

Tetra Tech
(Peter Waldren – Director)
Via email: Peter.Waldren@tetrattech.com

Dyddiad/Date: 16th July 2021

Ein Cyf./Our ref.: HR/Scoping/Rhydycar
Eich Cyf./Your ref.:

Gofynnwch am/Please ask for: Huw Roberts
Llinell Uniongyrchol/Direct Line: 01685 726204
e-bost/e-mail: Huw.Roberts@merthyr.gov.uk

Dear Mr Waldren,

**The Town and Country Planning (Environmental Impact Assessment)(Wales) Regulations 2017
Scoping Opinion**

Re: Proposed mixed leisure development on land at Rhydycar West, Merthyr Tydfil

I refer to the above request for a Scoping Opinion.

With regard to the requirement to provide a site location plan under the 2017 Regulations, the proposed development (albeit it is appreciated the small scale of plan does not allow for close scrutiny) would result in development, in places, tight up against the application site boundary (e.g. the proposed ski centre). This would appear to necessitate development (construction) outside of the site boundary. This needs to be assessed (and amended) and the relevant implications considered in the ES.

In line with Part 4(14) of the 2017 Regulations, formal consultation was undertaken with the following bodies:

- Caerphilly County Borough Council, Brecon Beacons National Park, Rhondda Cynon Taf County Borough Council.
- Natural Resources Wales (NRW)
- Cadw
- Health & Safety Executive
- The Coal Authority
- Glamorgan Gwent Archaeological Trust
- Highways Authority
- Welsh Government (Transport)
- Welsh Water
- (Internal Officers – Ecologist/Landscape Architect)

Responses received are attached.

Schedule 4(2) of the 2017 Regulations states that environmental statements (ES) must include 'A description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the applicant or appellant which are relevant to the proposed development and its specific characteristics and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.' Therefore, the need for the development in this location and the alternatives

considered must be presented in the ES and the detailed reasons/assessments behind the selection of the chosen option provided.

Schedule 4(5) of the EIA Regulations requires a description of the likely significant transboundary effects to be provided in an ES. The ES should address this matter as appropriate.

The ES should address any significant effects on population and human health, in light of the EIA Regulations. This could be addressed under separate topic chapters or within its own specific chapter.

The submitted information (in several of the appendices) refers to various mitigation and compensation/enhancement measures. Any such measures relied upon for the purposes of the assessment should be explained in detail within the ES. The ES should provide reference to how the delivery of measures proposed to prevent/minimise adverse effects is secured (through legal requirements or other suitably robust methods) and whether relevant consultees agree on the adequacy of the measures proposed.

Further comments on the scope of the ES are set out below:

Appendix 1: Community and Socio-Economic

This chapter needs to consider likely significant socio-economic effects (these maybe positive and negative and both inside and outside the County Borough) – see comments from Caerphilly County Borough Council and Brecon Beacons National Park.

Appendix 2: Sustainability and Climate Change

A sustainability assessment of the proposal and its impact on climate change is welcomed, however, in line with Future Wales and Planning Policy Wales a comprehensive assessment of the overall development needs to be undertaken in line with the decarbonisation agenda. This not only involves the removal of vegetation/trees, the construction of buildings and infrastructure but also must take into account the location of the site and the number of vehicular movements etc. It should be less about mitigation and more about creating a development which is as close to carbon neutral as possible.

Appendix 3: Ground Conditions

See comments from The Coal Authority and Gerald Coughlan (Highways/Engineering Officer).

Appendix 4: Ecology

See comments from Natural Resources Wales (NRW) and Matthew Davies (Councils Ecologist). I would draw your attention to the points raised that refer to outdated reports.

Appendix 5: Transportation and Movement

See comments from Welsh Government (Transport) and Gerald Coughlan (Highways/Engineering Officer).

Appendix 6: Heritage

See response from Cadw and Glamorgan Gwent Archaeological Trust.

Appendix 7: Hydrology and Hydrogeology

See response from NRW and Gerald Coughlan (Highways/Engineering Officer). As highlighted by NRW, the proposed method(s) of sustainable drainage needs to be included.

