



Persimmon

Together, we make a home.

OFFICIAL PARTNER

PERSIMMON HOMES WEST WALES

Dragon House

Parc Y Ddraig

Penllergaer Business Park

Swansea

SA4 9HJ

Tel: 01792 229800

www.persimmonhomes.com

Lucy Kelly
Planning and City Regeneration
City and County of Swansea
Civic Centre
Oystermouth Road
Swansea
SA1 3SN

Date: 17.10.2022

Dear Lucy,

Land at Fairwood Terrace, Gowerton

Request for an EIA Screening Opinion – The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017

Outline Planning Application for residential development of circa 230 dwellings; associated infrastructure; the provision of 50 park and ride spaces associated to Gowerton Railway Station; associated public open space.

Persimmon Homes West Wales and the Landowners/Option Holders are proposing a residential development of circa 220 dwellings, associated infrastructure works, landscaping, public open space, highways and drainage at the land adjacent to Fairwood Terrace, Gowerton, Swansea. The site is allocated as part of a Strategic Development Site in the Swansea Local Development Plan (SD H). This letter has been prepared to support a request to the City and County of Swansea Council (CCS) to adopt a screening opinion in accordance with Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 (the EIA Regulations) to determine whether the proposed development requires Environmental Impact Assessment ("EIA").

As required by Regulation 6 of the EIA Regulations this letter contains the following:

- a) A plan sufficient to identify the land;
- b) A description of the development, including in particular –
 - i. A description of the physical characteristics of the development and, where relevant, of demolition works;
 - ii. A description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected;
- c) A description of the aspects of the environment likely to be significantly affected by the development;



Persimmon

Together, we make a home.

OFFICIAL PARTNER

- d) A description of any likely significant effects, to the extent of the information available on those effects, of the proposed development on the environment resulting from –
 - i. The expected residues and emissions and the production of waste, where relevant; and
 - ii. The use of natural resources, in particular soil, land, water and biodiversity; and
- e) Such other information or presentations as the person making the request may wish to provide or make including any feature of the proposed development or any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment.

In summary, it is considered that the proposed development does not constitute EIA development in accordance with the EIA Regulations and as such an Environmental Statement is not required. We outline the analysis undertaken to reach this conclusion below.

Description of the site and surroundings

The site comprises approximately 8.7 hectares of part of an allocated Strategic Development Area (SDA) in the adopted Swansea Local Development Plan; the 8.7 ha makes up the proportion of the land which will be submitted as part of a planning application with this EIA screening being submitted jointly between Persimmon Homes/Land Owners/Option Holders.

Policy SDH is allocated for a residential led development comprising of a primary school, public realm, commercial units, community buildings and an Employment Site. SD H as a whole incorporated a mixture of Greenfield Land and Brownfield Land. The application site which this EIA screening relates at Fairwood Terrace is for approximately 230 dwellings and associated landscaping and infrastructure, along with the provision of a park and ride/Transport Hub. The land is also a mixture of previously developed land and Greenfield, with the previously developed land being utilised as a Tin Plate Works, however this has been fully demolished and the land has regenerated tree and shrub growth.

The redline boundary which forms the basis of this screening opinion comprises of an area of regenerated woodland and field parcels which have tree growth. There is one clear field parcel boundary which crosses the development site toward the south east. The site is bound to the north and north east by a band of dense woodland and to the South by the Railway Line. The north west of the site boundary is adjacent to the residential properties of Fairwood Terrace/Lliw Valley Close.

The site benefits from a good standard of existing pedestrian infrastructure to the north western boundary, with footways and street lighting connecting the access of the site to surrounding areas including Gowerton and Gorseinon which contain the vast majority of local amenities and facilities along with Gowerton railway station and bus connections on Victoria Road. Key facilities within

Gowerton include Community Centre, Retailers, Food shops, Church, Library, Pharmacy, Sports Clubs, Primary and Secondary Schools and many more facilities. The National Cycle Network also runs through Gowerton to the South of the site.

