

Geraint John

tel. 02920 105361

mob. 07531 324 325

email. geraint@gjplanning.co.uk

web. gjplanning.co.uk

address. Office 2, House 3,
1st Floor, The Maltings East
Tyndall Street, Cardiff CF24 5EA

26th May 2026

fao. Planning

address. Civic Centre,
Port Talbot,
Neath Port Talbot.
SA13 1PJ

Dear Sir / Madam,

DISCHARGE OF CONDITIONS APPLICATION

Unit D, North Bank Road, Port Talbot, SA13 1RE

Conditions 3, 4, 6, 8, 11, 12, 13 and 14 of Planning Application Reference: P2024/0212 - *'Proposed Construction of Industrial Building to Site Class 7 Test Centre for Vans and Cars and Lease Remaining Units for B2 and B8 Use'*

The following application, submitted on behalf of 'PTB Properties Ltd', sets out the context and justification in respect of Conditions 3, 4, 6, 8, 11, 12, 13 and 14 imposed on the permission ref. P2024/0212.

This application has been submitted via the Planning Portal under reference PP-14390051.

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

- Condition 3 (Construction Method Statement);
- Condition 4 (Construction Environmental Management Plan);
- Condition 6 (Contamination Assessment);
- Condition 8 (Landscaping and Planting Works);
- Condition 11 (Cycle Storage and Parking);
- Condition 12 (EV Charging); and
- Condition 13 (Refuse and Recycling Strategy); and
- Condition 14 (Ecological Walkover Survey).

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.

- Construction Method Statement (prepared by GJP);
- Construction Environmental Management Plan (prepared by GJP);
- Tier 2 Geotechnical and Geoenvironmental Report (prepared by Terra Firma);
- Landscaping (prepared by TDA);
 - Detailed Soft Landscape Proposals;
 - Landscape Specification & Management Plan;
- Proposed Block Plan 03 Rev D (prepared by GBA); and
- Pre-commencement Otter Survey (prepared by Wyndrush Wild).

Condition 3: Construction Method Statement

Condition 3 of planning permission reference P2024/0212 reads as follows:

"No development shall commence, including any works of demolition, until a Construction Method Statement has been submitted to and approved in writing by the Local Planning Authority. The approved statement shall be adhered to throughout the construction period. The statement shall provide for:

- a) the parking of vehicles of site operatives and visitors.*
- b) loading and unloading of plant and materials.*
- c) storage of plant and materials used in constructing the development.*
- d) the erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate.*
- e) wheel washing facilities.*
- f) measures to control the emission of dust and dirt during demolition and construction; and*
- g) a scheme for recycling/disposing of waste resulting from demolition and construction works.*

Reason: In the interest of highway and pedestrian safety, the environment, and the amenity of residents, and to ensure accordance with Policies BE1 and TR2 of the adopted Neath Port Talbot Local Development Plan."

Summary of Submission Information

As per the requirements of the condition, a Construction Method Statement (CMS) has been prepared and submitted alongside this application. The requirements of the condition have been addressed in the following sections of the Statement.

- a) parking of vehicles– **outlined in Section 2;**
- b) loading and unloading– **outlined in Section 3;**
- c) storage of plant and materials – **outlined in Section 3;**
- d) the erection and maintenance of security hoarding – **outlined in Section 4;**
- e) wheel washing facilities – **outlined in Section 5;**
- f) measures to control the emission of dust and dirt – **outlined in Section 5; and**
- g) a scheme for recycling/disposing of waste – **outlined in Section 6.**

In light of the above, and the information contained within the supporting documents, it is considered that condition 3 can be discharged accordingly.

Condition 4: Construction Environmental Management Plan

The wording of condition 4 reads as follows:

"No development, including site clearance, shall commence until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority. The CEMP shall be made with reference to the requirements of British Standard BS5228-1:2009 – Code of practice for noise and vibration control on construction and open sites. The CEMP should include the following information:

- *Construction methods: details of the extent and phasing of development; details of construction materials or techniques to be used; details for the storage and management of plant and materials used in constructing the development*
- *General Site Management: details of the construction programme including timetable; details of site clearance; details of site construction drainage, containments areas, appropriately sized buffer zones*

between storage areas (of spoil, oils, fuels, concrete mixing and washing areas) and any watercourse or surface drain.

