# Chimney's Link Masterplan

Pre-Application Consultation Statement and EIA Screening Report

Pembrokeshire County Council

20 July 2016

# Notice

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# 1. Introduction

# 1.1. Preamble

Pembrokeshire County Council, in consultation with the Co-Operative, is seeking to redevelop a part of Fishguard Town Centre which has become known as Chimney's Link. A scheme is being formulated to achieve the following principal objectives:

- Introduce a one-way system to the Town Centre to improve traffic flow and safety;
- Provide a mixed use development comprising retail, residential and open space uses and landscaping in the Town Centre; and
- Provide additional transport related infrastructure to encourage multi-modal travel.

# **1.2.** Purpose of the Report

The purpose of this report is twofold. Firstly the report will assist in pre-application consultation with the local planning authority regarding the scheme. The second purpose of the report is to inform and seek an Environmental Impact Assessment Screening Opinion from the Local Planning Authority.

# 1.3. Proposed Development

The Chimney's Link Masterplan is being produced and, once finalised, will establish a preferred option for the redevelopment of 1.5 hectares (ha) of land within Fishguard Town Centre with residential and retail uses. The masterplan will also include development of a new link road providing access through the development site while creating a one-way gyratory system.

The extents of the one-way gyratory system will be created by introducing a mini-roundabout where the new link road meets the A487 Trunk Road at West Street. It will then continue in a south-easterly direction towards the existing roundabout within the main square of Fishguard Town Centre; from there, it will take a south-westerly direction along the A40 Trunk Road at High Street to the proposed junction located adjacent to the Ship & Anchor Public House where the proposed link road will start. This one-way gyratory would operate in a clock-wise direction with Chimney's Link providing a new north-south connection between the existing Cooperative Store access junction and the West Street Priority junction with Ropewalk and Penslade.

The key elements of the Chimney's Link development ('the scheme') are likely to include:

- Development of an approx. 238m long, one-way, link road through the development site;
- Associated footpaths and tactile crossing along the new link road;
- New junction at High Street/A40;
- New mini-roundabout at West Street/A487;
- New accesses to the link road from within the development site;
- New bus/coach lay-by area and taxi rank, including associated bus shelters to reduce the time buses wait on the Square which will generally reduce traffic congestion;
- New road signage and road pavement markings;
- Street lighting;
- Appropriate and low-maintenance landscaping;
- New public and low-maintenance open space;
- Provision of approx. 0.46ha plot for retail/commercial uses and approx. 0.44ha plot for residential use;
- Demolition of buildings, namely: Fishguard Junior School, Ship & Anchor Public House and library building, property no. 44 High Street;
- The existing Co-Operative supermarket store will remain on site and its parking area is to be relocated.

A Site Location Plan is available on Appendix A of this report.

It is intended that an outline planning application and associated conservation area consent for the preferred scheme will be prepared and submitted. Regarding the outline planning application, all matters will be reserved for detailed approval at a later date, with the exception of access.

# 1.4. Need and Objectives

This scheme results from the need to address traffic constraints along the A487 High Street / A40 West Street, to improve accessibility within the surrounding area and to regenerate part of Fishguard Town Centre.

The key objectives of this scheme include:

- Produce and implement a masterplan which meets the requirements of all stakeholders;
- Meet the identified need for retail development in Fishguard;
- Provide public spaces within the redeveloped site;
- Provide an access road through the new development site which meets access requirements as well as those of the relevant standards and is in keeping with the surrounding road network;
- Provide a sufficient highway layout which accommodates bus stops and a coach lay by area; and
- Provide suitable routes for pedestrians and cyclists as part of the scheme.

# 1.5. EIA Screening Legislative Process

The basis for EIA legislation in Wales is the EU Directive 85/337/EEC, superseded by EU Directive 97/11/EC, which came into effect in 1999. For projects that fall under the town planning regime, this Directive is implemented in Wales by Statutory Instrument 2011 No. 1824 Town and Country Planning (EIA) (England & Wales) Regulations 2011, as amended. Schedule 2, Part 10 (b) of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2016 indicates that EIA Screening may be required for 'infrastructure projects', which includes urban development projects where the development extends over more than 1 hectare (ha) of urban land, as follows:

#### Table 1-1 EIA Regulations

Schedule 2, Part 10. Infrastructure projects			
(b) Urban development projects, including the construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas	<ul> <li>(i) the development includes more than 1 hectare of urban development which is not dwelling house development; or</li> <li>(ii) the development includes more than 150 dwelling houses; or</li> <li>(iii) the overall area of the development exceeds 5 hectares.</li> </ul>		

Although the proposed scheme falls below the thresholds for Schedule 2 infrastructure projects, this EIA Screening report has been prepared on a precautionary basis to consider the key environmental issues and potential impacts of the scheme.

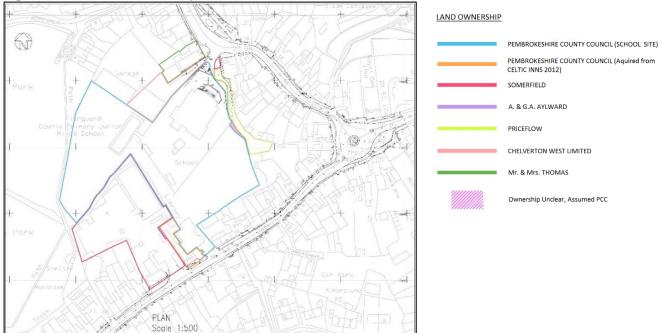
A formal Screening Opinion is requested from PCC to establish whether an EIA would be required.

# 2. Background Information

## 2.1. Land Ownership

The majority of the site is under the ownership of PCC, this is formed of the Fishguard Junior School site and land at Ship & Anchor Public House, purchased in 2012. The southern area of the site is owned by the Co-Operative. A small strip of land between that owned by PCC and by the Co-Operative is in third-party ownership. Several small parcels of land in the north of the site are under separate ownership. The land ownership is illustrated in **Figure 2-1**.

Figure 2-1 Land Ownership



# 2.2. Masterplanning

As PCC and the Co-Operative own the majority of the development site, they have identified the following spatial parameters for the masterplan:

- The Co-Operative store building is to remain in its current place but the internal layout of the building could be amended, with the potential to re-orientate the store entrance so that it faces High Street;
- A new road, designed to highway standards, needs to be constructed on the site in order to provide access to the site and to enable the creation of a one-way system to improve traffic flow and to improve conditions for all road users in the centre of Fishguard;
- New uses on site should conform to the policies set out in PCC's Local Development Plan unless material considerations indicate otherwise.

Given the above parameters, a preliminary layout identifying the road alignment, retail and residential areas has been prepared (**Appendix B**).

# 2.3. Stakeholder Consultation

Stakeholder consultation commenced at the scheme's inception and will continue through the planning and design processes to help determine the preferred masterplan for the site.

A meeting was held on 26<sup>th</sup> May 2016 between PCC Highways department, PCC Estates department, representatives from the Co-Operative and Atkins to discuss road alignment and masterplan options. During the meeting, it was decided that:

- A preferred highway alignment could provide a sensible separation between retail and residential zones and would serve each zone efficiently;
- Potential road alignments which place the existing Co-Operative store on the western side of the link road would divorce the store from the remainder of Fishguard Town Centre. Placing the Co-Operative store to the east of the link road will better connect retail uses with the town centre retail;
- Car parking for the existing Co-Operative store and new retail development should be consolidated;
- Access to land uses adjacent to the development site need to be maintained;
- Given the Local Development Plan allocation and the site context, the general approach will be to
  pursue retail uses on the town centre side of the link road and residential uses between the link road
  and Lota Park. Any retail to be considered on the park side of the road should be adjacent to the
  garage site to be in keeping with the existing land use;

- As the Co-Operative store would require a temporary access from High Street to its store during construction of the scheme, the Ship & Anchor Public House and adjacent library building will need to be demolished (this will be subject to an application for Conservation Area Consent); and
- Maximum building height should be capped at three storeys to reflect the scale of surrounding buildings and the site's location on the boundary of the Fishguard Conservation Area.

There is a long history of discussions between PCC and the Welsh Government (WG) in relation to the 'Chimney's Link' scheme. These discussions stemmed from a number of events, many of which occurred before the 'Fishguard Traffic and Transportation Study', including:

- The 1987 Fishguard Area Traffic Study (W.S.Atkins and Partners);
- Preseli District Council's Study into the Fishguard Inner Bypass (circa. 1987). The Fishguard Inner Bypass included a link from Park Street through Parc-y-shwt to High Street and on to West Street. It necessitated extensive demolition of property but allowed for the pedestrianisation of sections of the three roads radiating out from The Square;
- January 1990 Public Exhibition of various road proposals for Fishguard (Atkins on behalf of the Welsh Office);
- 1992 Lower Fishguard Diversion Inquiry this prompted the development of a report on a proposed Fishguard Southern By-pass;
- March 2003 Fishguard Bus Focal Point Study (Babtie) on the back of which a decision was made to accommodate the facility on the school site.

The 'Fishguard Town Centre Access Improvements' project was added to the South West Wales RTP programme pool by agreement (with SWWITCH and the Welsh Government) in 2012. Referred to previously as the 'Chimney's Link' project, the 'Fishguard Town Centre Access Improvements' scheme also included the following elements:

- Bus Focal Point (within the old school site); and
- Improved walking and cycling access in and to the Town Centre.

Consultation on the scheme will continue to be undertaken and this will include the following key stakeholders:

- PCC, including Road Safety Engineers, Local Transportation Planner and Transportation Strategy Section
- Welsh Government
- South Wales Trunk Road Agent (SWTRA)
- Local Town/Community Council
- Natural Resources Wales
- Developers, including the Co-Operative
- Statutory Utilities
- Local Land Owners

# 3. Site Description

## 3.1. Site Location

The site is located within the vicinity of Fishguard Town Centre, along the A40 Trunk Road, Pembrokeshire County Council (PCC). It is generally bound by High Street to the south, West Street to the east and Lota Park to the west. The proposed link road will connect the A487 Trunk Road at West Street and A40 Trunk Road at High Street and once constructed will form part of a one-way clockwise gyratory system through the centre of Fishguard.

Fishguard is located on the northern side of the Pembrokeshire coastline, at Fishguard Bay between Dinas Head to the east and Strumble Head to the west. To the east and west is the higher ground of the Pembrokeshire Coast National Park, and to the south the rolling lowland farmland towards Letterston.

