

**NEATH PORT TALBOT COUNTY BOROUGH COUNCIL
CYNGOR BWRDEISTREF SIROL CASTELL-NEDD PORT TALBOT**

**TOWN AND COUNTRY PLANNING ACT 1990
THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT
ASSESSMENT) (ENGLAND AND WALES) REGULATIONS 1999**

SCREENING OPINION – ENVIRONMENTAL STATEMENT REQUIRED

Name and address of the applicant

**Mr Adam Thomas
The Urbanists
The Creative Quarter
8A Morgan Arcade
Cardiff
CF10 1AF**

DATE REGISTERED: 2 April 2024

APPLICATION NO: P2024/0186

LOCATION: Parc Pelenna, Fairyland Road, Tonna, Neath, SA11 3QE

PROPOSAL: Request for Screening Opinion under Regulation 6 of the Town and Country Planning (Environment Impact Assessment) (Wales) Regulations 2017 for the construction of a series of 120 holiday lodges, supporting infrastructure (access, parking, landscaping and drainage) and a clubhouse with a pool, food and drink hospitality and associated road.

THE NEATH PORT TALBOT COUNTY BOROUGH COUNCIL AS THE LOCAL PLANNING AUTHORITY IN PURSUANCE OF ITS POWER UNDER THE ABOVE MENTIONED ACT AND REGULATIONS HEREBY ADOPTS THE FOLLOWING SCREENING OPINION THAT THE DEVELOPMENT IS AN E.I.A. DEVELOPMENT AND THAT THE APPLICATION NEEDS TO BE ACCOMPANIED BY AN ENVIRONMENTAL STATEMENT. THE REASONS FOR THIS OPINION ARE SET IN THE ATTACHED REPORT.

Signed:



Ceri Morris – Head of Planning & Public Protection

Date: 12 April 2024

Detailed EIA Screening Assessment.

In answering the following questions due regard must be given to the impact of the development taking into account:-

- (a) the magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected);
- (b) the nature of the impact;
- (c) the transboundary nature of the impact;
- (d) the intensity and complexity of the impact;
- (e) the probability of the impact;
- (f) the expected onset, duration, frequency and reversibility of the impact;
- (g) the cumulation of the impact with the impact of other existing and/or approved development;
- (h) the possibility of effectively reducing the impact.

Questions to be considered.	Yes, No, Unknown – provide description.	For Yes/Unknown are effects likely to be significant?
Criterion 1. Character of Development		
Question 1a Size and Design of Development.		
Will the design, Construction, Operation or decommission of the project involve actions which will cause physical changes in the locality (topography, land use, changes in waterbodies etc)?	Yes – the proposed development would result in the construction of 120 holiday lodges, leisure facilities including a clubhouse, food and drink hospitality and a pool together with a new road off the B4434. The proposal would also result in the removal of some habitat clearance.	The site is existing woodland and open countryside. Information provided also states that the site is a former quarry and grazing land. The scale of the physical alterations to the topography and land use of the site would likely result in significant effects.
Question 1b Cumulation with Other Existing Development and/or Approved Development.		
Are there any other factors which should be considered such as: <ul style="list-style-type: none"> • Consequential development which could lead to Environment effects? • The Potential for cumulative impacts with other existing approved development or planning activities in the locality? • Any plans for future land uses on or around the location which could be affected by the project? • Transfrontier impact? 	Yes – there are other developments within the area, including Fforch Dwm Wind Farm to the south east of the site. The Rheola House redevelopment has the potential to have an in combination effect through increased traffic movements along the A465 and in particular at the point where the road adjoins the M4 junction 43.	It is considered that based on the current information within the public domain and under consideration by PEDWs DNS team there is potential for a cumulative impacts. Due to the nature of a wind farm the potential the cumulative impacts in relation to the proposed development would be through Landscape visual impacts and biodiversity. It is also considered that due to the developments proximity to the Ffoch Dwm wind farm that a predicted noise impact assessment would have to demonstrate that the wind farm if granted permission would not impact the residential amenity of the

