
Environmental Statement

Volume 1 – ES Main Report

Coed Darcy

Prepared for:

St Modwen Developments

Prepared by:

Savills
2 Kingsway
Cardiff
CF10 3FD

Environmental Statement

Coed Darcy



Document Control

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Preface

This Environmental Statement has been coordinated and prepared by Savills on behalf of St Modwen Developments to accompany an outline planning application for the proposed housing-led development at Coed Darcy.

Given the scale of the Proposed Development, an Environmental Impact Assessment (EIA) has been undertaken. This Environmental Statement (ES) records the outcomes of the assessment and provides information on the Site, the Proposed Development, an assessment of the likely significant environmental impacts and the measures proposed to mitigate the impacts of the Proposed Development.

In accordance with the EIA regulations, the ES consists of the following elements:

- Volume 1: ES Main Report;
- Volume 2: Technical Appendices; and
- Volume 3: Non-Technical Summary

Consultant Team

The Consultant Team for the Proposed Development comprises a number of consultancies, all of whom are extensive experience of both designing schemes of this nature as well as undertaking Environmental Impact Assessment. Further details are provided in Section 1.3.



Consultation

Should interested parties wish to make representations on the content of the ES, they should be made in writing to Neath Port Talbot Council via email at planning@npt.gov.uk or in writing to Development Management, Neath Port Talbot CBC, The Quays, Brunel Way, Baglan Energy Park, Neath, SA11 2GG.

Copies of the full ES, along with all the planning application documents can be inspected at Neath Port Talbot County Borough Council's offices at the address previously noted above and on the Council's online planning register, via <https://planningonline.npt.gov.uk/online-applications/>

Alternatively, copies of the Environmental Statement on USB format can be obtained for £25.00. Documents/CDs/USBs can be obtained via a written request to:

Planning
Savills
2 Kingsway
Cardiff
CF10 3FD

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Abbreviations

Abbreviation	Meaning
AADT	Average Annual Daily Traffic
AOD	Above Ordnance Datum
AQAL	Air Quality Assessment Level
AQMA	Air Quality Management Area
AQS	Air Quality System
ATC	Automatic Traffic Count
BAP	Biodiversity Action Plan
BGS	British Geological Society
BRE	Building Research Establishment
CBC	Common Bird Census
CEMP	Construction Environment Management Plan
COMEAP	Committee on the Medical Effects of Air Pollutants
CSM	Conceptual Site Model
CRTN	Calculation of Road Traffic Noise
CTCs	Classified Turning Counts
CTMP	Construction Traffic Management Plan
DAM	Development Advice Map
dB	Decibel
DCWW	Dwr Cymru Welsh Water
DEFRA	Department for the Environment, Food and Rural Affairs
DfE	Department for Education
DfT	Department for Transport
DM	Do Minimum
DMRB	Design Manual for Road and Bridges
DS	Do Something
ECow	Ecological Clerk of Works
EIA	Environmental Impact Assessment
ENDS	Environmental Data Service
EPUK	Environmental Protection UK

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Abbreviation	Meaning
ES	Environmental Statement
EU	European Union
GHG	Greenhouse Gases
HDV	Heavy Duty Vehicle
HGV	Heavy Goods Vehicle
IAQM	Institute of Air Quality Management
IEMA	Institute of Environmental Management and Assessment
LAQM	Local Air Quality Management
LDP	Local Development Plan
LDV	Light Duty Vehicle
LPA	Local Planning Authority
MSOA	Middle Super Output Area
NNR	National Nature Reserve
NO	Nitric Oxide
NO ₂	Nitrogen Dioxide
NO _x	Nitrogen Oxide
NPTC	Neath Port Talbot Council
NRW	Natural Resources Wales
NTS	Non-Technical Summary
PIA	Personal Injury Accident
PPW	Planning Policy Wales
ProPG	Professional Practice Guidance
SAB	Sustainable Drainage Approval Body
SAC	Special Area of Conservation
SPA	Special Protection Areas
SPG	Supplementary Planning Guidance
SRA	Strategic Regeneration Area
SRN	Strategic Road Network
SSSI	Site of Special Scientific Interest
SuDS	Sustainable Drainage System
TA	Transport Assessment
TAN	Technical Advice Note

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Abbreviation	Meaning
The Regulations	Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017
TS	Transport Statement
WFD	Water Framework Directive
WG	Welsh Government
WHO	World Health Organisation
WTS	Wales Transport Strategy

1. Introduction

1.1. Overview

1.1.1. This Environmental Statement (ES) accompanies an outline application for the proposed development of Coed Darcy (Neath Port Talbot Local Development Plan reference SRA1), (hereafter referred to as 'the Site'). The ES reports the findings of the Environmental Impact Assessment (EIA) in accordance with the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 ('the EIA Regulations').