The site is currently occupied by the Co-Operative Supermarket, the former Fishguard Junior School and library buildings and the recently acquired Ship & Anchor Public House. The site is considered to be part of a wider regeneration area in Fishguard Town Centre.

To the eastern and southern boundaries of the site lie commercial town centre properties, most of which are in retail use. To the north of the site there are commercial premises in motor trade use and to the west is Lota Park, an attractive town centre public open space.



#### Figure 3-1 Site Location

The scheme does not fall within a designated landscape, however the Pembrokeshire Coast National Park is located approximately 600m to the northeast of the site, and again approximately 2.5km to the northwest. The Creigiau Abergwaun (Fishguard Cliffs) SSSI is located approximately 350m to the northwest at its closest point.

There are no trees covered by tree preservation orders (TPOs) within the site, although there is a linear belt of semi mature trees and large shrubs at the western edge of the site along the boundary with Lota Park and a row of mature conifers to the boundary with the adjoining garage.

Part of the site, to the eastern side, falls within the Fishguard Conservation Area, with over 100 Listed Buildings within 200m of the site.

Visual receptors include the residents along the surrounding roads, along High Street, West Street, Penbanc and Ropewalk, with occasional glimpses from residents in Penslade, Main Street, Wallis Street, where there are views along the road between buildings, allowing very limited glimpses. Many of the buildings along West Street and High Street are listed, and are within the Conservation Area. The majority of these will have direct views of the site from the rear of the properties and will experience adverse effects during construction and on completion of the proposed scheme. The proposals will mark a visual improvement when compared to the existing derelict Public House and Junior School buildings.

There are no public rights of way (PRoW) across the site, but several intersect with the adjoining roads. Users of these will experience glimpses of the proposed development, however the intervening buildings along West Street and High Street will prevent extensive views. There should be no direct impacts to the existing PRoWs, for example as diversion routes, as they do cross the site, but there will be indirect views of both construction operations and on completion of the works.

# 3.2. Site Images

The images shown below provide a snapshot of the overall site and the transport-related constraints along the A487 High Street and West Street: the pavements are not to standard, the roads are narrow and difficult to negotiate, and there is insufficient space for a bus focal point under the current system.



Figure 3-2Narrow Footway Looking East alongHigh Street



**Figure 3-2** Narrow Footway Looking East along High Street forcing pedestrians into carriageway at the carriageways narrowest point and on a section with below standard visibility



Figure 3-3 Narrow Carriageway High Street approach to the Square leading to congestion



**Figure 3-5** Narrow carriageway West Street approach to the Square causing vehicles to use both lanes and overhang of bus in footway



Figure 3-4Narrow Carriageway West Streetapproach to the Square



Figure 3-6Narrow Footway and trip hazardalong High Street view west



Figure 3-7Narrow Footway and trip hazardalong High Street view west



Figure 3-8 Vacant Fishguard Junior School

The following images depict the current state of the overall development site: the existing Co-Operative store, the vacant school and the adjacent open fields.



Figure 3-9 Entrance to development site, illustrating the Co-Operative store and the Ship & Anchor building



Figure 3-10 Existing fields within development site

# 4. Construction

Subject to planning approval, construction is scheduled to commence in February 2017. Demolition of the Fishguard Junior School and Ship & Anchor Public House will occur over a 12-week period from February to May 2017. During this time, temporary access to the Co-Op supermarket will be provided. Upon the completion of the demolition works, highway construction will begin (May 2017) and is expected to last nine-months, completed in March 2018.

Expected working hours will be from 08:00 to 18:00, Monday to Fridays, and from 08:00 to 13:00 on Saturdays. No works would take place on Sundays, unless otherwise instructed by the Project Manager under advice of the PCC officers who may extend hours where programme or construction activities require such.

Disruption to the existing road network will be kept to a minimal throughout the works. Towards the end of the construction period, road closures may be necessary along High Street and West Street to enable tie in of the link road. If necessary, intermittent road closures along High Street and West Street would last between three and four weeks each. Night working may also be required during the tie in of the link road.

# 5. Planning Context

# 5.1. Planning Policy

#### **Planning Policy Wales**

Planning Policy Wales (PPW) is the Welsh Government's main planning policy statement which establishes the key land use policies to be considered by local planning authorities in their plan-making and decision-taking. The policies established in PPW are material considerations to decisions on planning applications. Those of relevance, as they relate to a mixed-use development scheme, include:

- Chapter 6 Conserving the Historic Environment;
- Chapter 8 Transport;
- Chapter 9 Housing;
- Chapter 10 Planning for Retail and Town Centres;
- Chapter 11 Tourism, Sport and Recreation;
- Chapter 12 Infrastructure and Services; and
- Chapter 13 Minimising and managing environmental risks and pollution.

## **Technical Advice Notes**

A series of Technical Advice Notes (TANs) offer guidance on a range of planning topics, supplementing PPW. The following TANs are relevant and will be considered in the development of the scheme:

- TAN 2 Planning and Affordable Housing;
- TAN 4 Retail and Town Centres;
- TAN 5 Nature Conservation and Planning;
- TAN 11 Noise;
- TAN 12 Design;
- TAN 13 Tourism;
- TAN 15 Development and Flood Risk;
- TAN 16 Sport, Recreation and Open Space;
- TAN 18 Transport;
- TAN 20 Planning and the Welsh Language; and

#### **Local Development Plan**

PCC adopted a Local Development Plan (LDP) on 28 February 2013. The LDP sets out policies which guide development and use of land towards an established vision for Pembrokeshire to 2021. Policies of relevance to a mixed-use development, which the proposed scheme will comply with, include:

- SP 1 Sustainable Development
- SP 4 Promoting Retail Development
- SP 5 Visitor Economy
- SP 7 Housing Requirement
- SP 8 Affordable Housing Target
- SP 9 Welsh Language
- SP 10 Transport Infrastructure and Accessibility
- SP 12 The Settlement Hierarchy
- SP 13 Settlement Boundaries
- SP 14 Hub Towns
- GN.2 Sustainable Design
- GN.3 Infrastructure and New Development
- GN.12 Town Centre Redevelopment
- GN.13 Retail Allocations
- GN.15 Small Scale Retail
- GN.16 Visitor Attractions and Leisure Facilities

- GN.26 Residential Development
- GN.28 Local Needs Affordable Housing
- GN.34 Protection and Creation of Outdoor Recreation Areas
- GN.35 Protection of Open Spaces with Amenity Value
- GN.36 Green Wedges
- GN.37 Protection and Enhancement of Biodiversity
- GN.38 Protection and Enhancement of the Historic Environment
- GN.39 Transport Routes and Improvements

#### **Development Sites Supplementary Planning Guidance (SPG)**

The Development Sites SPG, published in 2013, provides information on all sites allocated for development in the LDP. It describes the site as "well connected to the existing Town Centre. A single foodstore will meet the identified need in this location."

#### Retail Study – 2010

As part of the evidence base for the adopted Local Development Plan, a County Wide Retail Study was issued in March 2010. It states that as Fishguard "suffers from a leakage of main/bulk-food and comparison goods shopping trips" it is recommend that the LDP identifies the area of an approved food store permission as the location for a new supermarket in Fishguard.

## **Parking Standards SPG**

Adopted in June 2013, the Parking Standards SPG establishes a series of parking zones. The majority of the development site is located within Zone 1 - Fishguard Town Centre (Appendix 1, A1.3). Areas in Zone 1 are considered to be of historic and townscape value, therefore parking areas must not compromise the integrity of the wider area.

A discrepancy between the boundaries of Fishguard Town Centre is noted between the Parking SPG document and the adopted PCC Local Plan. On the basis that the more recently adopted PCC Local Plan takes precedence over the SPG document, it is deemed appropriate to include the entirety of the development site as part of parking Zone 1. As such, no parking for residential or warehousing land uses and reduced levels of parking for industrial, office and retail development are required.

# 5.2. Planning History

A search of the PCC online planning database has identified a relatively high level of planning activity in recent years. A detailed list of applications is located at **Appendix C**. Key applications and permissions include:

- 14/1012/CA / qA1212416 PCC resolved to grant conditional consent for the demolition of the Fishguard Junior School at Ysgol Gwannau Gwaun on 6<sup>th</sup> August 2015. The following conditions stipulate that demolition must not commence until:
  - o A contract for the carrying out of works of redevelopment of the site has been made; and
  - Planning permission has been granted for the redevelopment for which the contract provides.
- **04/1591/PA** Supermarket (Outline), approved floor space limitation of 1,500m<sup>2</sup>. Conditionally approved 14th December 2005;
  - This permission included a condition recommended by Welsh Government Highways requiring the West Street junction to be improved and a condition requiring implementation of a programme of archaeological work.
  - A later application (ref. 08/0908/PA) was approved 30th December 2008 to vary condition 3 of application 04/1591/PA to allow for additional 2 years for submission of application.
- 99/0705/PA A1 use store with associated car parking and ancillary space (Outline Application), approved floor space limitation 2,400m<sup>2</sup>. Conditionally approved 9th February 2000;
  - This permission included a condition recommended by Welsh Government Highways requiring the West Street junction to be improved.

- A later application (ref. 04/1367/PA) was approved 6th May 2005 (with a 10 year time limit) to vary conditions 3 and 4 of Planning Permission 99/0705/PA to extend the period for submission of reserved matters and implementation of consent (Section 73).
- 97/0158/PA Erection of supermarket (Outline Application). Conditionally approved 8th May 1998.
  - Both (04/1591/PA and 99/0705/PA) permissions included a condition recommended by Welsh Government Highways requiring the West Street junction to be improved.
  - The PCC permission includes a condition requiring implementation of a programme of archaeological work.

# 5.3. Planning Conclusions

The concept of a link road at the former Fishguard Junior School site was originated in the 2003 report *Fishguard Traffic and Transportation Study and associated Public Exhibitions and* a 2004 Transport Assessment for Fishguard Country Primary School. More recently, LDP Policy GN.39 – *Transport Routes and Improvements,* establishes the principle for a link road between the A40 High Street and A487 West Street. Policy GN.39 also notes that the scheme is a PCC programmed highway scheme. This is illustrated on the Inset Map (**Figure 5-1**) for Fishguard within the Proposals Map DPD (PM04).

