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Dear Russell

The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017
Request for Screening Opinion under Regulation 6 (1)
Demolition of Existing School and Construction of a new comprehensive school and associated works.
Cefn Saeson Comprehensive School , Afan Valley Road, Cimla, Neath, SA11 3TA

I write further to the recent pre-application discussions (Pre. App. Ref. Q2018/0258) and meeting with the LPA regarding the above proposed development.

As you know, Asbri Planning Ltd. are acting on behalf of Morgan Sindall and Neath Port Talbot County Borough Council in respect of the proposed new school at the above site.

Under Regulation 6 (1) of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017, I write to request a screening opinion as to whether the Authority consider that an EIA is required to accompany a full planning application for the redevelopment of the aforementioned site. In accordance with Regulation 6 (2), we provide the required information as follows:

- a) A plan sufficient to identify the land;
- b) A description of the development, including in particular;
 - A description of the physical characteristics of the development and, where relevant, of demolition works;
 - A description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected;
- c) A description of the aspects of the environment likely to be significantly affected by the development;
- d) A description of any likely significant effects, to the extent of the information available on those effects, of the proposed development on the environment resulting from –
 - The expected residues and emissions and the production of waste, where relevant; and,
 - The use of natural resources, in particular soil, land, water and biodiversity; and
- e) Such other information or representations as the person making the request may wish to provide or make including any features of the proposed development or any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment.

Context

The proposal is for a new 900 place high school in Cimla which is part of the 21st Century Schools Programme. It is proposed that that new high school will replace the existing high school which also has a 900 place pupil capacity which is located off the B4287 Afan Valley Road at the eastern edge of Cimla, Neath. The proposed application site area extends to approximately 6.1 ha and includes the existing school and a number of grass sport pitches which serve the existing school. The location of the existing school buildings are within settlement limits while the sports pitches are considered to be outside of settlement and are designated as green wedge within the Neath Port Talbot Local Development Plan.

It is proposed that the new school will be constructed on the existing grass sports pitches and would be located to the south east of the application site. It is proposed that the existing school would remain operational while the new school is constructed. Following completion of the new school the original school buildings would be demolished and the new sports pitches to serve the new school would be constructed.

Currently the existing school buildings are located in the lower, western part of the site with the playing fields located on terraced plateaus rising to the east. A red gravel sports pitch is located at the easternmost end of the site, albeit this appears to be relatively unused. There would appear to be various changes of levels within the site.

The western side boundary abuts existing residential development located off Greenwood Drive. To the south, the site abuts the B4287 Afan Valley Road beyond which lies further residential development off Ridgewood Gardens. To the north-west, the site abuts a small watercourse which is designated as a Site of Importance for Nature Conservation (SINC). The watercourse runs from east to west through the housing estates to the west. Beyond this watercourse exists further residential development at Brynsiriol and further east, the site adjoins what appears to be a livery yard or stables. This yard is accessed via a narrow track which runs along the western and northern site boundaries between the school and the houses on Greenwood Drive and Brynsiriol respectively. To the east and north-east, the playing fields abut a hedged boundary to agricultural land associated with Cefn-Saeson Fawr Farm located some 200m to the north-east of the school site. A single agricultural field separates the school site from Cefn Saeson Playing Fields and pavilion, home to Cimla Cricket Club, which is accessed off the B4287 further east.

Screening Opinion

We are seeking your opinion on whether the proposal for a new school will require an Environmental Impact Assessment. In considering this screening application I would be grateful if you could also take the following additional information and representations into account:

- The proposed development does not fall within Schedule 1 of the Regulations, for which Environmental Impact Assessment would be mandatory.
- The development site is not located in a 'sensitive area' for the purposes of the 2017 Regulations.
- The proposed development area includes more than 1 hectare of urban development which is not dwelling house development. Therefore due to the size of the application site the proposal is considered to be a Schedule 2 development.

Since the development is considered to be a Schedule 2 development as described in the 2017 Regulations, it is necessary to identify whether it is likely the development would have significant effects on the environment. Schedule 3 of the 2017 EIA Regulations provides 'selection criteria' which outlines whether an EIA is required. The selection criteria include the following:

- ***Characteristics of the development (such as size and design, the cumulation with other development, the use of natural resources in particular land, soil, water and biodiversity, the production of waste, pollution and nuisances, and risk of major accidents and/ or disasters relevant to the development concerned including those caused by climate change, in accordance with scientific knowledge); and the risks to human health.***
- ***The location of development (having due regard to the environmental sensitivity of the geographical area) with regard in particular to the existing and approved land use; natural resources; the absorption capacity of natural resources; and,***
- ***The types and characteristics of the potential impact of the development (with due consideration being given to the magnitude and spatial extent of the impact, the nature of the impact; the transboundary nature of the impact, the intensity and complexity of the impact, the probability of the impact; the expected onset, duration, frequency and reversibility of the impact; the cumulation of the impact with the impact of other existing and/or approved development; and, the possibility of effectively reducing the impact.***

Characteristics of the Development

The proposed redevelopment scheme represents 'major development' as defined by the Regulations insofar as it proposes development in an area in excess of 1ha. The proposal has been designed to ensure that impacts on the wider landscape are limited and as such the proposal is not considered to be strategic in nature and are therefore not considered to be more than locally important.

