

Our Ref: 5277/SJH

11 September 2026

Development Management
Neath Port Talbot County Borough Council
Civic Centre
Port Talbot
SA13 1PJ

By email only: planning@npt.gov.uk

Dear Sir or Madam,

APPLICATION TO DISCHARGE CONDITIONS 5, 10, 11, 14 AND 22 ATTACHED TO PLANNING PERMISSION REFERENCE: P2022/0517.

Axis, on behalf of our client Alerion UK Limited (hereafter referred to as 'Alerion'), apply to fully discharge Conditions 05, 10, 11, 14 and 22 attached to the planning permission referenced P2022/0517 as per the above.

This application consists of the following:

- i. This Covering Letter;
- ii. Application Form;
- iii. Site Location Plan;
- iv. Site Plan;
- v. Construction Environmental Management Plan (Flood Risk and Drainage Statement Appended);
- vi. Highways Dilapidation Survey; and
- vii. Bat Monitoring Survey.

The submitted documents as listed above, have been submitted electronically as separate items on the Planning Portal under reference PP-14772285. Due to planning portal size requirements, the Highways Dilapidation Survey has been submitted via email to the case officer.

Background

Planning permission was granted by Neath Port Talbot County Borough Council on 4 April 2023 to Pennant Walters (FoelT) Limited under the reference P2022/0517 for the following:

“Amendment to the plans referred to in condition 3 of planning permission reference P2014/0825 to allow for approval of revised plans for the development. The revised plans include increases in rotor diameter of five turbines (T5, T6, T9, T10 and T11) up to 133m and increase in rotor diameter up to 117m of three turbines (T1, T2 and T8) with no increase in overall turbine height. The number of turbines to be constructed will be reduced from 11 to 8 (turbines T3, T4, and T7 removed)”.

A suite of conditions were attached to the Decision Notice, that are required to be discharged at varying stages of the development timeline. Alerion has purchased the right to implement the planning permission from the previous developer, and as such, is in the process of facilitating the discharge of all pre-commencement planning conditions.

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To avoid any ambiguity, this application seeks to fully discharge Condition 05, Condition 10, Condition 11, Condition 14 and Condition 22, which is required prior to commencement of the development. The conditions sought to be discharged are outlined below.

Conditions 05, 10 and 11

In order to discharge Conditions 05, 10 and 11, a Construction Environmental Management Plan (CEMP) has been prepared and submitted to the Local Planning Authority for approval. The CEMP has been developed to satisfy the requirements of Condition 05 and incorporates the Construction Method Statement required by Condition 10. In addition, to address the requirements of Condition 11, a Flood Risk and Drainage Strategy has been appended to the CEMP.

For the avoidance of doubt, Condition 05 is replicated below:

“No development shall take place, including vegetation clearance, until such time as a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority. The CEMP shall provide full details of the works to be undertaken including the construction timetable, details of the means of avoidance and inter alia, mitigation of any impacts on species and habitats as set out in table 9.12 in the Environmental Statement, and the pollution prevention measures to be implemented during the site preparation and construction phases of the development. The CEMP shall be implemented as approved.”

The submitted CEMP provides comprehensive details of the proposed preliminary and main construction phases, including the construction programme, methods of working, pollution prevention measures, and mitigation proposals for sensitive ecological and environmental receptors located within and adjacent to the Site. The document has been prepared to demonstrate compliance with all elements of Condition 05.

The CEMP has also been structured to fulfil the requirements of Condition 10, which requires the submission of a Construction Method Statement addressing a range of construction management matters. For completeness, the wording of Condition 10 is reproduced below:

“No development shall commence until a Construction Method Statement has been submitted to and approved in writing by the Local Planning Authority. The construction of the development shall only be carried out in accordance with the approved Statement. The statement shall be implemented and maintained for the duration of the construction works and shall address the following matters:

- a) A full drainage scheme for the management of surface water. This shall detail both the temporary and permanent drainage strategy and include details of the hydraulic calculations to control flow rates and detail measures to be implemented.*
- b) Details of the timing of the works and methods of working for cable trenches and foundation works*
- c) Disposal of surplus material*
- d) The construction of the access into the site and the creation and maintenance of the visibility splays and to include temporary speed reduction measures in the vicinity of the site access*
- e) Wheel cleaning facilities*
- f) Arrangements for keeping the site entrance and adjacent public highway clean.*
- g) All activities associated with the construction of the development shall be carried out in accordance with British Standard 5228, 2009: Code of Practice for Noise and Vibration Control on Construction and Open Sites -Part 1 -Noise, Part 2 - Vibration.*
- h) A scheme for the protection and conservation of soil at the site in order to prevent pollution of the water environment. The scheme shall include the pollution prevention techniques to be deployed during the construction and restoration phase.*

- i) *Details of the timing of works and methods of working for cable trenches and foundation works.*
- j) *Details of the timing of works and construction of construction compound and substation*
- k) *Dust management.*
- l) *A construction noise management plan (including identification of access routes, locations of material lay-down areas, details of equipment to be employed, operations to be carried out, mitigation measures and a scheme for the monitoring of noise).*
- m) *Temporary site illumination.*
- n) *Post-construction restoration and reinstatement of the working areas including removal of construction equipment and the construction compound.*
- o) *Details of any proposed temporary site compounds for storage of materials, machinery and operative/visitor parking within the site, to include the siting of temporary buildings and all means of enclosure and oil/fuel and chemical storage.*
- p) *Details of the method of borrow pit working including means of extraction, handling, storage and re use of soil, drainage control and restoration.*
- q) *A scheme for recycling/disposing of waste resulting from construction works.*
- r) *Arrangements to prevent wildlife becoming trapped in excavation works.*
- s) *Programme of works*
- t) *Working site speed limit*
- u) *Hours of working on site”.*

The CEMP incorporates the Construction Method Statement and addresses each of the matters listed under Condition 10 (items a–u), including surface water drainage, construction methodologies, traffic and access arrangements, pollution prevention, noise and dust management, ecological protection, waste management, temporary site facilities, restoration proposals, the programme of works, site speed limits and hours of operation.

