

DPP Planning

DESG
11-13 Penhill Road
Cardiff
CF11 9PQ

029 2280 4890
info@dppukltd.com
www.dppukltd.com



Neath Port Talbot Council
Planning Division,
The Quays,
Brunel Way,
Neath,
SA11 2GG

Ref: 5517LE/L002
Date: November 2023

Dear Sir/Madam,

TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) (WALES) REGULATIONS 2017 – REQUEST FOR A SCREENING OPINION IN RESPECT OF THE PROPOSED REDEVELOPMENT OF EXISTING BUILDINGS AND ERECTION OF NEW BUILDINGS TO ACCOMMODATE LEISURE USES TOGETHER WITH ASSOCIATED ACCESS, PARKING AND CIRCULATION AT RHEOLA HOUSE AND GROUNDS, GLYNNEATH, NEATH, SA11 4DT.

Introduction

On behalf of our client, Brook Group, we write to request a screening opinion pursuant to Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017. We are seeking confirmation from the Local Planning Authority that an Environmental Impact Assessment is required for the proposed redevelopment of existing buildings and erection of new buildings to accommodate leisure uses together with associated access, accessible parking, and circulation at Rheola house and grounds, Glynneath, Neath, SA11 4DT.

The following plans have been submitted in support of this letter.

- (505)2222-GWP-01-XX-PP-A-4B-Masterplan-PreApp-PO1
- (505)2222-GWP-01-XX-PP-A-4B-Masterplan-PreApp

The Site

The site measures approximately 41Ha of land and is located within the 19th Century Rheola Estate, 8 miles to the northeast of Neath in South Wales, adjacent to the A465. The Rheola Estate is set on a wooded hillside and includes a manor house, stables and associated outhouses and gardens.

During the mid-20th Century, part of the site was developed as an aluminium smelting works. This was operational until 1982 and has since been demolished. The site was previously used for a popular weekly market at the Rheola Showground.

Access to the site is derived from the B4242 via the entrance drive to the Estate in the south of the site. The driveway runs north into the centre of the estate before turning in a westerly direction towards the plateau. A spur off the entrance drive currently provides a separate access to the hardstanding area which was previously occupied by the aluminium works.

The site lies between two small rural settlements; Resolven and Cwmgwrach. To the north of the site lies Crugau wood, which forms part of the wider Rheola Forest. The B4242 runs along the southern border of the site, with the Neath Canal lying to the south of the road. Immediately to the south of this is the A465, beyond which there are two large lakes and a leisure site on which there are glamping pods and a camping area. The wider area is mostly forest land and green pasture.

The site lies within the catchment of the River Neath, a designated Salmonoid fishery, which flows in a generally south westerly direction approximately 150m from the eastern boundary of the site. The site is located within Flood Zone C2, which represents the highest level of risk. As such, Natural Resources Wales (NRW) will be consulted on development in line with TAN 15.

The site also contains several heritage assets including three listed buildings and a listed garden; Rheola House (Grade II* listed) Coach Houses (Grade II), Icehouse (Grade II) and The Rheola Historic Park and Garden (Grade II). These historic assets are protected by statutory listings facilitated by Cadw, along with policy BE1 of the Local Plan and an SPG that provides specific Guidance for heritage assets.

Planning Context

The site is currently allocated for tourism development under policy TO3/1 of the LDP, this planned tourism led regeneration scheme set out in the LDP states that the development could comprise of *'up to 100 units of holiday accommodation, up to 350 sqm retail premises and up to 1,000 sqm of leisure complex with associated access, footpaths, ecological improvements, landscaping, boundary treatments and services'*.

The planning history of the site includes a previous application for a holiday park tourism development in 2011 (Ref: P2011/1147) which benefits from a resolution to grant planning permission, subject to Section 106 agreement, that submitted a similar EIA screening request (Ref: P/2010/1175) following which the council decided EIA was required. The proposed development was of a similar scale to this proposal and as such would meet the same thresholds, meaning EIA would also be required in this instance. The previous application was preceded by an EIA scoping exercise (Ref: P2011/0114), which has informed the basis of this letter, and any future scoping beyond that outlined at the end of this letter will also draw on this previous EIA.