In regards to terrain, the site is relatively flat in nature, falling gradually towards the Brook to the North. The Lidar details changes in levels of where remaining Stock Piles of materials from past industry in the area are located on the Southern Boundary. There is dense tree coverage on sections of the site, with

A public right of way (PRoW LC101) runs through the northern section of the site and crosses the Bridge over the Gors Fawr Brook into the agricultural fields to the North of the development site. There are no Landscape Designations on the site and the site is free from any statutory nature conservation designations however the land is made up of the Alcoa Wet Meadows non-statutory Site of Importance for Nature Conservation (SINC). There is no Ancient Woodland within the site, with the nearest block of Ancient Woodland being located approximately 480 metres to the North East of the site. The woodland within the site is secondary, mainly growing on the site of the former tin plate works, site boundaries and stock piles.

There are no Sites of Special Scientific Interest, Special Areas of Conservation, National or Local Nature Reserves or Special Protection Areas located within close proximity of the site, with the Burry Inlet and Loughor Estuary SSSI/RAMSAR being located 1.34km to the West, with built forming sitting between the Land and the site of importance. The Fairwood, Pengwern and Welshmoor SSSI, Penllergaer Railway Cutting SSSI, Nant Y Crimp SSSI and Penpla Grasslands SSSI are also located in 5km of the site.

The main habitats of value on site are the trees and shrub which form the majority of the site boundary and are present within the body of the site.

The site is not located within an Air Quality Management Area or a Noise Action Planning Priority Area.

The site is not located within a Conservation Area and contains no Scheduled Ancient Monuments (the closest being 1.6km to the North) or Listed Buildings. The land is not located within a Historic Landscape or Historic Park and Garden or designated an an Archaeological Sensitive Area.

The site predominatly lies within Flood Zone A of the Natural Resources Wales (NRW) Development Advice Map (DAM) with a small section of C2 Flood Zone entering the site on the North Eastern Boundary, however all vulnerable development would be excluded from this area. Zone A defined areas considered to be 'at little or no risk of fluvial or coastal/tidal flooding'. It must be noted that the Draft Flood Maps for Planning introduce additional areas of the site as being 'Zone 3' which is

characterised in a similar manner to the existing C2 Zoning. A Flood Consequence Assessment in accordance with TAN 15 will therefore be submitted in support of the planning application.

Description of Proposed Development

The intention is for the application to take the form of an Outline Planning Application which would comprise of:

Outline Planning Application with all matters reserved for residential led development of circa 230 residential dwellings in total (use class C3), the provision of a Mobility Hub and associated public open space, play provision, highways, drainage, ecological mitigation, landscaping and engineering works.

New homes will be designed so that they have sufficient parking spaces based on the local authority standards, together with appropriate visitor parking. Affordable housing will be provided on site with a reduction from the 20% policy position to 15% and will be justified from the provision of viability evidence. The scale of the development will respond to the characteristics of the site and the surrounding townscapes with multiple pre-application work shops and DCFW review already been undertaken to inform this. It is proposed that housing will be built to a maximum of three storeys and apartments to a maximum of 4 storey to reflect the local character whilst responding to the mobility hub and relationship with Gowerton Station. Appropriate street hierarchies and typologies, including a Primary Street, secondary streets, shared surfaces and green streets will be adopted to air legibility and reinforce placemaking principles.

Undulations in the ridge and eaves lines will help provide variety across the site and allow the development to sit comfortably within the townscape/landscape. The massing of the built form will vary and could include short terraces as well as semi-detached and detached homes, as well as apartments. Development will be of a mixed palette and will draw on the material and characteristics of the area to help create a locally distinctive proposal, providing architectural uplifts in key focal nodes. Street frontage parking will be kept to a minimum, particularly on both sides of the carriageway.

The outline application will allow for a space for a Mobility Hub which is likely to consist of park and ride, bike parking and rental, an element of mixed use and connectivity to the link road to the eastern boundary will facilitate future connectivity.

Requirement for EIA

The proposed development does not fall within Schedule 1 development as set out in the EIA Regulations. The proposed development falls within Part 10 (b) (ii) and (iii) of schedule 2 of the EIA

Regulations as it comprises an Urban Development Project comprising more than 150 dwelling houses and on land that exceeds 5 hectares. For Schedule 2 development, the EIA Regulation require that EIA be undertaken where the development is 'likely to have significant effects on the environment by virtue of factors such as nature, size or location'.

