

5th May 2021
Our ref: CB/21.169

Unit 9 Oak Tree Court
Mulberry Drive
Cardiff Gate Business Park
Cardiff
CF23 8RS

Development Management
Blaenau Gwent County Borough Council
Municipal Offices
Civic Centre
Ebbw Vale
Gwent
NP23 6XB

Tel: 02920 732 652
www.asbriplanning.co.uk

Dear Sir/ Madam

**The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017
Request for Screening Opinion under Regulation 6 (1)
Proposed Construction of New Council Centre of Operations and Ancillary Infrastructure on the Former
Marine Colliery Site, Cwm, Ebbw Vale**

On behalf of Blaenau Gwent County Borough Council (Community Services), Asbri Planning write to formally request a Screening Opinion (under Regulation 6 (1) of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017), as to whether Environmental Impact Assessment (EIA) is required for the proposed construction of a new Council Centre of Operations and ancillary infrastructure on the former Marine Colliery Site, Cwm, Ebbw Vale.

In accordance with Regulation 6 (2), we provide the required information as follows:

- a) A plan sufficient to identify the land;
- b) A description of the development, including in particular;
 - A description of the physical characteristics of the development;
 - 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;
- 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 –
 - The expected residues and emissions and the production of waste, where relevant; and,
 - The use of natural resources, in particular soil, land, water and biodiversity; and
- e) Such other information or representations as the person making the request may wish to provide or make including any features of the proposed development or any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment.

The following drawings are submitted:

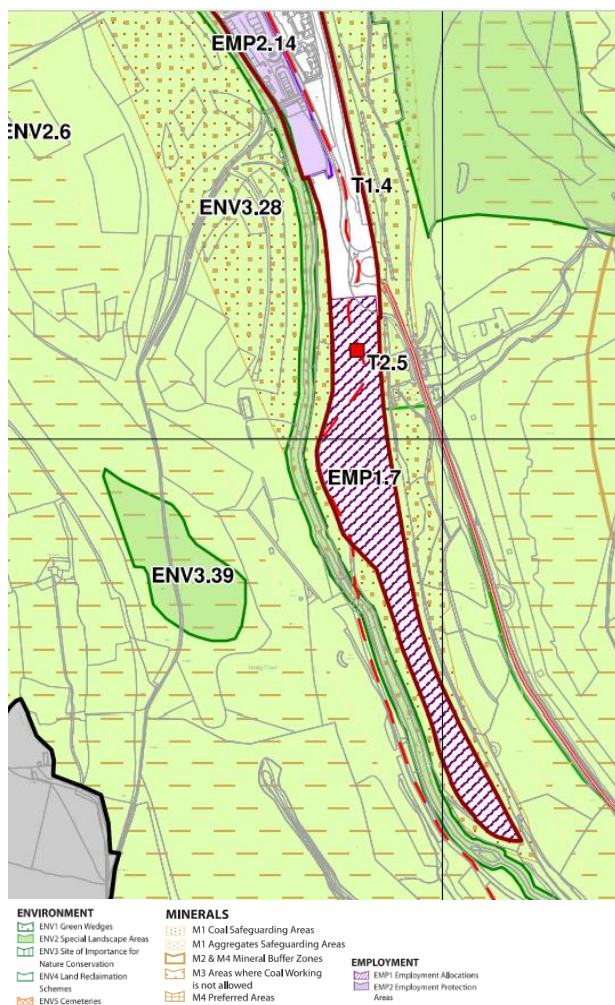
- Proposed Scheme Location Plan (Drawing Ref. TS1515-01)
- Proposed Scheme Site Plan (Drawing Ref. TS1515-02)
- Proposed Scheme Floor Plans (Drawing Ref. TS1515-03)
- Proposed Scheme Elevations/Materials (Drawing Ref. TS1515-04)
- Proposed Scheme Sections (Drawing Ref. TS1515-05)

The Site

The site is located circa 700m to the south of the settlement of Cwm and comprises an area of previously developed/brownfield land extending to circa 4.6 hectares, formerly occupied by the Marine Colliery Site which closed in 1989. The total site area of 4.6 hectares includes 1.7 hectares of land which is to be set aside for potential attenuation areas. The site forms a development platform currently comprised of reclaimed land, encompassing areas of hardstanding and scrub, with scattered trees/vegetation. There are three 3 mine shafts located on the site. Two of the mine shafts are capped (with colliery winding wheel/monuments), whilst third is an air shaft. The site comprises mainly of spoil which is of low biodiversity value although there is ecological connectivity to the adjacent plantation of woodlands at Graig y Deri and Graig Fawr to the west, and the presence of mature trees to the south.