1.1.2. The planning application has been submitted by Savills on behalf of St Modwen Developments ('the Applicant') to Neath Port Talbot County Borough Council (NPTC), as the Local Planning Authority (LPA). The planning application covers circa 126.5 hectares (ha) of land, as shown by the Site Location Plan (Figure 1).

1.1.3. This planning application seeks permission for:

Outline planning application, with all matters reserved except for strategic access, for residential uses (C2 & C3 use class), including land for education (D1 use class) with associated public open space, commercial uses (A1, A2, A3, B1, D1 & D2), commercial / employment (B2 & B8) uses, public open space, highway works, sustainable drainage, ecological mitigation and enhancement, landscaping, ground remediation, and associated engineering and infrastructure works

1.1.4. The Site has been identified and allocated within the adopted NPTC Local Development Plan (LDP) as a Strategic Regeneration Area for residential development, as part of allocation and policy SRA1.

1.1.5. An illustrative masterplan has been prepared to accompany the planning application to reflect the Applicant's layout for the Proposed Development – this is provided at Figure 3.4 This is supplemented by a series of parameter plans (Figures 2-4). Chapter 2 of the ES provides a full description of the Site and surroundings, and details of the Proposed Development are outlined in Chapter 3.

1.2. Environmental Impact Assessment

1.2.1. An EIA is a procedure for ensuring that the likely significant effects of a Proposed Development on the environment are fully understood and taken into account before the development is consented. This process ensures that the importance of any predicted effects, and the scope for reducing them, has been fully assessed before any decision is made by the determining authority.

1.2.2. Legislation determining when an EIA is needed for a Proposed Development is set out in the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 ('the Regulations').

1.2.3. An overview of the EIA process and methodology, including the scoping of significant effects, is set out in Chapter 4 of this ES.

1.3. The Planning Submission and the Project Team

1.3.1. The planning application has been submitted in outline, with all matters reserved except for access. The ES has been prepared by Savills in conjunction with the following consultants:

- Savills is the planning consultant preparing the application and has undertaken an assessment of the socio-economic effects of the Proposed Development. Savills has co-ordinated and prepared the ES;
- Powell Dobson is the consultancy undertaking the Masterplanning and urban design for the Proposed Development;
- Atkins has provided technical assessment of the baseline conditions and effects of the Proposed Development with regard to Transport and Travel, Air Quality and Noise.
- PJA has undertaken a technical assessment of the Proposed Development with regard to Soils, Ground Conditions and the Water Environment (hydrogeology and Water and Flood Risk).
- Ecology Solutions has provided technical assessment of the baseline conditions and effects of the Proposed Development with regard to Biodiversity.
- Soltys Brewster has provided technical assessment of the baseline conditions and effects of the Proposed Development with regard to Landscape and Visual Impact.
- Arup has provided technical assessment of the baseline conditions and effects of the Proposed Development with regard to Climate Change and Sustainability.

1.3.2. In accordance with Part 5, Schedule 17 (4) of the Regulations, statements of competence of the authors of this ES are provided in Appendix 1.1.

1.4. The Structure of the Environmental Statement

1.4.1. The ES comprises

- Volume 1: ES Main Report (this Statement) – provides the full text of the ES along with associated figures and tables;
- Volume 2: Technical Appendices – contains all of the technical surveys, reports and supporting documents referred to in the main text of Volume 1;
- Volume 3: Non-Technical Summary: A summary of the EIA, the likely significant effects of the Proposed Development, appropriate mitigation measures and the predicted residual effects.

- 1.4.2. This document is Volume 1 of the ES and comprises a total of 14 chapters. For ease reference, those figures and tables of the ES are provided within the text when possible. Where this is not possible, supporting material is provided within Volume 2 'Technical Appendices'.
- 1.4.3. Chapter 2 provides a detailed examination of the character of the Site and surrounding area and a description of the site's location and existing land use.
- 1.4.4. Chapter 3 provides a detailed description of the Proposed Development.
- 1.4.5. Chapter 4 identifies development options considered by the Applicant. This section also documents the pre-application consultation process that has informed the evolution of the Proposed Development. Chapter 4 also provides a review of the EIA process and provides a description of the EIA assessment methodology, including the approach to scoping the significant environment effects assessed within the ES.
- 1.4.6. Chapter 5 to 13 comprise the main element of the EIA work with a series of environmental studies undertaken by specialists engaged by the Applicant.
- 1.4.7. Chapter 14 draws together the residual impacts of the Proposed Development after taking mitigation into account.
- 1.4.8. Overall co-ordination of the EIA and the preparation of the ES has been undertaken by Savills.