# Transport Safeguarding (Policy GN. 39) Diogelu Trafnidiaeth (Polisi GN. 39) Town Centre Boundary (Policy GN. 12) Fin Canol Trefi (Polisi GN. 12) Primary Retail Frontage (Policy GN. 12) Blaen Adwerthu Cynradd (Polisi GN. 12) Blaen Adwerthu Eilradd (Polisi GN. 13)

#### Figure 5-1 Fishguard Inset Proposals Map

The table in Appendix 6 of the LDP provides more detailed information on the schemes identified by Policy GN.39. It states that the Chimney's Link road is supported by the Welsh Government as a concept which would ameliorate highway impacts in the centre of Fishguard.

The proposed new link road also forms part of the *Fishguard Town Centre Access Improvement Scheme*, added to the South West Wales Regional Transport Plan (RTP) in 2012. The RTP notes the importance of Fishguard regionally and outlines the need for a Bus Focal Point in Fishguard.

As it relates to redevelopment of the overall development site, Policy GN.12 of the LDP identifies 'The Old Primary School Site' as a retail allocation (RT/034/01). The Inset Map for Fishguard (shown in **Figure 5-1** above) defines the allocation boundary as well as the Town Centre boundary and the Primary Retail Frontages which are set out in DLP Policy GN.12.

As such, the adopted Local Development Plan establishes the principle for this scheme, which would conform to all applicable and relevant policies.

In addition to the LDP, there have previously been a number of outline planning permissions granted for retail development alongside the existing supermarket. Previous permissions have included supermarkets with 1500m<sup>2</sup> (appl. ref. 04/1591/PA) and 2390m<sup>2</sup> (appl. ref. 99/0705/PA) floorspace.

# 5.4. Scope of Outline Planning Application

It is intended that an outline planning application and associated conservation area consent application for the scheme will be prepared and submitted. Regarding the outline planning application all matters will be reserved for detailed approval at a later date, with the exception of access.

Subject to an EIA Screening Opinion from PCC, the following documents and drawings are recommended to support the future applications:

- Planning Statement
- Design & Access Statement
- Heritage Assessment
- Environmental report covering ecology, tree survey, air quality, noise, vibration, a summary of contamination risks and statements on utility provisions
- Transport Assessment
- Completion of the application forms and certificates of ownership;
  - Set of drawings, including:
    - o Location Plan
    - Existing Site Layout Plan
    - Proposed Site Layout Plan
    - Elevations and Cross-Sections
    - o Proposed Masterplan

# 6. Environmental Appraisal

As part of this EIA screening exercise, the following key potential environmental effects have been identified: ecology and natural environment, flood risk and drainage, cultural heritage, landscape and visual, noise and vibration, air quality and transportation impacts.

# 6.1. Ecology

An ecological desk study was undertaken in June 2016 which included a review of biodiversity records from the West Wales Biodiversity Records Centre (WWBRC) and a review of previous ecological survey information; a report written by Biodiversity Solutions (2014) Fishguard Junior School Demolition: Protected Species Survey (with specific reference to bats).

An extended Phase 1 habitat survey was undertaken on 6<sup>th</sup> June 2016 which included a badger survey and bat roost assessment surveys. The following represents a summary of the survey:

- One statutory designated site is located within 2 km of the Application Site;
- Creigiau Abergwaun (Fishguard Cliffs) Site of Special Scientific Interest (SSSI) located approximately 350 m to the northeast of the Application Site. However, this site is designated for its geological interest and no impacts from the scheme are anticipated;
- The habitats within the development site comprise semi-improved grassland, linear boundaries of trees, shrubs and scrub, amenity grassland, hard-standing and existing buildings;
- Habitats within the development site are suitable to support roosting and foraging bats, shelter/hibernation, basking and feeding opportunities for reptiles and nesting and foraging birds;
- The scheme will result in the loss of potential bat roosting and bird nesting sites as a result of the building demolition. Habitats suitable to support foraging bats, reptiles and birds will be lost as a result of the Scheme. Site clearance activities during construction may also have a negative impacts on reptiles and nesting birds from injury, harm or damage to nests.

Further surveys for bats should be undertaken to determine the presence of bats roosts in the existing buildings proposed for demolition as part of the scheme (including the former Fishguard County Primary School which has already received demolition consent). Results from these surveys will inform further appropriate mitigation measures in relation to bats and may include the requirement for a European Protected Species Licence if bats are found to be present.

A Precautionary Method of Working (PMW) document in respect of reptiles will be produced and the methods implemented during construction to ensure works do not result in negative impacts on these species. This will also include an ecological watching brief during site clearance works in respect of nesting birds if clearance works are undertaken during the bird breeding season (March to August), as required.

Landscaping is proposed within areas of the scheme which will provide some compensation for the loss of habitats. In addition to this it is proposed that bat boxes and bird nest boxes are incorporated into the commercial and residential development aspects of the scheme to compensate from the loss of bat roosting and bird nesting opportunities.

Taking into account the proposed avoidance, mitigation and compensation measures no significant residual effects on the conservation status of bats, reptiles or birds are anticipated as a result of the scheme.

# 6.2. Cultural Heritage and Archaeology

An online search for all designated heritage assets within a 250m radius, based on the approximate centre of the proposed development site, was undertaken though Archwilio, the online resource for Historic Environment Records (HER) of Wales and Historic Wales.

- There are no Scheduled Monuments, World Heritage Sites, Register of Parks and Gardens of Special Historic Interest in Wales and Register of Landscape of Historic Interest in Wales within the 250m radius;
- Although there is a high concentration of Listed Buildings within the search radius, 73 in total, none of these should be physically affected on by the development as none are located within the site extent of the proposed development. A table of all identified heritage assets can be seen in **Appendix D**.

The settings of at least nine Grade II Listed Buildings on High Street, to the south, and seven Grade II Listed Buildings on West Street, to the north, may be affected as most of these are within an approximate 10m distance from the outer edges of the development area. Furthermore, Grade II Victoria Wine [CADW UID 12373] and Grade II Bennett's Army Navy Tavern [CADW UID 26078] are situated on the outer perimeters of the proposed development area to the north and south respectively.

The potential impacts on the character and significance of the Fishguard Conservation Area will also have to be taken into consideration as the development area partially lies within it. The main school building of the now defunct Fishguard Junior School, which will be demolished in its entirety prior to the development of this scheme, lies within the Conservation Area. Once demolished, the area is planned to be the location for the proposed coach drop off area.

It must be noted, however, that the demolition of the school buildings and the consequent impact on the Conservation Area has already been covered and agreed in principle under a separate application (Application Number 14-1012-CA) if its outlined conditions are met. In relation to the demolition CADW's Inspector of Historic Buildings advises that the main school building frontage has character in line with the general character of the town's Conservation Area, which is why a decision was reached that it shall only be demolished once planning permission for subsequent development has been granted and if the design of buildings and structures should reflect that of the former junior school.

The location of the former Fishguard Primary School is within Fishguard Conservation Area, and apart from the site boundary bordering onto Lota Park to the west, most of the site is adjacent to the Fishguard Conservation Area.

The Fishguard Conservation Area will therefore potentially experience physical and settings impacts due to the proposed development.

Based on the above, it is therefore considered that the likely impacts do not warrant inclusion in an Environmental Impact Assessment and should be dealt with under the normal statutory planning process. However, as there are some areas which have seemingly not previously been developed, such as the former schools playing fields, and the impact on the Conservation Area should be investigated in more detail through a Heritage Statement as part of the planning process.

# 6.3. Landscape and Visual Amenity

The development site falls within Pembrokeshire which has an extremely rich geological, ecological, cultural and physiographical structure. This diversity contributes to a distinct landscape character resulting in nationally designated areas including the Pembrokeshire Coast National Park and Heritage Coasts.

Key characteristic features of Fishguard and the surrounding areas may be summarised as:

- Busy, attractive urban area with picturesque harbour reflecting a strong maritime influence.
- Historic urban core, within its own small bay and valley, retaining its character despite connectivity to more modern development, including the busy harbour and ferry port towards Goodwick.
- More modern residential areas towards the higher ground to the south and west.
- Good middle distance views towards the Pembrokeshire coast to the east and west of the urban areas.
- Distinctive coastline of the Pembrokeshire Coast National Park, with an attractive, open, undulating rolling rural landscape to the south.

Due to the nature of the proposals, the most significant impacts are likely to be in relation to:

- Loss of areas of open areas and construction of new buildings and hard surfaces in proximity to existing dwellings and commercial properties.
- High number of construction vehicles in narrow streets of the Conservation Area.
- Potential adverse impact on the setting of a number of Listed Buildings and the Fishguard Conservation Area.
- Potential adverse impact on users of the public right of way

Construction impacts:

- Within the local area there are a limited number of visual receptors, with topography and intervening vegetation obscuring most views of the proposed route. Generally, there are likely to be views from the High Street, West Street and Penbanc residential properties.
- It is likely that the site will not be visible from the majority of residential properties within the town and from the National Park, however consideration should be given to the potential impact of additional night time lighting and loss of existing green open space.

There are a number of mitigation measures that could be considered as the scheme is developed. These include:

- Minimising construction phase impacts by adopting best practice in reducing visual clutter, air pollution, noise and use of noisy machinery during the construction period.
- Minimising vehicular movements within the existing local network.
- Ensure early consideration of drainage design to ensure it is coordinated with townscape / streetscape design and visual impact mitigation requirements

Based upon the level of screening assessment undertaken, a sensitively planned and designed scheme with well-considered mitigation measures is considered likely to have moderate to slight adverse effects on the immediate area, with slight adverse to neutral impacts on the wider area and surrounding landscape. Individual residential and commercial properties within and around the Fishguard Conservation Area may experience more substantial impacts depending on their degree of exposure to the scheme.

# 6.4. Transport and effects on all travellers

The transport network within central Fishguard is typical of that found in a rural Welsh town. Peak period congestion is a daily concern and parts of the existing transport infrastructure falls well below current design standards; leading to high levels of conflict between motorised and non-motorised users.

There are long standing concerns with regards the suitability and safety of the existing transport network within Fishguard, specifically in relation to the narrowness of the highway network, lack of adequate pedestrian footways, on-street parking and the high occurrence of near misses (albeit based on anecdotal evidence).

#### **Existing Road Network**

• Fishguard's road network radiates (as shown in **Figure 6-1** below) from the centrally located 3-arm roundabout at The Square. The roundabout connects three road links which all form part of the A487 Trunk Road; clockwise from the east they are Main Street, High Street and West Street. Within the centre of Fishguard the A487 is bounded by residential and commercial properties. Other local distributor roads provide access off the A487 to residential properties and car parking as well as access to servicing for local businesses.