In determining whether a development is likely to give rise to significant environmental effects, reference should be made to Schedule 2 of the EIA Regulation. This identifies three criteria:

- 1) Characteristics of development (such as size and design of the whole development, cumulative effects, the use of natural resources, waste, pollution and nuisance, risk of major accidents, and risks to human health);
- 2) Location of development (such as existing and proposed land use, the capacity of natural resources, and absorption capacity of the natural environment);
- 3) Types and characteristics of the potential impacts (having regard to the likely significant effects of the development, taking into account magnitude and spatial extent; nature; transboundary nature; intensity and complexity; probability; expected onset, duration, frequency and reversibility; cumulation; and possibility of reduction).

Further guidance is contained within Welsh Office Circular 11/99: Environmental Impact Assessment which confirms that the focus should be on those effects which are likely to be significant. We consider the above criteria below:

Table 1: Screening Assessment for the Proposed Development at North of Gowerton Station

1. Characteristics of development	
<i>The characteristics of development must be considered with particular regard to -</i>	
1) The size and design of the whole development	The site is allocated as part of Strategic Development Area H within the adopted LDP for residential led development. This development site would consist of up to 230 residential dwellings, a 'mobility hub' which is likely to consist of parking, bike parking, an element of mixed use. The scale of the development will respond to the characteristics of the site and the surrounding townscape. It is proposed that housing will be built to a maximum of three storeys with the potential for an element of 4 storey apartments surrounding the station. The massing of the built

	form will vary and could include terraces, apartments, semi-detached and detached homes. The development will be of a mixed palette and will draw on the materials and characteristics of the area. In light of the above, the size and design of the proposed development would not be out of context with existing development in the vicinity.
b) cumulation with other existing development and/or approved development;	The land is located adjacent to existing built form at the end of Fairwood Terrace and to the North of Gowerton Station. Planning consent was approved on a residential development of up to 100 dwellings to the South of the Train Line (2017/1451/OUT). This will be shown due regard, as appropriate, in the preparation of the planning application, however noting that the development is separated by the Rail Track.
c) the use of natural resources, in particular land, soil, water and biodiversity;	The proposed construction and operation phases of the proposed development will use resources in terms of land, soil, water and biodiversity as would be expected of a primarily residential development.
d) the production of waste;	Construction waste would be store, reused and recycled as appropriate. Operational waste would be disposed of in accordance with SCC standards applicable at the time.
e) Pollution and nuisances	The construction phase would give rise to general noise and dust disturbance and the risk of pollutants entering the land associated with a residential development. These matters can all be adequately addressed via a suitable Construction Environmental Management Plan (CEMP). There would be plant and vehicle emissions associated with construction traffic and operation traffic. The number of vehicles travelling to and from the site during the

	operational phase would be associated with the Proposed Development. It is envisaged that operational traffic will be dispersed throughout the local highway network, including travelling towards the M4. Materials and fuels required for the construction phase would be stored in accordance with relevant legislation applicable at the time. It is not anticipated that the operational use would give rise to any significant risk from hazardous substances or toxic emissions to air, nor would it be likely that there would be a requirement to store large volumes of hazardous materials.
f) The risk of major accidents and/or disasters relevant to the development concerned, including those caused by climate change, in accordance with scientific knowledge;	Given the scale, location and proposed use of the development, it is not considered that it will give rise to the risk of major accidents and/or disasters. The effects of climate change will be considered during the design process and Flood Consequence Assessment.
g) The risks to human health (for example, due to water contamination or air pollution).	During the construction phase best practice will be adopted to seek to prevent accidental spillages of contaminants or harmful dust deposition. The number of vehicles travelling to and from the site during the operation phase would be associated with the proposed development and a Transport Assessment and Travel Plan will be prepared to accompany any planning application. The proposed land uses do not give rise to any significant risks to human health.
2. Location of development	
<i>The environmental sensitivity of geographical areas likely to be affected by development must be considered, with particular regard to -</i>	
a) The existing and approved land use;	The site is a mixture of brownfield and greenfield land. It has no statutory designation

