



A Critical Evaluation of Environmental Impact Assessment Practice in Wales: A Lee & Colley Review of the Parc Pelenna Leisure Development Environmental Statement, Neath Port Talbot

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Abstract

Environmental Impact Assessment (EIA) is a popular regulatory instrument which identifies and assesses environmental impacts of proposed developments before planning permission is granted. The Environmental Statement (ES) which was prepared in relation to the proposed development of Parc Pelenna leisure development, a 120-unit luxury holiday lodge development on a site of 45.5 hectares on the Vale of Neath, Neath Port Talbot, Wales, is the subject of critical evaluation in this paper. The work evaluates the ES in accordance with statutory requirements, best-practice advice and academic literature using the Lee and Colley [7] Review Package as its main analytical tool. The results show that although the ES exhibits sufficient quality in the two environmental topics it formally considers, landscape and visual impact, and ecology, it does not consider thirteen of the fifteen topics listed in the scoping opinion of the Local Planning Authority. Between the EIA theory, law and practice, three gaps are defined that are interrelated: the lack of assessment scope and the lack of alternatives analysis, and the lack of Welsh sustainability integration. These are systemic flaws that have been long-established in practice of the UK EIA. These gaps are addressed by giving recommendations on how to overcome them so as to enhance effectiveness of EIA in a similar development scenario.

1. Introduction

One of the most popular environmental management tools in the world is environmental Impact Assessment (EIA). It is essentially a procedure by which the possible environmental impacts of a proposed development are identified, assessed and documented prior to a decision being made in regard to a planning. The goal is to make sure that the decision-makers and the population can comprehend what a proposed project can do to the environment, and measures are taken to prevent or mitigate harm where feasible [1, 2]. However, EIA is not just about legal compliance. It is a means of true sustainable

development when appropriately implemented - a means that will help avoid the irreversible ecological destruction and a means that will make ecological and social costs known before people commit themselves [3, 4]. Low-quality EIA, in contrast, gives an illusion of environment investigation, but permits potentially harmful developments to take place. This is of great importance in this era of increasing rate of biodiversity loss and global warming, where a bad choice cannot be readily reversed [5].

The United Kingdom It has been a statutory requirement in the United Kingdom since 1988, first

by Directive 85/337/EEC and then reinforced by various amendments, most recently by Directive 2014/52/EU. In Wales it is now regulated by the Town and Country Planning (Environment Impact Assessment) (Wales) Regulations 2017 [8]. Although this has a long legal history, the quality of Environmental Statements (ESs) generated through EIA has been subject to constant scrutiny. Since Lee and Colley [7] to Morgan [3] and Glasson and Therivel [1] the literature has consistently identified a large disparity between what EIA is expected to accomplish and what it actually accomplishes in practice. The Institute of Environmental Management and Assessment (IEMA) [5] has determined that certain common weaknesses, such as poor scoping, weak impact prediction, minimal public involvement and poor mitigation, are still evident in the scholarly literature to this day [6]. It thus follows that the field has to be improved by reviewing actual EIAs against these standards.

This report is a critical analysis of the EIA conducted on the proposed Parc Pelenna leisure development - 120 unit high-end holiday lodge resort on a 45.5 hectare site in the Vale of Neath, Neath Port Talbot, Wales. The Urbanists Ltd has prepared the Environmental Statement (ES) on behalf of Trivselhus UK Holdings Ltd in June 2024: Parc Pelenna is a conducive and informative case study: it is a fairly limited development on a genuinely sensitive and intricate location that endured a full and traceable EIA procedure including screening (April 2024), scoping (August 2024) and the It thus provides a significant checking of the effectiveness of the EIA process within the context of a modern Welsh planning process. The assessment applies Lee and Colley [7] Review Package as its main framework, which has been selected due to the specific focus on ES review, is generally extensively validated in both academic and professional application over 25 years, and allows to conduct the assessment in four domains in a structured and replicable way. This is further supported by the allusion to the guidance of IEMA and the existing Welsh laws. This report is not regarding whether or not the development should go ahead; it all depends on the quality of the EIA process.