- *Biodiversity Management: details of tree and hedgerow protection; invasive species management; species and habitats protection, avoidance and mitigation measures.*
- *CEMP Masterplan: details of the extent and phasing of development; location of landscape and environmental resources; design proposals and objectives for integration and mitigation measures.*
- *Soil Management: testing of any imported or exported soils and materials, details of any topsoil strip, storage and amelioration for re-use.*
- *Control of Nuisances: Identification of the significant construction and demolition noise & vibration sources; details of physical and operational management controls necessary to mitigate noise & vibration emissions; details of dust & odour control measures and measures to control light spill and the conservation of dark skies.*
- *Resource Management: details of fuel and chemical storage and containment; details of waste generation and its management; details of water consumption, wastewater and energy use.*
- *Pollution Prevention: demonstrate how relevant Guidelines for Pollution Prevention and best practice will be implemented, including details of emergency spill procedures and incident response plan.*
- *Hours of working on site, including specified hours for deliveries; details of restrictions to be applied during construction and demolition works (including timing, duration and frequency of works) to prevent noise or nuisance amenity issues to surrounding properties;*
- *Responsible Persons: details of the persons and bodies responsible for activities associated with the CEMP and emergency contact details*
- *Landscape/ecological clerk of works to ensure construction compliance with approved plans and environmental regulations.*

The CEMP shall be implemented as approved throughout the site preparation and construction phases of the development.

Reason: In the interest of highway and pedestrian safety, the environment, and the amenity of neighbouring occupants, and to ensure accordance with Policies BE1, EN8 and TR2 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 4, a Construction Environmental Management Plan (CEMP) has been prepared and submitted alongside this application. The requirements of the condition have been addressed in the following sections of the Statement.

- Construction methods – **outlined in Section 5;**
- General Site Management – **outlined in Section 4;**
- Biodiversity Management – **outlined in Section 12;**
- CEMP Masterplan – **outlined in Section 12;**
- Soil Management – **outlined in Section 10;**
- Control of Nuisances – **outlined in Section 7;**
- Resource Management – **outlined in Section 5;**
- Pollution Prevention – **outlined in Section 11;**
- Hours of working on site – **outlined in Section 4;**
- Responsible Persons – **outlined in Section 14;** and
- Landscape/ecological clerk of works – **outlined in Section 12.**

Given that all of the above has been addressed within the supporting Construction Environmental Management Plan (CEMP), and has been submitted to the authority, it is considered that the information provided is satisfactory to enable the discharge of Condition 4.

Condition 6: Contamination Assessment

Condition 6 of planning permission reference P2024/0212 states:

"No development shall commence on site until an assessment of the nature and extent of contamination affecting the application site area has been submitted to and approved in writing by the Local Planning Authority. This assessment must be carried out by or under the direction of a suitably qualified competent person in accordance with BS10175 (2011) 'Investigation of Potentially Contaminated Sites Code of Practice' and shall assess any contamination on the site, whether or not it originates on the site. The report of the findings shall include:

- i) a desk top study to identify all previous uses at the site and potential contaminants associated with those uses and the impacts from those contaminants on land and controlled waters. The desk study shall establish a 'conceptual site model' (CSM) which identifies and assesses all identified potential source, pathway, and receptor linkages.*
- ii) an intrusive investigation to assess the extent, scale and nature of contamination which may be present, if identified as required by the desk top study.*
- iii) an assessment of the potential risks to:*
 - human health,*
 - groundwater and surface waters*
 - adjoining land,*
 - property (existing or proposed) including buildings, crops, livestock, pets, woodland and service lines and pipes, - ecological systems,*
 - archaeological sites and ancient monuments; and*
 - any other receptors identified at (i)*
- iv) an appraisal of remedial options, and justification for the preferred remedial option(s).'*

Reason: To ensure that information provided for the assessment of the risks from land contamination to the future users of the land, neighbouring land, controlled waters, property and ecological systems is sufficient to enable a proper assessment, and to ensure compliance with Policies SP16 and EN8 of the Neath Port Talbot Local Development Plan."

