

CADNANT

PLANNING

**FORMER SEIONT BRICKWORKS/QUARRY SITE,
SEIONT MILL ROAD, CAERNARFON**

Request for EIA screening opinion

SEIONT LTD

March 2022

2021.058_05

Conwy | 20 Connaught House, Riverside Business Park, Benarth Road, Conwy LL32 8UB

Chester | 1 Aldford House, Bell Meadow Business Park, Pulford, Chester, CH4 9EP

EIA Screening Opinion



Status of report:	Issue	V1.0	March 2022
Author:	Sioned Edwards MRTPI		
Checker:	Rhys Davies MRTPI		
Reviewer:	Rhys Davies MRTPI		
Approved by:	Rhys Davies MRTPI		
Document control:	CAD.01		

© The contents of this document must not be copied or reproduced in whole or in part without the written consent of Cadnant Planning Ltd. All plans are reproduced from the Ordnance Survey Map with the permission of the Controller HMSO, Crown Copyright Reserved, Licence No. 100020449



Cadnant Planning are accredited by and work to ISO 9001:2015 standard (The British Assessment Bureau)

Contents

1. The proposed development	1
2. Environmental Impact Assessment Regulations.....	10
3. Potential environmental effects.....	11
4. Conclusion.....	26

1. The proposed development

Introduction

- 1.1 This document sets out the formal request for a screening opinion under Part 2 Section 6 of the Town & Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 (the EIA Regulations) to be made by Gwynedd Council, with regard to an application for the creation of new vehicular access and alterations to Waunfawr Road, internal access road and temporary use of land for storage purposes, retention of concrete batching facility and recycling and the export of finished materials and products at the Former Seiont Brickworks, Seiont Mill Road, Caernarfon.
- 1.2 In accordance with Section 6, paragraph (2), this statement provides:
- (a) a plan sufficient to identify the land;*
 - (b) a description of the development, including in particular—*
 - (i) a description of the physical characteristics of the development and, where relevant, of demolition works;*
 - (ii) 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—*
 - (i) the expected residues and emissions and the production of waste, where relevant; and*
 - (ii) 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 site and surrounding area

- 1.3 The site of the former Seiont Brickworks lies on the south-eastern side of the town of Caernarfon, which is identified in Figure 1.1.

Figure 1.1 Aerial image identifying the former Seiont Brickworks site



- 1.4 The area is substantially the site of the former Seiont brickworks which comprised a brick clay quarry and brick production factory. The factory area is currently used as a temporary compound in connection with the Caernarfon to Bontnewydd bypass construction project. This area contains offices, mobile concrete batching facilities, heavy plant workshop facilities, materials storage areas and associated car parking.
- 1.5 Access to the application site is available from Seiont Mill Road, which also provides access to a separate brickyard to the south-west of the quarry, which is physically separated from the remainder of the site by the Afon Seiont. There is also a haul route from Waunfawr Road which has been constructed in connection with the site's use as a compound connected to the construction of the bypass. The application site comprises this haul route which is proposed to be constructed as an internal access

EIA Screening Opinion

road connecting the area of the former factory and brickworks site with Waunfawr Road to the north.

- 1.6 There is currently a deep quarry void to the east of the application site which is owned by the applicant. The Caernarfon to Bontnewydd bypass which recently opened lies beyond the quarry void to the east. Plas Treflan lies to the west of the application site and is also within the applicant's ownership. Beyond Plas Treflan to the west lies the Peblig Industrial Estate. Afon Seiont runs along part of the western boundary of the application site beyond which lies Ysbyty Eryri and the residential estates of Tyddyn Llwydyn and Glan Seiont. Residential properties are located along Seiont Mill Road.
- 1.7 The application site lies outside but in close proximity to the development boundary of Caernarfon.
- 1.8 The quarry site includes a Regionally Important Geological Site (RIGS) (designated in 2001), known as the Pen Y Bont (Seiont Brickworks)). The RIGS status is attributed to the associated Quaternary history and organic deposits of the pre-glacial age.
- 1.9 There are three international sites within 5km of the application site, with a further one just over 5km away:
 - Menai Strait and Conwy Bay Special Area of Conservation (SAC) (around 1.5km to the north-west)
 - Abermenai to Aberffraw Dunes SAC (around 4.5km to the west)
 - Glannau Mon: Cors Heli SAC (around 4.5km to the west)
 - Glynllifon SAC (around 5km to the south).
- 1.10 Due to the proximity of Afon Seiont, the Natural Resources Wales Development Advice Maps (DAM) identify that the north-western extent of the site and the quarry void fall within a C2 flood risk area – an area which is at flood risk, without significant infrastructure defence. The remainder of the site is within flood zone A, which is at little risk of flooding. This is identified in Figure 1.2.