2. Overview of the Parc Pelenna Case Study

2.1 The Proposed Development

The Parc Pelenna proposal is a luxury tourism and leisure project on a 45.5-hectare plot of the south-eastern slopes of the Vale of Neath, between the neighbouring communities of Tonna and Resolven in Neath Port Talbot, Wales. The proposed

development by Trivselhus UK Holdings Ltd will comprise of up to 120 holiday lodges and related parking, a communal leisure building that will include a pool and hospitality facilities, a new highway access off the B4434, sustainable drainage, on-site wastewater treatment and extensive nature planting [9]. The location is a combination of commercial forestry, ex-quarry land, grazing land and current residential structures. It is also home to a Scheduled Ancient Monument (Bronze Age cairns) and overhead power lines and a high-pressure underground gas main - features that make this a truly sensitive and complex site, and hence a good test of the quality of EIA.



Figure 1: Aerial view of the Parc Pelenna site location, Vale of Neath, Neath Port Talbot. Source: The Urbanists Ltd [13].

2.2 The EIA Process: Screening, Scoping and ES Submission

The project underwent full EIA process in accordance with the 2017 Regulations. In April 2024, Neath Port Talbot County Borough Council (NPTCBC) published a screening opinion that the development was EIA development, and that it had the potential to cause serious environmental impacts [10]. This was the right decision to make taking into consideration the sensitivity of the site. The gateway stage of EIA is screening and the response by the LPA on this was timely and appropriately implemented.

Based on a May 2024 scoping request, in August 2024, an LPA-related scoping opinion was published, listing fifteen environmental topics to be assessed: landscape and visual impact, ecology, traffic and transport, noise and vibration, historic environment and archaeology, hydrology, geo-environmental issues, climate change, socio-economic impacts, waste, ornithology, arboriculture. Scoping is also known to be one of the most crucial parts of EIA - it helps to focus the evaluation on the issues that really matter and helps to avoid such problems as over-assessment and under-assessment [5, 11]. The width of such scoping opinion indicates a comprehensive manner by the LPA. Nonetheless,

although the scoping opinion addressed fifteen topics, the ES filed in June 2024 officially evaluated two: Landscape and Visual Impact Assessment (LVIA) and Ecological Impact Assessment. The

other thirteen subjects were covered either by independent non-ES application documents or not covered at all, as shown in Table 1. The issue of this divergence is the main point of this report.

Table 1: Parc Pelenna ES Structure and Assessment Scope

ES Chapter	Topic	Status in ES
Ch. 1	Introduction	Included
Ch. 2	Legislative Context and EIA Process	Included
Ch. 3	Site and Surroundings Description	Included
Ch. 4	Development Description	Included
Ch. 5	Alternative Sites Assessment	Included
Ch. 6	Landscape and Visual Impact Assessment (LVIA)	Fully assessed in ES
Ch. 7	Ecological Impact Assessment	Fully assessed in ES
Vol. 3	Non-Technical Summary	Included
–	Traffic; Noise; Air Quality; Historic Environment; Hydrology; Geo-environmental; Climate Change; Socio-economic; Waste; Ornithology; Arboriculture; Agricultural Land; Accidents/Human Health	Addressed outside ES or deferred

Source: The Urbanists Ltd [13]; NPTCBC [12]

3. Critical Evaluation Using the Lee and Colley Review Package

The Lee and Colley [7] Review Package is a systematic guideline that has been created at the EIA Centre, University of Manchester, to assess the quality of Environmental Statements. The reason it was chosen here is that it is specifically created to be used in this way, as it has been broadly used in academic and professional ES review in the last 25

years [14, 15], and yields a replicable and defensible measure. Other frameworks, including the SWOT analysis, lack the structure and criterion-by-criterion analysis needed by EIA quality review. The package scores an ES on four Review Areas (RA) out of A (no important tasks unfulfilled) to F (very unsatisfactory, major omissions). The summary assessment is provided in Table 2 below and each area is discussed in detail below.