With regard to the impact of the development on the highway network a Transport Assessment (TA) has been commissioned and completed in support of the scheme. The TA will confirm that the new school will be designed to ensure highway and pedestrian safety.

It is concluded that, whilst the proposed use does represent 'major development' it is not considered to be of more than local importance. Furthermore the proposed use is highly unlikely to give rise to any significant effects with regard to key measures of environmental impact. The potential environmental impacts are further considered below.

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The Location of Development

The development site is not located in a 'sensitive area' as defined by Regulation 2(1) of the 2017 EIA Regulations. Circular 11/99 states that *'it does not follow that every Schedule 2 development will automatically require EIA. In each case, it will be necessary to judge whether the likely effects on the environment of that particular development will be significant in that location.'* It is considered that through adequate mitigation, environmental permits and protection measures that any potential significant effects can be reduced. As such it is considered that the proposal will not have adverse effects on the location.

The types and characteristics of the potential impact of the development

The characteristics of the potential impacts of the development have been fully considered having due regard to Schedule 3 of the 2017 Regulations and the Welsh Office Circular. The potential environmental impacts have been identified and an assessment of whether the impacts are significant is outlined below:

Drainage

The proposal will be supported by a Drainage Strategy prepared by WSP. The solution will be developed following the completion of site investigation which is ongoing that will identify the conditions on-site. The drainage for the site will be required to adhere to the standards set out in Schedule 3 of the Flood and Water Management Act 2010 which requires all new development to incorporate sustainable drainage to manage on-site surface water. Schedule 3 also places a duty on Local Authorities as SuDs Approving Bodies (SAB) to approve, adopt and maintain systems for surface water that are compliant with Section 17 of the Schedule. As such the surface drainage solution for the site will be subject to both planning and SAB approval. The drainage strategy will also confirm how foul drainage will be addressed onsite. Therefore the drainage solution for the site will not result in any significant adverse effects and therefore it is considered that an EIA is not required on drainage grounds.

Flood Risk

The site appears on the Natural Resources Wales (NRW) Flood Map as being located in an area considered to be at little or no risk of fluvial or coastal/ tidal flooding (Zone A).

Zone A is defined in TAN 15 as:

'Considered to be at little or no risk of fluvial or coastal/ tidal flooding is used to indicate that a justification test is not applicable and there is no need to consider flood risk further.'

However, the NRW flood mapping indicates that there are areas of surface water flooding on the site. A comprehensive Drainage Strategy, incorporating advice on Flood Risk is being progressed and will be submitted with an application. As such it is considered that an EIA is not required on flooding grounds.

Ecology

The potential significant environmental effects of the scheme in terms of ecology have been given consideration. The application site is located within the Borough of Neath Port Talbot. There are no statutory designations within the site and it is noted that the watercourse to the northern site boundary forms part of a Site of Importance for Nature Conservation (SINC). With regards to design the proposed layout indicates that the new school building will be generally located to the south east of the site on the site of the existing grass sports pitches. The design also includes for the provision of a 7m buffer from the watercourse (SINC) that is located on the northern boundary. It is noted that this area will only include fencing and no building that form part of the new school. This buffer requirement has been confirmed following discussions with the LPA and the County Ecologist and will ensure that the integrity of the watercourse is not affected by the proposed development. In addition the application will be supported by an Extended Phase 1 Ecological Appraisal and Bat Surveys for the Caretakers Cottage and the Main School Building. It is considered that the potential for bats is low but this will be confirmed following the completion of the surveys. The application will also be supported by an External Lighting Plan which will ensure that light spill does not result in any impacts on ecology and a Construction Environmental Management Plan (CEMP) which will ensure adequate protection measures are put in place during the construction phase to limit any potential impacts on ecology. As such with adequate measures being put in place during construction and operation it is considered that an EIA is not required on ecological grounds.

Trees

There are a number of trees on the site. A Tree Survey will be undertaken and will be submitted in support of the application. The survey will assess the quality of the trees and hedgerow on-site. It is concluded that any potential impacts with regards to arboriculture are considered to be temporary and can be addressed through the implementation of construction protection measures. As such it is considered that an EIA is not required on arboriculture grounds.