Summary of Submission Information

As detailed above, Condition 6 requires an assessment of the nature and extent of contamination affecting the application site area be submitted to the Local Planning Authority. As such, a Tier 2 Geotechnical and Geoenvironmental Report has been prepared by Terra Firma, setting out the following:

- Section 1: Introduction & Proposed Development;
- Section 2: Tier 1 Assessment;
- Section 3: Field Investigation;
- Section 4: Evaluation of Geoenvironmental Analytical Results;
- Section 5: Ground Gas Risk Assessment;
- Section 6: Generic Quantitative Risk Assessment;
- Section 7: Engineering Recommendations; and
- Section 8: Recommended Works.

The objectives of the Tier 2 Generic Quantitative Geoenvironmental Risk Assessment programme (as set out in Section 1 of the Report) were:

- To investigate the potential human health and environmental liabilities at the site associated with any contamination; and
- To provide a summary of the human health and environmental conditions at the site, together with any necessary further intrusive works and / or remediation works to render the site fit for its intended use.

The main objectives of the Geotechnical Site Investigation were:

- To investigate the type, strength and bearing characteristics of the shallow superficial and underlying solid geology;
- To provide engineering foundation and floor slab recommendations for the proposed development; and
- To provide recommendations regarding any other geotechnical aspects pertaining to the development.

In order to achieve the above objectives, Terra Firma carried out an assessment programme, a review of existing data, followed by a field investigation to collect geotechnical and geoenvironmental data from selected locations. The findings of the field investigation can be found within the supporting Report.

In light of the above, and the information contained within the supporting Report, it is considered that condition 6 can be discharged accordingly.

Condition 8: Landscaping and Planting Works

The wording of Condition 8 reads as follows:

"Following the eradication of Japanese knotweed on site and prior to any development works commencing on site as hereby permitted, a scheme of landscaping, which shall include details of both hard and soft landscape works (to include native shrub and tree planting), earthworks and a scheme for the planting of native floral species along the banks of the dock feeder bund, shall be submitted to, and approved in writing by, the Local Planning Authority. The scheme as approved shall be carried out in the first planting season following the completion of the development. Any trees, shrubs or plants that die within a period of five years from the completion of each development phase or are removed and/or become seriously damaged or diseased in that period, shall be replaced (and if necessary, continue to be replaced) in the first available planting season with others of similar size and species, unless the Local Planning Authority gives prior written permission for any variation.

Reason: To create a more diverse habitat onsite and improve the Net Biodiversity Benefits in accordance with Policy 9 of Future Wales: The National Plan 2040, Chapter 6 of Planning Policy Wales 12 (February 2024) and to accord with Policy SP15 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 8, the following documents have been prepared by 'TDA':

- Detailed Soft Landscape Proposals;
- Landscape Specification & Management Plan;

The document prepared sets out details of both hard and soft landscape works (including native shrub and tree planting), earthworks and a scheme for the planting of native floral species along the banks of the dock feeder. An extract of the proposed landscaping plan can be seen overleaf for reference.



Extract of Proposed Landscaping Scheme

Key			
	Proposed Tree Planting		Proposed Native Shrub Planting
	Proposed Native Understorey Planting		Proposed Native Groundcover
	Proposed Native Wildflower Planting		Proposed Native Rain Garden Planting

A planting schedule has been provided alongside the above landscaping proposals, and can be seen below for reference:

PLANT SCHEDULE

TREE PLANTING

ABBRV	SPECIES	DENSITY	HEIGHT/GIRTH	ROOT COND	POT SIZE	TOTAL
CI	Crataegus laevigata	AS SHOWN	14-16 (g)	RB	--	-
Hs	Hippophae salicifolia "Streetwise"	AS SHOWN	14-16 (g)	RB	--	-

NATIVE SHRUB, GRASS & PERENNIAL PLANTING

ABBRV	SPECIES	DENSITY	HEIGHT/GIRTH	ROOT COND	POT SIZE	TOTAL
Mc	Molinia caerulea	5 sqm	30 - 40 (h)	CON	2-3L	-
Ra	Ruscus aculeatus	4 sqm	40 - 60 (h)	CON	2-3L	-
Vo	Valeriana officinalis	6 sqm	30 - 40 (h)	CON	2-3L	-

