



Prifysgol Cymru
Y Drindod Dewi Sant
University of Wales
Trinity Saint David

Parc Pelenna EIA Review

Ioan Jeffries | Environmental Assessment, management and Auditing | 10/01/26

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1. Introduction

Environmental impact assessments (EIA) are processes that are conducted during the planning stages of a development to identify and evaluate any potential impacts that the project may have on the surrounding environment and potentially identify ways in which the project can be improved (Ling et al., 2015). A project may not need an EIA if it falls under schedule 2, as long as it meets certain criteria (Glasson, Riki Therivel and Chadwick, 2019).

The parc Pelenna project is a development in the Vale of Neath which aims to build a holiday resort including 120 lodges, hospitality, leisure Centre and a swimming pool along with a number of other facilities needed to run a holiday park. This project falls under schedule 2 as a “holiday village” but exceeds the 0.5 hectare limit meaning that this development requires an EIA (UK Gov, 2017). The project is currently in the planning stages having submitted its planning application including its EIA in 2024 (Neath Port Talbot Council, 2024a).

The aim of this report is to critically analyse the EIA process conducted and assess whether industry best practice has been applied using a robust, industry standard review framework. It will also be compared with similar projects to see what was done well and what elements could have been improved upon.

1. Methodology

1.1. Review Framework

In order to effectively assess the parc Pelenna EIA, a recognised and robust review structure must be used. This is an academically supported framework that is used to assess the quality of EIAs. There are a number of frameworks to choose from but in this report the Lee and Colley Review package (Lee and Colley, 1991) will be used. This framework is widely used in industry and allows for consistent assessment across a wide range of EIAs and is used to identify the weaknesses of EIAs and which sections need improving.

The framework assesses 4 key areas including;

1. Description of the proposed development and the local environment
 2. Identification and evaluation of key environmental impacts
 3. Alternatives and mitigation measures
 4. Communication of the results
- (Lee and Colley, 1991)

Each of these areas have a number of categories which they themselves have a number of subcategories. Each of these are graded A-F with A meaning very satisfactory and F being very unsatisfactory. Once all the categories have been graded, aggregate scores are assigned to the 4 areas and a final summary grade is assigned to the EIA as a whole. Due to the fact that the frame work covers a wide range of categories and sub-categories, it is an effective method of checking if the authors of the EIA have omitted any aspect of the assessment. This report won't investigate every subcategory in detail but will cover the broad categories and will cover any points of interest in more detail.

1.2. Comparator ES

In order to critically analyse the results of the Parc Pelenna ES, a similar developments EIA will be used as a comparison to see how they differ. This report is going to use the Swansea Skyline project which was approved on the 7th march 2025 (Swansea Council, 2025). Like Parc Pelenna, this project is a tourism and leisure construction within the South Wales area and as it was approved by the LPA, provides a good bench mark of how a EIA should be performed.

2. Overview of the Parc Pelenna EIA

2.1. Development Summary

As previously stated, the Parc Pelenna project is a leisure and tourism development planned to be constructed in the Vale of Neath between the towns of Resolven and Tonna. The site is approximately 45.5ha with the land currently consisting of commercial forestry and grazing land (Thomas, 2024a). The development will consist of a number of facilities including;

- 120 holiday lodges
 - Road and pedestrian access routes
 - A variety of leisure buildings
 - Back of house and waste buildings
 - Outdoor leisure areas
 - Waste water treatment systems
 - Nature enhancement spaces
 - Historic asset protections and signage
- (Thomas, 2024b)

According to the site description section of the EIA, no part of the site is listed as an area of conservational interest but does contain habitat that may potentially support a number of priority species as listed in the Environment Act (Wales) 2016 (Welsh Gov, 2016). These habitats include woodland, scrub and grasslands which this development may have an impact on (Thomas, 2024a).

2.2. EIA process

Most EIAs follow a similar process starting with the screening process. A screening request is submitted to the Local Planning Authority (LPA) to determine whether or not the development requires an EIA. If the project falls under schedule 1, then an EIA is required regardless. But if it falls under a schedule 2 like Parc Pelenna, then it may not require one. In this instance, the LPA decided in their screening opinion that Parc Pelenna does require an EIA be conducted before the project can continue (Neath Port Talbot Council, 2024b).

The next stage is to begin the scoping process. This aims to identify what the EIA should focus on and what the main environmental concerns would be during the construction as well as the operational stages of the development. An opinion request can be submitted to the LPA which can help to reduce disputes later down the line when submitting the final ES as the LPA will recommend areas to focus on (ISEP, 2023). It is important to include all stakeholders in this process including the general public. The developers will then release their scoping statement which discusses what areas they have concluded can be scoped out with justification for why. For example in the Parc Pelenna scoping statement, the developers scoped out air quality as they claim their development wouldn't contribute significant air quality effects (The Urbanists, 2024b).

