

COED DARCY

Environmental Statement Addendum

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savills

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1 Introduction

Introduction

- 1.1 This Environmental Statement Addendum (ESA) has been produced by Savills with input from the project team, on behalf of St Modwen Developments Ltd ('the Applicant').
- 1.2 An Outline Planning Application for the residential development of Coed Darcy was submitted to Neath Port Talbot County Borough Council (NPTCBC) in October 2021 (planning application reference: P2021/1193) (hereafter referred to as the '2021 Application').
- 1.3 The 2021 Application sought outline consent for the Proposed Development comprising of the following description of development:
- 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.*
- 1.4 Owing to the nature and location of the Proposed Development, the Applicant concluded that significant environmental effects could arise. Therefore, it was considered that the Proposed Development qualifies as EIA development as defined within the EIA Regulations and the 2021 Application was accompanied by an Environmental Statement ("the ES"). A Scoping Opinion was provided by NPTCBC on 2 November 2021 and the ES was prepared in accordance with this Opinion.
- 1.5 Following the submission of the 2021 Application, consultation responses have been received during the statutory consultation process from NPTCBC, the statutory consultees and local residents / groups. These comments have been reviewed by the Applicant and project team and subsequently changes have been made to the Proposed Development. Additional information has also been prepared since the submission of the 2021 Application to address consultation comments, notably in respect of ecology and transport and traffic matters. Full details of the design / mitigation changes and the additional information is provided below.
- 1.6 This Environmental Statement Addendum (ESA) responds to the consultation responses, presents additional environmental information and, where necessary, updates the ES in respect of the new and updated information and amended designs.
- 1.7 This ESA should be read in conjunction with the ES.
- 1.8 The ESA is accompanied by an updated Non-Technical Summary (NTS) which replaces the NTS submitted with the 2021 Application in its entirety to ensure clarity and ease of understanding.

The Proposed Development

- 1.9 Chapter 3 of the 2021 ES contains a detailed description of the Proposed Development. The minor changes to the development proposed and the mitigation required are set out below. It is noted that Coed Darcy continues to be allocated in the NPTC LDP for residential development (SRA1). The applicant is submitting an application for residential development in line with this allocation.

1.10 In response to the post submission consultation comments, minor updates have been made to the Proposed Development (updated text is shown with a strike through or in red), as follows:

- 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);
- Circa 1.2 hectares of land for commercial uses (retail, employment, community, assembly and leisure uses facilities comprising a neighbourhood centre (assume A1, A2, A3, B1, D1 and D2 Uses);
- Approximately 1.2ha of land to be used for employment uses as an extension to the existing Llandarcy Business Park (assume 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 a shadow Habitat Regulations Assessment in support of the AA.
 - 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. It is envisaged a draft / framework version of the document will be submitted with the planning application, with a formal version to be secured by condition.
 - 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.
 - 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 **improvements to the existing** ~~new~~ pedestrian footbridge across the railway line; ~~new and~~ improvements to active travel links, drainage works, ecology mitigation, landscaping, ground remediation and other engineering works.

1.11 The maximum quantum of development assessed within the EIA has not changed. The 2021 ES considered two possible options for how the education land would be developed – either as a primary school or a through school. Since the application was submitted, it has been determined that land will be delivered for a through school and that NPTCBC will be responsible for the delivery and construction of it.

- 1.12 As such, the assessments have been updated purely in respect of mitigation strategies and new information provided since the submission of the 2021 Application, where there is an implication to the respective environmental assessment.
- 1.13 As set out in Chapter 3 of the ES, the parameters comprise land-use, access and movement, building heights, green and blue infrastructure and density. These parameters identify the maximum extent of development in order to assess the worst case development scenario.

Updated Parameter Plans

- 1.14 The Parameter Plans used in the assessment are listed in Table 1.1, including details of any of amendments since the 2021 Application.

Table 1.1 List of Parameter Plans

Drawing Name	Drawing Number	ES Figure	Summary of Amendments
Land Use Plan	21009(05)200/J	3.1	
Scale and Massing Plan	21009(05)201/J	3.2	To confirm extent of school In land required for a through-school
Movement Plan	21009(5)202/K	3.3	
Illustrative Layout	21009(5)104/J	3.4	To confirm extent of school In land required for a through-school
Green Infrastructure Landscape Plan	2180801-SBC-00-XX-DR-L-101_PR16	Updated Appendix 10.6	

- 1.15 Table 3.2 of the 2021 is also updated, as per table 1.2 below.