• There is currently no vehicular route through the development site, although the northern part (former Fishguard School side) is accessible via a priority junction with the A487 West Street and the southern part (Co-Operative side) is accessed via a priority junction with the A487 High Street.

#### A487 Main Street

- Main Street links Fishguard (The Square) to Lower Fishguard and beyond largely following the Welsh coast.
- Multiple properties and businesses front directly onto this carriageway, and it connects with a
  number of local distributor roads including Hamilton Street, Kensington Street and Tower Hill. A
  30mph speed limit is in place from The Square until the edge of Lower Fishguard where the speed
  limit decreases to 20mph. A 30mph speed limit is applied to the winding incline out of Lower
  Fishguard, with the national speed limit applying beyond.
- Main Street is two way for its length. Within Fishguard town the width is constrained and no central white lines are in place. A single yellow line is in place on both sides of the carriageway from the eastern edge to The Square, indicating that no stopping or waiting is permitted between 8am and 6pm. A Pelican crossing is provided across Main Street near to The Square junction. The carriageway is in good condition, all road markings are clear and there are street lights along its length.

#### A40High Street

- The A487 along the southern side of the development site continues approximately 1200m to the A40. The A40 bypasses Fishguard Town Centre.
- Multiple properties and businesses are accessed directly from the carriageway, and numerous junctions provide access to key attractions (such as Lota Park and Fishguard Holiday Park),

<sup>©</sup> OpenStreetMap contributors

residential areas (such as Lota Park road and Y-Gongol) and also Maesgwyn Road, which acts as a direct link to Dyffryn on a narrow track.

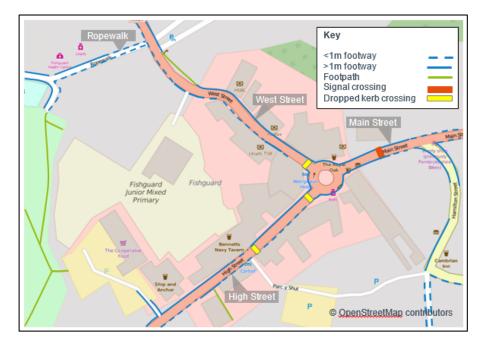
• The road is open to two-way traffic for its length, and is subject to a 30mph speed limit within Fishguard, with the national speed limit applying beyond. To the west of the A487 junction with Lota Park Road there are no parking restrictions in place. To the east single yellow lines are provided on both sides of the carriageway which indicates no parking or waiting from 8am to 6pm. Approx. 100m to the east of Lota Park Road, the carriageway narrows and no central white line is provided. This continues to The Square. The carriageway is in good condition, all road markings are clear and there are street lights along its length.

#### A487 West Street

- From the Square, the A487 runs along a north-westerly alignment to a roundabout junction with the A40. This section of the A487 commences as West Street (nearest The Square) before becoming Vergam Terrace and finally Windyhall as it approaches the A40 / A487 roundabout.
- As well as being an important local and strategic road link, access to a large number of residential roads and car parks are provided off this section of the A487.
- A 30mph speed limit is in place from the A40 / A487 junction through to The Square. The carriageway allows two way traffic and has a central white line marked from the existing school site junction to the A40 junction. For a short section to the east of the school access junction the carriageway is narrow and no central white line is provided, although this is provided again after a distance of approximately 20m.
- Single yellow lines (no stopping or waiting 8am-6pm) are provided from the junction with Clive Road to The Square. On the northern side of the carriageway the line is continuous, with some charged street parking provided on the southern side adjacent to the access junction to the school (c.7 spaces + 1 disabled space). The carriageway is in good condition, all road markings are clear and there are street lights along its length.

#### **Pedestrians**

• Despite the centre of Fishguard hosting a variety of shops, services and attractions, the pedestrian provision in terms of footways are limited. This is mainly as a result of the narrow streets which are constrained by the building line and the need to accommodate two way working. Many of the provided footways are sub-standard. The existing pedestrian network is illustrated on **Figure 6-2**.



#### Figure 6-2 Fishguard Pedestrian Network

• The footway and footpath network is varied in Fishguard Town Centre. Many footways, including on High Street are of unsuitably narrow widths. Recommended footway widths are 2m as this allows two wheelchairs to pass one another. 1.5m could be regarded as the minimum acceptable, allowing

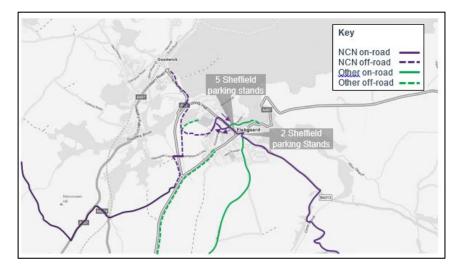
a wheelchair and pedestrian to pass one another. 1m is recognised as the absolute minimum width, used to pass obstacles.

In many cases, footways on key roads are either too narrow (<1m), or are not provided. This is
despite shops and services being accessed directly from these footways. Figure 6-2 illustrates the
footways which were estimated to be >1m, however as described above this is an absolute minimum
and should only be used to pass an obstacle, and not as a continuous length. If a minimum width of
1.5m is applied, very few parts of the existing footway network would meet this standard, making it
difficult for pedestrians and impossible for wheelchair users.

#### Cycling

 Sustrans' NCN is a series of safe, traffic-free paths and quiet on-road cycling and walking routes between all major UK towns and cities. Fishguard is located on Route 4 and Route 47 of the NCN. Route 4 is a long distance route between London and Fishguard, whilst Route 47 links Newport with Fishguard. These routes in Fishguard form part the Celtic Trail East or the Celtic Trail West depending on which route is taken.





- The NCN passes through the centre of Fishguard. Due to one way sections and narrow carriageways which limit contraflow cycling, cyclists on the NCN are required to cycle on the busy A487 via West Street and The Square, after which quieter roads are available.
- Cyclist's provision to improve the permeability of Fishguard town centre are limited, although there is a good radial network of routes out of Fishguard.

#### Bus

- Fishguard is well served by local and regional bus services with all services converging at The Square.
- There are two bus stops at the Square, one northbound and one southbound, both of which are located in laybys. The southbound layby is located on the roundabout which allows buses to approach and stop from all directions and to depart in all directions. Both bus stops at The Square include bus flagpoles with written timetables and live departure screens; however seating and shelters are not provided.
- Additional bus stops are located adjacent to the Maesgwyn Road / A487 priority Junction and along the A487 Vergam Terrace.

#### Potential Impacts of the Scheme

In addition to facilitating redevelopment of the Old Fishguard Junior School Site, Chimneys Link Road would support the formation of a one-way gyratory in the centre of Fishguard. The one-way gyratory would operate in a clock-wise direction with Chimneys Link Road providing a new north-south connection between the existing Co-operative Store Access junction and the West Street Priority Junction with Ropewalk and Penslade. With the connecting sections of High Street and West Street operating as one-way links, the

existing carriageway width would be modified to facilitate footway widening, improved provision for cyclists and to provide improved visibility for all transport users.

The proposed scheme would significantly reduce existing levels of conflict between vehicular traffic and cyclists / pedestrians; providing a safer environment that should encourage sustainable transport choices for local trips. The scheme would also enable a new bus focal point and interchange to be provided.

# 6.5. Flooding and Drainage

Fishguard Harbour is located approximately 395m north of the site and the nearest surface watercourse is the Afon Gwaun located approximately 600m to the east.

The Envirocheck Report<sup>1</sup> indicates that there are no current surface water discharge consents or abstractions on or within 500m of the site. Further information on revoked discharge consents within 500m of the site can be found in the Envirocheck Report<sup>1</sup>.

The NRW flood risk map<sup>3</sup> and Envirocheck Report<sup>1</sup> indicate that the site is not in an area at risk of flooding from rivers or the sea. The northern area of the site between West Street and the Primary School is in an area at medium – low risk of surface water flooding, however, the remainder of the site is not shown as at risk of surface water flooding.

As such, assuming that best practice mitigation measures are adopted during the construction and operation of the scheme, the scheme should have no significant effects on flooding nor drainage.

## 6.6. Land Contamination

The baseline land contamination conditions have been developed using information from a review of historical maps and readily available information including a site specific Envirocheck Report<sup>1</sup> (which includes historical maps), the British Geological Survey website<sup>2</sup>, the Natural Resources Wales website<sup>3</sup> and Defra's Multi-Agency Geographic Information for the Countryside (MAGIC) website<sup>4</sup>.

#### Landfills and Waste Management Facilities

There is no information available on the NRW website<sup>3</sup> regarding historical or current landfills or waste management facilities on or within 500m of the site. There are no recorded landfills within 1km of the site according to the Envirocheck Report<sup>1</sup>.

#### **Other Potentially Contaminative Land Uses**

The Envirocheck Report<sup>1</sup> was reviewed for active contemporary trade directories and active fuel stations within 250m of the site. There are four active contemporary trade directories within 250 of the site which are summarised in **Table 6-1**. Further information on inactive trade directories can be found in the Envirocheck Report.

Name	Classification	Distance from site
Pembrokeshire Press	Printers	70m east
Mason Phillips Electrical Services	Electrical goods – servicing and repairs	165m north
Cathy's Cleaning Services	Laundries and launderettes	205m north
Fishguard Exhaust Centre	Tyre dealers	230m north

#### Table 6-1 Contemporary Trade Directories within 250m of the site

The closest open fuel station is located 300m south-west of the site (Fishguard Service Station).

<sup>&</sup>lt;sup>1</sup> Landmark. Envirocheck Report 79641704\_1\_1

<sup>&</sup>lt;sup>2</sup> British Geological Survey website [online] http://www.bgs.ac.uk/GeoIndex/ (accessed June 2016)

<sup>&</sup>lt;sup>3</sup> Natural Resources Wales [online] http://naturalresources.wales/?lang=en (accessed June 2016)

<sup>&</sup>lt;sup>4</sup> Defra. MAGIC website. http://magic.defra.gov.uk/MagicMap.aspx (accessed June 2016)

#### **Preliminary Conceptual Site Model**

Based on the information reviewed, potentially contaminative current and historical land uses have been identified which could have given rise to, or could give rise to contaminants in, on or under the land of the scheme. Potential receptors to land contamination are also noted, specifically human receptors. Potentially contaminative land uses comprise the following:

- Primary School potential heating system and fuel storage tanks which could give rise to contaminants such as heavy metals, fuel/oil/hydrocarbons, cooling lubricants etc. due to accidental leaks;
- Fields potential for pesticides and herbicides to have been sprayed and for fuel/oil/hydrocarbon leaks from machinery used to maintain the fields; and
- Adjacent garage potential for heavy metal contamination or fuel/oil/hydrocarbon leaks from vehicles and machinery.