Is an EIA Required?

The EIA Regulations indicate that requests for Screening Opinions should be accompanied by an appropriate level of information to assist the authority in reaching its decision. The following matters will each be dealt with in turn:

- The nature of the proposed development; and
- The consideration of the screening criteria.

The Nature of the Development

The proposed development is a mixed-use, multi-phase development comprising a number of different uses and typologies, which are summarised below.

Firstly, the development will include the erection of several hotel accommodation units (which are detached 'pod' style units, but benefitting from hotel-level service including housekeeping, with food provided in the main hotel building proposed at Rheola House), with associated access and circulation arrangements, at an indicative density of circa 25 - 35 lodges per hectare dependent on unit size and subject to overall scheme viability.

Additionally, self-contained holiday lodges will be provided, as holiday lets. In total, 295 lodges and accommodation units are expected to be provided on site based on the emerging masterplan.

This will be accompanied by a leisure and sports complex including a swimming pool, play areas, spa, gym, & external sports areas such as a MUGA, tennis & padel courts, etc.

The listed Rheola House itself will be redeveloped into a boutique hotel & spa, with other facilities including a bar, restaurant & lounge, as well as bedroom accommodation, and including the reinstatement of an orangery type structure.

There will also be a further retail and commercial development based around the stables and mill buildings consisting of a pub/restaurant, farm shop/ café & complementary retail space relating to leisure activities such as non-motorised water-based sports and cycling. Car parking will also form part of this area of the development.

The walled garden will be retained along with the associated Gardeners Cottage, including greenhouses and orchard, and will be managed/operated by local community organisations.

An area around Rheola Pond will have lodge and hotel accommodation sensitively constructed, with the lake providing water-based activities such as swimming, fishing, and non-motorised water sports such as canoeing / paddleboarding.

Finally, the proposed development will include restoration or preservation of landscape and features within the site, including the grade II listed icehouse, the bachelor's hall, and game keeper's cottage, along with associated infrastructure and works including access, circulation, and landscaping.

Format of Planning Application

Due to the complex and multi-phase nature of the development proposals, it is proposed that a hybrid planning application will be submitted to the Local Planning Authority following Pre-Application Consultation. The hybrid application would be as follows:

Full Planning Permission:

- Site access works
- Holiday lodges & detached hotel rooms to be delivered as part of the first phase of development
- External and internal works to Rheola House including any new build development (all requiring separate Listed Building Consent).
- Retail and commercial development

Outline Planning Permission (with all matters reserved except for access)

- Holiday lodges
- Leisure Facilities

Consideration of the Screening Criteria

The requirement to provide an EIA should be determined having regard to the Regulations and Government advice set out in Circular 11/99 ('the guidance') which establishes the process for screening Environmental Impact Assessments in Wales. In determining whether a proposal constitutes EIA development, the determining body must consider whether a development falls within the relevant thresholds for either Schedule 1 or Schedule 2 development. Secondly, if development falls within Schedule 2 but not Schedule 1, it is determined whether the development would be 'likely to have significant effects on the environment' by reference to Schedule 3.

Schedule 1 of the Regulations establishes the development categories for which an EIA must be submitted, these are proposals which have a clear potential for significant environmental effects such as crude oil refineries, thermal and nuclear power stations and installations for the processing of irradiated nuclear fuels. There are 23 types of development in this schedule, however, the proposed development does not fall into one of these development categories.

Schedule 2 of the 2017 Regulations outlines the development categories for which an EIA may be required. The proposed development includes multiple uses across the site and as such could be considered for EIA under two categories in schedule 2 of the regulations. The main consideration under the schedule would be for holiday park development, but it is also worth noting the proposed retail, leisure, and commercial development on site that could be considered in terms of urban development projects, which includes shopping and leisure centres.

Paragraph 12(c) establishes that ‘*holiday villages and hotel complexes outside urban areas and associated developments*’ where the area of development exceeds 0.5 hectares may require an EIA.