3. Evaluation of the EIA

3.1. Description of the proposed development and local environment

This section will look at how the ES describes the site and the local environment surrounding it and how the development may affect potential habitats. The ES discusses the scale of the project along with the buildings and facilities that are planned to be developed along with their components and considerations. It does list a number of details and how they are mitigating environmental impacts such as creating sustainable run-off systems for the roads in the projects but other aspects are left a lot more vague. For example, when discussing the construction for the 120 holiday lodges in Chapter 4 Development Description, they are described as “maximising opportunities for sustainable construction” while providing no clarification for how this is being done (Thomas, 2024b). It does state that further details would be included in any reserved matters planning applications but in order to fit with best practices according to the Lee and Colley Review Package, more detail should be included.

In terms of the site description, the ES provides a detailed description of site size, current use and relevant ecological information. The areas in which the development will exist are well defined as well as what the sites will be used for. There are maps contained within the ES with detailed outlines of where the boundaries are and where each facility will be constructed but are located in Chapter 6: landscape and visual impact assessment (The Urbanists, 2024a). This is similar to the Swansea Skyline project who also provide detailed maps of the project site but the Parc Pelenna diagrams are a lot more detailed and numerous, providing the reader with more information (Swansea Skyline 2023)

Overall very little of the material and construction requirements were discussed in the ES other than some very brief mentions with the justification being that the document is looking to establish acceptable principles only as stated in 4.2.2 in chapter 4 (Thomas, 2024b). Taking all these points into account it was decided based on the Lee and Colley review package to grade this section overall an B.

3.2. Identification and evaluation of key environmental impacts

This section will look at what the EIA identified as potential environmental impacts and evaluated what effect proceeding with the project might have on them. The ES identifies a number of effects during the construction and operation of the holiday park such as the loss of habitat, especially during the construction phases of the project. It also identifies that the landscape changes will be minimal as the development will largely follow the topography of the local area.

The Lee and Colley review package discusses that there needs to be a systematic methodology for identifying any potential impacts the development may have. This is provided in appendix 6.2 of the ES (The Urbanists, 2024d) and provides a detailed methodology of how potential impacts are assessed by comparing the susceptibility of the landscape receptor with its value.

The scoping process is also important to identify key areas to focus on and should be carried out properly with genuine justifications as to why some sections were scoped out. In section 5 of the scoping statement (The Urbanists, 2024b), there is a table listing

the areas of assessment that were scoped out with justification as to why these were not relevant to the assessment. There should also be genuine attempts to communicate with special interest groups as well as the wider public. In the scoping statement under section 6.2.4 (The Urbanists, 2024b) which discusses the methodology of the scoping process, it states that advice and data was collected from a number of groups such as the LPA and Areas of Outstanding Natural Beauty (AONB) but didn't list any other local groups or information from the wider public. A wider range of sources should have been used in the scoping methodology as it may provide a more localised and in-depth view of potential impacts the development may have.

In regards to the Lee and Colley review package this section will be assigned a grade of B as the ES does highlight key areas that will be effected as well as justification for areas in the scoping statement that were ultimately scoped out but still should have included specialty groups and the wider public in potential impacts the project may have.

3.3. Alternatives and mitigation measures

When discussing potential environmental impacts of a project it is important to follow the mitigation hierarchy. This is the order a development should follow in order to create as little environmental impacts as possible with the optimum option being avoidance and the least preferred option being offsetting (Figure 1).

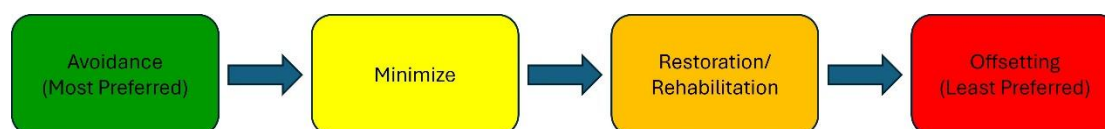


Figure 1 Mitigation Hierarchy (Ghijselincx, Matthysen and Honnay, 2025)

An important aspect of an ES is looking into potential alternative sites in order to avoid potential habitat and therefore reduce the environmental impact. The Parc Pelenna ES does not identify any other potential sites and only identifies the proposed site. This is discussed in 5.2 of chapter 5 (The Urbanists, 2024a), where it provides justification for the site selection. More could have been done to identify additional sites and discuss why these sites would not be a suitable alternative in order to avoid relying on offsetting their impacts.

A number of mitigation measures are put forward in the EIA to minimise and reduce the impact of the development. These are found in 6.7.2 in chapter 6 (The Urbanists, 2024a) and provide a list of measures being implemented including methods of avoidance such as building on lower value areas as set out in the scoping methodology. Where this is not possible the ES states that other mitigation methods will be used such as the replanting of trees to another section of the site. This demonstrates the EIA identified areas of ecological importance and mitigates the impacts by either building in lower value areas as well as by replacing lost habitat.

However, not all mitigation methods were discussed within the ES. In the scoping statement, a number of species were identified as likely to be affected. One of these species includes bats which is mentioned in the non-technical summary where it is mentioned that there are mitigation strategies (Urbanists, 2024). These strategies are

however not discussed at all in the ES itself. In order for this ES to fit best practice then these mitigation strategies should have been discussed further.