Table 2: Lee and Colley [7] Review Package – Summary Assessment of the Parc Pelenna ES

Grade	Review Area	Key Finding	Overall Verdict
B	RA1: Description of Development, Environment and Baseline	Development well described; baseline adequate for assessed topics but absent for 13 scoped topics	Satisfactory with reservations

Grade	Review Area	Key Finding	Overall Verdict
C	RA2: Identification, Analysis and Assessment of Impacts	Impacts assessed for LVIA and Ecology only; no assessment for noise, heritage, transport, hydrology, climate change or socio-economics	Can be improved
C	RA3: Alternatives and Mitigation	Alternatives chapter present; site rationale included; mitigation documented for assessed topics; comparative environmental analysis absent; no mitigation for 13 deferred topics	Can be improved
B	RA4: Communication of Results	Clearly structured; NTS provided; accessible language; NTS omits unassessed topics; limited pre-submission engagement evidence	Satisfactory with reservations

Source: Authors' assessment based on Lee and Colley [7]; Parc Pelenna ES [13]

In general, the ES lies in the range of B-C. Superficially this is satisfactory and in the two subjects it actually examines, the work is fairly sound. But this big picture masks a structural issue: of 15 topics scoped in by the LPA, just 2 were formally measured in the ES. This begs a basic question of whether the developer actually comprehended what the process of EIA was all about or whether he just saw it as a mere compliance need that had to be met as efficiently as possible.

3.1 Review Area 1: Description of Development, Environment and Baseline

The ES is good describing the proposed development. Chapter 4 gives a detailed description of the development elements, lodge types, access roads, drainage strategy, construction phasing and wastewater treatment and Chapter 3 gives a detailed account of the site which includes topography, ecology, landscape character, cultural heritage and land use. The baseline surveys in the two formally assessed topics are solid and up to date, with a variety of field seasons spanning 2020-2024 [13]. The LVIA is based on the Guidelines to Landscape and Visual Impact Assessment (3rd edition) of the Landscape Institute and the common Welsh LANDMAP approach. The ecological surveys involve Phase 1 habitat surveys, bat activity surveys, breeding bird surveys and invertebrate assessments - all which is in accordance with good practice.

But one should read this strength in the context of a serious limitation of the ES in terms of scope. The scoping opinion [12] found the site to be within a High Risk Coal Area, a Contaminated Land Area and a Landslip Zone, and high-pressure gas pipelines were on-site and notified by HSE. There is no established baseline of any of these topics in the ES itself. Lee and Colley [7] are certain that decision-makers need a complete description of the site constraints and environmental conditions to make the appropriate informed judgements. This criterion is not completely satisfied. This is a B: good in the areas assessed, but with significant concerns regarding what is not covered. This informs us much about the developer: where they did perform some baseline work, it is of good quality - but the choice to only perform it on two topics demonstrates an attitude that is more about minimising the assessment effort than about providing the decision-maker with a comprehensive environmental picture.



Figure 2: Illustrative masterplan of the proposed Parc Pelenna development. Source: The Urbanists Ltd [13].

3.2 Review Area 2: Identification, Analysis and Assessment of Impacts

This is the most significant area of review and this is where the most apparent constraint of the ES is realized. In the two assessed topics, the quality of impact analysis is reasonable. The LVIA finds that the majority of landscape and visual effects would be moderate to minor-negative, with some positive effects expected at Year 15 as planting matures [16]. The ecological analysis finds that, with the mitigation, no substantial residual ecological effects outside the site level, and the peatland restoration could have benefits [13]. Both tests use well-spelled magnitude and sensitivity matrices with graduated significance levels, which conform to the RA2.3 requirements of Lee and Colley [7].

Nevertheless, the ES does not include an evaluation of noise and vibration, air quality, traffic and transport, cultural heritage, hydrology, geo-environmental conditions, climate change or socio-economic effects, specifically scoped in by the LPA [12]. This is important because of a certain legal reason. The 2017 Regulations (Schedule 4) asks that the probable major impacts upon the population and human health, land, soil, water, air, climatic, material property, cultural heritage and landscape should be described. The fact that most of these factors are not assessed implies that the ES is not fully in line with this statutory requirement. However, the lack of climate change and socio-economic evaluations is especially striking, which can be explained by the fact that these issues manifest a contradiction between EIA as a compliance measure, and EIA as a real instrument of sustainable governance, a contradiction that is well-reported in the literature [3, 4]. In their comparative analysis of wind farm EIAs in the UK and Germany, Philip-Jones and Fischer [15] discovered that higher-quality ESs always covered the entire

spectrum of scoped issues in one and the same integrated document, which could be used to assess the cumulative effects in the genuine sense of the term, which is lacking here. The grade is C: the evaluation is fixable, but the lapses in coverage are severe and demonstrative of an approach based on compliance, as opposed to purpose.