Figure 1.2 Extract of Development Advice Maps identifying extent of C2 flood area (in blue)



Description of proposed development

- 1.11 The wider former Seiont Brickworks site is currently being used in connection with the construction of the Caernarfon to Bontnewydd bypass under planning permission C17/0011/19/MW. The bypass recently opened in March 2022 and this application seeks consent for the temporary use of the land for a period of up to five years and the construction of a new permanent vehicular access from Waunfawr Road to serve the temporary use of part of the site as well as facilitate the potential future use of the site.

Use, amount and scale

- 1.12 The proposed use of the former Seiont Brickworks site includes:
- General storage (B8 use class) extending to 5,350sqm;
 - Concrete batching plant area, where mobile plant would be sited extending to 2,700sqm.;
 - Recycling facility area extending to 5,800sqm together with associated processes. Materials that would be recycled on site would comprise soils and construction and demolition waste. Material which would be brought into the site would be selected so as to minimise any unsuitable waste which could not be recycled. Material that is unsuitable for recycling would be disposed at a licensed waste disposal site;

EIA Screening Opinion

- Plant maintenance and storage area extending to 5,000sqm where the existing workshop/fitter shed would be retained;
- Siting of portacabins to be used as offices with welfare facilities together with associated parking. These offices would connect on a temporary basis to the Dŵr Cymru Welsh Water main sewer system.

Appearance

- 1.13 There would be very little change to the overall appearance of the site as a result of the proposed development. Elements of the development including the batching plant, recycling facility, workshop/fitter shed and the offices are all present on site and have been throughout the use of the site in connection with the Caernarfon to Bontnewydd bypass. The number of offices at the site would be reduced considerably.

Layout and access

- 1.14 At present there is a haul route from Waunfawr Road to the north into the former Seiont Brickworks site which has been constructed across former agricultural land. It is proposed to provide a permanent new vehicular access from Waunfawr Road which would be metalled for up to 50m from the entrance with an internal access road (hard core finish) along the haul route to provide access to the former Brickworks site. No changes in land levels along the haul route are proposed. A pedestrian footpath would be provided along the western side of the new vehicular access road into the site to provide a safe means of access for pedestrians. An uncontrolled dropped crossing is proposed across the access road near Waunfawr Road.
- 1.15 A 3m footway/cycleway is proposed along part of Waunfawr Road each side of the new access leading to a 2.5m wide footway/cycleway which would run under the bridge which forms part of the Caernarfon to Bontnewydd bypass.
- 1.16 A visibility splay of 4.5m x 70m in each direction would be provided at the new access from Waunfawr Road. Improvements and alterations are also proposed to Waunfawr Road near the new vehicular access which would involve widening Waunfawr Road to provide a right-hand turn lane (ghost island) for vehicles travelling from Caernarfon.
- 1.17 A new access to serve the neighbouring property of Plas Treflan is proposed from the internal access road and the existing access to Plas Treflan from Waunfawr Road would no longer be used and would be stopped up.

EIA Screening Opinion

- 1.18 The proposed new access would serve to remove three existing access points; a previous agricultural access where the new access is proposed, vehicular access to Plas Treflan and the access to Seiont Quarry from Waunfawr Road. It would also be used for a maintenance access to the Caernarfon bypass.
- 1.19 The existing vehicular access from Seiont Mill Road would continue to be used. All light vehicles would utilise Seiont Mill Road access, along with some HGV's if travelling from the A487. The majority of HGV's are expected to utilise the proposed new access from Waunfawr Road.
- 1.20 Access to the site would therefore be shared between two access points; Seiont Mill Road and access from Waunfawr Road.
- 1.21 A wheel wash would be provided near the site entrance onto Waunfawr Road to ensure that no mud or debris would be transported on the highway. Seiont Mill Road is already a metalled to the former brickworks factory site.