The proposed development is set on a site of around 41 hectares, exceeding this threshold and therefore the proposal should be screened to determine whether EIA is needed. Annex B of the guidance, ‘selection criteria for screening schedule 2 development’, provides a broad indication of the type of scale of development that is likely to require an assessment. For the type of development proposed, the regulations state that EIA is ‘likely to be required’ for:

“Major new tourism and leisure developments which require a site of more than 10 hectares. In particular, EIA is more likely to be required for holiday villages or hotel complexes with more than 300 bed spaces, or for permanent camp sites or caravan sites with more than 200 pitches.”

Analysis of the proposed development against such criteria would suggest that the proposed development would meet the threshold for requiring EIA, given the size of the site and the number of lodges or hotel rooms would exceed the thresholds set out.

Paragraph 10(b) concerns urban development projects, including the construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas. These types of development will meet the criteria for EIA where they include more than 1 hectare of urban development aside from dwellings, include more than 150 dwellings, or the total area of development exceeds 5 hectares. While the proposed development would meet the criteria, it is not within an urban area and therefore would be considered under the indicative criteria which sets out that for sites which have not been intensively developed the following thresholds apply:

- (i) *Area of the scheme is more than 5 hectares; or*
- (ii) *It would provide a total of more than 10,000 m² of new commercial floorspace; or*
- (iii) *The development would have significant urbanising effects in a previously non-urbanised area (e.g. a new development of more than 1,000 dwellings).*

Considering these, the proposed development could also meet the threshold for EIA under this category given the area of the site is 41 hectares. Given that the proposals potentially meet the thresholds for this category, for completeness, we have considered the proposed development in the context of Schedule 3 of the regulations.

Schedule 3 establishes that the requirements to provide an EIA for Schedule 2 development will be subject to the consideration of the characteristics and location of the development proposed, and whether the development would be likely to have any ‘*significant effects*’ on those environmental factors set out at regulation 4(2) of the 2017

Regulations. As outlined above, analysis of the proposed development against the criteria in Schedule 2 would suggest that the proposed development would meet the threshold for requiring EIA. Notwithstanding this, the preamble to the guidance states that the figures “are indicative only and are intended to help determine whether significant effects are likely. However, when considering the thresholds, it is important to also consider the location of the proposed development.”

The guidance confirms the above by stating that “it should not be presumed that developments above the indicative thresholds should always be subject to assessment or those falling below these thresholds could never give rise to significant effects, especially where the development is in an environmentally sensitive location. Each development will need to be considered on its merits.”

In light of the above, we will now turn to look at the likely effects of the development, having regard to the selection criteria contained within Schedule 3 of the Regulations in relation to characteristics and location of the development proposed and whether the development would be likely to have any significant effects on those environmental factors set out at regulation 4(2) of the 2017 Regulations.

Characteristics of Development

According to the Regulations, the characteristics of development must be considered with particular regard to matters such as the size and design of the development; the use of natural resources, in particular land, soil, water and biodiversity; the production of waste, pollution and nuisances; the risk of major accident or disasters; and risk to human health.

In terms of holiday park developments, the regulations set out that the key considerations to assess the need for EIA are:

- Visual impacts;
- Impacts on ecosystems and;
- Traffic generation.

For Urban development projects, the regulations list the key considerations as:

- Physical scale of such developments;
- Potential increase in traffic;
- Potential increase in emissions; and
- Potential increase in noise.

The proposed development is of a significant scale and while some of this land constitutes previously developed land, other areas of the proposed development would be situated in wooded and green areas that have not been previously developed.

It is anticipated that there would be some visual impact on the landscape as a result of the development, which would need to be assessed. Furthermore, as ecological value is relatively high at the site, given the undisturbed nature of much of the site having been empty for a prolonged period. This will have potentially enabled wildlife to create habitats within the boundary of the site and thus the potential impact on ecology must be considered. There is potential for the vacant listed buildings will be home to bats, which are an EPS and therefore will require consideration of the impact of redevelopment.

