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3rd November 2025

fao. Planning
address. Civic Centre,
Neath,
Neath Port Talbot,
SA11 3QZ

Dear Sir / Madam,

LAND OFF THE PRINCESS MARGARET WAY, PORT TALBOT, SA12 6FA

APPLICATION TO DISCHARGE CONDITIONS 3 AND 4 PURSUANT TO PLANNING PERMISSION REF. P2025/0214

We are instructed by Studt's Events (the Applicant) to submit an application for approval of details reserved by conditions pursuant to planning permission ref. P2025/0214.

This letter outlines the detail submitted in support of this application with reference to the following conditions:

- Condition 3 – Noise Management Plan; and
- Condition 4 – Odour Management Plan.

The necessary, and supporting, information has been uploaded and submitted through Planning Portal to discharge the above Conditions. The information submitted in support of this application has been detailed below for reference.

- Noise (prepared by Aether Acoustics);
 - Noise Impact Assessment (including Noise Management Plan);
- Odour (prepared by Air Quality Consultants Ltd); and
 - Odour Management Plan.

Noise Management Plan

Condition 3

The wording of condition 3 reads as follows:

"Within 3 months of the date of this permission, a Noise Management Plan completed by a suitably qualified acoustic specialist shall be submitted to and approved in writing by the local planning authority. The submitted Noise Management Plan shall assess the cumulative impact of the fairground and Ferris Wheel seasonal events, including all associated fairground rides, concessions, generators and amplified sound equipment and include any proposed mitigation measures. The approved details shall be fully implemented on site prior to the start of each seasonal event. The site layout shall demonstrate the application of the approved details, including the noise mitigation measures, and should alterations to the site layout be undertaken a revised Noise Management Plan shall be submitted to and approved in writing by Local Planning Authority."

Reason: To protect the amenity of the locality in accordance with Policy EN8 of the Neath Port Talbot County Borough Council Local Development Plan (2011-2026) Adopted January 2016."

Summary of Submission Information

As per the wording of the condition, the following document has been prepared by Aether Acoustics in support of this application:

- Noise Impact Assessment.

As set out within Section 1 (Introduction) of the Noise Impact Assessment, the acoustic assessment undertaken covers the following:

- The results of a baseline noise survey in the vicinity of the nearest dwellings, as well as nearfield measurements of operational fairground rides and generators;
- Criteria for acceptable noise levels inside and outside noise sensitive receptors, based on recognised guidance;
- Assessment of noise levels affecting the nearest dwellings in the context of recognised guidance; and
- A discussion of the potential noise impact of the fairground for the proposed daytime operating periods, along with mitigation recommendations and a noise management plan.

First and foremost, it should be noted that a procedure for logging and responding to complaints was in place throughout the first season of operation. During this time there were no noise complaints received. As such, it is considered that the noise management plan will only increase, and enhance, the noise management measures that are already in place.

Section 4.3 (Noise Impact Summary) of the Noise Impact Assessment sets out the following points in respect to the noise assessment:

- *"In terms of commercial noise sources (BS 4142), the fairground operation will not significantly exceed the BSL during typical 1-hour daytime periods. Relocation of generator lorries (further SW / towards sea) and / or screening by other large vehicles will help further reduce any potential impact."*
- *"While noise from rides and amplified music / sound effects may be perceptible at the nearest dwellings, adoption of the noise mitigation strategies recommended below would minimise any subjective impact."*

Section 4.4 (Noise Management Recommendations) then sets out the noise control strategies which will be employed during the next operating season, all of which will minimise any potential impact. These noise control strategies are discussed in detail below.

- *"Mounting loudspeakers to face away from dwellings wherever possible."*

The Noise Impact Assessment notes that some of the PA speakers were facing directly towards off-site residences. These speakers will be repositioned during the next operating season to minimise any potential impact.

- *"Mount loudspeakers at lower height above ground and / or point speakers directly at patrons (which would enable lower output volume levels)."*
- *Localised screening (lined Heras fencing) around Bouncer ride."*

As set out within the Noise Impact Assessment, 2m high Heras fencing lined with nom.9-12mm thickness timber sheathing will be placed in front of the ride to visually screen the nearest dwellings and reduce noise propagation from the compressed air source at the base of the ride.