Landscaping

- 1.22 New boundary walling is proposed along the proposed new access road from Waunfawr Road. No other landscaping is proposed.

Planning policy

- 1.23 The National Waste Strategy Towards Zero Waste – One Wales: One Planet 2009 provides an overarching framework for the management of all types of waste, with the overall aim of reducing residual waste to zero by 2050. It is supported by a series of sector plans which details how the outcomes, targets and Policies in Towards Zero Waste are to be implemented.
- 1.24 Planning Policy Wales and Technical Advice Note (TAN 21) set a framework for facilitating the delivery of sustainable waste management infrastructure through the planning process.
- 1.25 TAN 21 advises that when “considering development proposals for all types of waste management facilities, planning authorities should take into account their potential contribution to the objectives, principles and strategic waste assessments set out in Towards Zero Waste and the relevant waste sector plans and the relevant development plan for the area. The extent to which a proposal demonstrates this contribution, in

EIA Screening Opinion

environmental, economic and social terms, will be a material planning consideration. The aim is to ensure that the right facilities are located in the right place to meet environmental, economic and social needs. At both a strategic and site level this means accepting that waste will need to be managed in all areas of Wales, that economic considerations relating to demand and viability may affect what management options can be acceptably brought forward in an area, that transportation considerations may affect whether a proposed location is suitable and that all proposals must be environmentally acceptable.

- 1.26 The Waste Hierarchy as set out in TAN 21 advises that where it is not possible to reuse materials and products or prepare them for reuse, recycling should be encouraged as it can reduce demand for resources and reduce atmospheric emissions.
- 1.27 The adopted development plan consists of Anglesey and Gwynedd Joint Local Development Plan (JLDP), which was adopted in July 2017.
- 1.28 Strategic Policy PS 21: Waste Management states:

The Councils will seek to ensure an adequate availability of land in appropriate locations for an integrated network of waste facilities to meet regional and local obligations in accordance with the requirements of the current relevant national/regional policy/guidance. The sites and types of facilities chosen will promote a sustainable approach to waste management based on the waste hierarchy of prevention and reuse, preparation for reuse, recycling, other recovery and then disposal whilst taking into consideration the unique character of the area including the transport links and rural nature.

- 1.29 Policy GWA 1: Provision of Waste Management and Recycling Infrastructure goes on to advise that land and property listed in the policy are allocated for the provision of infrastructure that could sustain or add to the range of suitable waste management facilities. The application site is not identified on the list.
- 1.30 The policy goes on to advise that in addition to the allocated sites, “*waste management and recycling infrastructure, excluding landfill and open windrow composting, may be acceptable on existing industrial estates, quarries and brownfield sites. Proposals for waste management and recycling infrastructure (which are not proposed on the above allocated sites) will be assessed on their own merit provided that there is a justifiable need for the development. The justifiable need should refer to the local need as*

EIA Screening Opinion

specified within the Municipal Sector Plan and Collections Infrastructure and Markets Sector Plan (CIMSP).

Any new development must be suitable in terms of size and scale and must not have an adverse impact upon the landscape, the natural environment or the amenity and health of the local population. All new proposals for Waste Management facilities should be accompanied by a Waste Planning Assessment (as defined by Annex B of TAN 21, Waste)."