NATIVE RAIN GARDEN PLANTING

ABBRV	SPECIES	ROOT COND.	POT SIZE	DENSITY	PERCENTAGE
Av	Aquilegia vulgaris	CON	2L	5 sqm	10%
Csa	Cornus sanguinea	CON	3L	3 sqm	10%
Car	Carex pseudocyperus	CON	3L	4 sqm	10%
Da	Dryopteris affinis	CON	3L	4 sqm	10%
Dc	Deschampsia cespitosa	CON	3L	4 sqm	10%
Euc	Eupatorium cannabinum	CON	3L	4 sqm	10%
Gp	Geranium pratense	CON	5L	5 sqm	10%
Hf	Helleborus foetidus	CON	5-7.5L	8 sqm	10%
LSA	Lythrum salicaria	CON	5-7.5L	8 sqm	10%
Pb	Persicaria bistorta	CON	3L	5 sqm	10%

Planted in random species groups of 3-5 with larger species located at the back of plant beds

NATIVE UNDERSTOREY PLANTING

ABBRV	SPP. & PERCENTAGE IN MIX	DENSITY	HEIGHT/GIRTH	ROOT COND	POT SIZE	TOTAL
AS KEY	Cornus sanguinea (15%)	1 per sqm	40 - 60 (h)	BARE ROOT	-	-
	Crataegus monogyna (20%)		40 - 60 (h)	BARE ROOT	-	-
	Euonymus europaeus (15%)		40 - 60 (h)	BARE ROOT	-	-
	Ilex aquifolium (20%)		40 - 60 (h)	CON	P9	-
	Prunus spinosa (10%)		40 - 60 (h)	BARE ROOT	-	-
	Rosa canina (10%)		40 - 60 (h)	BARE ROOT	-	-
	Viburnum opulus (10%)		40 - 60 (h)	BARE ROOT	-	-

Planted in random species groups of 3-5

NATIVE GROUND COVER PLANTING

ABBRV	SPECIES	DENSITY	HEIGHT/GIRTH	ROOT COND	POT SIZE	TOTAL
AS KEY	Hedera Helix	4 sqm	30 - 40 (h)	CON	2-3L	-

Proposed Planting Schedule

The proposed landscaping scheme is also supported by a Specification & Management Plan which sets out that all landscape works shall be implemented during the first planting season post practical completion. All works proposed will be carried out in accordance with BS4428:1989, Code for General Landscape Operations.

In light of the above, and the information submitted within the corresponding plans, it is considered that condition 8 can be discharged accordingly.