In terms of traffic generation, the site has good access from the B4242 and is well connected to small settlements in the area as well as the major city centre of Swansea which is located only 12 miles southwest. As a remote, out-of-centre destination, however, there is a need to consider the impact of an increase in trip generation and the resulting impact on the local and strategic highway network. Under the urban development criteria, the physical scale of the proposal would be of a considerable size given the expansive size of the site, however much of the development will be of a small scale with limited impact on the landscape. The potential increase in emissions from the site will mainly be as a result of trip generation from vehicles travelling to the site, as well as the increased intensity of waste produced by the commercial and leisure developments on site against the current use.

Finally, the proposal is not expected to generate increased noise or vibration which would have a significant environmental impact. The previous EIA on the site scoped this topic out as the predominant existing noise is generated from traffic along the A465 and B4242, along with traffic associated with the former weekly market. Impact of noise and vibration during construction is also unlikely to be significant as appropriate mitigation measures to counter any noise from plant and machinery will be implemented as outlined in any future CEMP. Therefore, noise impact should only be considered further in terms of increased traffic generation, which will be considered separately. Overall, given the characteristics of the proposed development, it is considered that the proposal will require an EIA.

Location of the Proposed Development and Characteristics of the Potential Impact

The location of the development is a key consideration when analysed against Schedule 3 of the regulations, given the existing land use is particularly sensitive with a mix of rural wooded areas, listed buildings, and water course within the site. The quality and abundance of natural resources in the area is also important to consider, with the areas of woodland surrounding the site being particularly relevant under paragraph 2(c) of the schedule, which highlights the absorption capacity of the natural environment and stipulates that ‘particular attention’ should be paid to forest areas. The characteristics of the potential impact will also be considered below to establish the extent of any such impacts, their complexity and the duration, along with other considerations to understand the need for an EIA.

Landscape and Visual Impact

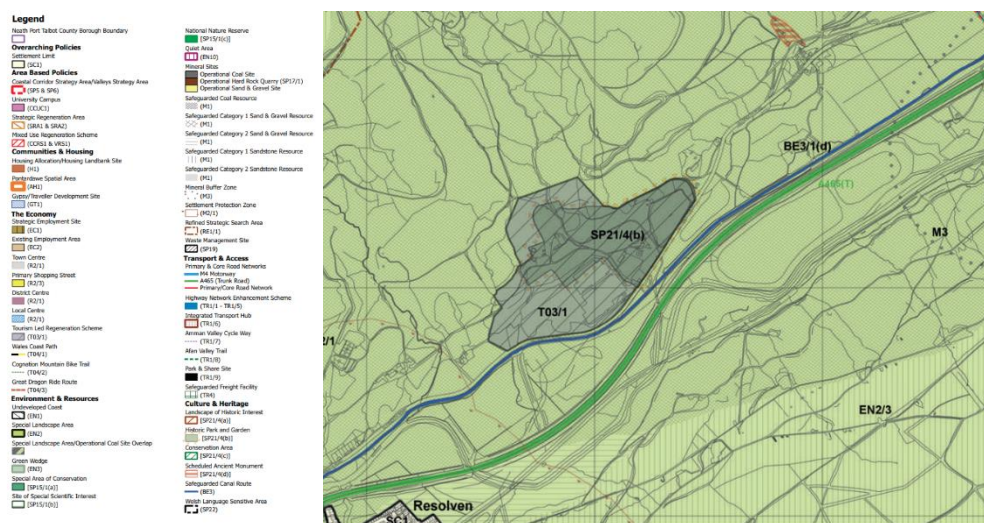


Figure 1: the site as shown in the NPT Council Policies Map

The site is situated within a Special Landscape Area (EN2) in the Local Plan, which states that:

“Development within the designated Special Landscape Areas will only be permitted where it is demonstrated that there will be no significant adverse impacts on the features and characteristics for which the Special Landscape Area has been designated.”

This designation enhances the importance of assessing any landscape impact the proposed development will have in terms of EIA screening. The scale of development is such that an LVIA will be required in any application. A previous application for a similar scheme has established that some visual impact is acceptable, however, this proposal exceeds that of the previous application and will therefore need to be fully assessed.

