

**PROPOSED HOLIDAY LODGES, VALE OF NEATH, LAND BETWEEN
TONNA AND RESOLVEN, NEATH PORT TALBOT**

TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT)

(ENGLAND AND WALES)

REQUEST FOR EIA SCREENING OPINION

v.1 - 18/03/2024

Request for an EIA Screening Opinion

theurbanists

1. Introduction

This request for an EIA Screening Opinion is provided for the reference of the Local Planning Authority, to provide an EIA screening opinion. The request is made in respect of development proposals for a private and premium holiday lodge development, on land located between the settlements of Tonna and Resolven, in Clyne and Melincourt Parish and Resolven Ward. The project will create a premium leisure development that would include holiday lodges and other supporting leisure facilities, and tie in with the wider natural leisure offer of the Vale of Neath as well as the adjacent Brecon Beacons National Park and South Wales Valleys landscape.

The development proposed is similar to a holiday village outside an urban area, and by the site area measuring over 0.5 ha, the proposed development falls within Category 12(c) of Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017.

The information provided in this request for an EIA Screening Opinion is that which is required by the Planning Authority, to allow it to provide a screening opinion as set out in the Regulations 2017. Information includes a plan sufficient to identify the land (see Section 7 Appendix One); a description of the development (including a description of the location of the development and the physical characteristics of the development); a description of the aspects of the environment that are likely to be affected by the development; a description of the likely significant effects of the proposed development on the environment, including from (i) residues, emissions and waste and (ii) the use of natural resources including soil, land, water, biodiversity; and a summary position on whether the development is considered to be EIA development.

Schedule 2 of the Regulations provides thresholds beyond which it is considered more likely that the project would require EIA. Development proposals below these thresholds may still be held to be EIA development if they are considered to still have significant environmental effects. Conversely, projects above these thresholds may not be considered to be EIA development if they are not expected to have significant environmental effects. **The latter is considered to be the case with the proposed development; a comprehensive planning application is being prepared for the proposed development that includes a holistic consideration of the environmental effects of the project. These assessments have already informed the proposed development and would ensure that the**

likely environmental effects of the proposed development are fully identified, assessed, and where necessary mitigated to acceptable levels.

The ongoing technical work is identified below through consideration of the likely aspects of the environment that could be affected by the development and the likely significant effects of the development on the environment.

2. The Proposed Development

The proposed development is for a series of premium holiday lodges, supporting leisure facilities as well as services and supporting infrastructure (access, parking, landscape and drainage). The development is to be a private operation, open to the public for rental. It will include communal areas comprising a clubhouse with a pool, as well as food & drink hospitality. The entire development will be integrated into the Vale of Neath's stunning natural landscape, as part of its unique selling point. A new vehicle route is proposed from the B4434, between the settlements of Tonna and Clyne. The proposed development constitutes the following:

Removal:

Very limited site habitat clearance to facilitate the development, mostly consisting of minor and low-value tree and scrub clearance, as well as the removal of some other low ecologically valued grassland habitat. The proposed development has purposely excluded and seeks to retain and enhance habitats where it's of a higher environmental value. Any habitat impacts will be limited to the area required for the delivery of the proposed development's buildings and associated infrastructures/facilities. The remaining existing site habitat will be retained and subject to enhancement and improved management post-development. During construction, there would likely be some localised disturbance of areas of low to moderate ecologically valued habitat to enable plant access and the undertaking of construction activities, but any such disturbed habitat will be restored, enhanced, and managed for this purpose post-construction.

• Proposed:

- Holiday home properties, of both level and raised platform designs.
- A Management-controlled leisure and hospitality clubhouse, including a large pool area.
- Associated road, drainage, and services infrastructure required for the above.

- Ecological enhancement and improved management, sensitive to the context and opportunities of the site, and set to enhance wider Green Infrastructure.

The development is proposed to meet a demand for high-end tourism accommodation, in a location that is integrated within the local area's natural assets and special landscape character, and which seeks to maintain and preserve those existing qualities as part of the proposal.

3. The Development Site

3.1 Site Description

The development site is located on land between the settlements of Tonna and Resolven. A series of site photographs are below, with locations referenced in the lower left corner, and site plans at Section 7 Appendix One.







Figure 1: Site photographs.

The site is approximately 45.5ha and includes commercial forestry, a former quarry, and grazing land, with occasional use for shooting parties. There are a series of existing residential and outbuilding properties located across the site, and electrical power lines transect parts of the site. The site is largely green and natural, but of a commercial nature in many areas. Areas of built structures, historic mineral workings, access tracks, and power lines, visibly reflect the development and infrastructure operations that have taken place in the area. A large easement is also present across the site,

regarding a high-pressure gas main that crosses the site in two directions, to and from the nearby pumping station. This easement reflects the less visible gas development and infrastructure which none-the-less is impacting the site and wider setting.

The site is located on the south-eastern aspect slopes of the Vale of Neath, above the valley floor. The site typically slopes from the southeast (the top of the valley side) downwards to the northwest (towards the valley floor). The existing access to the site is from the south of the site and is shared with other properties. It is a private gated track that connects to Fairyland Road (south-west of the site), further accessing the B4434, and later to the strategic highway network provided by the A465. A more basic existing track is located to the north of the site, through areas of woodland and field, winding up from the valley floor, and the B4434; and would be the proposed location of an improved development site access for construction and later use. A transport assessment has been completed in initial draft in order to inform the design.

A Public Right of Way (PRoW), which also comprises a bridleway and national route, lies on the development site's boundary to the southeast, while a further PRoW borders and crosses into the site's western side (see Figure 2). These are incorporated into the proposed development, as part of the design, and would likely experience some moderate increased use.

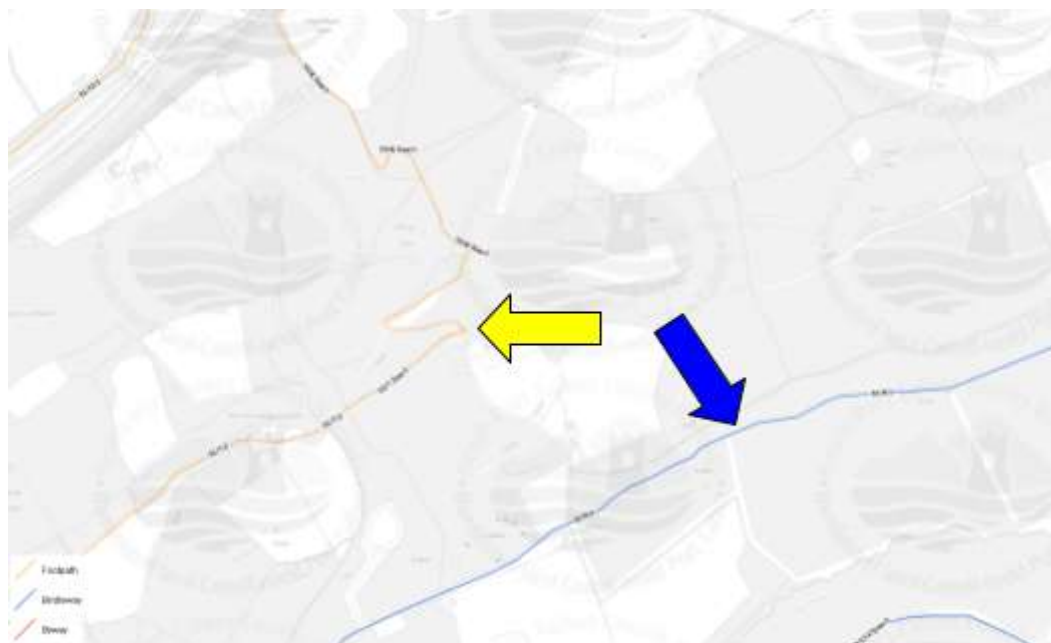


Figure 2 - Extract from Neath Port Talbot Council definitive Public Rights of Way map; with PRoW crossing site at Yellow arrow and boundary national route at Blue arrow.