Appendix 8: Arboriculture

The method of assessment is noted, however, greater detail maybe required with regard to smaller unrecorded trees/vegetation and cross referenced with the 'Sustainability and Climate Change' topic area (i.e. Carbon emissions). These smaller trees/vegetation will also have ecological value which may need to be assessed depending on their species and/or value.

Appendix 9: Townscape and Landscape.

It is questioned whether a 3km LVIA study area is acceptable and this needs to be considered further (with appropriate viewpoints). In addition to photomontages, wireframes must also be provided. A topographical survey of the site and relevant existing and proposed (illustrative) cross-sections must be provided. Also see comments from Tom Bramley (Landscape Architect).

Appendix 10: Noise, Acoustics & Vibration

See Comments from Garin Eldred (Environmental Health Officer).

Appendix 11: Air Quality

See Comments from Garin Eldred (Environmental Health Officer) and NRW.

Appendix 12: Lighting

Planning Policy Wales (PPW) (Edition 11) Paragraph 6.8 also needs to be addressed in the ES. Given the extremely sensitive setting and location of the development, vertical and horizontal light spillage diagrams/details (both within and outside the site) need to be provided. Light spillage not only needs to be assessed from external sources but also internally from the buildings/structures themselves. A night/sky glow assessment would also be required. As PPW points out there is also a need to reduce carbon emissions associated with lighting. Therefore, this assessment needs to be undertaken and included in the 'Sustainability and Climate Change' topic area.

Appendix 13: Services and Energy

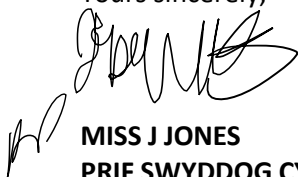
The scoping report provides little detail in terms of services. How the proposed development connects to the gas mains, electricity network, sewerage network etc. could have significant environmental impacts both inside and outside of the application site. Such connections and their impacts need to be fully considered (including plans which identify how the development would connect to the existing infrastructure) in the ES

Finally, as recently discussed, given the scale of the development and significant sensitivities/constraints of the site (and surroundings), the Local Planning Authority are seriously concerned about being able to fully assess any outline application (with only access to be considered at this stage). Whilst it is appreciated that there is a plethora of information to be submitted, it is considered that at the very least access, layout and scale must be considered at the outline stage. Indicative designs of the overall development as well as individual buildings/structures can then be provided to further inform the decision-making process. I should point out that this would be requested under Part 2 section 3(2) of The Town and County Planning (Development Management Procedure) (Wales) Order 2021.

In terms of developments close to the site which may have a cumulative impact, I would suggest planning permission P/19/0073 at Bike Park Wales. This permission is for the '*Provision of 36 camping pods and 5 chalets, erection of shower/toilet block and creation of play and picnic area. Construction of new parking area (150 spaces) with overflow carpark (46 spaces), together with a trail maintenance yard, new highway access routes, ground profile works, drainage, infrastructure and landscape works.*' In addition, there is permission for a Leisure facility (and other development) at the Trago Mills site (P/00/0268 and P/03/0130). Finally, the allocated sites in the Methyr Tydfil County Borough Council Replacement Local Development Plan (2016 – 2031), in proximity of the site, will need to be fully considered.

If you wish to discuss the above further, please do not hesitate to contact Huw Roberts using the above contact details.

Yours sincerely,



MISS J JONES
PRIF SWYDDOG CYNLLUNIO A GWASANAETHAU CYMDOGAETH/CHIEF OFFICER PLANNING & NEIGHBOURHOOD SERVICES

Croesawn ohebu yn Gymraeg a fydd gohebu yn y Gymraeg ddim yn arwain at oedi. Rhowch wybod inni beth yw'ch dewis iaith e.e Cymraeg neu'n ddwyieithog.

We welcome correspondence in Welsh and corresponding with us in Welsh will not lead to a delay. Let us know your language choice if Welsh or bilingual.