Table 1.2 – Schedule of Proposed Development and their Uses (Updated)

Building reference	Building Name / Purpose	Hectares or m2
C1	Residential space (2,000 homes)	37.7 Hectares
D1	Land for education with associated public open space	6.9 Hectares
A1, A2, A3, B1, D1 and D2 Uses	Land for commercial uses	Land area cannot be identified as it is part of mixed use residential area. Building Area (gross) = 1134m2
B2 and B8	Extension to the existing Llandarcy Business Park (1.2ha)	0.21 Hectares Building Area (gross) = 800m2

School Provision

- 1.16 As noted above, since the application was submitted, further discussions between the Applicant and NPTCBC has confirmed NPTCBC's preference to allow sufficient land within the masterplan for a through school (as opposed to a primary school only). The originally submitted parameter plans provided flexibility for two options, which if a primary school only was to be developed on the land reserved for education land, then the surplus could be developed for additional residential development. The 2021 ES assessed both options, and therefore in this

Addendum, this flexibility is removed as there is certainty about the need for the education land to be sufficient in size to deliver a through school. The parameter plans have been updated accordingly.

Ecological Mitigation

- 1.17 Since the submission of the application and preparation of the 2021 ES, a detailed mitigation strategy has been drawn up, introducing multiple ponds, hibernacula and areas of linking terrestrial habitat to the western corridor of the site. The requirement introduced by PPW12 requires every tree removed to be replaced with three newly planted trees has meant a large increase in area of proposed woodland on site, removing some of the grassland areas proposed. Additional areas for invertebrates have been identified in the form of an area to be subject to regular scraping, as well as the inclusion of green roofs for invertebrates on the school and roofs of garages.
- 1.18 However, none of these relatively small changes to mitigation have led to changes to the parameter plans.

Access and Movement

- 1.19 As a result of the Vision & Validate approach the previously proposed Phase II mitigation scheme for M4 Junction 43 has been reduced in scale with three lanes reduced to two on the A65 exit, M4 northbound off slip and circulatory, and B4290 entry arms. The M4 southbound off slip has reduced from four to two lanes and the B4290 exit has reduced from two to one lane. The revised highway mitigation scheme is known as Phase 1C.
- 1.20 It is proposed that the S.106 Agreement will have a stepped approach whereby Phase 1C is provided in the first instance and then reviewed. If it is determined that Phase II works are required in full, these will be actioned. If however Phase 1C is determined to be sufficient, then any cost savings between the two options will be released as a contribution to active travel improvements in the vicinity of the site.
- 1.21 An active travel route scheme has been identified from M4 Junction 43 to Crymlyn Road incorporating widening of the existing footway/cycleway at M4 Junction 43, straightening the existing route to Pen-Y-Heol, providing a new shared footway/cycleway along the eastern verge of Pen-Y-Heol, and a diagonal shared footway/cycleway crossing of Pen-Y-Heol between the railway parapets. The route then ties into the existing shared footway/cycleway to Crymlyn Road.

Additional Information

- 1.22 In addition to the design changes, further information has been prepared to respond to consultation comments and to provide any updated information which has become available since the 2021 Application.

Ecological Surveys

- 1.23 Updated walkover survey work was carried out between June and September 2024, to ascertain whether habitats and their condition were still largely the same and whether the relevant conclusions of the original ES remain valid. An updated baseline habitat plan was produced and this is presented in Appendix ESA1 – enclosed with this addendum.