Landscape and Visual Impact

The potential significant environmental effects of the scheme in terms of landscape and visual impact have been given consideration. The application site is located within the Borough of Neath Port Talbot. The planning application will be supported by a Landscape and Visual Impact Assessment that will assess the proposal from set viewpoints. It is considered that through appropriate design, the setting down of the school and the use of sympathetic materials the landscape and visual impact of the school can be reduced. As such it is considered that an EIA is not required on landscape and visual impact grounds.

Transportation

The proposal will be supported by a Transport Assessment prepared by WSP. The Transport Assessment will assess parking levels on site and will also consider the new drop off/ pick up facilities that will serve the site. The Assessment will confirm that the new facilities will provide a betterment to the current arrangements on-site and will demonstrate that they are acceptable in terms of highway and pedestrian safety. Furthermore the school will be designed to further the aims of active travel by providing improved pedestrian routes for those accessing on foot along with cycle storage to encourage pupils and staff to access the site via other means than by private vehicle. A Travel Plan will also accompany the planning application which will set out measures to further encourage and meet the aims of active travel. As such it is considered that an EIA is not required on transport grounds.

Ground Conditions

The planning application will be supported by a Site Investigation Report, The site investigation is currently ongoing and the results are awaited. If dictated by the site investigation the site will be remediated in accordance with recognised standards to ensure that the site is suitable for such a vulnerable use. Any requirements can be met via standalone reports and as such it is considered that an EIA is not required in relation to ground contamination.

Heritage and Archaeology

There are no listed buildings or scheduled ancient monuments located within or close to the site boundary and the site is not located in a Conservation Area.

Glamorgan Gwent Archaeological Trust (GGAT) have been contacted to establish whether there are any particular archaeological constraints that need to be taken into consideration. Their response, dated 13/12/18 states:

"Many thanks for your pre-planning enquiry. We have consulted the regional Historic Environment Record (HER) and note there are no known archaeological sites within the proposed development area. Similarly a review of historic Ordnance Survey mapping depicts no archaeologically significant features or structures. Sites are known from the wider area, including Cefn Saeson medieval grange, as well as some unusual features shown on aerial photographs to the north of the proposal, we which noted in our response to the LDP. However, the construction of the existing school, as well as the re-profiling you mention which is also visible on modern aerial photograph, will likely have had an adverse effect on any potential remains.

As a result it is unlikely that significant archaeological material will be encountered during the course of the proposed development. Therefore should a similar application to the one you have outlined be submitted, we would be unlikely to recommend any pre-determination work, or that any archaeological conditions be attached to any consent."

As such it is considered that an EIA is not required on Heritage and Archaeological Grounds.

Noise

A Noise Impact Assessment will be submitted in support of the planning application. A draft of the report is also provided in support of this screening request. Based on the current layout the internal noise levels range are predicted below the

BB93 internal ambient noise level targets with windows open and no façade upgrades. The report does not predict any significant noise impacts in terms of internal ambient noise. With regards to plant the current specification of the proposed plant are currently unknown. However an assessment of noise level limits at nearby residential receptors confirms that the emission limits based on BS4142 are considered to be achievable. The report does not predict any significant noise impacts in terms of plant noise. As such with appropriate mitigation it is considered that an EIA is not required on Noise Grounds.

Air Quality

The proposal is for a new comprehensive school to replace the existing Cefn Saeson Comprehensive School. The new school will not result in any increase in pupil number/ capacity. As such pre-application discussions with the Local Planning Authority have confirmed that as there is no proposal to increase the school's capacity, an Air Quality Assessment is not required in support of the planning application. However the application will be supported by a construction method statement which will outline the measure that will be employed during the construction phase which will ensure that there are no adverse impacts on air quality and receptors. As such it is concluded that an EIA is not required on Air Quality Grounds.

Conclusion

The proposed development is for the construction of a new comprehensive school and associated works on the existing school site which does not give rise to the potential for unusually complex nor hazardous environmental effects.

As such the development of the site for a school is therefore a compatible form of development and appropriate for the site and location.

In summary, for the purposes of the EIA Regulations 2017 the development of Cefn Saeson Comprehensive School, Afan Valley Road, Cimla, Neath, SA11 3TA is considered to be a Schedule 2 development because the development area is in excess of 1ha. The proposed development is not strategic in nature nor is it complex or hazardous.

As you know, pre-application discussions have already been conducted with Neath Port Talbot County Borough Council and the supporting documents required for the planning application submission have already been agreed.

We would be grateful if you could review this screening request and formally respond within the statutory 21 day period for a screening decision.

Should you require any further information, require any further information please do not hesitate to contact me.

Yours sincerely