The site has been subject to a number of temporary uses since the closure of the former Marine Colliery, including event car parking and most recently for the purposes a COVID-19 testing centre. In terms of surrounding land use, the site is adjoined by the Ebbw Valley Railway Line (a branch line of the South Wales Main Line) directly to the east, separated by fencing and intermittent vegetation. An existing footpath/cycle path runs along the site's western boundary. The River Ebbw is located within circa 50m of the site to the west. Existing highway is located directly to the north of the site – this adjoins a roundabout within circa 150m providing a direct connection to the A4046, which runs in a north-south direction to the east of the site. A scheduled ancient monument (forming a pumping engine) is located to the north of the roundabout (between the A4046 northern spur and the highway leading to Marine Street).

The site is allocated for employment use in the adopted Blaenau Gwent Local Development Plan (LDP) (adopted 2012). LDP Policy EMP.7 (Marine Colliery, Ebbw Vale) allocates a total of 5.3 hectares for the following uses: B1, B2, and B8 Use Classes, an appropriate Sui Generis use and an ancillary facility or service to the proposed employment use (as illustrated on the LDP Proposals Map extract below).



Blaenau Gwent Adopted LDP Proposals Map Extract

The Proposed Development

It is proposed that an application for full planning permission is submitted for the construction of a new Council Centre of Operations building and ancillary infrastructure on the site of the former Marine Colliery. The proposals encompass the construction of a two-storey building with a total gross internal floor area of circa 5,766sqm, sitting within an overall site area of 4.6 hectares. The 'developable' site area extends to 2.9 hectares whilst 1.7 hectares are set aside for potential attenuation.

The proposed depot is of a modern and sustainable green/future-proof design, which will replace the existing Central Depot at Barleyfield Industrial Estate in Brynmawr. The existing depot is outdated and subject to issues with regard to layout and efficiency. The proposed replacement depot building will allow for future-proofing in terms of moving towards a carbon neutral building/operation (in line with the Welsh Government objective to achieve carbon neutrality in the Welsh public sector by 2030), and supporting the Authority's move to a fully electrified fleet within the next 5 to 10 years. The

development will also look to become a centre of excellence in collaboration with Coleg Gwent through upskilling opportunities around electric fleet vehicles.

The two existing capped mineshafts on the site are incorporated into the site layout, forming key design features by framing the entrance/building approach.

The following services will be accommodated at the Council Centre of Operations site.

- Cleansing Services
- Waste & Recycling Services
- Grounds Maintenance Services
- Bereavement & Cemetery Services
- Highways Maintenance
- Winter Maintenance
- Fleet storage and Maintenance
- Street Lighting & Technical Services DLO
- Stores for vehicle parts, cleaning materials and service consumables indoor and outdoor provision
- Office accommodation
- Welfare/showering facilities
- Staff and fleet parking

Additionally, it is intended to create a HGV Testing Centre on the site, which in addition to being used for the Council's vehicle fleet, will also operate as a drive-through testing centre for the public (operated by the Local Authority).

An indication of proposed floorspace of the various facilities to be accommodated at the proposed Council Centre of Operations site is provided at Table 1 below (with a comparative figure for the current Central Depot at Brynmawr which the new Council Centre of Operations will replace).

Workshop/Storage/Office/Welfare Facilities	Current (Brynmawr Central Depot m²)	Future (Marine Colliery Replacement Depot m²)
Garage Repair Facility	1,080	1,383
Internal Storage Areas	982	600
External Storage Area	1600 [approx.]	1400
Archive	209	159
Office Accommodation	600	1000
Staff Welfare Facilities (i.e. showers toilets)	220	339

Table 1: Indicative Floorspace for Various Facilities at the Proposed Depot Site

A summary of indicative staffing numbers associated within the proposed new Council Centre of Operations site (with a comparative figure for the current Central Depot at Brynmawr) is set out in Table 2 below.