The majority of the site is still, or recently comprised, a mixture of semi-natural mixed woodland and broadleaf woodland habitats, of which some have been recently felled as part of forestry operations and now comprise in part scrubby habitats (see Figure 3). Further larger areas of habitat comprise semi-improved grasslands, semi-natural broadleaved woodland, coniferous woodland (plantation), and scattered scrub (including former areas of woodland). There are also some smaller but ecologically significant areas of marshy grassland, and less valuable cultivated/disturbed amenity grassland, bare ground, and continuous/dense scrub. Some small areas of standing water, amenity ponds, are also present.

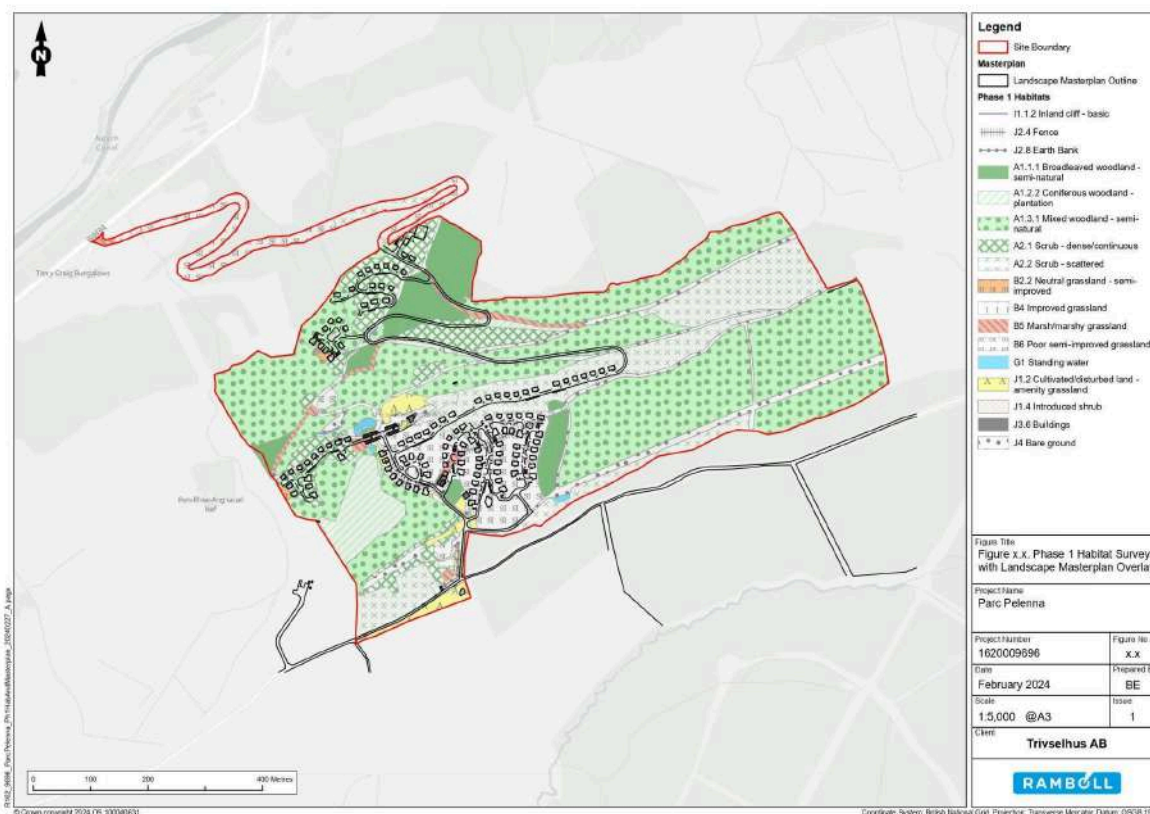


Figure 3 - Phase 1 ecological survey habitat types present at the site, with the current proposed development overlaid.

An area of peat has been identified by the ground reporting desk assessment, located to the southwest of the site (see Figure 4). It is located in areas of current mixed-woodland and coniferous woodland, as considered by Ecological Phase 1 mapping (see Figure 3). This area is further detailed by reporting as being a superficial deposit of peat and of a generally soft nature ground. This area is to be safeguarded

from any harm and potential ecological enhancement options are being explored to secure a net benefit for biodiversity which includes this feature.

Table 2.4: Geology

Ref. for Figures	Location	Stratigraphic Name	Description
Superficial Deposits (Figure 2.7)			
1	On site (west).	Peat	Partially decomposed mass of semi-carbonised vegetation.
Solid Geology (Figure 2.8)			
8	On site.	Hughes Member	Green-grey 'Pennant sandstones' with thin mudstones/siltstone, seatearth interbeds and thin coals.
6	On site.	Brithdir Member	Green-grey 'Pennant sandstones' with thin mudstones/siltstone, seatearth interbeds and thin coals.



Figure 2.7: Superficial deposits.
(Reproduced with permission from Groundsure)

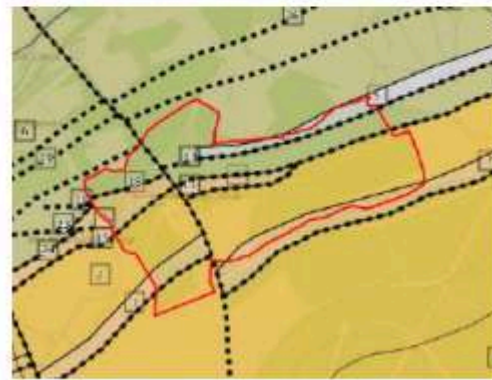


Figure 2.8: Solid geology.
(Reproduced with permission from Groundsure)

Figure 4 - Ground Reporting extracts explaining and showing the superficial area of Peat (at No.1 on the left-most map).

The site is located in a Pre-Assessed Area for wind energy, and approximately 4.5km northeast (at a minimum) is the Pen y Cymoedd Wind Farm. The inclusion of the site in this area demonstrates that it is deemed to be located in a landscape that can assimilate change to the visual and landscape character. The delivery of the Wind Farm has already delivered such change.

3.2 Local Development Plan Constraints and Allocations

In the Local Development Plan (LDP) the site falls outside of the designated settlement boundary and falls under the following designations: Special Landscaped Area, Sandstone Resourcing Area, and Valleys Strategy Area. A scheduled monument is located in the southwest corner of the site (see Figure 5). The proposed design has taken into consideration this designation and given high regard and consideration of the opportunities to safeguard and enhance its value.