Condition 11: Cycle Storage and Parking

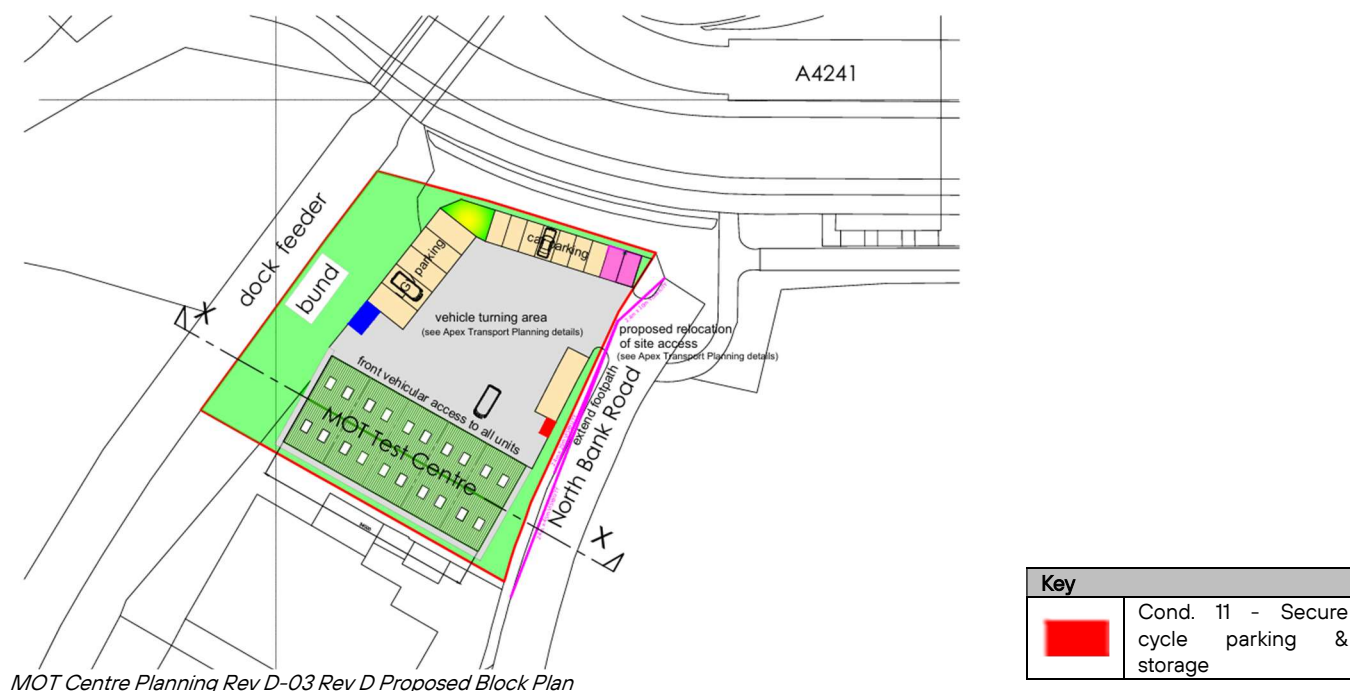
Condition 11 of planning permission reference P2024/0212 reads as follows:

"The development shall not be brought into beneficial occupation until facilities for the secure parking and storage of cycles have been provided in accordance with details which shall first have been submitted to and approved in writing by the Local Planning Authority. Thereafter the cycle parking spaces shall be retained and maintained as agreed and shall not be used for any other purpose."

Reason: To ensure that adequate provision is made for the sheltered and secure parking of cycles in accordance with Policies SP20 and TR2 of the Neath Port Talbot County Borough Council Local Development Plan (2011-2026) Adopted January 2016 and Supplementary Planning Guidance: Parking Standards (October 2016)."

Summary of Submission Information

As per the requirements of condition 11, the proposed Block Plan has been amended by 'Gerald Blain Associates' to demonstrate the proposed location for the secure parking and storage of cycles. An extract of the Block Plan can be seen below for reference:



Examples of the cycle storage and parking proposed on site can be seen overleaf for reference.



Cycle Parking Examples

As illustrated above, secure cycle parking will be provided in the form of Sheffield stands, constructed from durable stainless steel and installed on a level, hardstanding surface. The stands are arranged in a series to allow two bicycles per stand (one on each side), ensuring efficient use of space while maintaining ease of access. The layout provides clear and appropriate manoeuvring space for users and is positioned in a well-overlooked area to promote security.

In light of the above, it is considered that the information provided is satisfactory to enable the discharge of Condition 11.