- 1.31 The proposal seeks to utilise the application site for a temporary period of up to five years for the siting of a concrete batching plant and recycling facility. Planning permission C17/0011/19/MW has granted permission for concrete batching facility at the site. The site of the former brickworks is considered to be previously developed land and this proposal would enable the continued use of the site for this purpose for a further five years. It would allow the existing facility to diversify and expand to export finished materials and products to the local market.
- 1.32 The application site is a windfall site that has become available and could be delivered immediately following the completion of the Caernarfon to Bontnewydd bypass. The proposed use is only sought on a temporary basis for five years after which the site could be restored. The proposed use comprises a general storage area (B8 use class), a concrete batching area, plant maintenance area and a recycling area.
- 1.33 Planning permission C17/0011/19/MW approved a restoration scheme for the site, which involved the infilling of the quarry void with imported material from the construction of the Caernarfon to Bontnewydd bypass. However, there was insufficient material from the construction of the bypass to enable the quarry void to be filled. Condition 8 of permission C17/0011/19/MW requires a detailed scheme of restoration and aftercare to be submitted for the site within three years from the date of commencement. The applicant is in discussions with the Mineral Planning Authority regarding the submission of a restoration scheme. Given that the use proposed would be for a temporary period of up to five years, the site would then be restored in accordance with the restoration scheme to be submitted and approved as part of condition 8 of planning permission C17/0011/19/MW.
- 1.34 Caernarfon is identified as an Urban Service Centre in the JLDP and the application lies outside but in close proximity to the development boundary. It is recognised that Urban Service Centres provide a good range of employment, facilities and services that

EIA Screening Opinion

serve their own population as well as their wider catchment areas. Indeed, the upcoming national guidance “Future Wales; The National Plan: National Development Framework” identifies Caernarfon as a Regional Growth Area, and states that these areas should be recognised “...as a focus for housing, employment, tourism, public transport and key services within their wider areas and support their continued function as focal points for sub-regional growth”.

- 1.35 It is evident from the above that Caernarfon is a highly sustainable settlement and the site’s location close to the development boundary would constitute sustainable development in line with the Plan’s Spatial Strategy.
- 1.36 The need for the finished material that would be produced has been identified in the market by the applicant, and the proposal for the temporary use for five years would enable the applicant to meet an identified current demand in the short term. The proposal would continue to provide employment opportunities in Caernarfon and would also support indirect jobs in the local economy.

2. Environmental Impact Assessment Regulations

Application of Regulations

2.1 It is proposed that the development sits within the following paragraph of Schedule 2 of The Town & Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017, defined development.

- Paragraph 11, section (b) installations for the disposal of waste where the following thresholds apply
 - ii) where the area of development exceeds 0.5 ha; and
 - iii) the installation is to be sited within 100m of any controlled waters.

2.2 The application site would extend to a total area of 6.97ha, however the area where the concrete batching plant and recycling facility would be provided would extend to 0.27ha and 0.58ha respectively. The proposal would be within 60m of the Afon Seiont at its closest point.

2.3 Annex A of Circular 11/99, paragraph A.36 advises that

“The likelihood of significant effects will generally depend on the scale of development and the nature of the potential impact in terms of discharges, emissions or odour. For installations (including landfill sites) for the deposit, recovery and/or disposal of household, industrial and/or commercial wastes... EIA is more likely to be required where new capacity is created to hold more than 50,000 tonnes per year, or to hold waste on a site of 10 hectares or more...sites seeking only to accept inert wastes (demolition rubble etc), are unlikely to require EIA”.

2.4 The development would see the handling of up to 120,000 tonnes per year which is above the 50,000 tonnes per year referred to in paragraph A.36, however, the proposal would only seek to accept inert waste (soils and construction and demolition material).

3. Potential environmental effects

3.1 Schedule 3 of The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 set out a selection criteria that may be used to determine whether a project that meets or exceeds the applicable threshold in Schedule 2 requires an EIA. Please see Table 3.1.