3.3 Review Area 3: Alternatives and Mitigation

Chapter 5 of the ES offers an evaluation of alternatives that encompasses site selection and design. The site selection justification is grounded on six criteria: land ownership, preference of brownfield, landscape quality, M4 accessibility, closeness to local services and leisure assets and the ES mentions a history of planning the site dating back to 1984. There are also design options that are explored and the layout is presented in terms of how it changed as a result of topography, heritage limitations, ecological aspects and infrastructure. This is a broadly positive iterative design method that is consistent with the principle of good practice the existence of alternatives as informing design [7, RA3.1].

The alternatives chapter, however, leaves much to be desired, in terms of legal and professional requirements. It outlines site credentials and design development, but is not a systematic comparison of the environmental impacts of each rejected alternative. The 2017 Regulations, Schedule 4(2) specifically states that alternatives should be described and the key reasons why the option has been selected, with a comparison of environmental impacts. There is no such comparative analysis. It is not a recent weak point: Glasson et al. [14] in a longitudinal study of UK planning ESs found alternatives assessment to be one of the weakest and least improved of the whole range of qualities, and developers habitually talked about alternatives without comparing their relative environmental merits. This pattern was confirmed by IEMA [5] as at the modern day practice. Independently investigating EIA quality in Bangladesh, Kabir and Momtaz [17] identified the same failure as indicating that failure to assess alternatives adequately is not a UK thing only, but rather a systematic tendency of the process in all regulatory settings wherever it is developer driven. This trend is evident in the Parc Pelenna ES in Wales in 2024 - regardless of the express wording of Schedule 4(2) of the 2017 Regulations.

The ES on mitigation sets up a mitigation pecking order of LVIA and Ecology in accordance to the IEMA guidance. Particular commitments are the statements of the method of construction, protection of bats, the restoration of peatlands and extensive

planting of the landscape. They are practical and narrow, and are indicative of good practice of the subjects covered [18]. Nonetheless, as in the case of impact assessment, the thirteen postponed issues have no mitigation strategy at all. An ES reader would be uninformed on how noise, traffic, heritage or hydrology effects would be addressed. The grade is C: the ES demonstrates effort and quality in what it does address, but the lack of both analysis of comparative alternatives and mitigation of most of the scoped topics is a very serious weakness.

3.4 Review Area 4: Communication of Results

The ES is professionally presented. It is logically arranged having a distinct chapter order, a table of contents and cross-references to technical appendices. The text is typically easy to understand. The Non-Technical Summary (NTS), volume 3 is a plain-English summary of the site, development, alternatives and findings of the two topics assessed [19]. Visual aids to comprehension - photographs of the site, illustrative masterplan and photo-views - aid non-experts in learning about the proposals. These are real strengths that satisfy the Lee and Colley [7] RA4 criteria of layout, presentation and NTS quality. In this regard the developers were well aware of the significance of effective communication.

However, there is a serious failure in transparency in the NTS. It fails to recognize that the LPA had thirteen topics scoped but not measured in the ES. The existence of the NTS alone would not have informed a member of the public that noise, traffic, heritage, hydrology and other such important issues were not part of the environmental assessment. An NTS is meant to allow serious and effective community involvement in the EIA; an NTS which fails to capture the most basic constraint of the ES is not that. It is also not well evidenced what pre-submission consultation with the community took place; the scoping opinion mentioned that Natural Resources Wales had not yet responded when the issue was submitted [12], casting doubt on whether the statutory consultation was undertaken prior to the submission of the ES. It is a B: good in the contents of itself, but with critical conditions concerning what lies behind the scenes.

4. Gaps Between Theory, Law and Practice

The case of Parc Pelenna demonstrates three interrelated gaps between the EIA theory, law and practice that can be traced back to the weaknesses that have been long-standing in the UK context.

The initial and the most basic gap is the gap in assessment scope. The ES only formally tested 2 out

of 15 topics scoped in by the LPA. Regulations and best practice guidance published in 2017 demand a coherent Environmental Statement that encompasses all the major impacts [8, 1]. Breaking up the environmental information into individual documents i.e. not part of the ES itself) disaggregates the evidence base and does not allow cumulative and interaction effects to be taken into account in a proper manner. This is dangerous to precisely the type of ill-informed decision making that EIA is meant to avoid [4].