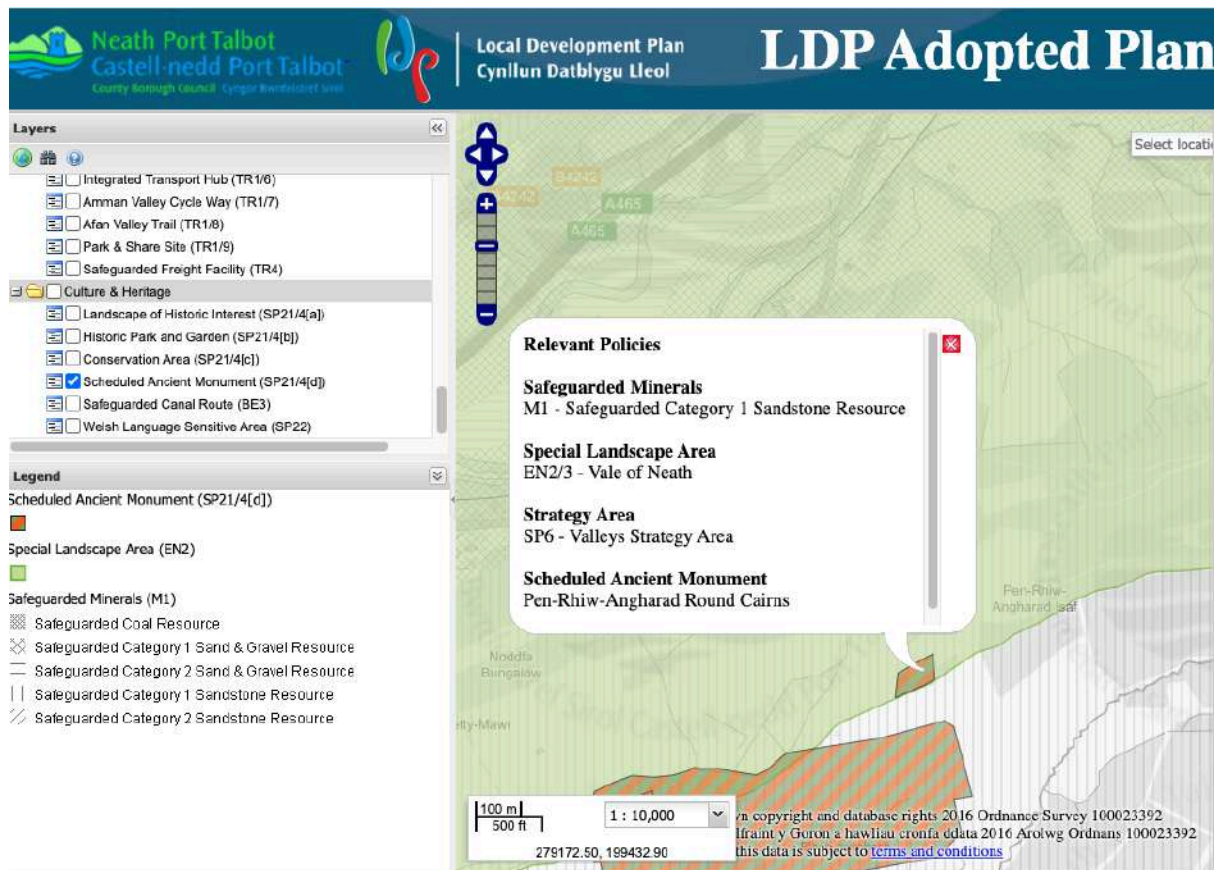


Figure 5 - Extract from Neath Port Talbot Council interactive LDP map, relevant designations in callout text.

3.3 Other Statutory Constraints Mapping

Part of the lower (northern) end of the site and some middle slope areas (to the east) are designated as plantation / restored / semi-natural ancient woodland. Further areas of ancient woodland with specific Nitrogen-sensitive Lichens or Bryophyte present are identified nearby northward, beyond the site's

proposed access routes. The masterplan design process has had a high regard for these designations, of which is reviewed further below.

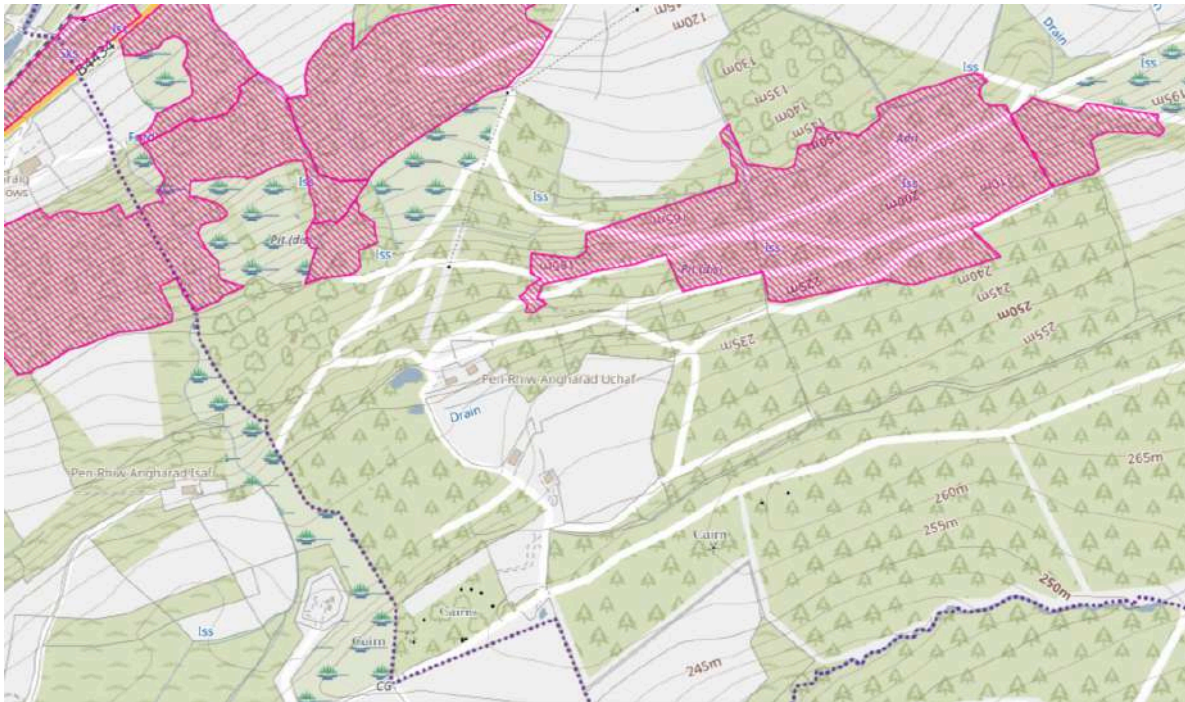


Figure 6 - Extract from Ancient Woodland designations



Figure 7 - Extract from Ancient Woodland with Nitrogen sensitive Lichens or Bryophytes recorded as present.

In respect of other statutory mapping (see Figures 8 & 9), the site is not designated as subject to flood risk constraints that would prevent development (according to either the Development Advice Map or Flood Maps for Planning). No part of the site is identified as being of high-quality best and most versatile agricultural land (all parts falling below the 3a category; see Figure 10) and none is designated access land or common land.