Condition 12: EV Charging

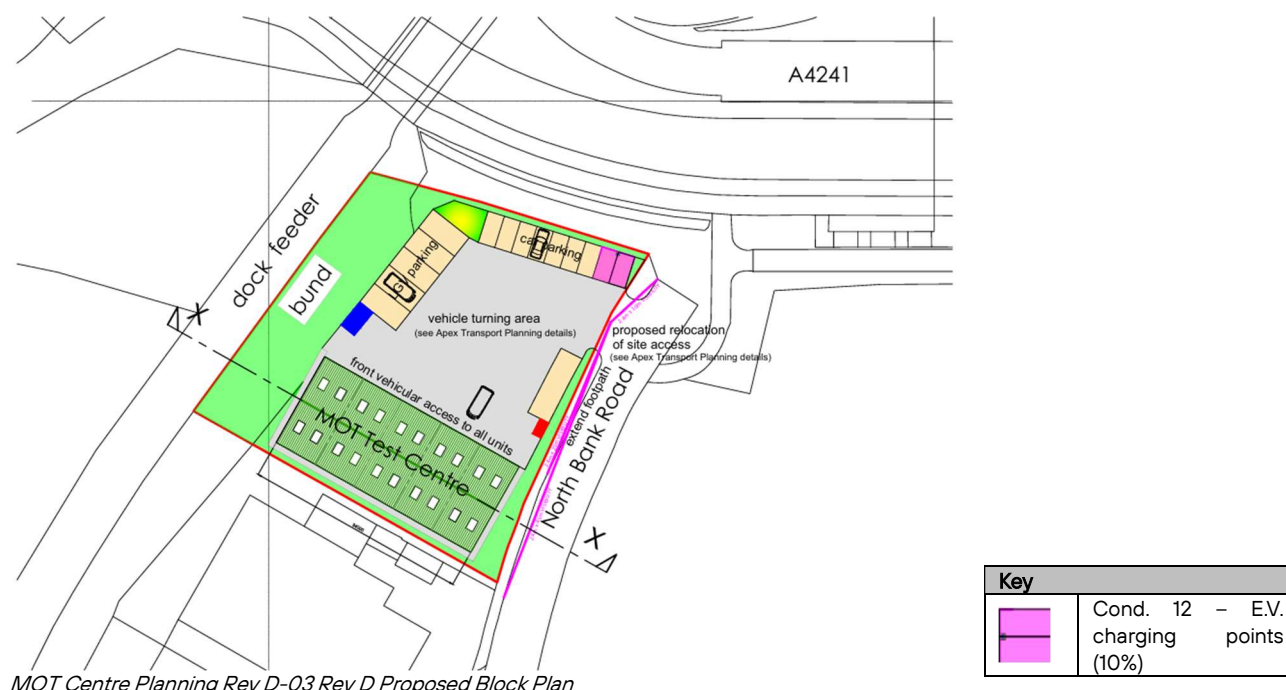
The wording of condition 2 reads as follows:

"Prior to the first beneficial occupation of the development hereby approved, a scheme shall be submitted to and approved in writing by the Local Planning Authority detailing the provision of Electric Vehicle (EV) Charging Points to serve the development. The scheme shall include a minimum of 10% of the overall spaces and shall also include details of how future electric charging points can be delivered. The scheme shall be fully implemented prior to occupation of the units in accordance with the agreed details and thereafter, EV charging facilities shall be retained and maintained for the beneficial use by occupants of the premises and their visitors and for no other purpose."

Reason: In the interests of meeting Welsh Governments Electric Vehicle charging strategy and action plan (2021), the objectives of Future Wales: The National Plan 2040, Planning Policy Wales 12 (February 2024), and policies BE1 and TR1 of the Neath Port Talbot Local Development Plan (2011-2026) adopted January 2016."

Summary of Submission Information

As per the requirements of the Condition 12, the proposed Block Plan has been amended by 'Gerald Blain Associates' to demonstrate the proposed location for the provision of EV Charging Points. An extract of the Block Plan can be seen overleaf for reference:



In line with current guidance, and as required by the condition, the proposals will incorporate electric vehicle charging at a rate of 10% of total parking spaces. The scheme will include dedicated EV charging bays equipped with fast chargers (typically 7–22 kW) positioned directly adjacent to the access to ensure convenient access for both staff and customers. The proposed layout ensures safe circulation within the car park / turning area, and maintains accessibility and manoeuvrability as per the approved layout.

All charging points will be installed in accordance with BS EN 61851 standards and will be compatible with a range of vehicles. The infrastructure will be future-proofed, with ducting and electrical capacity provided to allow for additional chargers should demand increase.

As set out above, the condition requires a scheme for the “provision of Electric Vehicle (EV) Charging Points” be submitted to the authority. As such, given the information provided above, it is considered that the condition 12 can be discharged accordingly.