Transport and Active Travel

- 1.24 Further to comments received from NPTCBC, Transport for Wales and the Welsh Government, it was agreed by all parties that additional mitigation should be provided for active travel measures with reduced junction capacity mitigation to reflect recent policy changes. In order to reduce highway mitigation and invest the savings in active travel, it was agreed the Vision & Validate approach should be used.
- 1.25 The Vision & Validate approach took account of the Vision of the new community and considered the mobility and placemaking interventions to help realise those conditions. These interventions and broader policies were Validated by calculating their impact and applying it to the transport modelling.
- 1.26 A spreadsheet driven Validation Tool utilising data from the Census, Office for National Statistics (ONS) and the National Travel Survey (NTS) was used to validate the trip generation of the site. A comprehensive exercise to derive a total trip generation was undertaken based on credible and reliable data sources to accurately estimate key inputs.
- 1.27 The Vision & Validate approach more accurately reflects the external vehicular trip generation of the proposed development which is almost half that determined by using the TRICS database.
- 1.28 It is proposed that the cost savings from the M4 Junction 43 mitigation scheme are included as part of the S106 planning gain which could be used by NPT Council towards active travel measures such as the scheme identified from M4 Junction 43 to Crymlyn Road.
- 1.29 The proposed changes with the Vision & Validate approach result in less external vehicular trip impact and therefore less mitigation is required. The Phase 1C highway scheme would suitably mitigate the peak hour vehicular impact of the proposed development.
- 1.30 The Phase 1C mitigation scheme already forms part of the previously proposed Phase II works, albeit at a lesser scale.
- 1.31 The proposed changes would not trigger any additional effects to those considered in the ES Chapter and therefore would not change any of the conclusions.

Phasing

- 1.32 Recognising that delays in determining the planning application has caused 2 years slippage in programme: paragraph 3.8.1 of the 2021 ES is updated accordingly:
- 1.33 It is intended that, should planning permission be granted in the first half of 2023~~26~~, infrastructure works commence in the Summer of 2023~~26~~ then the first dwellings would be constructed in Autumn/Winter of 2023~~26~~.
- 1.34 No changes are proposed to the construction process and methods as summarised in Section 3.9 of the 2021 ES.

EIA Methodology and Approach

- 1.35 There have been no changes to EIA Legislation since the preparation of the 2021 ES which triggers any changes to the EIA Methodology chapter (chapter 4) of the EIA.

Cumulative Impact Assessment

- 1.36 Savills has considered whether, since 2021, there have been any major planning applications approved which may need to be considered in this addendum as having the potential, in combination with this Proposed Development, to have significant cumulative effects with other

development. Only applications with planning consent need to be considered as committed or approved, and Savills has reviewed both NPTCBC and Swansea Council's planning search functions to determine whether any relevant, other developments within proximity of the site, and of such a scale, require further consideration. This exercise has concluded that there are no approved applications, since 2021, which require further consideration in this addendum in the form of an updated cumulative impact assessment.

Planning Policy Review

- 1.37 Since the 2021 ES was undertaken, the Welsh Government has published Edition 12 of Planning Policy Wales (PPW) earlier in 2024 which contains updates relating to environmental and biodiversity measures. The key changes place greater emphasis on taking a proactive approach to green infrastructure, including the requirement for a Green Infrastructure Statement. The changes now explicitly require securing a net biodiversity benefit through a 'stepwise' approach.
- 1.38 These changes have been considered and addressed by the Project Team, as reported in Appendix ESA1 of this ESA, which is a specific addendum to the biodiversity chapter (chapter 10).

2 Revised Assessments

Site Context

- 2.1 As noted above, the 2021 Application was accompanied by the ES which assessed the potential for significant environmental effects to arise as a result of the Proposed Development.
- 2.2 The updated plans and additional information have been considered by the project team to determine whether they alter the findings set out in the ES. This section presents any new or additional conclusions as a result of the revised assessment, or confirms the validity of the conclusions presented within the ES.
- 2.3 The additional information has been considered by Savills and the wider project team to determine their potential to alter the findings set out in Chapters 7-13 of the ES, including any measures identified. This relates to the following topics scoped into the EIA:
- Transport and Travel
 - Air Quality
 - Noise
 - Soils, Hydrogeology and Ground Conditions
 - Water and Flood Risk
 - Biodiversity
 - Landscape and Visual Impact
 - Climate Change
 - Socio-economics
- 2.4 For each environmental topic it has been concluded that the additional information presented in this ESA does not alter the findings of the Coed Darcy EIA and the conclusions presented in the ES. Further details in relation to each environmental topic scoped into the EIA is presented below.