1.5. Other Reports

- 1.5.1. A number of other documents, drawings and plans have been prepared to accompany the planning application. Key elements of this material are incorporated within the Appendices of the ES and reference is made within the relevant ES chapter, where applicable.

2. The Site

2.1. The Site

Location

- 2.1.1. The Site is identified on the Site Location Plan in Figure 1.1. The Site is a former BP refinery and is predominately brownfield land. The Site is approximately 126.5 ha in size.
- 2.1.2. The Site comprises post-industrial land which has been cleared under the extant permission and has been subject to significant remediation since its previous use as an oil refinery. It predominantly comprises bare land, which has been partially vegetated with patches of woodland and some existing landscaping at the site boundaries.
- 2.1.3. The Site includes the existing D'Arcy Business Park and existing building at Britannic House and William Knox House which accommodates office space. The Site also includes the original contractor's yard, which is located to the south of the Site boundary and to the north of Llandarcy Village, and is leased to a mix of businesses for open storage and industrial uses.
- 2.1.4. Around 300 homes have been delivered on the Site already (i.e. Phase 1 Persimmon development) which lies outside of the Site boundary. Furthermore, the 'Heritage Gate' development, comprising further residential development has been developed to the south west of the Site, directly to the north of Llandarcy Village.
- 2.1.5. Further to the east of the Site there are a number of commercial and leisure uses, including a hotel, restaurant and sports facilities.
- 2.1.6. The Site is located to the west of junction 43 of the M4 motorway. Swansea city centre lies 4km south-east of the site whilst Neath town centre lies circa 3.5km north-east. The Site is currently accessed from the B4290 which feeds off of junction 43 of the M4 motorway via the Northern Access Road (which has been implemented under the existing planning permission).
- 2.1.7. A railway line dissects the northern and central part of the Site. The far northern boundary adjoins the 'north site' reservoir (which lies outside of the site boundary) and the M4 abuts the eastern boundary of this part of the Site.
- 2.1.8. The Site is relatively steep in parts, with a number of topographical features. The high point of the Site is identified immediately west of the existing residential development lying at approximately 77.0m AOD and falls from east to west towards the Crymlyn bog down to a level of approximately 9.0m AOD. Levels also fall from this high point to the railway to north, which is in a cutting, and towards the existing Coed Darcy Business Park where levels are approximately 29.0m AOD. The topography north of the railway has a plateau through the centre, where levels are approximately 55.0m AOD which falls away to approximately 40m AOD along the northern boundary and southern boundaries and approximately 25m AOD in the south-western corner of the Site.

2.1.9. The Crymlyn Bog Ramsar Site, Special Area of Conservation (SAC), Site of Special Scientific Interest (SSSI) and National Nature Reserve (NNR) abuts the western boundaries of the Site.

2.1.10. The primary access will be achieved from Ffordd Coed Darcy which has already been built as part of the NAR network.

2.2. Planning Policy Context

2.2.1. Each topic chapter addresses the relevant planning policy context with regard to the individual matters addressed in the ES.

2.2.2. There are a number of policies that provide guidance for social and economic development in the UK, Wales and at a local authority level, the key documents are set out below:

- Future Wales – The National Plan 2040 (February 2021);
- Planning Policy Wales (11th Edition, February 2021) – sets out the land use policies of the Welsh Government;
- PPW is supplemented by a series of Technical Advice Notes (TANs). In particular, TAN 23 Economic Development (February 2014).
- Well-being of Future Generations (Wales) Act 2015;
- Building Better Places (July 2020);
- Placemaking Charter (September 2020); and
- NPTC Local Development Plan (LDP) (2011-2026) (January 2016).

3. Proposed Development

3.1. Overview

- 3.1.1. This chapter provides a detailed description of the Proposed Development at Coed Darcy. As discussed in chapter 2, Coed Darcy is identified and allocated in the NPTC LDP for residential development (SRA1). The Applicant is submitting an application for residential development in line with this allocation.
- 3.1.2. This EIA supports the outline planning application. The chapter sets out the description of the Proposed Development that has been assessed by the EIA.

3.2. The EIA Parameters

- 3.2.1. In order for the likely significant environmental effects of the Proposed Development to be properly identified and assessed, it is necessary to clearly identify and scope the components of the Proposed Development that are likely to be delivered. A maximum potential development is tested so to assess a worst-case scenario.
- 3.2.2. EIA parameters are used to define the extent of the Proposed Development in terms of scale, mass, quantum etc. and allow the likely worst-case scenario and any likely significant environmental effects to be identified. These parameters allow for a degree of flexibility should there be any changes in the requirements over the construction period – which for a project of this scale is likely to be six years, starting in 2023.
- 3.2.3. The parameters are presented in Figures 3.1 – 3.3, as per Table 3.1 below. These are referred to throughout the ES.

