ditch system, which prevents lateral migration of water from the site reaching the water features of the Site of Scientific Interest (SSSI) to the south.

The site also benefits from an existing private foul drainage system. This comprises a reed bed treatment facility, following which the treated water is pumped to the Severn. This system will continue to be operational and fully maintained throughout these demolition works.

Suitable welfare facilities will be provided for all personnel whilst they are on site. HCD will use existing facilities within the site during the duration of the demolition works, which will provide kitchen/canteen, internal showers, drying rooms, offices and numerous toilets.

Prior to demolition, all identified drums containing chemicals, waste grease, and oils will be removed and stored separately in an agreed, ventilated, and quarantined area inside the building. Sealed containers will be placed on a concrete floor, while open containers will be stored on spill pallets. These items will then be categorised in preparation for removal.

Any other unidentified items, if sealed, will be taken outside and stockpiled on an impermeable surface for categorisation by a qualified person. All unused oil tanks within the hot mill will be emptied into tankers.

Once all materials have been identified and categorised, they will be removed off-site by a registered waste carrier and taken to an appropriately registered facility for recycling or disposal.

SERVICES

All buildings and structures to be retained/live are located adjacent to the Hot Mill Building, which is scheduled for demolition. Prior to commencement of demolition activities, any electrical cables or services passing through the proposed demolition zone will be identified, isolated, or rerouted as necessary. A Decommissioning Certificate will be issued to the demolition contractor confirming the completion of all isolation and service disconnection works. The following measures will be implemented:

- During the soft stripping/removal of equipment local electrical supplies for lights and cranes will remain on but everything else will be isolated / cut at source and decommissioning permits put in place
- All gas supplies within the Hot Mill will be isolated/capped with a physical break/disconnection after the isolation point
- All water supplies will be isolated/capped with a physical break/disconnection after the isolation point
- All hydraulics will be isolated electrically and checked to ensure de-pressurised (systems have been off since 2015), tanks drained of oil
- All pneumatics will be isolated with a physical break/disconnection after the isolation point and permits put in place
- Prior to any demolition all electrical supplies to that part/area of plan will be isolated/cut at source and decommissioning permits put in place.

The Demolition Contractor shall carry out a detailed risk assessment of the works and prepare a comprehensive mitigation plan to ensure the demolition of the Hot Mill Building and any associated structures can proceed without risk or impact to the adjacent live buildings and retained structures. All protective measures and demolition activities must be conducted in accordance with the method statements, relevant safety standards, and local regulations.

WASTE

All waste materials will be removed from site by HCD using a licensed waste carrier, in full compliance with all relevant waste management regulations. Where applicable, Duty of Care Waste Transfer Notes and Consignment Notes for hazardous waste will be completed and retained.

Each waste transfer will be documented with a Waste Transfer Note detailing the waste carrier's name, type and quantity of waste, vehicle registration, carrier licence number and the final disposal location.

Waste will be segregated on site into suitable streams, including brick, concrete, and metal. Concrete and hardcore will be processed and crushed in designated laydown areas to produce reusable material, while metals will be prepared for recycling using mechanical processing equipment. HCD will implement a "Load Safe" policy to ensure safe loading, unloading, and material handling procedures.

Hazardous substances, including chemicals, oils, greases, and waste drums, will be:

- Removed and temporarily stored in a dedicated, ventilated, quarantined area within the building
- Sealed containers stored on concrete; open containers on spill pallets
- Unidentified but sealed items will be moved to an external impermeable surface for categorisation by a qualified person
- Waste oils will be transferred from unused tanks to tankers for off-site disposal
- All hazardous items will be removed from site by a registered carrier and transported to a licensed waste facility, in accordance with COSHH regulations and best practice guidance.

ASBESTOS

A fully intrusive survey has been carried out to identify any asbestos in relation to the work being undertaken. Where licensed asbestos is identified, an appropriate contractor (licensed by the HSE) will be appointed for its removal. The contractor undertaking the works will be expected to allow for appropriate removal methodologies for the asbestos materials on the site.

A full and heavy air monitoring regime is to be implemented during the asbestos removal process with 4 stage clearance testing certifications to be undertaken by an independent UKAS approved laboratory. Where unlicensed asbestos is identified, this will be removed by trained operatives from HCD (in compliance with the Asbestos Regulations 2012).

EXCLUSION ZONES

Whilst the site sits within a secure steel works, which is not publicly accessible, the demolition area will be fully be fully enclosed within a ring-fenced CDM area, with Heras fencing used to define internal work package boundaries. Access gates will be secured when not in use and clearly signed with emergency and safety information. Only inducted and authorised personnel will be allowed on site, with visitor escort protocols in place.

All mechanical demolition operations will take place within clearly defined exclusion zones, set up in accordance with BS 6187:2011 – Code of Practice for Demolition. These zones are critical for maintaining safe distances between operatives and machinery. They will:

- Be implemented prior to each demolition activity
- Be managed and monitored by the Site Manager or designated Work Area Supervisor
- Include active supervision from banksmen, positioned outside the exclusion zone but within the CDM boundary
- Use two-way radios for safe coordination and communication

Access to these zones will be restricted to essential personnel only. All plant, including MEWPs and demolition rigs, will operate exclusively within these areas. Rescue plans and emergency procedures will be in place for all high-risk operations involving mobile plant.