Transport and Travel

- 2.5 SLR has engaged in further consultation with the Welsh Government (as truck road agency) and NPT Highways during the determination of the application. It was agreed that additional mitigation should be provided for active travel measures with reduced junction capacity mitigation to reflect recent policy changes. In order to reduce highway mitigation and invest the savings in active travel, it was agreed the Vision & Validate approach should be used. The trip generation for the site was updated using the Vision & Validate approach which reduced the external vehicular impact. The junction capacity analysis for M4 Junction 43 was updated and it was determined that a reduced highway mitigation scheme was required. The revised highway mitigation scheme Phase 1C was submitted along with the updated junction capacity analysis. An active travel route scheme was identified from M4 Junction 43 to Crymlyn Road incorporating widening of the existing footway/cycleway at M4 Junction 43, straightening the existing route to Pen-Y-Heol, providing a new shared footway/cycleway along the eastern verge of Pen-Y-Heol, and a diagonal shared footway/cycleway crossing of Pen-Y-Heol between the railway parapets. The route then ties into the existing shared footway/cycleway to Crymlyn

Road. The scheme drawing and corresponding junction capacity analysis of the footway/cycleway crossing was submitted.

- 2.6 The 2021 ES concluded that the impact of the Proposed Development were considered negligible, with a range of measures proposed to reduce the impact on the surrounding highway network, including a range of physical (junction and non-motorised user improvements) and Travel Planning and Construction Management Planning measures.
- 2.7 The post submission changes still result in negligible impact and include a range of physical (junction and non-motorised user improvements) and Travel Planning and Construction Management Planning measures.

Air Quality

- 2.8 An air quality assessment presented in Chapter 6 of the ES. It is considered that the proposed changes do not alter the assessment conclusions of Chapter 6 of the ES.

Noise and Vibration

- 2.9 A noise and vibration assessment presented in Chapter 7 of the ES. It is considered that the proposed changes do not alter the assessment conclusions within ES Chapter 7 – Noise and Vibration.

Soils, Hydrogeology and Ground Conditions

- 2.10 PJA have reviewed the updated plans and additional information in respect of the assessment on soils, hydrogeology and ground conditions presented in Chapter 8 of the ES. It is concluded that the proposed changes do not alter the assessment conclusions within ES Chapter 8 – Soils, Hydrogeology and Ground Conditions.

Water and Flood Risk

- 2.11 On the 31st March 2025, the Welsh Government published the updated Technical Advice Note 15: Development, Flooding & Coastal Erosion. This includes a transitional period whereby applications submitted before that date are considered under the previous version of TAN15. In this context, PJA have reviewed the updated plans and additional information in respect of the Water and Flood Risk assessment presented in Chapter 9 of the ES. It is concluded that the proposed changes do not alter the assessment conclusions within ES Chapter 9 – Water and Flood Risk.

Biodiversity

- 2.12 SK Environmental considers that the extent of consultation, changes to the proposed mitigation measures and to planning policy mean that, for completeness, an addendum chapter has been prepared. As such, an updated assessment on biodiversity effects is submitted to supplement Chapter 10 of the 2021 ES. This is appended within **Appendix ESA1** of this ESA and is referred to as Chapter A10 of the ES.

Landscape and Visual Impact

- 2.13 Following the changes to Planning Policy Wales, a Green Infrastructure Statement (GIS) was required to be submitted as part of the planning application, which is now appended as **Appendix ESA2** of this ESA.

- 2.14 The amendments to the parameter plans, the indicative layout and the strategic green infrastructure plan do not result in any significant changes to the quantum of development proposed, nor the structural landscape mitigation proposed. As such, these changes are relatively small in relation to the overall scheme and do not alter the magnitude of landscape and visual impact and do not alter the significance of the effects assessed in the Landscape and Visual ES chapter.
- 2.15 It is concluded that in terms of landscape and visual effects, the conclusions within the Landscape and Visual Chapter, Chapter 11, of the ES remain valid.

Climate Change

- 2.16 A climate change assessment presented in Chapter 12 of the ES. These amendments to the parameter plans are not anticipated to lead to new or different effects to those reported in the ES. As such the findings and conclusions of the Climate Change Chapter of the ES (Chapter 12) do not alter as a result of the design changes and additional information.

Socio-economics

- 2.17 Savills has reviewed the updated plans and additional information in respect of the socio-economic assessment presented in Chapter 13 of the ES. However, it is concluded that the proposed changes do not alter the assessment conclusions with ES Chapter 13 – Socio-economics.

Appendix ESA1 – Chapter A10 (Ecology Addendum)

Appendix A of Appendix ESA1 – Chapter A10 (Ecology Addendum)

Appendix ESA2 – Green Infrastructure Statement

Plans:

Revised Figures and Updated Appendix 10.6

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