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		lodges. There is potential for either of these matters to have a significant impact. In addition, the development together with the Rheola House redevelopment has the potential to increase traffic movements through junction 43 which is currently at capacity, the potential impacts would have to be assessed in any application submitted and has the potential to be significant.
Question 1c Use of Natural Resources, in particular land, soil, water and biodiversity;		
Will construction or operation of the project use natural resources, in particular land, soil, water and biodiversity etc. which are non-renewable or in short supply?	Yes – the proposal would require approximately 45.5 ha of land and the use of natural resources for the construction of the buildings and the new access road. The operation of the site has the potential to use natural resources in the lodges and associated infrastructure.	The proposed development is unlikely to use natural resources in the construction of the road or lodges that would be above and beyond that of a development of this scale and nature. As such the proposal is unlikely to have significant effect.
Question 1d. Production of Waste		
Will the project produce solid wastes during construction or operation or decommissioning?	Yes – some waste would be produced during the construction and operation of the site. No waste information has been provided as part of the screening request.	It is considered that the submission of a construction waste management plan and an operational waste management plan can be submitted to support a planning application, and as such waste generated by the development could be appropriately addressed as part of the planning application and are unlikely to be significant.
Question 1e. Pollution and Nuisances.		
Will the project involve use, storage, transport, handling or production of substances or materials which could be harmful to human health or the environment or raise concerns about actual or perceived risks to human health?	The project may involve the use, storage, transport, handling of harmful substances or materials. All construction operations have a risk to human health however appropriate site management in accordance with HSE regulation should mitigate any such effects.	Due to the nature and scale of the development it is not of a nature that should be harmful to human health or the environment.
Will the project cause noise	Yes – noise and vibration is	Any application submitted

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and vibration or release of light, heat energy or electromagnetic radiation?	likely during the construction phase however it would be localised and time limited. The development when operational is likely to generate light pollution and noise, through comings and goings on site, site accommodation, site lighting, and building functions.	would be require a piling method statement to assess the impact of piling during construction, a CEMP would consider the proposed construction noise and a Landscape Visual impact assessment would assess the potential for significant adverse effects with regard to lighting particularly in regard to the elevated position of the site.
Will the project release pollutants or any hazardous, toxic or noxious substances to air, or lead to risks of contamination of land or water (including surface waters, groundwater, coastal waters or the sea)?	No.	
Question 1f Risk of accidents and/or disasters relevant to the development concerned, including those caused by climate change, in accordance with scientific knowledge.		
Will there be any risk of accidents and/or disasters relevant to the development concerned, including those caused by climate change, in accordance with scientific knowledge during construction or operation of the project?	Yes, there is a potential for accidents, disasters or contribution to climate change. The proposal is for a tourism and leisure development, within the countryside however there are two high pressure gas mains running through the site and as such there is risks during construction and operation.	Any application would have to demonstrate that there would not be any adverse impact upon the development through consultation with HSE.
Are there risks to human health for example due to water contamination or air pollution?	No.	
Criterion 2 Location of development.		
Question 2a Existing and approved land use.		
Will the project result in social changes for example, in demographic, traditional lifestyles employment?	No, the development is not considered to be of a nature or scale that would result in these impacts.	
Are there any routes or facilities or approved facilities on or around the location, which are used by the public for access to recreation or other facilities, which could be affected by the project?	Yes, there are Public Rights of Way through the site which are proposed to be either retained or diverted to accommodate the proposals.	The development has the potential to impact upon the PROWs that run through the site, however subject to careful design and the imposition of planning conditions, together with

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		financial contribution to Active Travel, the impact is not likely to be significant.
Are there any transport routes or approved routes which are susceptible to congestion or which cause environmental problems, which could be affected by the project?	Yes - the proposal would be accessed off the B4434 via a new access point and has the potential to increase traffic flows. However, while the impact upon the B4434 is unlikely to result in unacceptable levels of congestion the site has the potential to increase congestion along the A465 and the junction with the M4 motorway which is currently at capacity.	The site would be accessed off a Classified B road and as such any application could be supported by a Traffic Survey, Transport Assessment and Statement and as such is unlikely to result in a significant impact. However the development has the potential to have an in combination impact upon the capacity of the A465 and junction with the M4 due to the proposed development at Rheola House near Resolven that would be accessed off the A465 and the M4 motorway. As such the in combination impact of the development on congestion has the potential to have a significant impact.
Is the project located in a previously undeveloped area where there will be loss of greenfield land?	Yes - The supporting information state that the site was historically a quarry however it's currently considered have been returned to nature and to be greenfield land, with deep peat identified on site, and is located outside settlement limits.	An application would need to be supported by an Agricultural Land Survey and soil assessment, including the identification of Peat. In the absence of this information, there is potential for the development to have a significant impact.
Are there any areas on or around the location occupied by land uses or approved land uses which could be affected by the project, particularly sensitive land uses e.g. hospitals, schools, places of worship, community facilities?	No, there are no sensitive land uses in close proximity to the site.	
Question 2b Relative Abundance, Availability, Quality and Regenerative Capacity of Natural Resources (including soil, land, water and biodiversity) in the area and its underground;		
Are there any areas on or around the location which contain important, high quality or scarce resources e.g. groundwater, surface waters, forestry, agriculture, fisheries, tourism, minerals, soil, land, water and biodiversity, which	Yes – the site is located within a mineral safeguarding area (sandstone), Deep peat, High Risk Coal, Contaminated Land, A high pressure gas line and a Scheduled Ancient Monument and potential for setting of a Scheduled Ancient Monument	Given the extensive areas of important resources, while the submission of surveys and mitigation measures could be submitted to support the application, the development, given its scale and absence of available information the