Ecology

The ecological value of the site is high given it consists in part of woodland and other green areas. The site has been empty for a prolonged period and this lack of disturbance will have potentially enabled wildlife to create habitats within the boundary of the site, as well as increasing the likelihood of bats within the empty listed buildings. The proposed development will likely lead to disturbance of potential habitats both during construction and through the lifetime of the development, and as such, the impacts on ecology should be considered in an EIA.

Traffic and Transport

The traffic impact of the proposed development is likely to merit consideration in an EIA on transport grounds. Despite the strong access links from the B4242 and the A465 there is limited access to public transport, with the X7 bus running along the B4242 and the nearest train station at Neath some 8 miles away, while the nature of the development as a tourist destination will also likely influence modal choice towards car trips. As a remote, out-of-centre destination, with limited access via public transport, this development is of such a scale that consideration for the impact of a significant increase in trip generation and the resulting impact on the local and strategic highway network is warranted.

Flood Risk and Water Resources

The site lies within Flood Zone C2, meaning there is a high risk of flooding and that only ‘less vulnerable’ development should be considered; development will be subject to application of the justification test, including acceptability of consequences. In line with TAN 15, Natural Resources Wales will be consulted to determine the potential environmental impact of development within the Flood Zone. The high risk of flooding is a key consideration and will need to be considered in an EIA. A Flood Consequences Assessment is being produced and expect new modelling to remove the site from Zone C2, subject to confirmation from NRW.

Cultural Heritage

Heritage impact is a key consideration with regards to the proposed development given the three Grade II* listed buildings on site, including Rheola House itself, Coach Houses (Grade II), Icehouse (Grade II), as well as the Rheola Historic Park and Garden, which is also Grade II listed in Cadw’s Register of Landscapes Parks and Gardens of Special Historic Interest in Wales. The wider redevelopment of the site will have an impact on the setting of these heritage assets as they are refurbished and redeveloped, although we anticipate that the impact would be of significant benefit to the heritage assets enabling their long-term future. While the scheme will be sensitive to the existing context of the heritage assets, the potential impact is still significant and therefore merits full consideration in an EIA. There are also a

significant number of sites of archaeological interest identified surrounding the site, with Prehistoric, Roman, and Medieval remains being discovered nearby, the archaeological potential of the site could therefore be high. In light of these considerations, a comprehensive Heritage Impact Assessment will also accompany any application.

Arboriculture (Trees)

The erection of the holiday lodges within the woodland areas will likely have an impact on trees on the site and therefore any application will be accompanied by a full arboricultural survey to determine the impact on trees on site. Depending on the extent to which lodges are proposed within the woodland areas this will need to be taken into consideration in an EIA, however, generally tree features will be incorporated into the scheme where possible. Furthermore, a previous arboricultural survey noted that the majority of trees occupy steep and uneven ground, giving them natural protection from potential impacts.

Ground Conditions

A large portion of the site constitutes previously developed land, in particular the former aluminium works that was demolished many years ago and of which only the hardstanding remains. A Phase 1 Desk Study has been produced and will be submitted alongside any planning application, which will assess any potential contamination together with recommendations for any remediation and further surveys. Phase 2 intrusive surveys may also be required to support the application, therefore, there is a case for an EIA in respect of ground conditions.

Planning Policy and Land Use

As the site is currently allocated in the LDP for tourism redevelopment this proposal would align with planning policy and would bring a significant contribution to the wider policy context in Wales. The preservation and enhancement of the setting of the heritage assets would also be beneficial and therefore while this is important to consider as part of any EIA, we suggest that this impact will not have any adverse effects.

Sustainability

Sustainability is another important consideration for EIA development, as outlined in the previous EIA on the site the redevelopment will have an impact on sustainability through the effects on the local economy, the effect on the wider community and the effect on the environment. A full sustainability assessment will accompany any future EIA application.