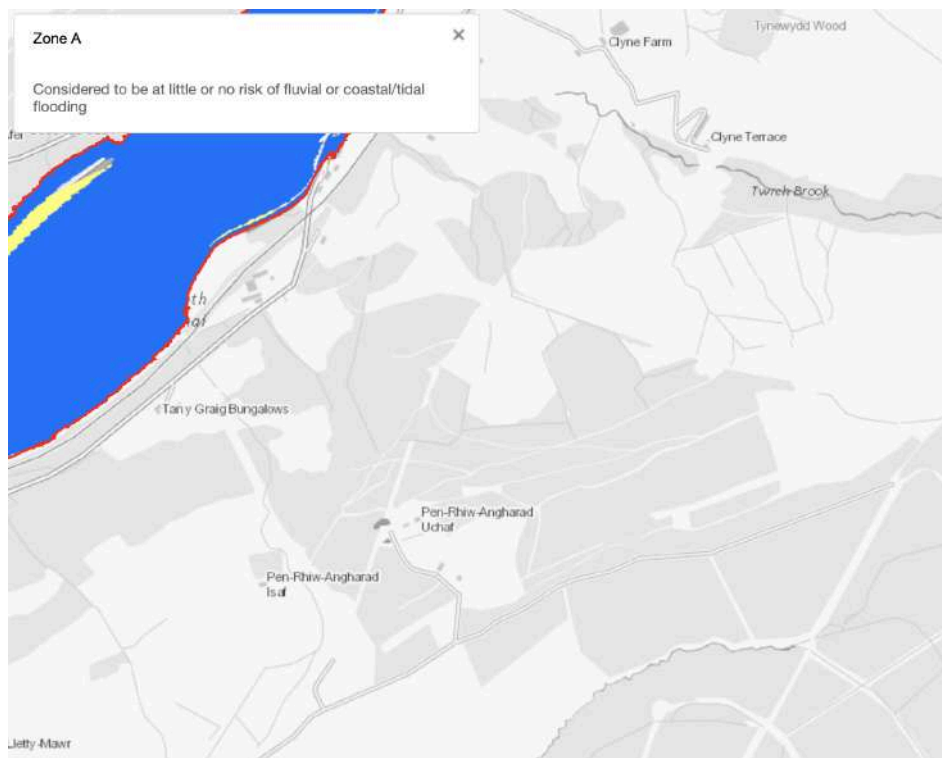


Figure 8 - Extract from Flood Risk by NRW Development Advice Map - showing no risk at the site.

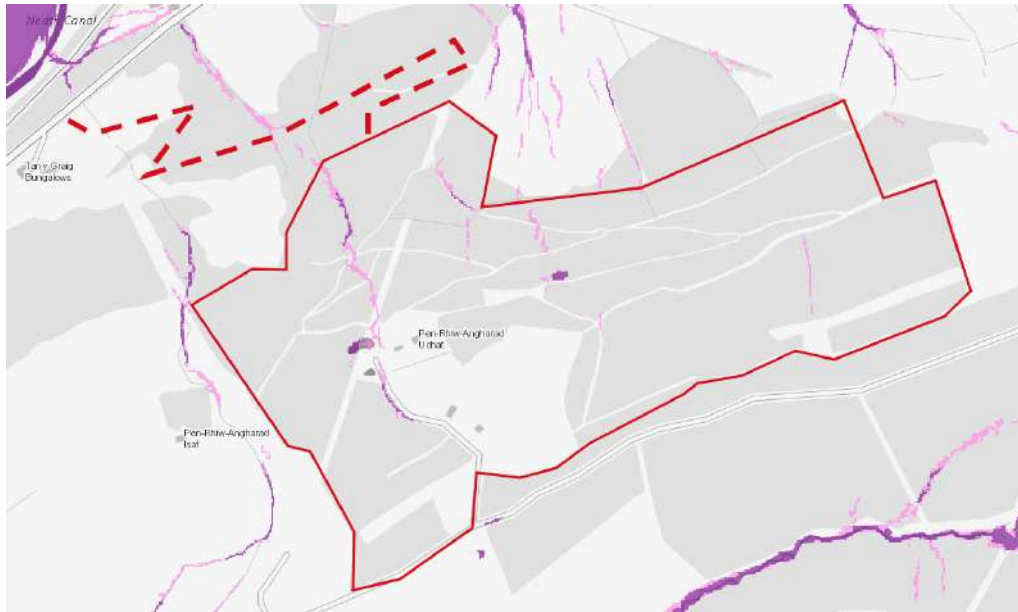


Figure 9 - Extract from Flood Risk by NRW Flood Map for Planning - Surface Water Flood Risk in Purple, shown within the approximate site area (Redline) and in the context of the approximate access route (dashed Redline).

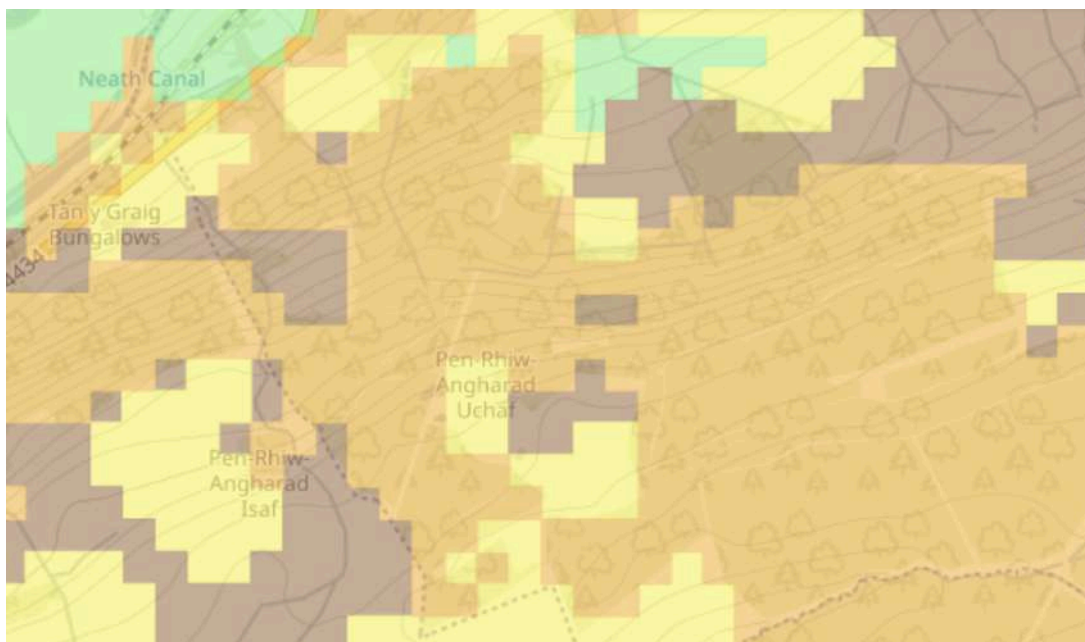


Figure 10 - Extract from NRW Provisional ALC mapping - showing grades 4 (Yellow) and 5 (Brown) and N/A areas (Orange) - The site being mainly N/A where woodland is present, or grade 4 or 5 elsewhere.