Table 3.1 – Parameter Plans

Parameter	Figure	Status
Land Use Plan	3.1	For Approval
Scale & Massing	3.2	For Approval
Movement	3.3	For Approval

- 3.2.4. The parameter plans define the limits of the Proposed Development which have been the subject of the EIA. The detailed design of these elements for which outline permission is sought should therefore evolve within these parameters to the extent that they do not give rise to any significant un-assessed effects.

3.3. Detailed Description of the Proposed Development

- 3.3.1. The outline planning application proposes to comprehensively redevelop the Site. The outline planning application is with all matters reserved except for access. The description of the Proposed Development is:

Outline planning application, with all matters reserved except for strategic access, for residential uses (C2 & C3 use class), including land for education (D1 use class) with associated public open space, commercial uses (A1, A2, A3, B1, D1 & D2), commercial / employment (B2 & B8) uses, public open space, highway works, sustainable drainage, ecological mitigation and enhancement, landscaping, ground remediation, and associated engineering and infrastructure works.

- 3.3.2. Accompanying the Description of Development and appended to the application form is a schedule detailing the quantum of development by use. This schedule is copied below at Table 3.2.

Table 3.2 – Schedule of Proposed Development and their Uses

Use Class	Use Description	Quantum
C2 / C3	Residential	Up to 2,000 dwellings on 40ha net residential area
D1	Land for Education. The application proposals include land for a two form entry primary school with additional 'flexible' land which could be used to deliver either a through school or residential development and open space.	2.6ha for education with a further 4.4ha of flexible land for education. The maximum floorspace for a primary school is 2,500sq.m. and the maximum for a through school is 15,000sq.m. <i>[Note: should the authority take up the option of the Through School this would reduce the quantum of land available for residential development by 1.7ha]</i>
Land for commercial purposes to be provided within the 'Flexible Mixed Use' zone on the Land Use Parameter Plan. There are two such areas:		
A1 / A2 / A3 / B1 / D1 / D2	(1) in the neighbourhood centre;	Up to 1,134 sq.m. GIA within the mixed use core of the proposals. This floorspace may be integrated within buildings which also contain residential dwellings. It is proposed that a maximum of 750 sq.m. GIA floorspace within this area is for A1 Retail use and that this quantum will be controlled by condition.
A3 / D1 / D2	(2) the conversion of existing buildings (known as Britannic House, Heritage House and William Knox House) close to the eastern boundary of the site.	Either residential dwellings (within the maximum parameter of 2,000 dwellings specified above) and / or up to 4,550sq.m. floorspace from the converted buildings.
B2 / B8	Extension to Darcy Business Park	Up to 800 sq.m. GIA on 0.22ha of land

3.3.3. The Proposed Development will include:

- Up to 2,000 new homes ,comprising a mixture of market and affordable housing (Use Class C3) and extra care provision (Use Class C2);
- Land for education (either a through-school or primary school only), with associated public open space (Use Class D1);
- Two areas of land for a flexible mix of commercial and community uses (retail, employment, community, assembly and leisure uses facilities comprising a neighbourhood centre (assume A1, A2, A3, B1, D1 and D2 Uses);
- Land to be used for employment uses as an extension to the existing Llandarcy Business Park (B2 and B8 Uses), in addition to retaining the existing Contractors Yard commercial uses;
- An extensive scheme for ecological mitigation, including:
 - Adoption of appropriate construction safeguards to ensure that potential impacts on retained and off-site habitats are avoided. This to include consideration of all potential impact pathways on designated sites.
 - It is further anticipated that potential impacts on sites of international importance (SAC, Ramsar) will be subject to appropriate assessment. The applicant has produced and submitted a shadow Habitat Regulations Assessment.
 - The creation of an extensive green infrastructure network for the site, with this to support a wide range of high quality habitats and with in-perpetuity biodiversity management secured.
 - The adoption of a site wide Landscape and Ecological Mitigation and Management Plan, detailing precise habitat creation and management proposals for the site.
 - The completion of any necessary protected species translocations, not least in respect of amphibians and common reptiles.
 - Adoption of appropriate construction practices in respect of faunal species.
 - The removal of undesirable and non-native species, such as Japanese Knotweed, where this is located within the site.
- Open space, sports pitches, formal areas of play and informal amenity space including, a mix of informal 'greenways', landscaping, green infrastructure, walking and cycling routes and sustainable drainage systems; and
- Associated highways works, including a new pedestrian footbridge across the railway line; new and improvements to active travel links, ecological mitigation, ground remediation and other engineering works.