	for nature conservation or landscape and has been allocated in the Swansea LDP for residential development. The site is designated as a SINC, which is a non-statutory designation. As part of the development proposals appropriate mitigation and compensation will be provided to offset any impacts of the loss of a part of the SINC. However as previously noted, the principle of residential development has already been set through the allocation.
b) The relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground;	The developable area of the site currently lies within Flood Zone A of the Natural Resources Wales (NRW) Development Advice Map (DAM). This zone defines areas considered to be 'at little or no risk of fluvial or coastal/tidal flooding'. The Draft Flood Maps for Wales however illustrates sections of the eastern leg of the site being within 'Zone 3'. Therefore a Flood Consequence Assessment (FCA) will be submitted in support of a planning application to ensure that the proposals are acceptable in regards to flooding. Surface water on the site will be appropriately managed through the statutory SuDS approval process. A Drainage Strategy will accompany any planning application and a SAB approval will be obtained. There are no statutory landscape designations (National Parks and AONBs) within the context of the site nor are there any local landscape designations within the site. There is no Ancient Woodland within the site, with the nearest block of Ancient Woodland being located approximately 480 metres to the

	North East of the site. The woodland within the site is secondary, mainly growing on the site of the former tin plate works, site boundaries and stock piles. The land is made up of the Alcoa Wet Meadows non-statutory Site of Importance for Nature Conservation (SINC). Mitigation and compensation will therefore be considered as part of the development proposals to ensure that there is no significant impact. There are no Sites of Special Scientific Interest, Special Areas of Conservation, National or Local Nature Reserves or Special Protection Areas located within close proximity of the site, with the Burry Inlet and Loughor Estuary SSSI/RAMSAR being located 1.34km to the West, with built forming sitting between the Land and the site of importance. The Fairwood, Pengwern and Welshmoor SSSI, Penllergaer Railway Cutting SSSI, Nant Y Crimp SSSI and Penpla Grasslands SSSI are also located in 5km of the site. Celtic Ecology and Conservation Ltd have undertaken Ecology Surveys on the site. The site is comprised of woodland and marshy grassland. The woodland has established since 1970 on a former tinplate works. In regards to the ecology survey, the trees on the site have been inspected on numerous site visits with no evidence of bats being observed. A full dormouse survey was undertaken on the site as the habitat present is superficially suitable for this species and there are records within 2km. However, no evidence of this species has been found.
--	--

	Otters have been recorded as using the Gors Fawr Brook which runs along the site's northern boundary. Evidence suggestive of badgers has been observed on the site, this will therefore be considered as part of the proposed development moving forward. It is considered that the woodland areas scheduled for vegetation cutting are too heavily shaded to be suitable for reptiles; however it should be assumed that the areas of marshy grassland will provide all four common species of reptile with suitable foraging, basking and potential hibernation habitat. Japanese knotweed is present on the western areas of the site within the woodland. The proposed development site would include a network of green infrastructure across the site with any additional mitigation/compensation being accounted for to the north of the development site. It is considered likely that any significant ecological impacts can be suitable mitigated within or adjacent to the site. The future planning application shall be supported by reports detailing the ecological survey work completed and proposed mitigation, enhancement and compensation to reduce impacts on ecological receptors.
c) The absorption capacity of the natural environment, paying particular attention to the following areas – (i) Wetlands, riparian areas, river mouths;	See above for (i) – (vi) (vii) The principle of development on this site is established through the allocation of the site under SDA H in the LDP, therefore its acceptability for such growth has been