- *"Reorient / relocate rides if feasible "*
- *"Relocate generator lorries if feasible and / or screen behind other lorries."*

The Noise Impact Assessment also sets out that reorienting rides so that the loudspeaker array faces the sea, along with relocated generator lorries, would help reduce noise impact. As such, both the loudspeaker array and generators will be reoriented / relocated during the next operating season.

As suggested within the Noise Management Plan, and as set out above, a procedure for logging and responding to complaints was in place throughout the first season of operation. During this time there were no noise complaints received. As such, it is considered that the measures set out above will only enhance the measures currently in place.

In light of the above, and the submitted supporting documentation, it is considered that the Noise Management Plan would minimise any potential noise impacts, and condition 3 can be discharged accordingly.

Odour Management Plan

Condition 4

The wording of condition 4 reads:

"Within 3 months of the date of this permission, an Odour Management Plan for all relevant food concessions to be accommodated on the site in association with either the Fairground or Ferris Wheel seasonal events, shall be submitted to and approved in writing by the Local Planning Authority. The approved details shall be fully implemented on site for the duration of each seasonal event. Should the proposed food concessions feature alternative vendors, then a revised Odour Management Plan shall be submitted to and approved in writing by the Local Planning Authority."

Reason: To protect the amenity of the locality in accordance with Policy EN8 of the Neath Port Talbot County Borough Council Local Development Plan (2011-2026) Adopted January 2016."

Summary of Submission Information

As per the requirements of the condition, the following document has been prepared by Air Quality Consultants Ltd:

- Odour Management Plan.

As set out within Section 1 (Introduction) of the Odour Management Plan (OMP), the OMP outlines methods by which the Operator will systematically assess, reduce, and, where possible, prevent potentially odorous emissions from the food and drink concession stands on site. It also identifies nearby sensitive receptors and sets out appropriate mitigation measures to minimise the risk of odour impacts during the operation of food concessions.

The OMP sets out that *"The main odours associated with the concession stands include those associated with grilling and frying activities, using vegetable oils. These activities are expected to generate odours primarily through the release of cooking fumes and vapours, with potential for fugitive emissions to atmosphere. Each concession stand is fitted with an extractor fan, which operates during cooking hours to assist in the dispersion of odorous emissions."*

The OMP continues by stating that *"Although cooking will take place in open or semi-enclosed setups, rather than sealed systems, the odours generated from grilling or frying are typical of food preparation. The presence of extractor fans helps to reduce the intensity of emissions. Given the nature of the cuisine, the temporary outdoor setting, and the limited duration of operation, fugitive emissions are expected to be small-scale and of moderate to low offensiveness."*

As stated above, the fugitive emissions are expected to be small-scale and of moderate to low offensiveness. Section 3 (Odour Control Measures and Best Practice) of the OMP sets out good management practices that will help to ensure that odour impacts from the site are kept to a minimum, with Table 3-1 (Good Management Practice Measures) providing a summary of the good practice measures that will be implemented during the next operating season. An extract of Table 3-1 can be seen overleaf for reference.

Management Area	Good Practice Measure
Staff Training	All staff should be made aware of the requirements of the OMP and trained in good housekeeping practices. This includes understanding how cooking activities may contribute to the odour emissions and ensuring extractor fans are operating effectively during food preparation. The Site Operator is responsible for ensuring these measures are implemented.
Operational Hours and Scheduling	Cooking activities are limited to specific periods of operation, as permitted by the planning approval. This restriction on operational days and hours helps to manage the overall duration of odour emissions and supports effective control measures.
Complaint Procedure	A trained member of staff should be available to respond to any odour-related complaints. Complaints should be formally recorded and investigated, with appropriate remedial action taken. If a complaint is received, a boundary odour check should be undertaken.
Records and Review	Records of extractor fan maintenance, staff training, and any odour-related complaints should be kept in the OMP. An annual review of the OMP should be undertaken, or earlier if complaints are received or operational changes are proposed.
Odour Surveys	Regular odour surveys should be undertaken by a designated employee/ the Site Operator to monitor potential odour emissions. These surveys should include boundary sniff testing, during operational hours, following the procedure, and using the form, set out in Appendix A4. If any odour incidents or complaints occur, the frequency of surveys should be increased to daily until the issue is resolved. All findings should be recorded and used to inform ongoing odour management practices.
Contingency Odour Controls	Should odour complaints arise, the operator will assess the cause and evaluate the feasibility of installing supplementary odour control measures, such as carbon filters or UV systems. Where complaints are substantiated and odour impacts are deemed significant, appropriate mitigation measures will be implemented.
Maintenance Programme	Cleaning and maintenance of extractor fans and cooking equipment should be pre-planned where possible to avoid disruption during operational hours. While odour release during maintenance is expected to be minimal, care should be taken to ensure that works do not coincide with peak visitor periods. The Site Operator is responsible for ensuring cleaning and maintenance is carried out in line with manufacturer guidelines and that all equipment remains in good working order.
External Communications	If required, and prior to the commencement of operations, an inception meeting may be held with NPTCBC to address any concerns and provide relevant information regarding odour management and operational practices.