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could be affected by the project?	(SAM). The supporting information states that the agricultural land quality is below 3a grade, however the application has not been supported by a report and as such the screening opinion would have to be considered on a precautionary basis. There is also woodland on site. The development would have the potential to impact upon biodiversity, minerals, the SAM, peat, agricultural land quality, forestry, land and soil.	development has the potential to result in significant impacts.
Question 2c Absorption Capacity of the Natural Environment		
Are there any other areas on or around the location which are important or sensitive for reasons of their ecology, or are used by protected, important or sensitive species of fauna or floras which could be affected by the project?	Yes – as noted above the site has identified deep peat on the site, and woodland with the potential for sensitive species.	Given the nature of the development for a tourism complex, the development has the potential to impact upon ecology, peat and protected species, which has the potential to be significant.
Are there any inland, coastal, marine, river mouths, riparian area or underground waters on or around the location which could be affected by the project?	No, the site is located on a sloping mountain top.	
Are there any areas or feature of high landscape or scenic value on or around the location which could be affected by the project?	Yes – the site is located within the Vale of Neath Special Landscape Area (SLA) and the site is located near the top of a mountain located to the south/ south-east of the A465. While it is noted that the site is in fairly close proximity to the Pen Y Cymoedd Wind Farm, the site is located outside settlement limits and has the potential to be highly visible which could impact upon the landscape and scenic value of the locality.	Any application should be accompanied by a Landscape and Visual Impact assessment and it is noted that Pen Y Cymoedd is located to the south-east of the site however given the potential visibility of the proposal from the A465 and the secondary roads between Tonna and Clyne, and the location of the site within the SLA, the landscape and scenic impact has the potential to be significant.
Is the project in a location where it is likely to be highly visible to many people?	Yes - the site is located near the top of a mountain located to the south/ south-east of the A465. The site is located outside settlement limits and has the potential to be highly visible from public vantage	Any application should be accompanied by a Landscape and Visual Impact assessment however given the potential visibility of the proposal from public vantage points the impacts of the development

Questions to be considered.	Yes, No, Unknown – provide description.	For Yes/Unknown are effects likely to be significant?
	points.	are likely to be significant.
Are there any areas on or around the location which are densely populated or built-up, which could be affected by the project?	The site is located between the settlements of Tonna and Clyne.	Due to the distance of the development from settlement boundaries the development it is unlikely to have a significant effect on the population of the immediate and wider area.
Are there any areas, landscapes, sites or features of historic, archaeological or cultural importance or significance on or around the location which could be affected by the project?	Yes there is a Scheduled Ancient Monument on site and the site is in close proximity to further Scheduled Ancient Monuments.	The potential impact of the development on the Scheduled Ancient Monument and the setting of further Scheduled Ancient Monuments with consideration given to the context of the site and nature of the development the impacts are likely to be significant.
Are there any areas on or around the location which area already subject to pollution or environmental damage e.g where existing legal environmental quality standards are exceeded, which could be affected by the project? Or in which it is considered there is such a failure? Such as AQMA?	No.	
Is the project located susceptible to subsidence, landslides, erosion, flooding or extreme or adverse climatic conditions, which could cause the project to present environmental problems?	Yes – the site is located within a high risk coal area.	The impacts associated with high risk coal constraints can be assessed through Contaminated Land surveys and a Coal Mining Risk assessment. Planning conditions can also control remediation and verification works on site with necessary consultations undertaken during the application process. As such the impact of the development is not likely to be significant.

Statement Of Reasons

In coming to this decision the Authority has had due regard to all information submitted by the developers; the available results of other environmental assessments as well as the criteria set out within schedule 3. The Authority's main reasons for coming to this decision are set out within the above table. In conclusion, the Authority is of the opinion that the proposed development, either alone or in combination, is likely to have a significant adverse effects on the environment. This is

on the understanding that the above identified effects could not be avoided or prevent as specified within the table. As such, the likely effects of the development are likely to be significant enough to warrant EIA development.