3.4 Planning History

The following planning applications relate to the site area:

- 84/0252 - Siting of temporary residence - Approved 26.07.84
- 85/0454 - Building farm chalet bungalow - Approved 23.10.85
- 86/0623 - Holiday chalet - Approved 13.12.86
- 87/0078 - 11 Holiday chalets - Approved 08.04.87
- 94/0664 - Stone extraction - Refused 13.02.95
- 97/0226 - 7 Chalets, storage and treatment of minerals - Refused 14.07.97
- 03/0261 - Limited removal of stone & restoration - Approved 09.09.03
- 03/0946 - Occupancy condition removal - Withdrawn
- 03/1327 - Approval of details related to condition 11 re signage of planning permission P2003/0261) - Approved 13.11.03
- 05/0036 - 7 Holiday chalets - Approved 22.02.05
- 05/0440 - Certificate of lawfulness for an existing use for 11 Chalets - Refused 30.06.05
- 05/0962 - 7 Holiday chalets (amendment to 05/0036) - Approved 11.08.05
- 05/1283 - Extension of time of application 03/0261 - Approved 02.11.05
- 05/1921 - Construction of 4 holiday cottages - Withdrawn
- 06/0480 - Variation of condition regarding 12 week occupancy - Approved 30.07.07
- 06/0938 - Agree condition 2 of 05/0962 re: materials - Approved 13.07.06
- 06.0942 - Agree condition 4 of 05/0962 re: landscaping - Approved 13.07.06
- 06/1084 - Agree condition 5 of 05/0962 re: materials for parking area - Approved 14.09.06
- 07/0660 - Engineering works to re-grade hillside - Withdrawn
- 08/0755 - Retention of detached building for water tanks - Approved 25.07.08
- 08/0854 - Construction of 4 Holiday Lodges - Approved 18.08.08
- 10/0493 - Construction of 12 No. Holiday Homes (outline) - Withdrawn
- 12/0354 - Construction of 32 Holiday Homes access road, stables and children's play area (outline) - Approved 19.08.14

- 16/0430 - Construction of 22 holiday lodges, swimming pool, reception buildings, associated infrastructure and landscaping. (Outline application with means of access to be agreed). - Pending Determination
- 17/0628 - Variation of condition 3 of P2012/0354 to allow an extension of time for a further 2 years for the submission of reserved matters. - Approved 02.08.17
- 17/0742 - Certificate of Lawful Development (Existing) for use of the property as a residential dwelling (Use class C3) in non-compliance with an agricultural occupancy condition. - Certificate not issued 07.09.17
- 18/0618 - Section 73 application to vary wording of condition 3 of Planning Application P2017/0628 granted on August 2nd 2017 to allow extension of time. - Withdrawn
- 18/0681 - Proposal: Certificate of Lawful Development (Existing) for the use of the property as a residential dwelling (Use Class C3) in breach of an agricultural occupancy condition for a continuing period of 10 years or more - Certificate issued 05.11.18
- 18/0972 - Removal of Condition 1 (Agricultural Occupancy Condition) of Planning Permission P1985/0454 granted on 23/10/85 - Approved 11.01.19

4. Aspects of the Environment that Could be Affected by the Development

As required by the Regulations, the below are aspects of the environment that could be affected by the development:

- Ecology
- Trees and Woodlands
- Landscape Character and Visual
- Archaeology and Heritage
- Agricultural Land
- Water Resources
- Coal Risk and Contamination
- Local Highway Network

None of these matters, however, are considered to be worthy of the requirement for an EIA, with regard to the proposed development. This is further discussed in the following section which considers the potential for effects from each of these environmental aspects.

5. Potential Likely Environmental Effects

As required by the regulations, the below analysis identifies the potential environmental effects that could arise from the development are considered to be the potential environmental effects that could arise from the development. None are, however, considered to warrant the undertaking of an EIA.

Ecology - The habitats present on the site consist of a combination of woodland/woody habitats, grassland habitats, scrub habitats and some aquatic/marginal aquatic areas. Woodland habitats include semi-natural mixed woodland which constitutes the majority of the site, and which is of moderate ecological value. No impacts are likely to impact those mixed woodland areas. Parcels, of recently felled broadleaved woodland are spread across the site, of which little is of any significant ecological value, but has the potential to progress to good condition and valuable scrub habitat. In part, development as well as ecological enhancement is likely to be targeted at these areas, because they are both of low existing ecological value and large scope of opportunities to enhance them. Semi-natural broadleaved woodland of higher ecological value is spread across the site adjacent to the mixed woodland. These areas are to be retained and protected in their vast majority. Parcels of coniferous woodland are also present but are of limited ecological value. These coniferous areas will be targeted for any required Mitigation or enhancement, reflective of their larger opportunities for restoration and better management.

Parts of the woodland on site are included in an Ancient Woodland designation, though much of the areas included in the designation are the felled broadleaf woodland areas. These areas are either already bare ground, to be avoided, or comprise areas that in the recent past were cleared agricultural land (see Figure 11 below) and as such their designation is challenged. This challenge of designation being previously considered as acceptable, with regard to a previous planning approval of a similar development. Irrespective of designation, they will remain woodland areas to be suitably protected or development impacts managed suitably. The bare-earth of an existing tracks in much of those 'designated' areas means impact from the proposed access road can be suitably minimised and, where impacts occur, opportunities for any woodland habitat compensation are present across large areas of the site.

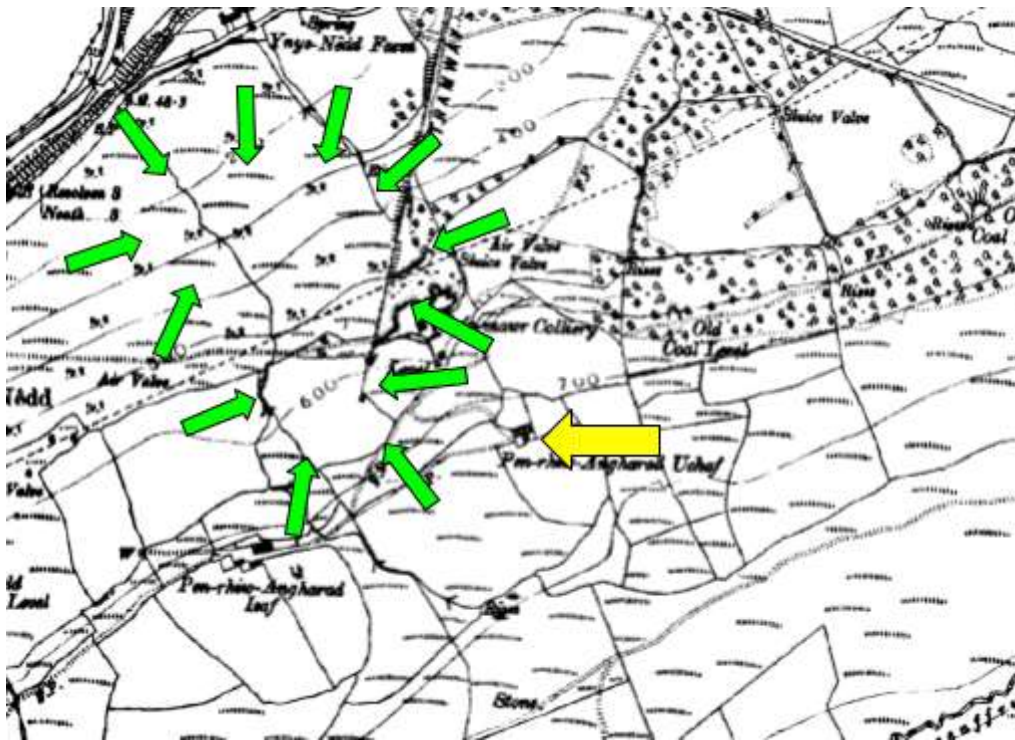
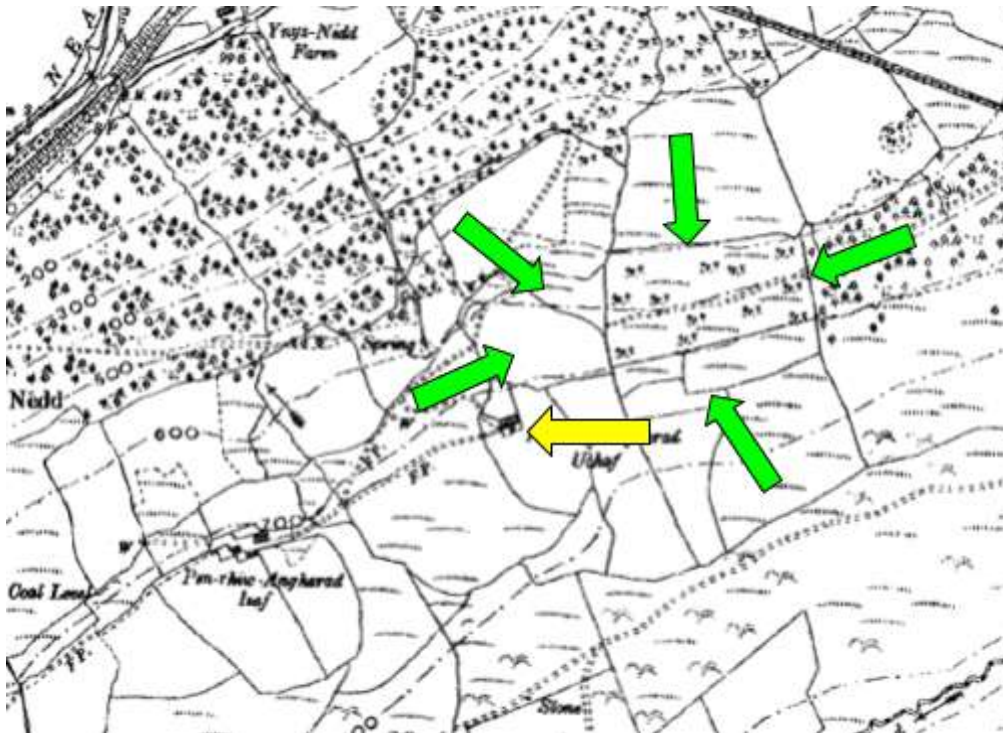