Although the above potentially contaminative land uses have been identified, the risk of significant contamination within the scheme are considered to be minimal.

## **Potential Impacts of the Proposed Development**

#### Construction

Potential impacts of the proposed development on land contamination arising through the construction phase relate to changes in the presence of sources, pathways or receptors and subsequently pollutant linkages to exist. The potential changes include:

- The construction phase of the proposed development will potentially introduce new sources of contamination, such as fuels and oils and create new migration pathways. There is the potential for release of these polluting substances, for example, spillages of oil or fuel from equipment or vehicles, or the stockpiling of waste.
- Potential for mobilising contaminants by excavation and stockpiling material. This would increase the risk to controlled water receptors through leaching and run-off. Earthworks could provide opportunity for run-off to contain suspended solids if not managed properly;
- Potential for exposure of human receptors by the generation of potentially contaminated dust released by the construction works;
- Potential for exposure of construction workers, a new receptor, to existing potential contamination because of direct contact (dermal contact/ingestion) with these materials.

Many of the above potential impacts can be mitigated through standard construction practices such as storage of fuel and oils in accordance with regulations and guidance, good management of soils, groundwater, construction materials and waste, dust suppression techniques, and appropriate PPE for construction workers.

The contamination risk associated with the scheme is considered to be low due to the historical and current use of the site and the limited sources of contamination currently identified.

Based on the above, with adoption of best practice mitigation during the design and construction of the Proposed Scheme there should be no significant effects with respect to land contamination.

#### Operation

Once the construction phase is complete, the land will comprise of a mixture of uses including retail, residential and transport infrastructure. There will be a limited impact in terms of land contamination during the operation phase of development due to the working methods and site practices to be adopted during the construction and maintenance of the road.

There will be a spill risk associated with the new activities, for example, accidental release of fuels/oils from vehicles if there is an accident or breakdown. New structures and below ground services could create additional potential pathways for the migration of potential contamination which were not present at the baseline.

Mitigation measures implemented during the design, such as suitable drainage to intercept potentially contaminated road run-off, excavation and removal of material not suitable for re-use and import of

uncontaminated material should mitigate these potential impacts. There is potential for a slight improvement to land contamination at operation stage as mitigation during construction should have reduced potential historical contamination present by removal (or rendering it suitable). Therefore, the potential risk from contamination should decrease.

Based on the above, with adoption of best practice mitigation during the design, construction and operation, there should be no significant effects with respect to land contamination from the operation of the scheme.

#### Summary

Assuming that best practice mitigation is adopted during the design, construction and operational phases, the scheme should have no significant effects on land contamination.

# 6.7. Air Quality

This section of the report addresses the screening of potential air quality effects of the proposed scheme and includes a discussion on baseline air quality conditions, current and future constraints, and potential impacts.

The proposed scheme will introduce new exposure to air pollution and potentially affect air quality at existing sensitive receptors due to changes in road traffic flows, and therefore emissions, on local roads. Demolition and construction works associated with the proposed scheme may also affect air quality due to emissions from demolition / construction activities and vehicles.

As scheme specific traffic data is not currently available, defining the Affected Road Network (ARN) likely to be affected by air quality is not possible at this stage.

#### Effect of Air Quality on the Proposed Development

The baseline conditions (**Appendix E**) indicate that exceedances of the air quality criterion for annual mean  $NO_2$  or  $PM_{10}$  are unlikely to currently occur in close proximity to the scheme. Likewise, background pollution mapping data from Defra indicates that annual mean background concentrations of  $NO_2$  and  $PM_{10}$  are likely to be well within relevant air quality criteria.

Whilst baseline traffic flows for roads in the vicinity of the proposed scheme are expected to increase in the future as a result of other committed developments, given that background concentrations are well within air quality criterion, exceedances are considered unlikely to occur in the future, particularly as vehicle emissions and background concentrations are expected to improve over time.

It is therefore considered unlikely that future users of the proposed scheme will be exposed to concentrations of  $NO_2$  or  $PM_{10}$  in excess of the relevant air quality criteria for these pollutants, indicating that the effect of air quality upon the proposed scheme is likely to be not significant.

#### Effect of the Proposed Development on Air Quality

As the proposed scheme is likely to comprise 10 or more residential units, over 1,000 square metres of commercial floor space and more than 10 car parking spaces, a screening assessment was undertaken using the Stage 2 2015 EPUK / IAQM Land-Use Planning and Development Control Guidance criteria described in Table 7-5 in order to assess the potential for the proposed scheme to affect air quality.

Whilst scheme specific traffic data is not currently available, it is considered likely that the proposed scheme will result in changes in LDV traffic flows on local roads in excess of the 2015 EPUK / IAQM Land-Use Planning and Development Control Guidance criterion of 500 AADT for locations not within or adjacent to an AQMA. In addition, the proposed scheme will realign roads, thereby changing the proximity of receptors to traffic, and introduce a new junction near to relevant receptors.

As a number of the Stage 2 2015 EPUK / IAQM Land-Use Planning and Development Control Guidance criteria (described in **Appendix E**, Table 7-5) are exceeded, an assessment is required in order to assess the impact of the proposed development on air quality.

#### Summary

Based on the available information, issues associated with construction dust and construction vehicle emissions are unlikely to be significant following the application of standard and appropriate mitigation techniques. A qualitative risk assessment of potential construction phase effects in accordance with IAQM

guidance<sup>7</sup> is therefore considered appropriate, the conclusions of which could subsequently be used to determine appropriate mitigation measures.

The operational scheme may affect air quality as a consequence of changes in vehicle emissions on the scheme route and nearby roads as a result of changes to the local road network. Until traffic data is available, subsequent scoping out of this potential impact cannot be determined. It is however considered likely that dispersion modelling will be required to assess the effect of the proposed scheme on concentrations of  $NO_2$  and  $PM_{10}$  at existing sensitive receptors adjacent to the ARN and at proposed sensitive receptors which form part of the proposed scheme itself.

On the basis of screening, potential air quality impacts on designated ecological sites and greenhouse gasses are not expected to be of sufficient magnitude to require further consideration.

## 6.8. Noise and Vibration

The scheme introduces a new road into Fishguard Town Centre, and re-routes traffic on some of the existing roads within the Town Centre as a result of making these roads one-way. Both of these factors have the capability to change the noise climate on existing noise sensitive receptors in the area.

In particular the new road alignment has the potential to increase noise levels at façades of some buildings which do not currently have a direct view over any road. The re-routing of traffic on existing routes has the potential to either increase or decrease noise levels on routes in Fishguard as results of changes in flow, speed and the level of congestion.

The planned retail units may offer some screening of road traffic noise, which would reduce impacts, but they may also have mechanical or electrical plant as part of their design which will need to be designed so that noise levels are acceptable. Delivery noise may need to be controlled by condition on operational hours.

The planned residential units are unlikely to need significant noise control measures in their design, but the planning, design and layout of these properties should be reviewed to ensure that there are no acoustic conflicts of interest, particularly from operations at the existing Co-Operative supermarket.

Depending on the operation of the coach lay-over and bus-stops, there may be a need to consider noise from these affecting nearby noise sensitive receptors.

This scheme has the potential to result in perceptible changes in noise both in the vicinity of the scheme and on traffic routes through Fishguard. Noise impacts may also arise from the retail units and bus/coach stops. Mitigation may be required in order to reduce any adverse noise impacts.

# 6.9. Potential for Cumulative Impacts

The following **Table 6-1** lists the major planning applications and permissions in the Fishguard Community Area within the past five years. None of the following four applications are in immediate proximity of the Chimney's Link Masterplan site, therefore no cumulative effects are expected as a result of the scheme.

Application Number	Application Type	Location	Decision and Date	Full Proposal
12/0044/PA	Major (Full)	Goodwick Industrial Estate, Main Street, Goodwick, SA64 0BD	Granted, 11/09/2014	Erection of 23 dwellings.
12/0297/PA	Major (Full)	Ranelagh, Prescelly Crescent, STOP AND CALL, Goodwick, SA64 0HF	Withdrawn / Called In / Turned Away, 07/01/2013	Demolition of existing dwelling and erection of 9 dwellings with associated ground & roadworks.
15/0203/PA	Major (Full)	Delfryn, Heol Penlan, STOP AND CALL, Goodwick, SA64 0EX	Granted, 21/01/2016	Demolition of existing bungalow and residential development for 10 houses.

Table 6-1 Major Applications and Permissions within Fishguard

11/0739/PA Major (Outlin	Pishguard Harbour, The Parrog, Goodwick, SA64 0DE	Granted, 06/10/2014	Mixed-use development comprising commercial marina, residential apartments, ancillary retail/ commercial facilities, together with land reclamation (including the provision of a development platform), infrastructure (including accesses) and landscaping.
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# 7. Conclusion

The proposal would be defined as an "urban development project" under Schedule 2, 10 (b) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2016, or 'EIA Regulations'. The scheme would fall below the thresholds which define Schedule 2 development and thus the proposal is not Schedule 2 development. It is not necessarily the case that projects falling below the thresholds in Schedule 2 do not have the potential to have significant environmental effects. Therefore, this EIA Screening report has been prepared on a precautionary basis to determine whether the scheme is EIA development.