3.4. Land Use

- 3.4.1. The Land Use Plan (Figure 3.1) defines the development parcels and the proposed distribution of uses within the site. These land uses correspond with those outlined in Table 3.2 above and the two should be read together. The Land Use Plan shows the area of land proposed for education purposes and, in addition to this, an area where there is flexibility to increase the size of the education land to accommodate a Through School as opposed to a Primary School. Making this change would result in the loss of an area of open space and a residential land parcel.
- 3.4.2. The Land Use Plan also includes a prescribed limit of deviation for the alignment of the internal road network of +/- 10m. This flexibility will enable the reserved matters applications pursuant to the outline to realign the precise boundaries of the development parcels and movement infrastructure between them to the extent of that deviation.

3.5. Scale and Massing

- 3.5.1. The Scale and Massing Plan (Figure 3.2) outlines the density and size of structures proposed on the Site. The Plan utilises shading to indicate the density and scale of buildings proposed, varying from 2-2.5 storeys high through to 2.5-4 storeys high – which is reflected in densities of between 32-40 dwellings per hectare to 40-50 dwellings per hectare. The Plan also indicates the scale of non-residential land, including educational and commercial.

3.6. Movement

- 3.6.1. The Movement Plan (Figure 3.3) illustrates both how the Proposed Development interacts with and is part of its surroundings. The routes, streets and connections identified on the Plan seek to integrate the Proposed Development with existing and planned routes both surrounding and through the Site. Primary, secondary and pedestrian/cycle nodes are identified and will be key junctions for residents and users of the Site.

3.7. Illustrative Masterplan

- 3.7.1. The Illustrative Masterplan (Figure 3.4), submitted with the application, clearly illustrates a layout, including open space and landscaping areas, amongst other features. Please note that these matters will be addressed in detail through the submission of reserved matters planning applications, should this application be approved.

3.8. Sustainability & Energy Strategy

- 3.8.1. The planning application is accompanied by an Energy Strategy prepared by Ove Arup and Partners Ltd. The strategy will seek to minimise energy demand and associated GHG emissions through the application of the energy hierarchy and will include consideration of:
- Baseline building regulations requirements at the time of construction;
 - Minimising energy demand through passive solar gain and a fabric first approach;

- Incorporating building integrated and / or masterplan level renewable energy sources; and
- Incorporating low carbon energy sources including, where appropriate, viable and feasible.

3.8.2. The energy strategy defines and demonstrates that site-wide energy targets can be achieved in principle. Individual future phases will then be expected to demonstrate compliance with targets through detailed design and updated energy calculations at the reserved matters stages. The proposed energy strategy defines the likely energy sources and requirements, including spatial requirements, within the masterplan and underpins the relevant topics within the EIA.

3.8.3. In recognition of the climate emergency declared at UK and Welsh government levels, and of Welsh government targets to reduce emissions, the developer recognises that the reduction in GHG emissions must be a priority for the Coed Darcy development, and subject to a full techno-economic analysis is aiming to reduce emissions as close to net zero as viable. In defining the energy strategy for the site, consideration will be given to relevant legislation, policy and guidance including (but not limited to):

- The Well-being of Future Generations (Wales) Act 2015
- Building regulations – Part L and F (2014, however both are due to be updated in Autumn 2021)
- Prosperity for all: A low carbon Wales (2019)
- Technical advice note (TAN) 12: design
- Neath Port Talbot County Borough Council (NPTC) Local Development Plan (2011-2026)
- NPTC Decarbonisation and Renewable Energy Strategy (2020)
- NPTC Supplementary Planning Guidance: Renewable & Low Carbon Energy (2017)
- Expectations in decarbonisation of the electricity grid.

3.9. Phasing

3.9.1. It is intended that, should planning permission be granted in the first quarter of 2023, infrastructure works commence in the Summer of 2023 then the first dwellings would be constructed in Autumn/Winter of 2023.

3.10. Construction

3.10.1. It is anticipated that contractor's compounds will be located as secure areas within the relevant phase under construction and will be relocated as each phase nears completion onto the subsequent phase. The precise nature and location of the contractor's compound are to be determined. The working hours are anticipated to be:

- 07:00 - 19:00 hours Monday to Friday inclusive;
- 08:00 - 13:00 hours on Saturday; and

- No work to be carried out on Sundays or Bank Holidays.

3.10.2. In order to maintain these working hours, the contractor(s) may require a period of up to half an hour before and up to one hour after normal working hours for start-up and close down of activities. This does not include operation of plant or machinery giving rise to noise with the potential to disturb nearby residents or the arrival of any HGV at site before 06:30 hours.

3.10.3. It is anticipated that development would be undertaken on a rolling programme of site preparation and construction, allowing earlier phases to be completed and occupied while subsequent phases are constructed. All materials and plant storage will occur on the Site and no off-site compounds are necessary. The on-site materials storage compound will be located in a position compatible with the ongoing phases of development.