Figure 11: Agricultural or other land on 'Ancient Woodland' areas correlating with approximate location of proposed development at Green arrows, with central-site farmhouse area at Yellow arrow for reference.

Grassland habitats include improved grassland, poor semi-improved grassland, amenity grassland and marshy grassland. The semi-improved grassland comprises a significant single central habitat in the site, although it is of little ecological value. This area is also targeted for proposed development, as its loss is more easily compensated for. The smaller areas of marshy grassland are of a higher ecological value than the central grassland habitat, while very-small areas of amenity grassland are of little ecological value. The marshy areas are to be targeted for enhanced management, and potential integration into proposed water management within the site, aimed at increasing their functional resilience. Continuous and scattered scrub is present on the site and comprises two distinct but relatively smaller areas of the site and is of some value. Some of these areas will be impacted, as again these areas are more easily compensated for, but also a location for targeted enhancement. In addition to the above, there are some small areas of pond which offer some ecological value but are generally in poor condition and areas of bare ground that have little to no ecological value. These are a considerable opportunity for enhancement for the benefit of wildlife, and some for the integration of sustainable drainage.

The development could have potential adverse effects on some habitats if a suitable design approach was not followed. That, however, will not be the case, as has been evidenced in the prioritisation of areas for development and enhancement (or suitable compensation), as already discussed above. For example, the largest area of the development is proposed to be located on the poor semi-improved grassland, or amenity grassland, while part will be located on an area of felled broadleaf woodland. Such habitats are typically of limited ecological value and their loss will not result in adverse effects; or can be easily minimised, mitigated or compensated for. Similarly, lower ecological value habitats, and higher value habitats in poor conditions, are areas to be targeted for improvement to offset any adverse effects and create overall enhancement.

Further, as part of the proposed development, a suitable landscape and ecological enhancement planting and management will be delivered. This is to ensure that any effects that do arise are mitigated and enhancement delivered, to ensure overall net benefit for biodiversity.

Some protected species and priority species have been assessed as likely present in areas of the site. Bat roosts have been identified in some of the existing onsite buildings, and some trees have been identified as having low and moderate potential to support bats. Barn owls have also been identified as present, albeit designated on-site boxes have no recorded use. Common reptiles (grass snake, slow worm, and common lizard) are confirmed to be present, and likely in moderate numbers. Badgers have

been observed on-site, but no sett(s) found, and Brown Hare have also been observed. The only Invertebrates recorded were common and widespread species. Birds identified are generally common and widespread species, with few important species observed from the site or sometimes present (but with no nesting recorded). To ensure that the potential for effects on such species is fully mitigated, the proposed development will include a series of preventative measures. For example, in respect of known bat roosts and trees that offer potential for bat roosts, these will be protected in the first instance and only removed if absolutely necessary under license. In such a scenario, replacement roost features will be incorporated into the development, to ensure no loss of opportunities. Where removal of grassland and scrub habitat is required then the replacement landscape design will include suitable replacement, to ensure that a viable reptile population can continue on the site. The same will apply for Barn Owls, Badger, Brown Hare and Bird species, with incursions into the existing habitat minimised and enhancement provided as part of the scheme landscape design. Enhancement of the site will include measures specifically aimed at those species of principal importance known from the site or local area.

The full ecological effects that could arise from the development, including the mitigation proposed, and the approach to delivering biodiversity net gain, will be comprehensively set out in an Ecological Impact Assessment and Green Infrastructure Statement (which sets out how ecosystem resilience is ensured). On the basis that these documents will robustly assess the potential for ecological effects, ensure that any potential effects identified are Mitigated and establish how Net Benefit for Biodiversity (NBB) and Ecological Resilience (ER) enhancement will be delivered as part of planning policy requirements, and that no significant effects are expected, it is not considered that ecological grounds will warrant the undertaking of an EIA.

Trees and Woodland - Of the 140 items identified across the site, 12 have been categorised as A, of high quality; 72 have been categorised as B, of moderate quality. These items will be prioritised for retention where practicable due to their condition, age and retention span. As established above, there are different woodland habitats on the site and part of the woodlands is subject to an Ancient Woodland designation. The majority of the development is to be delivered on poor semi-improved grassland and areas of felled broadleaf woodland. The proposed access track shall follow the route of an existing track that is bare-earth ground, to minimise tree removal. Where development is integrated into woodland it will be done so sensitively, and where tree removal is required then replacement will be undertaken in accordance with the guidance of Planning Policy Wales; including the requirement to demonstrate an enhancement of ecological resilience and NBB for the development.