Staff Numbers	Current (Brynmawr Central Depot)	Proposed (Marine Colliery Replacement Depot)
Highways Maintenance	19	19
Winter Maintenance	Made up of staff from other departments	
Street Lighting	4	4
Transport	9	9
Cemeteries	1	1
Grounds Maintenance	19	19
Waste Management and Recycling	140	140
Street Cleansing	Included in Waste figures	
Retained Leisure function	1	0
Business Support	8	8
Tech. Services	4	4

Table 2: Indicative Staffing Numbers at the Proposed Depot Site

A summary of indicative fleet numbers associated with the proposed new Council Centre of Operations site (with a comparative figure for the current Central Depot at Brynmawr) is set out in Table 3 below.

Fleet Numbers (by service area)	Current (Brynmawr Central Depot)	Proposed (Marine Colliery Replacement Depot)
Refuse	7	7
Recycling	28	35
Street Cleansing	7	7
Street Lighting	2	2
Social Services	10	10
Grounds Maintenance	5	5
Highways	12	12
Cemeteries	1	1
Vehicle Maintenance	1	1
Leisure Trust	3	3
Fleet Pool	8	8
Tech Services	4	4
Education	1	1
Env. Health	2	2
Playgrounds	1	1
Plant / Tractors / trailers etc.	20 minimum	20 minimum

Table 3: Indicative Fleet Numbers at the Proposed Depot Site

In addition to proposed fleet numbers, an indication of parking requirements is set out within Table 4 below.

Parking requirements	Current (Brynmawr Central Depot)	Proposed (Marine Colliery Replacement Depot)
Parking Spaces (fleet)	112 [spaces needed for all the vehicles above]	116
Car Parking (office and frontline staff only)	72	120
Internal Parking areas (Winter fleet / sweepers & gully cleaning Vehicles)	15	15
Electrical hook-ups inside building (Electric Fleet vehicles)	0	15
Electrical hook-ups outside (Electric Fleet vehicles)	0	100 fleet parking bays as a minimum
Electrical payable hook-ups outside (Electric staff cars)	0	50 parking bays minimum

Table 4: Indicative Parking Requirements at the Proposed Depot Site

As illustrated in detail on Drawing Ref. TS1515-02 (Proposed Scheme Site Plan) specific uses (and proposed floorspace) include the following:

- Welfare facility (339 sq m)
- Archives (159sq m)
- Catering / Cleaning Storage (110sq m)
- DLO workshop / welfare / office (146sq m)
- Main store (racking system) (600 sq m)
- Garage repair facility (1383 sq m inc HGV Bay)
- HGV 'drive through'
- Fleet internal parking area (1672 sq m)
- Welfare / offices
- Internal open storage
- External vehicle wash down ramp (facility to clean underside)
- Service vehicle park area
- Fuel area including various fuel types / internal card reader system
- Vehicle wash down area with raised area for cleaning roof - enclosed spay housing (174 sq m)
- External storage and racking
- Building material pick up zone inc bays and vehicle access area (5 x 5m open bays) (900 sq m) Tarmac warm store
- Main sewer store (130 sq m)
- External sewer store (54 sq m)
- DLO store inc glass racks (130 sq m)
- Recycling vehicle bays 21no (10 x 3.5m bay) electric hook up
- Grab lorries / refuse collection bays 13no (10 x 3.5m bay) electric hook up

- Mini bus bays 8no (7 x 3m bay) electric hook up 24.7.5t vehicle bays 8no (7 x 3m bay) electric hook up
- Large vans 42no (6 x 3m bay) electric hook up
- Small vans / cars 16no (4.8 x 2.6m bay) electric hook up
- Garage Repair Facility entrance external bays / vehicle waiting
- Staff parking (electric charging zone) 50 spaces
- Staff / visitors parking / cycle store / accessible parking 67 spaces (1no electric charged access bay)
- Shipping Container store (20ft - 6050mm x 2500mm each measuring 33 cubic metres)
- Salt Store (210 sq m)
- Cycle Compound

EIA Regulations

As set out within the Town and Country Planning (Environmental Impact Assessment) Wales Regulations 2017, "EIA development" means development which is either—

(a) Schedule 1 development; or

(b) Schedule 2 development likely to have significant effects on the environment by virtue of factors such as its nature, size or location.

The proposed development is not categorised as 'Schedule 1 development' where EIA would be mandatory.

'Schedule 2 development' is development of a type listed in Schedule 2 which:

a) is located wholly or in part in a 'sensitive area' as defined in regulation 2(1); or

b) meets one of the relevant criteria or exceeds one of the relevant thresholds listed in the second column of the table in Schedule 2.