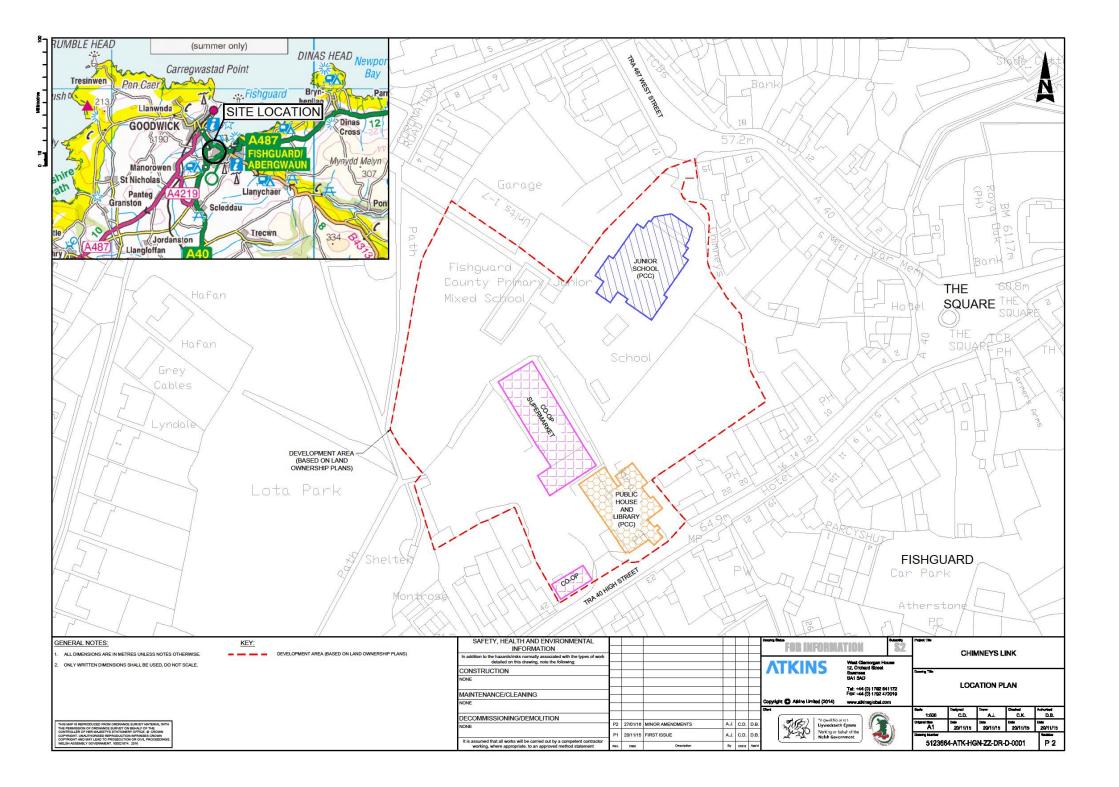
As a result of this environmental screening assessment, it is concluded that the development will not give rise to any likely significant effects on the environment, and that the proposed mitigation measures will minimise any impacts caused by the proposals during both construction and operation. Therefore, it is not considered that an Environmental Impact Assessment is required for the proposed works, having regard to Schedule 2, Part 10 (b) of the EIA Regulations 2016.

Upon receipt of an EIA Screening Opinion from PCC, an outline planning application and associated conservation area consent will be prepared and submitted. For the outline planning application all matters will be reserved for detailed approval at a later date, with the exception of access. The proposed scope of assessments to support that application are set out in this report. We kindly request PCC to confirm these requirements and provide any pre-application comments at this stage.

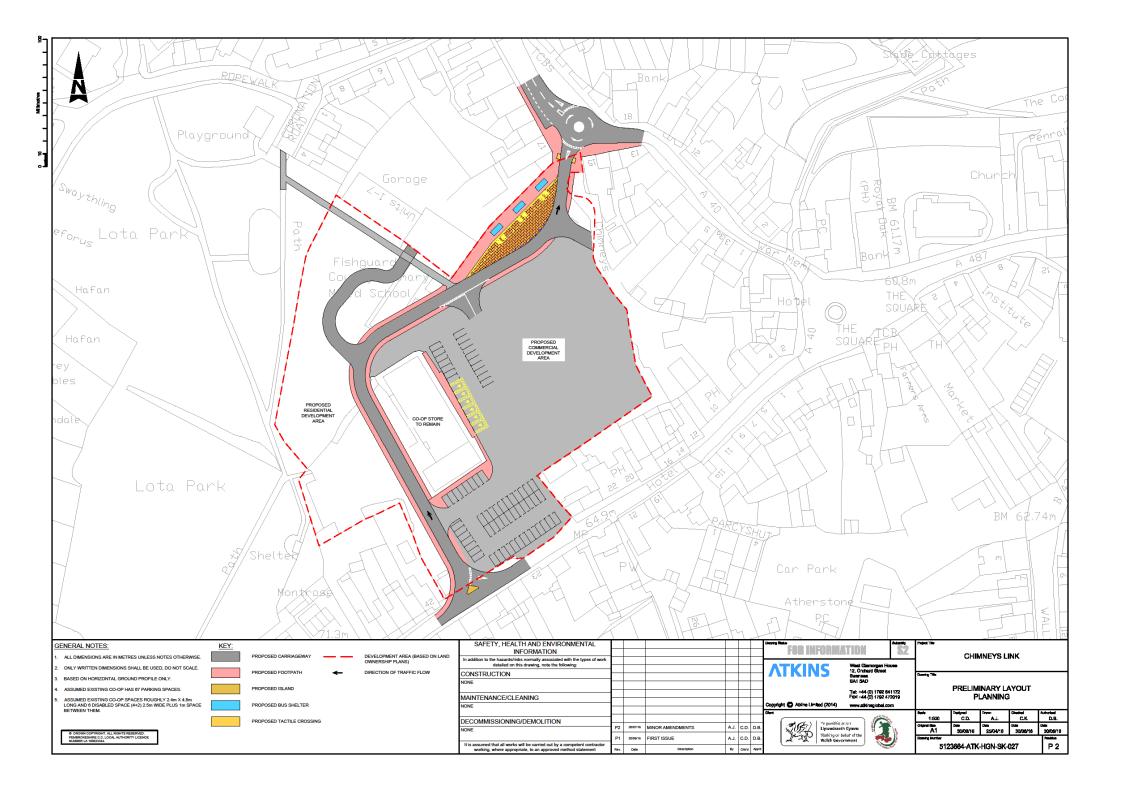
# Appendices



# **Appendix A. Site Location Plan**



# **Appendix B. Preliminary Layout**



# **Appendix C. Site Planning History**

#### Table C-1 Site Planning History

Planning Ref	Description	Address	Decision
11/0836/PA	Installation of an ATM cash machine	32, High Street, Fishguard, SA65 9AR	Conditionally Approved
11/0611/AD	1 non-illuminated hanging sign and 1 fascia sign	29, West Street, Fishguard, SA65 9AL	Conditionally Approved
11/0102/PA	New entrance ramp, steps and automatic inner entrance door	7, West Street, Fishguard, SA65 9AQ	Refused
12/0046/PA	Extension	Bennetts Navy Tavern, 20, High Street, Fishguard, SA65 9AR	Conditionally Approved
12/0047/LB	Extension	Bennetts Navy Tavern, 20, High Street, Fishguard, SA65 9AR	Conditionally Approved
12/0254/PA	Change of use from A1 to mixed A1 and A3 use	32, High Street, Fishguard, SA65 9AR	Conditionally Approved
12/1115/AD	Erection of signage	7, West Street, Fishguard, SA65 9AQ	Conditionally Approved
12/0975/PA	Change of use from public house (A3) to a playgroup (D1)	Ship & Anchor, 28, High Street, Fishguard, SA65 9AR	Conditionally Approved
13/0320/AD	Installation of 1 No internally illuminated marketing unit	Lloyds TSB Bank Plc 7, West Street, Fishguard, SA65 9AQ	Withdrawn
14/1012/CA	Demolition of the former junior school buildings to clear the site in readiness	Ysgol Glannau Gwaun, West Street, Fishguard, Pembrokeshire, SA65 9AL	Conditionally Approved
15/0583/PA	Change of use of 1 and 2nd floors from a dwelling to 2x 1 bedroom flats	7, High Street, Fishguard, Pembrokeshire, SA65 9AN	Conditionally Approve
15/0865/PA	Proposed extraction unit & ducting (In Retrospect) to the rear	31, West Street, Fishguard, Pembrokeshire, SA65 9AL	Conditionally Approve
15/1104/PA	Change of use to hot food takeaway, replacement of shop front to north elevation	31, West Street, Fishguard, Pembrokeshire, SA65 9AL	Conditionally Approve

# **Appendix D. List of Heritage Assets**

Grade	Name	CADW UID
Grade II	No 61 High Street	12281
Grade II	Nevern House	12280
Grade II	Old Pump House	26051
Grade II	Nos 43-49 (odd nos) High Street, including front garden walls to Nos 43, 45 & 49 railings and gates	26050
Grade II	Llys-Teg	26049
Grade II	Nos 43-49 (odd nos) High Street, including front garden walls to Nos 43, 45 & 49 railings and gates	12279
Grade II	Mount Pleasant	12278
Grade II	Unnamed Listed Building situated on the street line, at the end of a terrace row of houses, next to No 50 (High Street)	26026
Grade II	Bank House [	12276
Grade II	Cottage occupied by St John's Fishguard Nursing Division	12275
Grade II	listed Mileplate in forecourt wall of Hermon Chapel	12274
Grade II*	Hermon Baptist Church including forecourt walls and steps	12273
Grade II	No 21 & No 21A High Street	12272
Grade II	Bennett's Navy Tavern	26078
Grade II	No 21 & No 21A High Street	26053
Grade II	Cartref Hotel	12271
Grade II	Nos 14 & 16 High Street	12284
Grade II	Nos 14 & 16 High Street	26048
Grade II	Nos. 11, 11a and 13 High Street	26055
	Unnamed Listed Building situated on the street line	12283

Outside II	historia N. 40 144 (1911)	
Grade II	between Nos 10 and 14 (High Street	
Grade II	Nos. 11, 11a and 13 High Street	12270
Grade II	Nos. 5,7 and 9 High Street	26057
Grade II	Nos. 5,7 and 9 High Street	26056
Grade II	Nos. 5,7 and 9 High Street	12269
Grade II	Nos 20 and 20A Market Square	12320
Grade II	Nos 17 and 18	12319
Grade II	Nos 15 and 16	12318
Grade II	The Farmer's Arms	12317
Grade II	The Town Hall	12316
Grade II	Nos 39 and 41 West Street	26075
Grade II	Nos 39 and 41 West Street	12374
Grade II	Unnamed Listed Building situated on the street line, between Nos 35 and 39	26074
Grade II	Nos 1&2 The Slade, including front garden walls & gates	12354
Grade II	Nos 1&2 The Slade, including front garden walls	26038
Grade II	Victoria Wine	12373
Grade II	The Old Post Office	12370
Grade II	Unnamed Listed Building situated on the street line, some 65m from the centre of The Square, between Nos 3a and 7	12369
Grade II	Nos 14 & 16 West Street	26072
Grade II	Unnamed Listed Building situated on the street line some 100m from the centre of The Square, paired with No. 16	12380
Grade II	Seaways Bookshop	12379
Grade II	Halifax Building Society	26076
Grade II	The Royal Oak	12321