Construction Environmental Management Plan (CEMP)

3.10.4. Details of measures to protect the environment during the construction of the Proposed Development will be set out in a framework CEMP. Measures will address hours of working, noise, vibration, dust, light spill, wheel washing and control of runoff. It is anticipated that the implementation of a full CEMP will be a condition of the planning permission and that it will be regularly monitored.

3.10.5. Once finalised and approved by the Local Planning Authority, the CEMP would be held on-site. All site personnel would be made aware of its existence and undertake to adhere to the guidance.

3.11. Assumptions & Limitations

3.11.1. Each chapter will review any particular assumptions that have been made with regard to the particular topic. The chapters will also include information on any limitations that their assessments have made. However, it should be noted that no significant limitations have been faced in undertaking this EIA or compiling the baseline data.

3.12. Alternatives & Design Evolution

3.12.1. In identifying the information to be included in the ES, the Regulations specify, in paragraph 2, part 1, schedule 4, a requirement that “*an outline of the reasonable alternatives studied by the applicant or appellant and an indication of the main reasons for this choice, taking into account the environmental effects*”.

3.12.2. The purpose of this section of the ES is, therefore, to describe the alternative sites and development options which have been assessed through the course of preparing the planning application. The objective of this exercise is to provide an understanding of the matters that have led to the Proposed Development and set out its environmental credentials.

3.12.3. For this assessment, the alternatives and options fall within two categories:

3.13. An alternative location

- 3.13.1. As the Site has already been considered in detail as part of the NPTC LDP, it is not necessary to re-assess the potential for alternative sites.
- 3.13.2. The Site's allocation in the NPTC LDP promotes the principle of the Site's development for the proposed form of development (residential), there is no further necessity at this point to consider alternative locations for the Proposed Development.

3.14. An alternative design

- 3.14.1. The scale and nature of development is defined within the NPTC LDP on the basis of meeting the housing needs of the County Borough area. The total allocation for the 'Coed Darcy Strategic Regeneration Area' is 4,000 units (2,400 within the Plan period) and with 41,200 sq. m. of business floorspace. This application is for part of the area allocated within the LDP and it is proposed to develop 2,000 new homes.
- 3.14.2. As identified above the Site is subject to an allocation for residential-led mixed use development in the adopted LDP. This indicates that the Site should be developed for a range of uses including housing and business. Given this policy position, it is not considered appropriate to consider any options for alternative uses and instead the main design iterations have been considered.
- 3.14.3. It is noted that the LDP allocation for the site includes the potential to deliver 41,200sqm of B1 office space. Justification for not delivering this amount of B1 office space is provided in the Planning Statement which accompanies the planning application.

3.15. Consultation

- 3.15.1. In the lead up to the planning application and throughout the development design, a programme of consultation has been undertaken with statutory and non-statutory consultees, key stakeholders and members of the public. Further technical consultation will also be undertaken as part of the ongoing EIA process and pre-application engagement.
- 3.15.2. Details of technical consultation, directly related to the production of this ES are provided in the methodology and baseline sections of each topic chapter.

4. EIA Methodology

4.1. Overview

- 4.1.1. The aim of Environmental Impact Assessment (EIA) is to protect the environment by ensuring that the determining body, in this case NPTC, when deciding whether to grant planning permission for a project, which is likely to have significant effects on the environment, does so in the full knowledge of the likely significant effects and the decision-making process.
- 4.1.2. The aim of EIA is also to ensure that the public are given early and effective opportunities to participate in the decision making procedures. EIA is a process for identifying the positive and negative environmental effects of proposed developments.
- 4.1.3. This chapter describes the process undertaken to identify the environmental issues as those most likely to give rise to significant effects requiring EIA. Subsequent chapters of the Environmental Statement (ES) (Chapter 5-13) describe the methodologies undertaken to identify and assess the potential significant effects arising.
- 4.1.4. This chapter comprises:
- Legislation & guidance;
 - EA scoping opinion; and
 - EIA stages & assessment.

4.2. Legislation & Guidance

- 4.2.1. The ES has been prepared in accordance with the Town & Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 ('the Regulations'). The Regulations apply the amended European Union (EU) directive 2014/52/EU "*on the assessment of the effects of certain public and private projects on the environment*" to the planning system in Wales.
- 4.2.2. The EIA Regulations apply to separate lists of projects, including:
- Schedule 1 projects for which EIA is required in every case; and
 - Schedule 2 projects for which EIA may be required if the project is likely to give rise to significant environmental effects.
- 4.2.3. The Proposed Development constitutes Schedule 2 development in the context of the Regulations under criteria 10 (b) 'urban development projects'. The Proposed Development exceeds the statutory threshold for dwellings in Schedule 2 (more than 150 dwellings), and thus the Proposed Development required EIA screening – screening was not undertaken with the LPA. The Proposed Development was not screened as it was assessed to comprise EIA development by the applicant.