The application site is not located within a 'sensitive area' as defined in regulation 2(1). However, it is considered that the proposed development falls within Class 10(b) of Schedule 2 to the 2017 Regulations i.e. "urban development project", and exceeds the threshold listed in the second column of the table in Schedule 2 i.e. "more than 1 hectare of urban development" (the site area totals 3.2 hectares).

Schedule 3 of the Regulations sets out the selection criteria which must be taken into account in determining whether a development falling in Schedule 2 is "likely to have significant effects on the environment". The three broad criteria are:

- 1) characteristics of the development;
- 2) the environmental sensitivity of the location; and
- 3) types and characteristics of the potential impact.

In addition, Welsh Office Circular 11/99 sets out that in general EIA will be needed for Schedule 2 development in three main types of case as follows:

- 1) for major developments which are of more than local importance;
- 2) for developments which are proposed for particularly environmentally sensitive or vulnerable locations; or
- 3) for developments with unusually complex and potentially hazardous environmental effects.

An assessment of the likely significant effects of the proposed development on the environment in the context of the selection criteria outlined in Schedule 3 of the Regulations is set out below.

'Characteristics of the Development'

The character of the development is that of land and buildings comprising B1, B2 and B8 uses on land allocated for employment use within the adopted Development Plan i.e. the Blaenau Gwent LDP. In this regard, the land is located within the boundary of an employment allocation i.e. LDP Policy EMP.7 allocates 5.3 hectares of land at the site of former Marine Colliery for "B1, B2, and B8 Use Classes, an appropriate Sui Generis use and an ancillary facility or service to the proposed employment use". The proposed development will allow Blaenau Gwent County Borough Council to establish a fit for purpose, future proof, green and sustainable works depot in order to continue to deliver quality frontline services to the local community (on a site considered appropriate for such uses, as demonstrated by the employment land allocation).

A brief assessment of the detailed criteria outlined at Paragraph 1 of Schedule 3 in relation to the characteristics of the development is provided below:

(a) the size and design of the development

The total red-line site area is 4.6 hectares – however, the ‘developable’ site area extends to 2.9 hectares whilst 1.7 hectares are set aside for potential attenuation. The site area exceeds the “more than 1 hectare of urban development” threshold defined at Class 10(b) of Schedule 2. However, as stated, the developable area on the former Marine Colliery Site is reduced in light of the need to incorporate appropriate areas of land to set aside for sustainable urban drainage. The building itself has GIA of 5,766sqm, comparable with the GIA of the existing Central Depot at Brynmawr which totals 5,300sqm. It should be noted that the site is positioned on previously developed land, and within a designated Employment Allocation where such uses as that proposed (i.e. B1, B2, B8) have been assessed as appropriate by the Local Authority as part of the LDP preparation process. The Employment Allocation (EMP.7) includes a site area which extends to 5.3 hectares (i.e. significantly exceeding the site area proposed). As stated, the Local Authority have assessed the development of B1, B2, B8 uses on 5.3 hectares as appropriate and acceptable. As such, it is not considered that the size of the proposed development (at 4.6 hectares) is likely to bring about any significant effects on the environment.

Annex A of Circular 11/99 is relevant in considering the size of the development, confirming at Paragraph A19 in regard to ‘urban development projects’ that: “*Development proposed for sites which have not previously been intensively developed are more likely to require EIA if: the site area of the scheme is more than five hectares; or it would provide a total of more than 10,000sqm of new commercial floorspace; or the development would have significant urbanising effects in a previously non-urbanised area*”. In considering the above criteria in the context of the proposed development, it is the case that:

- the site has been previously intensively developed (forming brownfield land formerly occupied by a colliery);
- the site area does not exceed 5 hectares;
- the proposal will not provide more than 10,000sqm of new commercial floorspace (or any type of floorspace); and
- the development would not have an urbanising effect on a non-urbanised area (the site forms previously developed land, located adjacent to a main-line railway and within metres of a busy A-road).

The size/scale of the proposed development is effectively replicating that already in operation at the Central Depot in Brynmawr (with sustainability/efficiency enhancements) which has been in operation for circa 35 years – as such, the replacement facilities at the Marine Colliery Site cannot be considered to be of a size/scale which would have wide-ranging environmental effects sufficient to justify EIA.