Table 3-1: Good Management Practice Measures

As set out above, the following measures will be employed by the site operator (the applicant) throughout the operating season:

- **Staff Training;**
 - All staff will be made aware of the requirements of the Odour Management Plan (OMP) and be trained in good housekeeping;
- **Operational Hours and Scheduling**
 - Cooking activities will be limited to the periods permitted by the approved planning permission;
- **Complaint Procedure;**
 - A trained member of staff will be available to respond to any odour related complaint, which will be formally recorded and investigated;
 - If any complaint is received, a boundary odour check will be undertaken. Remedial action and boundary odour checks will occur if complaints are received;
- **Records and Review;**
 - Records of extractor maintenance, staff training, and complaints will be kept in the OMP;
 - Annual reviews of the OMP will be undertaken, or sooner if complaints are received or operations are changed;
- **Odour Surveys;**
 - Regular odour surveys will be undertaken using the form set out within Appendix A4 of the OMP;

- Results of the survey will be recorded, and further surveys will be undertaken if odour issues arise. These surveys will take place until the issue is resolved.
- **Contingency Odour Controls;**
 - Should odour complaints arise, the operator will assess the cause and evaluate the feasibility of installing supplementary control measures;
 - Should it be necessary, appropriate mitigation measures will be implemented;
- **Maintenance Programme;**
 - Cleaning and maintenance of extractor fans and cooking equipment will be pre-planned where possible; and
 - Care will be taken to ensure that works do not coincide with peak visitor periods.

Section 4 (Odour Incidents) of the OMP considers the potential for accidents that would result in the loss of effective management of odorous substances and could have short-term impact on the local community.

Table 4-1 (Odour Incident Measures) sets out the events that may lead to a higher risk of odour, along with additional measures to be implemented during these events. An extract of table 4-1 (Odour Incident Measures) can be seen below for reference:

Potential Incident	Description of Incident	Measure
Extractor Fan Failure	A mechanical fault or power issue results in extractor fans not operating during cooking hours, leading to increased odour emissions (due to reduced dispersion capability).	The Site Operator will ensure extractor fans are regularly cleaned and maintained in line with manufacturer guidelines to minimise the risk of failure. In the event of a breakdown, cooking activities should be reduced or paused until the issue is resolved. If odour complaints are received, a boundary sniff test should be undertaken and recorded. Any complaints should be logged and investigated using the Complaint Record Form (Appendix A5).

Table 4-1: Odour Incident Measures

Before every operating season the site operator (the applicant) ensures that all extractor fans are fully operational, and continues to review and maintain all extractor fans throughout the operating season. Notwithstanding this, the following measures will be implemented during the operating season to enhance, and maintain, the odour management strategy.

- Extractor fans will be regularly cleaned and maintained in line with manufacturer guidelines to minimise the risk of failure;
- In the event of a breakdown, cooking activities will be reduced or paused until the issue is resolved; and
- If odour complaints are received, a boundary sniff test will be undertaken and recorded. All complaints will be logged and investigated using the Complaint Record Form (Appendix A5 of the OMP).

In light of the above, and as demonstrated within the submitted Odour Management Plan, it is considered that all odours generated from the site can, and are, managed appropriately. As such, it is considered that Condition 4 (Odour Management Plan) can be discharged accordingly.

Conclusion

It is considered that the information provided above, and in the documents referenced, enables the discharge of Conditions 3 and 4 of application ref. P2025/0214. for the site in question.

As such, in light of the above, and the enclosed, we trust that this is all sufficient and understood at this stage, and look forward to hearing from us as soon as possible with such confirmation. Should however you have any queries or require anything further then please do not hesitate to contact me.

Yours sincerely,



Geraint John
Director
Geraint John Planning Ltd.