(ii) Coastal zones and the marine environment; (iii) Mountain and forest areas; (iv) Nature reserves and parks (v) European sites and other areas classified or protected under national legislation; (vi) Areas in which there has already been failure to meet the environmental quality standards, laid down in Union legislation and relevant to the project, or in which it is considered that there is such a failure; (vii) Densely populated areas; (viii) Landscaped and sites of historical, cultural or archaeological significance.	considered acceptable by virtue of the site's allocated status. Gowerton had a population of circa 5,212 in the 2011 census. It is therefore not considered that this modest development of approximately 230 homes will have significant effects on Gowerton as a settlement. (viii) There are no scheduled monuments within the site, the nearest being c. 1.6km to the North East. There are no listed buildings located within the site or directly adjacent with the development of the site not causing an impact upon Conservation areas, registered parks, gardens or historic landscapes. An Archaeological and Heritage Assessment has been undertaken for the site which establishes that there are no designated heritage assets within the vicinity of the site which would be sensitive to the effects of the development. With regard to non-designated assets, the site contains features related to the industrial former uses of the area, including a mill leat and canal, as well as limited remains of the Fairwood Tinplate Works and extant remains of the New Gorwydd Colliery. A programme of archaeological monitoring and recording during the clearance of vegetation will be undertaken however it is unlikely that the remains have more than a low heritage value. A watching brief and monitoring is likely to be required as part of the development works.
3. Types and characteristics of the potential impact	
<i>The likely significant effects of the development on the environment must be considered in relation to criteria set out in paragraphs 1 and 2 above, with regard to the impact of the development on the factors specified in regulation 4(2), taking into account -</i>	

(a) The magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected);	The proposed development is confined to approximately 8.7 ha of land in Gowerton, Swansea. The proposed development will have an impact on the surrounding highway network in terms of additional traffic associated with the scheme. Other matters such as drainage, ecology, heritage and noise are not considered to have an impact beyond the site itself and its immediate environment. The proposed development will be visible from certain points in its surroundings, it is not considered that it will give rise to any significant environmental effects. Further, proposed mitigation can reduce any impacts of the proposed development on landscape, drainage, ecology, heritage and noise.
(b) The nature of the impact	As above
(c) The transboundary nature of the impact	None
(d) The intensity and complexity of the impact;	It is considered that the intensity and complexity of the impact will be commensurate with a scheme of the scale of the Proposed Development.
(e) The probability of the impact;	Given the nature of the Proposed Development, the probability of the impact can be accurately identified from the outset with reasonable technical confidence and can therefore be appropriately addressed, and mitigated if necessary.
(f) The expected onset, duration frequency and reversibility of the impact;	Construction effects would be short term, intermittent and temporary whereas operational effects would be long term, continuous and permanent.
(g) The cumulation of the impact with the impact of other existing and/or approved development;	Given the size and location of the approved residential development of up to 100 dwellings to the South of the Train Line (2017/1451/OUT). This will be shown due regard, as appropriate, in



Persimmon

Together, we make a home.

OFFICIAL PARTNER

	the preparation of the planning application, however noting that the development is separated by the Rail Track. The existing built form in the vicinity of the site will be considered in any technical assessments as appropriate.
(h) The possibility of effectively reducing the impact.	It is anticipated that any impacts can be reduced through appropriate mitigation.

This request for a Screening Opinion therefore comprises the following documentation:

- A request for a Screening Opinion letter dated 17/10/2022 and
- Site Location Plan

Planning Submission

Notwithstanding the above and any formal Screening Opinion adopted by the Council, based upon our experience, it is anticipated that the following documentation will accompany any planning application for the proposed development:

- Planning Application Forms
- Suite of Architectural Plans
- Design and Access Statement
- Landscape and Visual Impact Assessment
- Green Infrastructure Strategy
- Planning Statement
- Pre-application Consultation Report
- Drainage Strategy
- Flood Consequence Assessment
- Ecological Appraisal
- Tree Survey
- Heritage and Archaeological Assessment
- Transport Assessment
- Noise Report
- Phase 1 Ground Investigation Report and Coal Mining Risk Assessment Report

Conclusion



Persimmon

Together, we make a home.

OFFICIAL PARTNER

We trust the the Council has sufficient information to determine whether the proposed development requires EIA in accordance with Regulation 6 of Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017. Notwithstanding, as set out above we are firmly of the view that, based on the above evidence, the proposed development does not constitute EIA development in accordance with the EIA Regulations and as such Environmental Statement is not required.

As you will be aware, Regulation 6 (6) (a) of the EIA Regulations requires a local authority to adopt its Screening Opinion within 21 days from which the person making the request submits the necessary information. We would therefore be grateful if the Council could adopt its formal Screening Opinion by 7th November 2022.

Please do not hesitate to contact me should you require any further information.

Yours Sincerley,

Kate Harrison
Strategic Planning Manager

Persimmon Homes West Wales

Telephone – 01792 229800

Email – kate.harrison@persimmonhomes.com