The second loophole is in alternatives evaluation. The ES presents the history and design development of the site but does not present the comparative environmental assessment of the options which Schedule 4(2) of the 2017 Regulations expressly states. This tendency to characterize options and leave their comparison to the background is a long-standing limitation of UK EIA dating back at least to the 1990s [14, 5]. Good practice treats alternatives assessment as a real opportunity to find the least damaging option to the environment; compliance-driven EIA as a story to be used to justify a pre-judged decision. The Parc Pelenna ES is in the latter category, though it excels in the other aspects.

The third gap is related to the lack of Welsh sustainability factors. The ES makes no mention of the Well-being of Future Generations (Wales) Act 2015 and climate change and socio-economic considerations are left to one side altogether. This affirms the tension that Morgan [3] and Cashmore et al. [4] found between EIA as a box-ticking compliance measure and EIA as a real sustainability governance. Considering that the LPA will have to make its decision related to the planning within the context of Welsh sustainability legislation, such omission can be deemed as a material weakness of the ES.

5. Recommendations for Improvement

According to the Lee and Colley [7] assessment and the identified gaps above, the following improvements can be suggested:

Incorporate all the fifteen scoped topics into the ES: Noise, transport, heritage, hydrology, geo-environmental, climate change and socio-economic effects should be assessed within the ES itself, as required by Schedule 4 of the 2017 Regulations. Integration is essential in that cumulative and interaction effects among the topics can be given due consideration which would not be the case when the topics are dispersed in different documents.

Reform Chapter 5 to add a comparative environmental assessment of abandoned

alternatives: Under every alternative, the ES must include a summary of the environmental impacts to be expected, not site credentials and design justification as needed by Schedule 4(2) of the 2017 Regulations.

Make sure that there is complete pre-submission consultation with Natural Resources Wales: The scoping opinion reported that NRW was yet to respond at the point of issue [12]. Engagement of statutory consultees prior to ES submission is basic to a comprehensive and thorough evaluation [5].

Revise Non-Technical Summary to indicate the entire scope of the ES: The NTS must explicitly admit that thirteen scoped topics were evaluated using different documents, clarify the contents of these documents and indicate their locations. This is necessary to have transparent public engagement.

Make the EIA a part and parcel of Welsh sustainability legislation: The ES is to show how the development and the EIA process are linked to the objectives of the Well-being of Future Generations (Wales) Act of 2015 and the Environment (Wales) Act of 2016, in the context of the planning policy established by Planning Policy Wales [20].

6. Conclusion

The proposed Parc Pelenna leisure development has been critically assessed in this report using the Lee and Colley [7] Review Package of EIA. As mentioned in the introduction, it is important that the quality of EIA is not only a formality in the legal sense but also as a tool of true sustainable development. The low quality of EIA gives a chance to make a decision without comprehension of the environmental impacts, the latter can be irreparable [3, 4].

The Parc Pelenna ES has actual strengths: it is professionally organized, uses strong methodologies in the two issues it formally evaluates, displays multi-season survey data, and conveys information in a clear and simple manner both in the main ES and the Non-Technical Summary. These attributes reveal that the developer can deliver great EIA work. But the important question is, did the developer really appreciate and accept the role of EIA as a tool of sustainable development, or did it see it more as a regulatory challenge? The indications lean towards the latter. The developer created an ES that provided compliance but no substantive environmental governance by officially evaluating just 2 of 15 scoped topics, by not analyzing comparative alternatives, by offering no mitigation to most environmental issues, and by making the NTS icy-

cloaked instead of transparent about what the ES entails.

The weaknesses herein identified, in scoping outcomes, alternatives and cumulative effects, are the very weaknesses that were found by the IEMA [5] and Morgan [3] to be common issues in UK EIA practice, and which Jay et al. [6] affirmed were common issues in the literature. Philip-Jones and Fischer [15] showed that even complex developments can be assessed better by quality EIAs even when the process is seen as purposeful (as opposed to procedural) by the developers. The Parc Pelenna ES fails to meet that criterion. The case thus shows a more general systemic problem: as long as the developers, consultants and LPAs themselves are aware of what it is really about, not merely what it needs to be under legal regulations, EIA is best. The Parc Pelenna ES would be able to serve a useful role with the improvements described in Section 5. This is not the case as it is currently.

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