An Arboriculture Impact Assessment shall be undertaken as part of the planning application and will assess the effects on trees and woodland, and shape the replacement planting strategy to deliver an overall GI enhancement as part of the landscape design. The longer-term management of the woodland will also be secured through a Woodland Management Plan or wider Landscape and Ecological Management Plan (LEMP) to ensure maximum gains will be delivered. Given the development approach of locating development largely in areas of grassland, or where trees have already been felled and bare ground, plus the longer-term opportunities for enhancement through woodland, it is considered that there could be a positive effect on trees and woodland. The specific woodland focus of the site's landscape value and enhancement of this will be beneficial to the proposed development's economic viability, and as such there is much greater certainty of the proposed positive effects being secured. **It is therefore considered that effects on woodland and trees will not warrant the undertaking of an EIA.**

Landscape Character and Visual - The development site is located in the Vale of Neath Special Landscape Area (SLA) 3. On LANDMAP the site is part of the Mynydd Nant y bar / Mynydd Blaenafan visual/sensory aspect area within the Landmap information system. It is fairly typical of this area which is characterised as a large area of undulating plateau running across the high ground between the Afan Valley and Neath Valley to the east of the county borough. Rising from approx 50m AOD in Neath Valley to 600m AOD. Numerous small valleys provide added topographical interest to this landscape which the conifers emphasise and add drama to. The assessment within Landmap is that it is of moderate value. It should also be noted that the site is part of a Pre-Assessed Area for wind energy development, thus evidencing its capacity to assimilate landscape change. Any landscape effects from the development proposed herein would be minor in the context of the extensive wind infrastructure that has been delivered, as part of the Pen Y Cymoedd project. Landscape enhancement will also be undertaken to assimilate the site into the surrounding landscape. The planting selected will be appropriate to the landscape character of the site and wider Special Landscape Area.

The most elevated areas of the site are the most exposed and visible site areas. Development is to be avoided in these locations and the additional tree planting proposed, as part of the development, shall screen views of the development as well as assimilate it into the landscape. This screening is also to be effective in those areas where footpaths and bridleways run adjacent or through the site, although some greater views of the proposed development will be had from these. It is considered that this kind of proactive approach to enhancing the site landscape can suitably mitigate and minimise the visual

effects of the development. This was recognised in the pre-application response provided by the Planning Authority (ref: Q2023/0104). The planting proposed in the development will be appropriate to the landscape that exists and already largely screens many areas of the site. Furthermore, any views towards the proposals, which may be available from the surrounding valley landscape and valley floor will be seen in the context and as part of the wider Vale of Neath Landscape; which stretches far beyond the development site. The wider, vegetated landscape filters many views towards the site. The lodges themselves are designed to work with the contours on site (built into the hillside, rather than sitting atop of), and the landscape strategy proposed will seek to provide more screening benefits by integrating strategic tree planting in key locations to minimise visual effects even further. A further consideration that will reduce visual effects is the architectural response, which while premium, shall be appropriate to the site setting. For example, the use of unobtrusive shades and tones, minimising storey heights and massing, and minimising density by clustering lodges and buildings in moderate sizes. Lighting shall also be downward facing to prevent light spill, and external lighting impacts will be similarly considered as part of the overall scheme. Again, the landscape and visual value of the site are key to the economic viability of the proposed development, and therefore positive outcomes of the proposed development will be delivered with more certainty.

To ensure that the landscape and visual effects of the proposed development are fully scrutinised a Landscape and Visual Appraisal (LVA) is being undertaken as part of the planning application. This will ensure that appropriate mitigation is built into the scheme and that residual effects are fully established. On that basis, an LVA is to be prepared, and any recommendations positively tied to the proposed development's economic viability, it is not considered an EIA is warranted on landscape and ecological grounds.

Archaeology and Heritage - The site contains the entirety of a scheduled monument the Pen-Rhiw-Angharad Round Cairns' (Cadw reference - GM276). It is also located c. 80 m from the scheduled monument Blaen-Cwmbach Camp' (GM258) and c. 600m from the scheduled monument Blaen-Cwmbach Earthwork (GM277). The Pen-Rhiw-Angharad Round Cairns comprise a group of Bronze Age burial cairns. The group are hard to appreciate as they are located entirely within a small plantation defined by deciduous trees and scrub vegetation. Only a low mound is perceptible at the west end of the monument as well as one of the cairns located just beyond the plantation, adjacent to a road. The group are primarily of archaeological significance however they also have a spatial relationship with other contemporary monuments which lie along the summit of the east-west ridge at the southern end of the site. The development would have no impact upon the monument and would

be set lower down the slope away from the axis of Bronze Age features along the ridge. Notwithstanding that the monument is hard to experience visually anyway, the development would be screened from the monument by the retention of an existing stand of trees that would block all views to the part of the site that is proposed for development.

The other monuments further to the west comprises the archaeological remains of a Roman marching camp and an earlier Iron Age hillfort that is located within the camp. As with the Round Cairns these monuments are primarily of archaeological significance but are also significant on account of their topographic ridge-top location which gives broad views out across the surrounding countryside. The development would be entirely screened from these monuments by trees and would be at a sufficient level lower down the valley slopes so as to have no presence in views out from the monuments along the ridge or out to the wider landscape. Listed buildings are also located c. 110-360m to the north of the site. These all comprise Grade II listed features of the Neath Canal which runs along the valley bottom. All of these assets are closely associated with the canal side and are screened from the site by trees and so the proposed development would not be visible from them or change their settings in any way. In conclusion, it is highly unlikely that any designated historic asset would have their setting changed and significance affected by the site's development as proposed.

The site contains archaeological remains mainly comprising those related to coal mining activity from the 19th and 20th centuries that includes the remains of a colliery, mine entrances and spoil tips. Remains of this nature would be of limited heritage significance and would largely be preserved by the development. Indeed, the development presents an opportunity for the site's archaeological history to be interpreted and presented to the visiting public. There is also some potential for the dense coniferous plantations on the high southern slopes of the site to contain further prehistoric features such as Bronze Age cairns. However, development is not proposed for these areas and so such remains would not be affected by the proposals.

The planning application would be supported by an Archaeological and Heritage Desk-based Assessment which would set out an assessment of the site's archaeological potential, an assessment of the significance of archaeological features within the site and the potential for change to the settings of historic assets within the site and its vicinity. The scope and methodology of the assessment will be agreed in advance through a Written Scheme of Investigation with the Glamorgan Gwent Archaeological Trust (GGAT). Further consultation with GGAT will determine whether there is any requirement to support the application with archaeological fieldwork.

Given the likelihood of no effects on the significance of any designated historic assets, only limited impacts upon archaeological remains and the potential for heritage interpretation within the scheme, it is not considered that there would be any potential for a significant effect on the historic environment and therefore it is not considered that any EIA is warranted on archaeological and heritage grounds.