(b) the cumulation with other existing development and/or approved development

There is no existing development, and no known approved/committed development, on the application site / within the surrounding area which would necessitate the consideration of cumulative development impacts.

(c) the use of natural resources, in particular land, soil, water and biodiversity

In regard to the use of natural resources, the proposal makes good and efficient use of an existing previously developed / brownfield site, which will incorporate sustainable drainage in accordance with Schedule 3 to the Flood and Water Management Act 2010. The site comprises mainly of spoil which is of low biodiversity value although there is ecological connectivity to the adjacent plantation of woodlands at Graig y Deri and Graig Fawr to the west, and the presence of mature trees to the south. A Preliminary Ecological Survey has been carried out (Wildwood Ecology, April 2021) which concludes that the site is not located within an ecologically sensitive area, and the ecological impact of the development is not anticipated to be significant. In summary, it is considered that the proposed development would not give rise to any significant implications in respect of use of natural resources.

(d) the production of waste

The proposed development is unlikely to create any significant implications in respect of the production of waste, and the management of waste/recycling has been carefully incorporated into the design of the proposed development, as illustrated on Drawing Ref. TS1515-02 (Proposed Scheme Site Plan). A site-specific waste management plan will be developed by the contractor upon appointment. It can be concluded that there are no likely significant environmental effects in regard to the production of waste.

e) pollution and nuisances

It is anticipated that a degree of air pollution could potentially arise in relation to an increase in traffic movements arising from the proposed use of the site – however, it is not considered that the development will be a significant potential source of either pollution or nuisances in the context of the site's designation as an Employment Allocation for use for B1/B2/B8 operations. In addition, it should be noted that the increase in traffic movements associated with the proposed depot at the former Marine Colliery Site will represent a displacement of traffic movements associated with the current Central Depot at Brynmawr (there will be no discernible increase in total traffic movements on the local highway network, and as such, no overall increase in air pollution). Furthermore, it is the case that the proposed depot is being constructed in order to replace the out-dated Central Depot, allowing for a green/future-proof design including facilities to deliver the electrification of the Local Authority's vehicle fleet within the next 5 to 10 years. As such, the proposed development will result in a significant decrease in air pollution in the long term.

(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

By nature of the development proposed, there is unlikely to be any undue risk of major accidents and/or disasters. The proposed development encompasses a replacement of the current Central Depot facility which has operated in its current format for circa 35 years – there have been no major accidents and/or disasters associated with the site's operation.

(g) the risks to human health (for example due to water contamination or air pollution)

By nature of the development proposed, there is unlikely to be any risks to human health. The proposed development encompasses a replacement of the current Central Depot facility which has operated in its current format for circa 35 years – there have been no major accidents and/or disasters associated with the site's operation.

'Environmental Sensitivity of the Location of the Development'

It is set out at Paragraph 2 of Schedule 3 that "*The environmental sensitivity of geographical areas likely to be affected by development must be considered*", having regard to the following detailed criteria:

(a) the existing and approved land use;

The site is not subject to any national or international designations in regard to ecology / landscape / heritage or any other matters. It is the case that non-statutory designations, which do not fall within the definition of 'sensitive areas' but are nonetheless environmentally sensitive, may be of relevance in determining the need for EIA. The application site is located within close proximity of non-statutory ecological and landscape designations, including Special Landscape Area (SLA) and Site of Importance for Nature Conservation (SINC) designations. However, as set out above, the site is located within a designated Employment Allocation in the adopted Blaenau Gwent LDP, and its development for B1/B2/B8 uses as proposed has therefore been assessed as acceptable by the local authority. The impact of the proposed development in ecological and landscape terms will be assessed as part of the Planning Application – however, in the context of the existing land use, it is not considered that the proposed development will have any adverse impact upon the environmental sensitivity of the surrounding area.

There is a Scheduled Ancient Monument located within circa 150m to the north of the site, which comprises the remains of a steam pumping engine originally constructed at Marine Colliery in 1893. The engine was moved to its current location in 2003 following construction of the A4046. The CADW Scheduled Monuments Full Report states that the monument is of national importance for its potential to enhance knowledge of mining in Wales. The sensitivity of the designation would be assessed as part of the Planning Application – however, the Scheduled Ancient Monument is located outside the boundary of the development site.

In summary, the development of B1, B2 and B8 uses on the application site (as proposed) is considered appropriate in the context of the existing and approved land use.