Condition 13: Refuse and Recycling Strategy

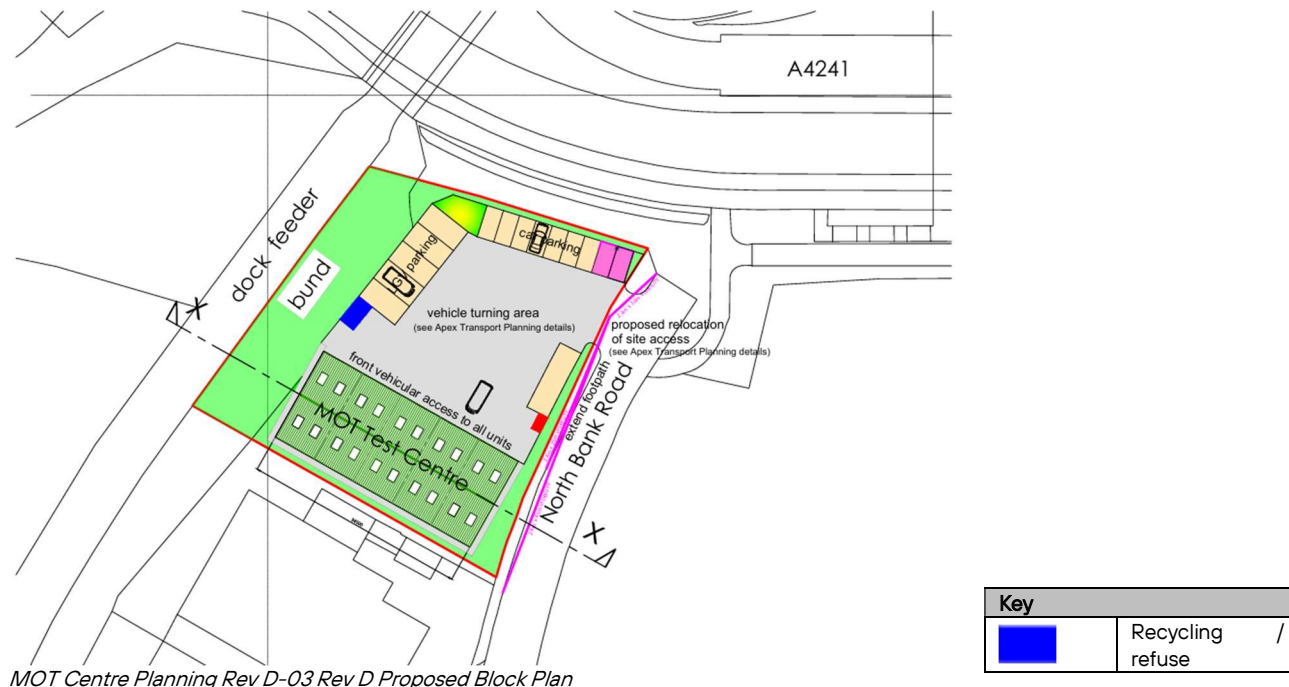
The wording of condition 13 reads as follows:

“Prior to first beneficial use of the development, a scheme detailing a refuse and recycling strategy shall be submitted to and approved in writing by the Local Planning Authority, including full details of bin storage provisions (inc. siting, design, and finishes), recycling point locations and collection details. The scheme, as approved, shall be implemented prior to occupation of the approved industrial units in accordance with the agreed details and retained as such thereafter.”

Reason: In the interest of safeguarding visual amenity, and to ensure adequate bin storage is provided for future residents to ensure compliance with Policy BE1 and EN8 of the Neath Port Talbot Local Development Plan (2011–2026), adopted January 2016.”

Summary of Submission Information

As per the requirements of condition 13, the proposed Block Plan has been amended by 'Gerald Blain Associates' to demonstrate the proposed location for refuse and recycling. An extract of the Block Plan can be seen below for reference:



Further to the above, the following sets out a comprehensive refuse and recycling strategy to support the operation of the proposed development. The strategy ensures that waste is managed safely, efficiently, and in accordance with waste-management requirements and good practice.

Waste and Capacity Provision

The development will generate a combination of general commercial waste and recyclable materials. Each unit will be provided with dedicated containers for:

- General residual waste;
- Mixed dry recyclables (paper, cardboard, plastics, cans);
- Glass recycling (if required by tenant operations); and
- Any operational waste specific to the occupier, to be managed in accordance with statutory requirements.