Agricultural Land - The site is not of high-quality agricultural land with all parts of the site being below 3a grade. Significant effects on agricultural land resources are not therefore considered to be likely **and would not warrant the undertaking of an EIA.**

Water Resources - The site is not identified as being at risk of fluvial flooding or for any significant other surface water flooding potential. To ensure that the development does not impact adversely on the existing surface drainage regime then a compliant SUDS design shall be delivered as part of the development. This shall ensure that existing Green Field Runoff Rates are maintained and offsite surface water risk is not increased. Initial desk-based assessments identify good potential for infiltration, though this shall be further explored as part of site investigation and inform the surface water drainage design. The potential for pollution from the operation of the development will be fully mitigated through the surface water drainage design that is to include interception or other pollution controls (as required). There is no groundwater Source Protection Zone on the site or the connected downstream hydrological area. **Based on the site character, proposed development type, and opportunities for SUDS to be delivered through the development effects on water resources is not deemed to warrant the undertaking of an EIA.**

Coal Risk and Ground Contamination - Ground investigation desktop reporting undertaken to date has highlighted the presence of a disused coal mine and former coal tip that comes into the site's northern boundary. Also, there is a former tramway leading away from the site. There is no development proposed around these features, but an assessment of risk and effects on/from these features will be accounted for in the planning application through the preparation of a Coal Mining Risk Assessment. Broader contamination considerations for the site and development include a former quarry in the centre of the site, where fly-tipping has also occurred, an operational farm property, which has an asbestos tile roof and an above-ground storage tank that could include substances such as petroleum and hydrocarbons. In respect of ground gases, methane, carbon dioxide and radon are considerations of the proposed development, and naturally elevated concentrations of arsenic have been found across the soils in the site. The risk of these features is considered typical and the effects

the development could have in releasing contamination can be fully resolved through a contamination management plan and remediation strategy, underpinned by comprehensive site investigation. These documents will be included in a planning application and will sufficiently manage the effects of known contamination and minimise the risk of any contamination spreading. **On these grounds, coal risk and contamination effects are not deemed to require an EIA to be prepared.**

Local Highway Network - The proposed development will generate vehicle movements during its operation and the initial period of construction. The vehicle movements associated with these stages could have adverse effects on the local highway network and the safety of users should appropriate measures not be taken to assess the effects and deliver enhancements to the highway. To ensure that due regard is made to the efficient running of the highway and safety of users a Transport Assessment is being prepared for the development. The draft of that reporting has already had a consideration of the proposed vehicle generation associated with the 120 lodges and associated delivery vehicles to ensure that the highway can accommodate the flow of vehicles generated, and advise on suitable safe means of access. A key strength of the development site is that it can connect to the B4434, which in turn connects to the strategic A465, a strategic west/east movement corridor. This highway network is deemed to be suitable to serve the development, and this will be evidenced in the Transport Assessment being prepared. The initial consideration of trips has taken into account that there are multiple pedestrian, cycle, and bridleway paths across the site, and that most visitors will stay within the site to utilise the range of leisure and retail opportunities to be present. Trip generations calculated show only a low number of movements with no significant effect to the wider highway network. A transport plan to reduce vehicle use further is to also be produced and submitted as part of any planning application. Construction vehicles will only be temporary for the build period, and their access and egress to the site will be managed via a Construction Traffic Management Plan or holistic Construction Environment Management Plan to ensure safe operation is undertaken. These documents can be a condition to any future permission granted by the Planning Authority. As part of the development, an existing track access shall be upgraded, the planning application will demonstrate how the upgrade would comply with current standards and facilitate a safe internal highway environment. Adequate safe use of the proposed access road has already been considered in initial swept path mapping, and access can suitably be gained by all required vehicles, including refuse, and fire and rescue services. **On the balance of these factors, it is deemed that effects on the local highway network would not be notable, and the proposal does not warrant the undertaking of an EIA.**

Summary of likely significant environmental effects -

It is considered that the potential for significant environmental effects, that could arise from the development, is limited. Each aspect area will be fully considered and effects will be suitably reduced by implementing a sensitive design (as proposed by the development) and responding to appropriate technical assessments, which are all in hand. **It is therefore considered that likely environmental effects would not deem EIA necessary and that it would not examine any environmental effects not already being fully scrutinised and addressed by the proposed scheme of development.**

A summary of the environmental reports and drawings to be included in the future planning application(s) which will ensure that all environmental effects are robustly examined and managed are below.

Drawings	Reports
Site Location Plan	Design and Access Statement
Existing Site Plan	Planning Statement
Topographic Survey / Existing Levels Plan	Pre-application Consultation Report
Proposed Levels Plan	Arboricultural Impact Assessment
Proposed Site Layout Plan(s) - Including Hard and Soft Landscaping	Transport Assessment
Site Sections	Travel Plan
Surface Water Drainage Design	Ecology Phase 1 Surveys and Report(s) - As part of EclA
Foul Drainage Details	Ecology Phase 2 Surveys and Report(s) - As part of EclA
Existing Access Plans	Ecological Management and Monitoring Plan
Proposed Internal Access Tracks Details	Construction and Environmental Management Plan
Landscape and Ecological Management Plan	Landscape and Visual Impact Assessment
External Lighting Plan	Phase 1 Ground Conditions Desk Study

	Contaminated Land Information (If Necessary)
	Land Stability Risk Assessment (If Necessary)
	Coal Mining Risk Assessment
	Desktop Heritage Assessment
	Assessment of the Significance of the Impact of Development on Historic Landscape (ASIDOHL)
	Drainage Strategy / SAB Compliance
	Green Infrastructure Statement
	Ecological Monitoring/Landscape and Ecological Management Plan*
	Operational Waste Management Plan

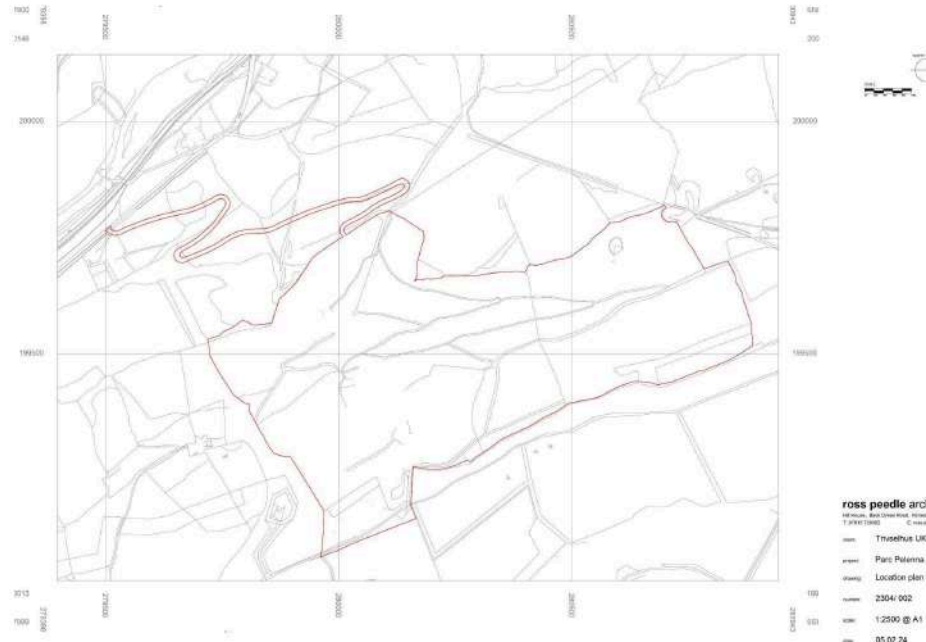
Table: Proposed planning application(s) content

6. Conclusion

The proposed development falls within the threshold for EIA screening under Schedule 2, category 3(a) development. This in itself, however, does not mean an EIA is required. In order to ensure that the proposed development is planned appropriately, a careful design process is ongoing to integrate the development into the site context and character and mitigate environmental effects. As outlined above, the planning application content that is being progressed has been selected to ensure that the key environmental factors are duly considered and the likely effects are fully set out for future consideration by the Planning Authority. **In light of this, the proposed development is not considered to be EIA development and it is respectfully requested that the EIA opinion adopted by the Planning Authority confirm this position.**

7. Appendices

Appendix One - Site Location Plans





Appendix Two - Constraints Plan