Accordingly, the submitted CEMP provides a single, integrated document that demonstrates compliance with the full requirements of Condition 10.

Finally, the CEMP has been prepared to address the requirements of Condition 11. To ensure compliance, a Flood Risk and Drainage Strategy has been appended to the CEMP, setting out the temporary and permanent drainage arrangements and associated flood risk management measures that will be implemented during the construction and operational phases of the development. The submitted information should therefore be read alongside the CEMP in demonstrating compliance with the requirements of Condition 11, the wording of which has been replicated below:

“No development shall commence until a surface water drainage strategy has been implemented in accordance with details that shall first have been submitted to and approved in writing by the local planning authority. Before these details are submitted, an assessment shall be carried out of the potential for disposing of surface water by means of a sustainable drainage system in accordance with the principles set out in Appendix 4 of TAN 15 (or any subsequent version), and the results of the assessment provided to the local planning authority. The drainage strategy shall include:

- a) Information about the design storm period and intensity, the method employed to delay and control the surface water discharged from the site and the measures taken to prevent pollution of the receiving groundwater and / or surface waters;*
- b) A timetable for its implementation;*
- c) Provide a management and maintenance plan for the lifetime of the development; and*
- d) Additional information identified within item 9 of the further Environmental Information dated June 2019”.*

Condition 14

For the avoidance of doubt, Condition 14 has been replicated below:

“No development shall commence until a dilapidation survey of the proposed route(s) (the scope and type to be first agreed by the local Planning Authority in consultation with Bridgend CBC) shall be carried out by the developers and submitted to and agreed in writing by the Local Planning Authority. A further survey shall be undertaken within two months of removal of all temporary works on the site and any damage to the highway identified as being due to the increased volume of construction vehicles shall be repaired by the developer in accordance with a scheme to be agreed in writing within the Local Planning Authority”.

The submitted Highways Dilapidation Survey provides a record of the existing condition of proposed construction and Abnormal Indivisible Load (AIL) route network prior to the commencement of construction activities. The survey establishes a baseline condition of the highway environment which any potential future deterioration or damage attributable to construction traffic and abnormal loads may be assessed. The Survey documents the existing conditions identified at each defined point of interest, supported by photographic records, together with a general assessment of the intervening sections of the primary route and the entirety of the secondary route to provide a continuous baseline record of highways conditions at the time of survey.

The submitted survey sets out the methodology utilised in the production of the final report, and the final result, alongside the accompanying evidence. The survey results are intended to provide a baseline record of highway conditions for comparison following completion of construction activities and associated AIL movements, including any required reinstatement works in line with the wording of Condition 14.

Condition 22

For the avoidance of doubt, Condition 22 has been replicated below:

“No development hereby granted planning permission shall occur until the following has been submitted to and approved in writing by the Local Planning Authority:

- a) A detailed programme of ongoing, post-construction monitoring of bat injuries, fatalities and activity at the site, covering all turbine locations and spring, summer and autumn in each monitoring year. The detailed monitoring programme shall include:*
 - Methods for data gathering and analysis (to include use of specially trained dogs for carcass searches, static detector bat activity monitoring linked to SCADA systems within the turbines;*
 - Location of monitoring;*
 - Timing and duration of monitoring;*
 - Appropriate persons and equipment to carry out monitoring;*
 - Timing and format for presenting and dissemination of monitoring results including submission to all data relevant databases;*
 - Contingency prescriptions that will be carried out in the event of failure to undertake required surveillance; AND*
- b) A detailed curtailment plan, which shall be fully implemented, if on-going monitoring (as required by a. above) identifies anything other than a low risk to bat species at moderate or high risk of collision with wind turbines; And*
- c) Confirmation of a commitment to the use of wind turbines with SCADA systems to effect any curtailment plan which may be required.*

The monitoring programme and any required curtailment shall be carried out in accordance with the approved details, within the agreed timescales”.

The submitted Bat Monitoring Strategy has been produced so that it addresses the wording of Condition 22 set out in the decision notice. The Bat Monitoring Strategy has been produced in order to demonstrate a consistent, transparent and standardised approach to the bat survey methodologies used for post-construction bat monitoring for the development. It sets out the baseline, monitoring and proposed curtailment plan for the proposed development. The proposed curtailment plan addresses the approach, the parameters and the proposed review strategy for curtailment.

We trust that the content of this letter and the application documents are self-explanatory and allow for the discharge of Condition 5, Condition 10, Condition 11, Condition 14 and Condition 22 of planning permission reference P2022/0517.

However, please do not hesitate to contact the undersigned should you have any queries or require any further information.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Steve Harding', with a stylized, cursive script.

Steve Harding

Associate Director on behalf of Axis