POST-DEMOLITION

Following the completion of demolition activities, the site will be left in a safe, clean, and level condition. All basements and below-ground voids will be infilled with site-won crushed hardcore (6F2), placed in compacted layers to ensure a stable and level surface suitable for any future development.

Any proposed future use of the site will be addressed separately and, where required, will be subject to a separate planning application(s).

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

This application demonstrates that the proposed demolition accords with the Town and Country Planning (General Permitted Development) Order 1995 (as amended). The demolition will be completed in a safe and controlled manner and will not give rise to any adverse impacts. The DMS sets out the safety measures and procedures that will be followed to manage and avoid potential detrimental impacts.

We look forward to receiving notice that the application has been registered. Please do not hesitate to contact us should you have any queries.

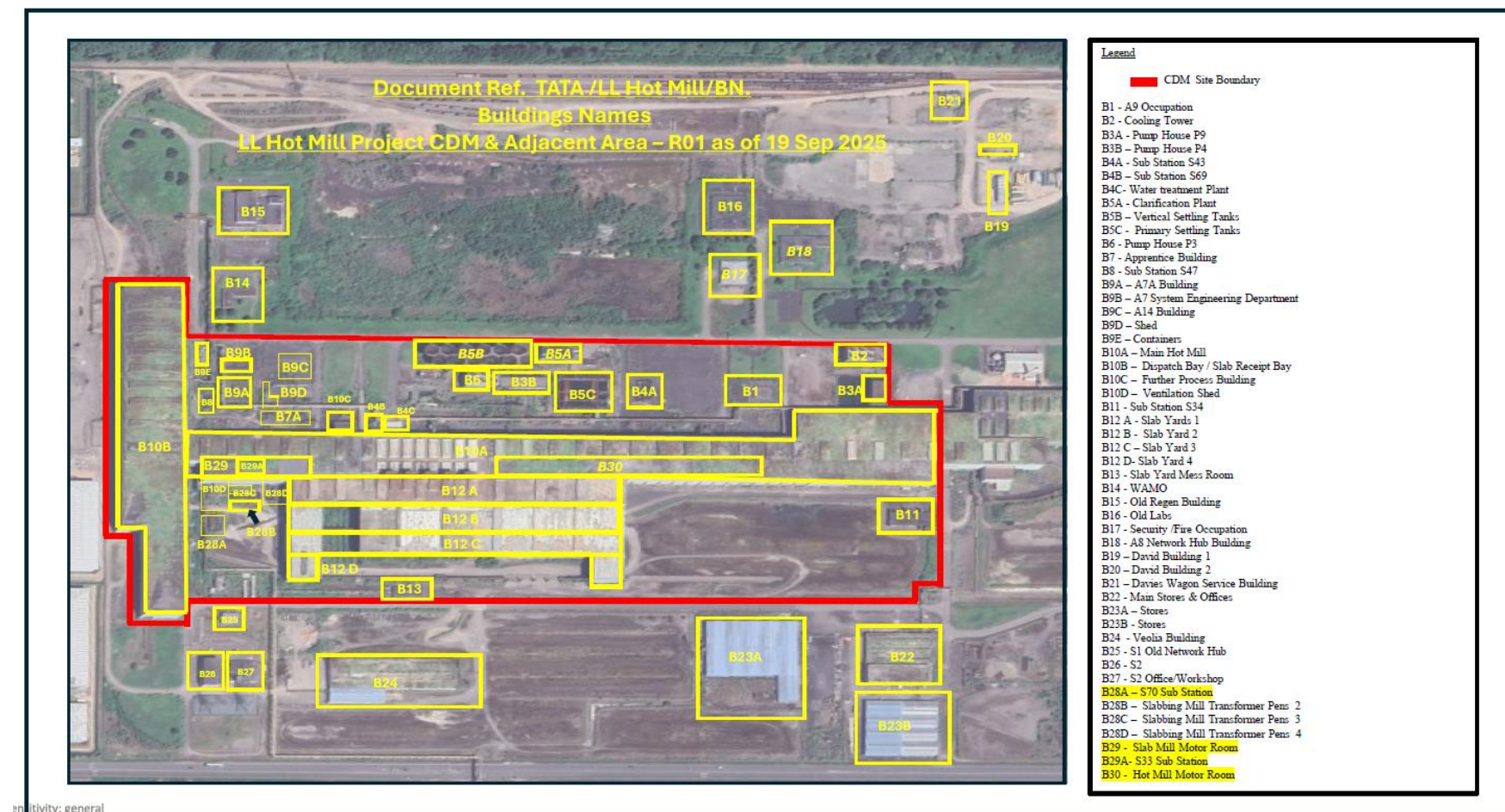
Yours sincerely

M. Jones

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Senior Planner

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Appendix A: Existing Site Layout Plan with Building Names



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