Grade II	Railings to churchyard of	12301
	Church of St Mary	
Grade II	Parish Church of St Mary	12299
Grade II	Inscribed stone in St Mary's Churchyard	12300
Grade II	Unnamed Listed Building situated on the street line between Walter Brearley House and No 4	12335
Grade II	Walter Brearley House	12334
Grade II	Premised occupied by The Dragon House	12266
Grade II	Former Store Building	12332
Grade II	Unnamed Listed Building situated set back some 100m from the junction with Park Street, between Nos 7 and 31	12367
Grade II	Unnamed Listed Building situated on the street line, forming the eastern boundary of St Mary's Churchyard	12302
Grade II	Unnamed Listed Building situated on the street line attached to No 5 at start of terraced row	12303
Grade II	Unnamed Listed Building situated on the street line, between Nos 3 and 7	12304
Grade II	Nos 7 & 9 Main Street (Compton House Hotel	26081
Grade II	Sally Port	12306
Grade II	Manor House Hotel	12307
Grade II	Elim Lodge	12308
Grade II	Nos 22 to 26 (even nos) Main Street	26045
Grade II	The Fishguard Arms	26044
Grade II	Nos 16-20 (even nos) with no1 Hamilton Street	26047
Grade II	Nos 22 to 16 (even nost) Main Street	12312

Grade II	Nos 16-20 (even nos) with no1 Hamilton Street	26046
Grade II	Nos 16-20 (even nos) with no1 Hamilton Street	12311
Grade II	Ty Twt	26073
Grade II	Unnamed Listed Building situated on the street line between Nos 1 and 5, extending slightly forward of these two	26064
Grade II	Unnamed Listed Building situated on the street line, attached to No 3	26065
Grade II	Sycamore Lodge	12265
Grade II	Nos 7 & 9 Hamilton Street	12261
Grade II	Nos 11 & 13 Hamilton Street	12262
Grade II	Nos 7 & 9 Hamilton Street	26059
Grade II	Nos 11 & 13 Hamilton Street	26060
Grade II	Nos.11, 11a and 13 High Street	26054

# Appendix E. Air Quality Baseline Conditions

## Approach

The air quality screening has been undertaken with reference to:

- Institute of Air Quality Management (IAQM) and Environmental Protection UK (EPUK) guidance on 'Land-Use Planning & Development Control: Planning For Air Quality', May 2015<sup>5</sup>;
- HA207/07 Design Manual for Roads and Bridges (DMRB) Volume 11, Section 3, Part 1, May 2007;
- Defra's Local Air Quality Management Technical Guidance (LAQM.TG(16))<sup>6</sup>, where appropriate; and
- IAQM 'Guidance on the assessment of dust from demolition and construction', February 2014<sup>7</sup>.

Air quality screening has reviewed baseline conditions and constraints, and considered the scale and potential impact of the proposed scheme in drawing conclusions on screening of the scheme in terms of the need for an EIA.

## **Review of Existing Information**

Existing air quality conditions for the proposed scheme area have been characterised with reference to the following information/sources:

- Boundaries of Air Quality Management Areas (AQMAs)<sup>8</sup>;
- Pembrokeshire County Council (PCC) Local Air Quality Management (LAQM) reports and monitoring data<sup>9</sup>;
- Department for Environment, Food and Rural Affair's (Defra) Magic website<sup>10</sup>;
- Defra's UK Air Information Resource (AIR) website<sup>11</sup>;
- Locations of sensitive receptors (e.g. residential properties, schools, hospitals and elderly care homes) from Ordnance Survey (OS) base mapping<sup>12</sup>; and
- Boundaries of designated ecological sites held by Natural Resources Wales<sup>13</sup>.

## Air Quality Criteria

#### **Public Health**

There are two sets of ambient air quality criteria for the protection of public health: those implemented by the Government in relation to the National Air Quality Strategy (AQS)<sup>14</sup> and those set by the European Union (EU) and transposed into national law by The Air Quality Standards (Wales) Regulations 2010<sup>15</sup>.

The criteria set out in the AQS include standards and objectives for local authorities to work towards achieving; these apply in locations with relevant public exposure which are defined in Defra's technical guidance LAQM.TG(16)<sup>6</sup>.

<sup>13</sup> http://lle.wales.gov.uk/home?lang=en

<sup>&</sup>lt;sup>5</sup> http://www.iaqm.co.uk/text/guidance/air-quality-planning-guidance.pdf

<sup>&</sup>lt;sup>6</sup> http://laqm.defra.gov.uk/technical-guidance/

<sup>&</sup>lt;sup>7</sup> http://iaqm.co.uk/text/guidance/construction-dust-2014.pdf

<sup>&</sup>lt;sup>8</sup> https://uk-air.defra.gov.uk/aqma/list

<sup>&</sup>lt;sup>9</sup> http://www.pembrokeshire.gov.uk/content.asp?id=5634&d1=0

<sup>&</sup>lt;sup>10</sup> http://www.magic.gov.uk/

<sup>11</sup> https://uk-air.defra.gov.uk/

<sup>&</sup>lt;sup>12</sup> https://www.ordnancesurvey.co.uk/business-and-government/products/opendata-products.html

<sup>&</sup>lt;sup>14</sup> https://www.gov.uk/government/publications/the-air-quality-strategy-for-england-scotland-wales-andnorthern-ireland-volume-1

<sup>&</sup>lt;sup>15</sup> http://gov.wales/docs/desh/policy/100624airgualityregsen.pdf

The standards set by the EU are legally binding, mandatory limit values requiring national Government compliance. Failure in compliance (for a compliance agglomeration zone) can lead to infraction proceedings by the EU against the member state.

Local air quality criteria that are relevant to this assessment in terms of human health are summarised in Table 7-2 below. The primary source of nitrogen dioxide (NO<sub>2</sub>) and particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>) emissions in the UK is road traffic. National assessments have demonstrated that there is no risk of carbon monoxide, 1,3-butadiene or benzene concentrations exceeding relevant UK AQS objective and EU limit value thresholds due to emissions from traffic anywhere in the UK. The pollutants carbon monoxide, 1,3-butadiene are therefore not considered further.

Table 7-2	Relevant Air	<b>Quality Criteria</b>	(Human H	ealth)
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Dellutent	Criteria	Compliance Date		
Pollutant	Criteria	AQS Objective	EU Limit Value	
NO	Hourly average concentration should not exceed 200 µg/m <sup>3</sup> more than 18 times a year	31 December 2005	1 January 2010	
NO <sub>2</sub>	Annual mean concentration should not exceed 40 $\mu$ g/m <sup>3</sup>	31 December 2005	1 January 2010	
DM	24-hour mean concentration should not exceed 50 $\mu$ g/m <sup>3</sup> more than 35 times a year	31 December 2004	1 January 2005	
PM <sub>10</sub>	Annual mean concentration should not exceed 40 $\mu$ g/m <sup>3</sup>	31 December 2004	1 January 2005	
PM2.5	UK (except Scotland): annual mean concentration should not exceed 25 µg/m <sup>3</sup>	2020	-	
	EU Stage 1 Limit Value: annual mean concentration should not exceed 25 µg/m <sup>3</sup>	-	1 January 2015	
	EU Stage 2 Limit Value: annual mean concentration should not exceed 20 µg/m <sup>3*</sup>	-	1 January 2020	
	Exposure Reduction: UK urban areas target of 15% reduction in concentrations at urban background	Between 2010 and 2020	Between 2010 and 2020**	

\*\* Target of 20% reduction in concentrations at urban background

#### **Ecological Sites**

The EU has set a Critical Level for annual mean concentrations of oxides of nitrogen (NOx) to protect sensitive vegetation. This is included in the Air Quality Standards (Wales) Regulations 2010. The Critical Level for annual mean NO<sub>x</sub> for the protection of vegetation is  $30 \ \mu g/m^3$ .

Assessment of compliance with the critical level for the protection of vegetation is undertaken at locations more than 20 km from towns with more than 250,000 inhabitants or more than 5 km from other built-up areas, industrial installations or motorways or major roads with traffic counts of more than 50,000 vehicles per day.

UK Statutory Nature Conservation Agencies' (e.g. Natural Resources Wales) policy is to apply the 30 µg/m<sup>3</sup> criterion, on a precautionary basis, as a benchmark, in all 'designated sites' as defined in HA207/07 Annex F, i.e. Ramsar sites, Special Protection Areas (SPA), Special Areas of Conservation (SAC) and Sites of Special Scientific Interest (SSSI).

#### Dust

There are no statutory quantitative controls or limits on general dust emissions from construction sites. Such emissions are however included in Statutory Nuisance provisions under the Environmental Protection Act 1990. Dust can give rise to a Statutory Nuisance if it is considered to be 'prejudicial to health or a nuisance'. Detection of and the requirement of action to stop any Statutory Nuisance are responsibilities of the relevant local authority.

## **Existing Conditions**

#### Local Air Quality Management

All local authorities are required by Part IV of the Environment Act 1995 to review air quality and to assess both present and likely future air quality against objectives set out in the government's national AQS. Where a local authority finds that one or more of the AQS objectives is likely to be breached through detailed modelling or monitoring it must designate an Air Quality Management Area (AQMA) and develop an Action Plan to alleviate pollution levels.

The proposed scheme is located within the area administered by Pembrokeshire County Council (PCC). PCC has declared two AQMAs due to exceedances of the annual mean AQS objective for NO<sub>2</sub>. These AQMAs are located in Haverfordwest and Pembroke, approximately 20 km and 35 km south of Fishguard respectively, and are therefore unlikely to be affected by the scheme.

The proposed scheme is not within or adjacent to any of the designated AQMAs, suggesting that UK AQS objectives are currently achieved in the vicinity of the scheme.

#### **Air Quality Monitoring**

Air quality monitoring is undertaken by national and local authorities and is a key component of local air quality management. Measurements of pollutant concentrations include analytical instruments that measure continuously, and simpler sampling devices such as diffusion tubes which give longer period results (typically monthly, to calculate an annual mean concentration).

The nearest automatic Continuous Monitoring Station (CMS) to the scheme is located in Narbeth, approximately 30 km southeast of the scheme. This is a rural background site located at grid reference 214440, 212663.