(b) the relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground;

It is considered that owing to the previously developed nature of the land, the development of the site for employment uses as proposed will be unlikely to have significant environmental implications in respect of the relative abundance, quality and regenerative capacity of natural resources in the area. Indeed, the site is allocated for development in the Development Plan, and in light of its location on a previously intensively developed site, the land is not expected to be of significant ecological interest – as is suggested by recent ecological surveys which confirm that the site is not located within an ecologically sensitive area, and the ecological impact of the development is not anticipated to be significant.

(c) the absorption capacity of the natural environment paying particular attention to the following areas—

(i) wetlands, riparian areas, river mouths;

(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 a failure to meet the environmental quality standards laid down in Union legislation and relevant to the project, or in which it is considered there is such a failure;

(vii) densely populated areas;

(viii) landscapes and sites of historical, cultural or archaeological significance.

None of the areas listed above is applicable to the application site – the site is not located within an environmentally sensitive area in terms of ecology, landscape, archaeology etc, neither is it located within (vii) a ‘densely populated area’. As outlined above, there is a Scheduled Ancient Monument located within circa 150m to the north of the site – however, this monument is located outside the application site boundary. It is not considered that the proposed development would have any adverse impact on the absorption capacity of the natural environment.

In conclusion, the application site is not considered to be in, or have a direct impact upon, a sensitive location as defined by the EIA Regulations.

‘Types and Characteristics of Potential Impact’

The type and characteristics of the potential impacts arising as a result of the development are considered below, having regard to the criteria under Paragraph 3 of Schedule 3, namely:

(a) the magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected);

(b) the nature of the impact;

(c) the transboundary nature of the impact;

(d) the intensity and complexity of the impact;

(e) the probability of the impact;

(f) the expected onset, duration, frequency and reversibility of the impact;

(g) the cumulation of the impact with the impact of other existing and/or approved development;

(h) the possibility of effectively reducing the impact.

Traffic and Transportation

The proposed use of the site for a new Council Centre of Operations site will give rise to an increase in traffic movements to/from the former Marine Colliery Site, in comparison to the baseline position when the site is vacant. The site has recently been in use as a COVID-19 testing centre – traffic movements associated with this use will be of a different type and magnitude to that associated with the proposed use of the site as a Council Depot.

It is the case that the development of B1/B2/B8 uses as proposed will have an impact on the surrounding road network in light of the increase in traffic movements associated with these uses. However, it is established that there will be no significant impact on the capacity of the existing road network (evidenced by the site’s employment allocation status). It is acknowledged that the LDP was adopted over 9 years ago and that the local highway network may have been subject to a change in position in the intervening years since the site was allocated. It is understood that the Local Authority is currently in the process of preparing a replacement LDP, and that the Marine Colliery Site has been submitted as a Candidate Site, comprising 5.3 hectares for employment use. The Council’s ‘Finding of the Candidate Site Assessments’ report (published November, 2020) has been reviewed. The report identifies in regards to its assessment of the Marine Colliery Site (Candidate Site ref. EV024) that: “The existing highway network can accommodate the development proposal”.

In addition, it should be noted that the increase in traffic movements associated with the proposed depot at the former Marine Colliery Site will represent a displacement of traffic movements associated with the current Central Depot at Brynmawr (there will be no discernible increase in total traffic movements on the local highway network).

A Transport Assessment (Capital Transport Planning, April 2021) has been prepared which will be submitted in support of the Planning Application. The Transport Assessment has reviewed the transport impacts associated with the proposed development in detail and it is concluded that the development can be delivered without prejudicing safety and the free flow of traffic on the public highway. As such it is considered that an EIA is not required on transport grounds.

Ground Conditions and Contamination

The site is brownfield in nature and as such appropriate geo-environmental assessments will be undertaken. The proposed planning application will be supported by a Site Investigation Report. It is considered that with appropriate investigations, any potential on-site contamination can be identified and remediated as required. It is also considered that there is a very low risk of contamination associated with the operation of the development proposal and thus it is not considered to be large enough, complex or unusual enough to require an EIA. As such, it is considered that an EIA is not required in relation to ground conditions and contamination.