- 4.2.4. Screening is a procedure used to determine whether a Proposed Development is likely to have significant effects on the environment. An applicant can choose not to seek a screening opinion and proceeded directly to prepare an ES the scoping process provides an opportunity to engage with the Local Planning Authority and stakeholders prior to submission and aids the development of the ES, making it more focused and proportionate.
- 4.2.5. An ES may consist of one or more documents, but it must include a “a non-technical summary of the information referred to in sub-paragraphs (a) to (d);”. The form of this ES therefore takes that of the standard approach adopted by practitioners of a three-part document, as per:
- Volume 1: ES Main Report (this Statement);
 - Volume 2: Technical Appendices; and
 - Volume 3: Non-Technical Summary.
- 4.2.6. This ES has been prepared to comply with the requirements of the Regulations (Schedule 4), Table 4.1 sets out where the relevant information is located within the ES.

Table 4.1 Compliance with Schedule 4 of the Regulations

Section	Location of information in this ES
1a	Chapter 2 of the ES
1b	Chapter 3 of the ES
1c	Chapter 3 and 6-14 of the ES.
1d	Chapter 3 and 6-14 of the ES.
2	Chapter 4 of the ES.
3	Chapter 3 and 6-15 of the ES.
4	Chapters 6-14 of the ES.
5	Chapters 6-15 of the ES.
6	Chapters 6-15 of the ES.
7	Chapters 6-15 of the ES.
8	Chapters 6-15 of the ES.
9	A standalone Non-Technical Summary is provided as ES Volume 3 to this ES.

Section	Location of information in this ES
10	Reference lists are provided at the end of each chapter where relevant.

4.3. Information Required by the EIA Regulations

Vulnerability to risks of major accidents or disasters

- 4.3.1. Consideration has been given to any adverse effects of the Proposed Development arising from its vulnerability to risks of major accidents and or disasters. No such risks have been identified that are considered likely to cause any significant adverse effects for the topics considered in this ES. No significant adverse effects of the Proposed Development on the environment deriving from the vulnerability of the development to risks of major accidents and/or disasters which are relevant to the proposed development concerned are anticipated.

Risks to Human Health

- 4.3.2. No major risks have been identified by the consultant team nor statutory consultees which are considered likely to cause significant adverse effects on human health. In addition, the technical disciplines have considered any potential for effects on human health as an integral part of the assessment, and where relevant is reported within individual topic chapters.

4.4. EIA Scoping

- 4.4.1. The Proposed Development exceeds the statutory threshold of residential development (more than 150 dwellings) set out in Schedule 2 of the Regulations, meaning that an unmitigated scheme could give rise to significant environment effects.
- 4.4.2. Regulation 10 of the Regulations makes provision for an applicant to request a formal opinion from the Local Planning Authority on the information to be provided in the ES, namely a 'scoping opinion'.
- 4.4.3. The scoping process enables those issues which are considered by the applicant (and the determining authority) to be the main effects of the Proposed Development to be considered and discussed, and to confirm the focus for the ES. As well as defining the main effects for assessment, the process also 'scopes out' issues of only marginal relevant (or non-significant) in consideration of the Proposed Development.
- 4.4.4. A scoping request was prepared by Savills and submitted to NPTC on 2nd August 2021. The scoping request set out the technical matters considered to be required by the applicant for assessment to identify the likely significant environmental effects and proposed methodologies.
- 4.4.5. The scoping request considered the following likely environmental effects from the Proposed Development:
- Traffic & transport;

- Air quality;
- Noise & vibration;
- Ground conditions;
- Water environment;
- Ecology & nature conservation
- Landscape & visual impact;
- Climate change; and
- Socio-economic impacts.

4.4.6. On the 4th November 2021 NPTC issued their scoping opinion for the Proposed Development (see appendix 4.1). Many of the surveys and reports were progressed prior to receipt of the response but with the benefit of extensive engagement with NPTC and other parties so to help guide the nature and content of the assessments.

4.4.7. Following receipt of the scoping opinion, some amendments were required to the ES. All ES chapters were revised accordingly to address any additional matters and requirements arising from the Scoping Opinion. These amendments are considered relatively minor in nature and did not require any substantial amendments to the ES. As such, the ES is in accordance with the Council's scoping opinion.

4.5. EIA Stages & Assessment

4.5.1. The preparation of the ES has been guided by the following:

- Statutory requirements set out in regulation 17 of the Regulations and supplemented by Schedule 4;
- Planning Policy Wales
- Policies and guidance relevant to the topic being assessed
- Experience of the EIA team on similar projects;
- An understanding of the nature of the Proposed Development;
- An understanding of the Site, its neighbouring uses and wider context in Neath Port Talbot and Swansea;
- Consultation with statutory bodies.