In terms the Lee and Colley review package, this section will be graded a C as the lack of alternative site considerations means that the developers could have done more to justify why they selected this site compared to other options. There were however a number of mitigation methods that prioritise avoidance of habitat but still follow the mitigation hierarchy where avoidance isn't possible. However, more detail should have been included on mitigation strategies for species that have been identified as being potentially impacted by the development.

3.4. Communication of the results

In order for any ES to be effective, it must be clearly communicated and easily understood by not just the developers and professionals, but also the general public. This is highlighted in *The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 (Welsh Gov, 2017)* where it states in section 17, that any EIA must contain a non-technical summary. The Parc Pelenna ES does contain a non-technical summary which discusses the main points of the statement in a simplified and easier to read manner. This aligns with industry best practice in order to make the document more accessible to the general public.

This EIA receives an A for it's communication as the ES is clearly laid out with an effective non-technical summary that is easy to follow and allows the findings to be more accessible to the general public.

3.5. Summary of review scores

The over all score for the Parc Pelenna development was a B with the scores of each subsection being found in appendix 1. This reflects the high quality the communication as well as the need to improve the mitigation strategies and provide more details.

1.	DESCRIPTION OF THE DEVELOPMENT, THE LOCAL ENVIRONMENT AND THE BASELINE CONDITIONS	B
2.	IDENTIFICATION AND EVALUATION OF KEY IMPACTS	B
3.	ALTERNATIVES AND MITIGATION	C
4.	COMMUNICATION OF RESULTS	A
	Over-all Grade	B

Figure 2 Scores for each section according to the Lee and Colley review package (Lee and Colley, 1991)

4. Conclusion

EIAs are important in order to strike a balance between the need for new developments and our impact on the natural environment. An EIA should be robust, extensive and be justified not only in what it includes but also what is scoped out. The Parc Pelenna EIA is a well written ES and aligns with industry best practice in most aspects. The ES is well communicated with a clear non-technical summary. It also identifies a number of potential impacts of the development as well as some mitigation measures but falls short in discussing all of these points in depth. The EIA also fails to consider alternative sites which means there could potentially be alternative sites which have a reduced environmental impact.

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6. Appendix

Appendix 1. The final grades assigned to the ES as describes in the Lee and Colley Review Package (Lee and Colley, 1991)

1.	DESCRIPTION OF THE DEVELOPMENT, THE LOCAL ENVIRONMENT AND THE BASELINE CONDITIONS	B
1.1	Description of the development: The purpose(s) of the development should be described as should the physical characteristics, scale and design. Quantities of materials needed during construction and operation should be included and, where appropriate, a description of the production processes.	B
1.2	Site description: The on-site land requirements of the developments should be described and the duration of each land use.	B
1.3	Wastes: The types and quantities of wastes which might be produced should be estimated, and the proposed disposal routes to the environment described.	B
1.4	Environment description: The area and location of the environment likely to be affected by the development proposals should be described.	B
1.5	Baseline conditions: A description of the affected environment as it is currently, and as it could be expected to develop if the project were not to proceed, should be presented.	B

2.	IDENTIFICATION AND EVALUATION OF KEY IMPACTS	B
2.1	Definition of impacts: Potential impacts of the development on the environment should be investigated and described. Impacts should be broadly defined to cover all potential effects on the environment and should be determined as the predicted deviation from the baseline state.	A
2.2	Identification of impacts: Methods should be used which are capable of identifying all significant impacts.	A
2.3	Scoping: Not all impacts should be studied in equal depth. Key impacts should be identified, taking into account the views of interested parties, and the main investigation centred on these.	C
2.4	Prediction of impact magnitude: The likely impacts of the development on the environment should be described in exact terms wherever possible.	B
2.5	Assessment of impact significance: The expected significance that the projected impacts will have for society should be estimated. The sources of quality standards, together with the rationale, assumptions and value judgements used in assessing significance, should be fully described.	B

3.	ALTERNATIVES AND MITIGATION	C
3.1	Alternatives: Feasible alternatives to the proposed project should have been considered. These should be outlined in the Statement, the environmental implications of each presented, and the reasons for their rejection briefly discussed, particularly where the preferred project is likely to have significant, adverse environmental impacts.	C
3.2	Scope and effectiveness of mitigation measures: All significant adverse impacts should be considered for mitigation. Evidence should be presented to show that proposed mitigation measures will be effective when implemented.	C
3.3	Commitment to mitigation: Developers should be committed to, and capable of, carrying out the mitigation measures and should present plans of how they propose to do so.	C

4.	COMMUNICATION OF RESULTS	A
4.1	Layout: The layout of the Statement should enable the reader to find and assimilate data easily and quickly. External data sources should be acknowledged.	A
4.2	Presentation: Care should be taken in the presentation of information to make sure that it is accessible to the nonspecialist.	A
4.3	Emphasis: Information should be presented without bias and receive the emphasis appropriate to its importance in the context of the ES.	B
4.4	Nontechnical summary: There should be a clearly written nontechnical summary of the main findings of the study and how they were reached.	A