Bin capacities will be sized to reflect the anticipated operational needs of each unit, with flexibility to increase provision depending on tenant requirements.

Bin Storage Areas

Dedicated bin storage areas will be provided within the site (as demonstrated above), and will:

- Be easily accessible to occupiers for day-to-day use;
- Be screened from public viewpoints using;
- Use durable, low-maintenance materials;
- Provide hardstanding surfaces suitable for manoeuvring and cleaning; and
- Ensure clear separation between waste storage and operational/parking areas.

The storage areas are positioned to avoid conflict with vehicle movements associated with the proposed development.

Siting and Design

The bin stores will be located in discreet but practical positions adjacent to the test centre, ensuring:

- Short, unobstructed routes for transporting waste;
- Safe access for collection vehicles without reversing into parking areas;
- No obstruction to parking, turning, or site operations; and
- Compliance with fire-safety separation distances.

The store will be finished in neutral, industrial-appropriate colours (e.g., grey or green) to minimise visual impact.

Collection Arrangements

Waste and recycling will be collected by a licensed commercial waste contractor. Given the location of the refuse and recycling areas, the following arrangements will be available to the contractor:

- Collection vehicles can enter and exit the site in a forward gear;
- Adequate turning space is provided within the service yard;
- Bins can be presented for collection without obstructing access or manoeuvrability; and
- Collection frequencies can be adjusted depending on operational needs etc.

Management and Ongoing Compliance

The above measures will be:

- Implemented prior to occupation; and
- Maintained and enhanced over the lifetime of the development to ensure that the facilities and process operate effectively and efficiently.

As requested by the condition, the above sets out a scheme detailing a refuse and recycling strategy, and therefore, given the detail provided above, it is considered that condition 13 can be discharged accordingly.

Condition 14: Ecological Walkover Survey

Condition 14 reads as follows:

"Prior to any site clearance or development commencing on-site, an ecological walkover survey should be undertaken by an appropriately competent person (e.g. an ecological clerk of works or on-site ecologist) to ensure there are no otters resting in the area. The findings of this survey shall be finalised and submitted to the Councils Senior Countryside and Wildlife Officer.

Reason: To ensure that ecological surveys to investigate for the presence of otters is overseen by an appropriately competent ecologist to ensure the development complies with Policy EN7 of the Neath Port Talbot Local Development Plan."

Summary of Submission Information

As per the requirements of the Condition 14, a thorough site inspection was made by Wyndrush Wild in September 2025. The aims of the survey were to:

- Check for the physical presence of otters;
- Locate and describe any otter protected sites (breeding and resting sites) and feeding sites;
- Identify likely impacts of the proposal on otters or badgers; and
- Identify potential mitigation measures.

The summary and conclusions of the report sets out that while otters may use the river for commuting and foraging, there were no signs of otters found on the site. A single possible resting place was found (as shown by the extract below), but this lies outside of the proposed development area / clearance zone.



Boundary of Survey Area and Location of Single Possible Resting Place

In light of the above, the survey report confirms that the proposed construction work is unlikely to impact negatively on otters, and no EPS license is required. That said, Reasonable Avoidance Measures have been suggested, and will be fully implemented during the construction and operational phases of the development.

As detailed above, condition 14 sets out that *"an ecological walkover survey should be undertaken by an appropriately competent person"* and be submitted to the authority. Given the information submitted and findings set out within the relevant report, it is considered that condition 14 can be discharged accordingly.

Conclusion

It is considered that the information provided in the referenced documents satisfies Conditions 3, 4, 6, 8, 11, 12, 13 and 14. As such, the Applicant respectfully contends that the application is acceptable, and the conditions ought to be discharged.

The relevant information / documentation has been uploaded via the Planning Portal (PP-14390051), and the requisite fee of £333 has been paid under a separate cover.

We look forward to hearing from you in due course once you have had opportunity to review and consider the submission. As previously discussed, we would be more than prepared to discuss and/or supplement any aspect of the submission if it is unclear and / or requires further information.

Yours sincerely,



Geraint John
Director
Geraint John Planning Ltd.