4.5.2. Details of the specific assessment methodology used for each of the topics are set in chapters 5 – 13.

General approach to topics

4.5.3. The following comprises the general approach taken to the topics set out in chapter 5 – 13, which include:

- Introduction;
- Assessment criteria & methodology;
- Baseline environment;
- Inherent design mitigation;
- Potential environmental impacts & effects;
- Additional mitigation, compensation & enhancement measures;
- Residual environmental impacts & effects;
- Cumulative effects; and
- Assessment summary.

Assessment criteria & methodology

4.5.4. This section will outline previous assessments undertaken in relation to the Site, the Scoping Opinion, relevant topic specific legislation, policy, published standards, guidance and best practice and the method by which the baseline has been established. This section should include a table showing where/how scoping responses received have been addressed.

4.5.5. This section will also set out the methodology by which the impacts have been assessed. It should also state the relevant assumptions made in undertaking the assessment and/or identify if/ where information gaps exist (if any).

Baseline environment

4.5.6. This section will describe the existing environment against which the impacts of the Proposed Development have been assessed. Data will either be reproduced in the chapter or included in an Appendix. Published data or information contained in reports accompanying the planning application can be referred to and summarised.

Inherent design mitigation

4.5.7. This section will outline elements of the Proposed Development that have been included as being in place when undertaking the assessments and would be particularly important to ensure are retained.

Potential environment impacts & effects

- 4.5.8. This section will outline the potential impacts of the Proposed Development and the resultant environmental effects. Effects should be defined for the construction (temporary) and operation (permanent) phases of the development.

Additional mitigation, compensation & enhancement measures

- 4.5.9. Best practice for mitigation is to 'avoid, reduce or compensate'. Additional mitigation measures are those that can be applied in addition to the Proposed Development to reduce the potential effects. This section will include details on how the mitigation will be achieved. Mitigation can be used to enhance positive effects further and this has been considered wherever possible.

Residual environment impacts & effects

- 4.5.10. This section will outline the impacts and resultant effects that will remain following the implementation of proposed mitigation and enhancement measures.

Cumulative effects

- 4.5.11. Cumulative effects are those that arise from the combination of the Proposed Development and other existing or reasonably foreseeable developments. The potential for likely significant effects on the environment resulting from committed developments in the area coming forward at the same time as the Scheme have been considered and no other existing or reasonably foreseeable developments have been identified. As such, no cumulative effects have been identified or assessment within the ES.
- 4.5.12. As noted within our Scoping Report, Savills has undertaken a review of whether there are other development schemes within a reasonable proximity of the Site's boundary – which was 5km – and which benefit from an extant planning consent and are certain to progress to construction and operational phases. From our review, we consider that there is one scheme within proximity to the Site, Heritage Gate which could have the potential to result in cumulative effects with the Proposed Development in respect of transport and air quality.

Assessment summary

- 4.5.13. A table summarising the potential impacts and effects, mitigation and residual effects will be included at the end of each Chapter.

4.6. Assumptions & Limitations

- 4.6.1. The following key assumptions have been made in preparing this ES:
- All legislative requirements will be met. Therefore, any standard guidance which is provided to ensure minimum legal compliance is not considered to constitute mitigation in the EIA. The assessment of effects prior to the adoption of mitigation measures will assume that all legislative requirements will be met;

- Any limitations or uncertainties associated with impact prediction or the sensitivity of receptors due to the absence of data or other factors will give rise to uncertainty in the assessment. Any such limitations will be referred to in the relevant technical chapters of the ES;
- The EIA considers the likely effects of the Proposed Development using a combination of current knowledge of the Site and its context, and desktop and survey investigations. Appropriate regard has been had to relevant national and local development plan policy, relevant legislation, and guidance and best practice.
- Every reasonable effort has been made to obtain data concerning the existing baseline conditions and to accurately predict the effects of the Proposed Development. Known deficiencies, or where it has been necessary to make assumptions, are documented within individual topic chapters. For some topics, there are no commonly accepted methodologies for assessing impacts (such as in the case of socio-economic effects). In these cases, professional judgement and experience have been applied to inform the EIA.
- Assumptions are of importance to environmental assessments. Typically, assumptions are implicit, largely dependent upon expert judgement. The approach adopted in the EIA is one of making assumptions explicit wherever possible in order that they may be understood and critically evaluated by external parties. This is particularly true of construction impacts, where assessments are based on broad assumptions made in advance of agreement and approval of specific construction programmes and methods. In such cases, the worst-case scenario has generally been tested.
- The assessment of effects prior to the adoption of mitigation measures will assume that the Proposed Development will be constructed in accordance with construction industry standard techniques. Such techniques will therefore not be considered as mitigation.