Noise

The increase in traffic movements and the use of the site for employment uses (i.e. incorporating B1, B2 and B8 uses) will result in the generation of noise. The development will have an impact upon local receptors in terms of noise, with existing residential properties being located to the east of the site (circa 5 dwellings are located along the A4046). However, it is the case that the application site is separated from the existing dwellings to the east by both the Mainline Railway Line and the A4046, and it is not anticipated that the operation of the proposed development will not result in any significant increase in noise. A Noise Impact Assessment has been prepared which will be submitted in support of the Planning Application.

Potential noise impacts will also occur during the construction phase of the development. It is considered that the potential construction noise can be mitigated by ensuring that contractors operate within best practice guidelines. A Construction Environmental Management Plan (CEMP) will outline measures to control and reduce noise impacts during the course of the development. It is concluded that noise at the construction phase of development will be of a temporary nature and impacts will be mitigated through measures to be outlined in a CEMP, and that there will be no significant increase in noise levels above baseline conditions once operational – as such, EIA is not required on noise grounds.

Air Quality

The proposed development will generate a degree of air pollution, arising primarily from the increase in traffic movements. However, it is the case that the proposed depot is being constructed in order to replace the out-dated Central Depot, allowing for a green/future-proof design including facilities to deliver the electrification of the Local Authority's vehicle fleet within the next 5 to 10 years. As such, the proposed development will result in a significant improvement in air quality across the County Borough in the long term. Potential air quality impacts arising as a result of construction activities will be short term and temporary and can be minimised through the adoption and implementation of good construction practices. As such it is concluded that EIA is not required on air quality grounds.

Landscape & Visual Impact

The application site is located on a brownfield site; is located within settlement limits; and is designated as an Employment Allocation in the adopted LDP. The site itself is not subject to any specific landscape designations. However, it is located within close proximity of a Special Landscape Area (SLA) to the west. As such, the proposed site layout has been developed to retain a buffer (incorporating drainage) and softer edge to the site's western boundary, and it will be ensured that the majority of vegetation is retained. Furthermore, as illustrated on Drawing Ref. Proposed Scheme Elevations/Materials (Drawing Ref. TS1515-04), the building height has been restricted to two-storeys with the sloping roof providing a reduction in height as the building gets closer to the SLA to the west. A sympathetic materials pallet is proposed which allows the building to integrate with its surroundings. The high-quality design proposed will ensure that a highly sustainable and future proofed building is delivered, which does not appear incongruous in either short or long-term views. In light of the site context and careful design, it is considered that any impact on the SLA will be localised and that impact on the wider landscape will not be significant. As such it is considered that an EIA is not required on landscape and visual grounds.

Ecology

The site is not located within an ecologically sensitive area, and the ecological impact of the development is not anticipated to be significant in light of the site's previously developed nature. In this regard, the site comprises mainly of spoil which is of low biodiversity value although there is ecological connectivity to the adjacent plantation of woodlands at Graig y Deri and Graig Fawr to the west, and the presence of mature trees to the south. Appropriate buffers are incorporated into the site layout to minimise impact upon areas of adjacent ecological value, and the provision of mitigation in the form a range of biodiversity enhancements as recommended in the Preliminary Ecological Appraisal will ensure that the impact of the proposed development on ecology and biodiversity is minimal. This is confirmed by the Preliminary Ecological Appraisal undertaken on the site (Wildwood Ecology, April 2021) which concludes that:

- There were both statutory and non-statutory designated sites identified within the vicinity of the site (see Table 4). The closest statutory site was Cwm Merddog Woodlands 2km from the site, and the closest non-statutory site was Ebbw River South Section 67m from site.
- Given the scale of the proposed development, and the lack of likely impacts beyond the site boundary, the nearby designated sites are sufficiently well separated so that no impacts on their designated features are anticipated as a result of the works designated sites in the vicinity of the site are sufficiently well separated so that no impacts on their designated features are anticipated as a result of the proposed development.

Recommendations are also set out in the Preliminary Ecological Appraisal regarding protected species – it is recommended that further surveys are carried out in regard to the potential presence of reptiles and dormouse:

- Due to the suitable habitat on site and in the surrounding habitat, a reptile presence or likely absence survey is required. This will determine if specific reptile mitigation is required as part of the development. If reptiles are present on site, reptile mitigation such as fencing may be required, and suitable hibernacula should not be removed or disturbed during the hibernation period.
- Depending on the scale and location of vegetation clearance a dormouse nest tube survey may be required to determine if dormice are present on site. If only small areas of vegetation are removed, a precautionary working approach and method statement will need to be followed during clearance.