Concentrations of NO<sub>2</sub> and PM<sub>10</sub> as measured at the Narbeth CMS are presented below in Table 7-3 for the years 2011 to 2015 inclusive, which indicate measured concentrations were well below relevant AQS objectives at this site in recent years. It should be noted however that air quality measurements at this rural background site are likely to be significantly lower than those in the urban location of the scheme.

Pollutant	Statistic (Units)	AQS Objective	2011	2012	2013	2014	2015
NO <sub>2</sub>	Annual Mean (µg/m <sup>3</sup> )	40	4	6	5	4	3
NO <sub>2</sub>	Hourly mean > 200 $\mu$ g/m <sup>3</sup> (hours)	18	0	0	0	0	0
PM <sub>10</sub>	Annual Mean (µg/m3)	40	12	11	16	14	12
PIVI10	Daily mean > 50 µg/m <sup>3</sup> (days)	35	3	1	3	1	0
SOURCE: https://uk-air.defra.gov.uk/data/							

#### Table 7-3 Pollutant Concentrations Measured at Narbeth CMS (2011 to 2015)

Annual mean NO<sub>2</sub> concentrations are also measured by PCC using diffusion tubes, however as these diffusion tube sites are located in Haverford West, Narbeth and Pembroke respectively, and are therefore some distance from the scheme area, the results from these diffusion tube sites are not considered relevant and have therefore not been presented within this report.

#### **Defra Background Maps**

Estimates of current and future year background pollutant concentrations in the UK are available on the Defra UK-AIR website. The background estimates, which are a combination of measured and modelled data, are available for each one km grid square throughout the UK for a base year of 2011, which is the basis for the future year estimates up to 2030. These background estimates include contributions from all source sectors, e.g. road transport, industry and domestic and commercial heating systems.

Estimated annual mean background concentrations in the study area for the current year (2016) are presented below in Table 7-4 for the pollutants NO<sub>X</sub>, NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub>. Background concentrations of key pollutants are therefore expected to be well below relevant AQS objectives and EU limit values in 2016.

#### Table 7-4 Defra Mapped Background Concentrations, 2016 (µg/m<sup>3</sup>)

Grid Square (x, y)	NOx	NO <sub>2</sub>	<b>PM</b> <sub>10</sub>	<b>PM</b> <sub>2.5</sub>
195500, 237500	5.8	4.7	11.3	7.2
195500, 236500	5.6	4.5	11.4	7.2
Average	5.7	4.6	11.4	7.2

#### **Scope for Mitigation Measures**

The environmental assessment will inform the need for specific mitigation where there are any potentially significant adverse effects. Where necessary, recommendations for mitigation will be made which draw on industry best practice and experience.

## **Potential Impacts of Proposed Scheme**

#### **Construction Impacts**

Construction (and demolition<sup>16</sup>) impacts are likely to be limited to dust associated with construction sites and emissions from construction vehicles and plant. Dust may have two impacts:

- Cause annoyance due to surface deposition/soiling, with the potential to cause a statutory nuisance if inadequately mitigated, or to damage vegetation/foliage; and/or
- Reduce local air quality due to emissions of particulates from construction activities and site vehicles/plant (potentially affecting PM<sub>10</sub> concentrations), with potential to cause significant effect if inadequately mitigated.

Significant local air quality effects due to road traffic may result only if there are substantial movements of construction vehicles and / or disruption to general traffic due to traffic management measures over the period of construction. Such effects are more likely to occur when such traffic impacts occur over periods of six months or more in duration, in locations where there is relevant exposure within 200 m of affected routes and there is poor baseline air quality.

During scheme construction the potential for substantial increases in vehicle emissions due to additional construction vehicles using the network is likely to be limited given the scale of works involved in the scheme. Any changes in air quality associated with emissions from these vehicles would also be temporary, during the period of the works only.

There is also the potential for emissions of dust from scheme related demolition, earthworks and construction activities, and from the movement of vehicles on and off site. Based on the available information, significant impacts associated with construction dust are unlikely following the application of appropriate mitigation. Any impacts would be of a temporary nature, with any effect from dust occurring within 350 m of the site boundary.

#### **Operational Impacts**

Scheme specific traffic data are not currently available to enable the definition of the local air quality Affected Road Network (ARN). However, using available mapping, potentially affected roads with sensitive receptors adjacent to them include West Street, High Street and the A487.

Once the scheme is complete and operational, air quality could be affected by material changes in vehicle activity (flows, speeds and composition) as a result of the scheme, both as a result of proposed changes to the local road network and as a result of additional road traffic movements generated by the proposed residential and commercial aspects of the scheme. Air quality could also be affected by material changes to the distance between sources of road traffic emissions and sensitive receptors due to changes in road alignment. Further quantitative assessment would need to consider potential effects on existing and proposed sensitive receptors (e.g. residential properties, hospitals, schools etc.) near roads where there is expected to be a material change in traffic with the scheme, not just those roads that comprise the scheme. Likewise potential air quality effects at the residential receptors which form part of the proposed scheme

<sup>&</sup>lt;sup>16</sup> It is understood that the existing school, community building (property number 44) and Ship and Anchor Public House/Library will be demolished as part of the scheme.

would need to be considered. Further assessment would also need to consider the potential cumulative effects of the operational scheme in combination with other road schemes and wider development in Fishguard and the surrounding area.

The scheme route does not pass through any designated ecological sites of national importance nor are there any HA207/07 Annex F defined designated ecological sites which contain designated features which are sensitive to air pollution within 200 m of the proposed scheme.

Given the small nature of the scheme and its expected localised effects, greenhouse gas emissions are unlikely to be a reason for requiring an EIA.

### Air Quality Screening Assessment Methodology

#### Effect of Air Quality on the Proposed Scheme

As suggested by EPUK / IAQM<sup>5</sup>, the potential effect of air quality on future users of the proposed scheme has been assessed by taking into account the following factors:

- The background and future baseline air quality and whether this will be likely to approach or exceed air quality criteria;
- The presence and location of Air Quality Management Areas as an indicator of local hotspots where the air quality criteria may be exceeded;
- The presence of a heavily trafficked road, with emissions that could give rise to sufficiently high concentrations of pollutants (in particular NO<sub>2</sub>), that would cause unacceptably high exposure for users of the new development; and
- The presence of a source of odour and / or dust that may affect amenity for future occupants of the development.

#### Effect of the Proposed Scheme on Air Quality

The potential operational effects of the proposed scheme have been assessed with reference to the screening criteria given in the 2015 EPUK / IAQM Land-Use Planning and Development Control Guidance<sup>5</sup>, which suggests a two-stage approach should be employed. The first stage is intended to screen out smaller schemes and / or schemes where impacts can be considered to have insignificant effects, whereas the second stage relates to specific details regarding the proposed scheme and the associated likelihood of air quality impacts.

The Stage 1 criteria suggest an air quality assessment may be required if the scheme comprises:

- 10 or more residential units or a site area of more than 0.5 ha; or
- More than 1,000 square metres of floor space for all other uses or a site area greater than 1 hectare; and either:
  - More than 10 parking spaces; or
  - A centralised energy facility or other centralised combustion process.

Should either of the above criteria be met, the Stage 2 criteria (reproduced below in Table 7-5) provide more specific guidance as to when an air quality assessment is likely to be required to assess the impacts of a proposed development on the local area. It should be noted however that where an air quality assessment is identified as being required by these criteria, the 2015 EPUK/ IAQM Land-Use Planning and Development Control Guidance indicate this may take the form of either a Simple Assessment (i.e. one relying on already published information and without quantification of impacts) or a Detailed Assessment (i.e. one completed with the aid of a predictive technique, such as a dispersion model). In other words, meeting a screening criterion in itself does not automatically lead to the requirement for a Detailed Assessment.

However, if none of the criteria in Table 7-5 are met, the 2015 EPUK / IAQM Land-Use Planning and Development Control Guidance indicate that there should be no requirement to carry out an air quality assessment for the impact of the development on the local area, and the impacts can be considered as having an insignificant effect.

# Table 7-5 Stage 2 2015 EPUK / IAQM Land-Use Planning and Development Control Guidance Screening Criteria

The Development Will:	Indicative Criteria to Proceed to an Air Quality Assessment		
1. Cause a significant change in Light Duty Vehicle (LDV) traffic flows on local roads with relevant receptors. (LDV = cars and small vans <3.5t gross vehicle weight)	<ul> <li>A change of LDV flows of:</li> <li>more than 100 AADT within or adjacent to an AQMA</li> <li>more than 500 AADT elsewhere</li> </ul>		
<ul> <li>2. Cause a significant change in Heavy Duty Vehicle (HDV) flows on local roads with relevant receptors.</li> <li>(HDV = goods vehicles + buses &gt;3.5t gross vehicle weight)</li> </ul>	<ul> <li>A change of HDV flows of</li> <li>more than 25 AADT within or adjacent to an AQMA</li> <li>more than 100 AADT elsewhere</li> </ul>		
3. Realign roads, i.e. changing the proximity of receptors to traffic lanes.	Where the change is 5m or more and the road is within an AQMA		
4. Introduce a new junction or remove an existing junction near to relevant receptors.	Applies to junctions that cause traffic to significantly change vehicle accelerate/decelerate, e.g. traffic lights, or roundabouts.		
5. Introduce or change a bus station.	<ul> <li>Where bus flows will change by:</li> <li>more than 25 AADT within or adjacent to an AQMA</li> <li>more than 100 AADT elsewhere</li> </ul>		
6. Have an underground car park with extraction system.	The ventilation extract for the car park will be within 20 m of a relevant receptor Coupled with the car park having more than 100 movements per day (total in and out)		
7. Have one or more substantial combustion processes	<ul> <li>Where the combustion unit is:</li> <li>any centralised plant using bio fuel</li> <li>any combustion plant with single or combined thermal input &gt;300kW</li> <li>a standby emergency generator associated with a centralised energy centre (if likely to be tested/used &gt;18 hours a year)</li> </ul>		
8. Have a combustion process of any size	Where the pollutants are exhausted from a vent or stack in a location and at a height that may give rise to impacts at receptors through insufficient dispersion. This criterion is intended to address those situations where a new development may be close to other buildings that could be residential and/or which could adversely affect the plume's dispersion by way of their size and/or height.		
Source: EPUK / IAQM, Land-use Planning & Development	Control: Planning for Air Quality (May 2015), Table 6.2.		

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