Waste

The waste generated by the construction and operation of the development is of concern in terms of impact on the environment, however the applicant is considering all avenues available to re-use existing materials on site such as the area of hardstanding retained on site. When the development is in operation the various uses on site will generate waste, however the applicant expects further detail on waste management and recycling to be provided as part of later detailed design work or by appropriate planning conditions.

Socio-Economic and Community

The key socio-economic impacts of the proposed development are considered to be the increased employment and tourism opportunities generated in the area, which currently suffers from higher than average unemployment. The Welsh affairs committee report *“Wales as a Global Tourist Destination”*¹ published in July 2023 reported that Wales suffers from a low number of international tourists, and a significantly lower proportion of day trips by British tourists than are undertaken in England (as overall proportion of the population of Great Britain).

As such this proposal has the potential to significantly increase both national and international tourism visits to the area, to Bannau Brycheiniog National Park and to Wales generally. This may have both positive and negative impacts in respect of visitor numbers to local services and facilities, but overall we consider that the proposed development would have a net positive socio-economic impact on the surrounding area by virtue of a significant number of new jobs and business/tourism opportunities which will significantly benefit the local economy.

Cumulative Effects

The cumulative effects of the above topics must be considered as part of an EIA, generally the cumulative effects of many of these when considered in context are considered to be broadly positive, especially in terms of planning policy, socio-economic effects, and cultural heritage. The site is allocated for tourism development so would help meet the objectives of the LDP, this development would also contribute significantly to the local economy and bring numerous socio-economic benefits to the area.

In terms of cultural heritage, the scheme would secure the redevelopment of the listed buildings on site while improving their context and allowing the public to visit them more than they are currently able to, providing another cumulative benefit. Redevelopment of the site would also improve ground conditions as a result of remediation, visual impact would also improve following redevelopment of the hardstanding at the former works site, and generally the redevelopment of the site would have negligible cumulative effects on the other topics covered previously to establish an overall net benefit cumulatively.

Conclusions

It is considered that the proposed development meets the threshold under Schedule 2 (12(c)) of the EIA Regulations. For clarity, we have highlighted the key areas that are likely to have an impact and merit further consideration. Relevant planning issues, including visual impact, ecology, traffic and transport, flood risk, cultural heritage, arboriculture, and ground conditions have been properly assessed in support of this screening request. Taking the above into account, along with the relevant guidance contained within the EIA Regulations, we are of the opinion that the proposed development does warrant a formal EIA due to its size, and potential for environmental and cultural impacts.

We trust the above information is of assistance and look forward to receipt of your formal Screening Direction within the timescales prescribed by Regulations (5)5. In the meantime, please do not hesitate to contact me should you require anything further.

¹ “Wales as a Global Tourist Destination” Report to the House of Commons [Online] [[Wales as a global tourist destination - Welsh Affairs Committee \(parliament.uk\)](https://www.parliament.uk/business/committees/committees-a-z/welsh-affairs-committee/wales-as-a-global-tourist-destination/)]

EIA Scoping

As outlined above, we consider the proposed development to meet the required thresholds to justify an EIA, as such we put forward that the following should be considered in the scope of any EIA in line with the impacts of the proposed development and the topics addressed in the previous similar application (ref: P2011/0114).

- Arboriculture
- Cultural Heritage
- Cumulative Effects
- Ecology
- Ground Conditions
- Landscape and Visual
- Planning Policy and Land Use
- Socio-Economic and Community
- Sustainability
- Transport Statement
- Waste
- Water Resources.

These topics have already been outlined above in the consideration of impacts under Schedule 3, while both Noise Impact and Air Quality have been screened out due to the lack of noise generated in comparison to the traffic along the A465, and similarly the lack of increased air pollution as a result of the development is not deemed significant apart from in terms of any potential increase in traffic generation. As such, these will not be considered further outside of consideration of traffic impacts.

We trust that the information given above concerning the analysis against the EIA regulations is sufficient to provide a decision on the need for EIA, however, if you require any further information in order to make a determination, please do not hesitate to contact me.

Yours faithfully,



Oliver Corbett
Principal Planner

DPP

E: Oliver.Corbett@dppukltd.com