It is concluded that the site is not located within an ecologically sensitive area, and the ecological impact of the development is not anticipated to be significant. The preparation of a Construction Environmental Management plan will ensure further protection of ecological features during the construction of phase of development. In light of the above, it is considered that an EIA is not required on Ecology grounds.

Drainage & Hydrology

The Welsh Government Development Advice Map indicates that the majority of the site is located within Zone B, with a small area of the site running along its western boundary being located within Zone C2. However, the updated 'Flood Map for Planning' indicates that the entirety of the site is located within Zone 1, where there is no flood risk constraint to development. This position is confirmed within the Council's assessment of the Marine Colliery Candidate Site – the Council's 'Finding of the Candidate Site Assessments' report (published November, 2020) identifies in regards to its assessment of the Marine Colliery Site (Candidate Site ref. EV024) that the site is "*not in a flood risk area from rivers and sea*".

A detailed Drainage Strategy for the site will be prepared and submitted in support of the Planning Application, which will demonstrate that the proposed development can be delivered in a SuDs-compliant manner in accordance with the provisions of Schedule 3 of the Flood and Water Management Act 2010. As shown on the Proposed Scheme Location Plan (Drawing Ref. TS1515-01), significant areas of land are set aside for potential attenuation (i.e. a total 17,322 sqm across the site).

It is also important to ensure that surface water run-off from the site during construction is controlled so as to prevent contamination of environments directly adjoining the site. To this end, the CEMP will detail surface water will be controlled during construction to ensure no damaging run-off. Strict adherence to the CEMP during construction will ensure no impact on the natural environment. As such, it is considered that an EIA is not required on drainage / surface water pollution grounds.

Heritage & Archaeology

The proposed development will have no impact upon Listed Buildings or Conservation Areas, with no such assets being located within proximity of the site. As stated, there is a Scheduled Ancient Monument located within circa 150m of the site's northern boundary, and the proposed development will be visible from this asset. As such, although located outside

the site boundary, the potential impact of the proposed development upon the Scheduled Ancient Monument will be assessed as part of the Planning Application. An Archaeological Setting Assessment of the impact of the proposed development on the Scheduled Ancient Monument has been undertaken by Glamorgan Gwent Archaeological Trust (April, 2021). The assessment finds that the development area is essentially invisible from the monument, nor can the monument be seen from the development area. This effectively means that in relation to the views from the Marine Colliery pumping engine, lines of sight to and from the monument are self-screened, with the result that no effect on the setting of the monument would be caused by the development. Overall, it is concluded that the proposed development will have no visual impact on the historic asset and its setting.

The proposed development will bring the site back into beneficial use and provide an employment-generating use for the site which is currently vacant, whilst appreciating the site's cultural heritage through incorporation of the existing mineshafts as a central design feature which frames the entrance to the proposed building (alongside a thorough assessment of any potential impact upon the nearby Scheduled Ancient Monument). Therefore, with the provision of a robust Archaeological Setting Assessment it is affirmed that the proposals can be adequately assessed via standalone reports, and as such it is considered an EIA is not required on heritage and archaeology grounds.

Requirement for EIA – Summary

As set out within this letter, Blaenau Gwent County Borough Council (Community Services) request a formal Screening Opinion from Blaenau Gwent County Borough Council (Development Management) as to whether the proposed development of a new Council Centre of Operations building and ancillary infrastructure on the former Marine Colliery Site constitutes EIA development.

In summary, the proposal constitutes Schedule 2 development – however having regard to the characteristics of the development; the environmental sensitivity of the location; and the types and characteristics of the potential impact (in accordance with the criteria set out within Schedule 3 of the Regulations), it is not considered that the proposed development is likely to have significant effects on the environment. The development is not of more than local importance; is not proposed for a particularly environmentally sensitive or vulnerable location; and does not have unusually complex and potentially hazardous environmental effects.

It is concluded that the proposed development a new Council Centre of Operations building and ancillary infrastructure on the former Marine Colliery Site is unlikely to have significant effects on the environment, enough to warrant an EIA. As such, it is considered that EIA is not required.

We would be grateful if you could review this screening request and formally respond within the statutory 21 days of formal receipt. Should you require any further information, require any further information please do not hesitate to contact me.

Yours sincerely



Catherine Blyth
Associate