Table 3.1 Applicant's response Schedule 3 selection criteria

	Schedule 3 selection criteria	Response
1.	<p>Characteristics of development</p> <p>The characteristics of development must be considered having regard, in particular, to—</p>	
	<p>a) the size and design of the development;</p>	<p>The application site would extend to a total area of 6.97ha including:</p> <ul style="list-style-type: none"> • 0.27ha - Concrete batching plant • 0.58ha – recycling facility • 0.5ha – plant maintenance and storage • 0.5ha – general storage <p>In terms of volumes:</p> <ul style="list-style-type: none"> • Material brought in for recycling – assume 100,000 tonnes per annum • Material taken out after recycling – assume 100,000 tonnes per annum • Aggregate brought in for production of concrete – assume 18,000 tonnes per annum • Cement brought in for production of concrete – assume 3,000 tonnes per annum • Concrete for use – assume a volume of 10,000m³ per annum,

EIA Screening Opinion

	b)	the cumulation with other existing development and/or approved development;	The development is proposed for a temporary period of up to five years following the completion of the Caernarfon to Bontnewydd bypass.
	c)	the use of natural resources, in particular land, soil, water and biodiversity;	Soil and construction and demolition waste would be imported for recycling. Cement would be imported for the processing of materials.
	d)	the production of waste;	Facility would manage waste arising from construction and demolition.
	e)	pollution and nuisances;	<p>Due to the proximity of Afon Seiont, the Natural Resources Wales Development Advice Maps (DAM) identify that the north-western extent of the site and the quarry void fall within a C2 flood risk area – an area which is at flood risk, without significant infrastructure defence. The remainder of the site is within flood zone A, which is at little risk of flooding.</p> <p>Fluvial flooding from the Afon Seiont is the main potential source of flood risk at this site. The site is shown to be flood free during all events up to and including the 1% AEP plus 30% climate change event. Shallow depth flooding (less than 260mm) is estimated in the northern extent of the site (the C2 flood risk area) during the 0.1% AEP event with a maximum flood level of 14.19m AOD.</p> <p>Offices proposed to connect to Welsh Water sewer for a temporary period.</p> <p>Open air operations which could generate noise and dust from the processing of materials and transportation to and from the site.</p>
	f)	the risk of major accidents and/or disasters relevant to the development concerned, including those caused by	Application site partially includes a C2 flood risk area as explained above.

EIA Screening Opinion

		climate change, in accordance with scientific knowledge;	
	g)	the risks to human health (for example due to water contamination or air pollution).	Potential for noise and dust which could affect air quality as a result of vehicles movements to and from the site.
2.	Location of development		
	The environmental sensitivity of geographical areas likely to be affected by development must be considered, having regard, in particular, to—		
	a)	the existing and approved land use;	The area is substantially the site of the former Seiont brickworks which comprised a brick clay quarry and brick production factory. The factory area is currently used as a temporary compound in connection with the Caernarfon to Bontnewydd bypass construction project under planning permission C17/0011/19/MW. This area contains offices, mobile concrete batching facilities, heavy plant workshop facilities, materials storage areas and associated car parking. The site would be restored in accordance with a detailed scheme to be submitted and approved by the LPA.
	b)	the relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground;	No unique features within the site which would be lost or significantly effected by the development. No changes to land levels proposed. No change to visual impact as most all elements except the access track and new access from Waunfawr Road are already present on site.
	c)	the absorption capacity of the natural environment, paying particular attention to the following areas—	
		(i) wetlands, riparian areas, river mouths;	Yes – site partly within C2 flood risk area.

EIA Screening Opinion

			There are a range of statutory and non-statutory nature conservation sites within a distance of 5km. Chapter 9 of the Environmental Statement that accompanied planning application C17/0011/19/MW identified that bats use a roost on the fringes of the scheme and otter use the river corridor, while a range of bird species use the site and setting.
		(ii) coastal zones and the marine environment;	N/A
		(iii) mountain and forest areas;	N/A
		(iv) nature reserves and parks;	N/A
		(v) European sites and other areas classified or protected under national legislation;	<p>Afon Seiont within 60m at its closest point which is a SSSI.</p> <p>There are three international sites within 5km of the application site, with a further one just over 5km away:</p> <ul style="list-style-type: none"> • Menai Strait and Conwy Bay Special Area of Conservation (SAC) (around 1.5km to the north-west) • Abermenai to Aberffraw Dunes SAC (around 4.5km to the west) • Glannau Mon: Cors Heli SAC (around 4.5km to the west) • Glynllifon SAC (around 5km to the south).
		(vi) areas in which there has already been a failure to meet the environmental quality standards laid down in [E1retained EU law] and relevant to the project, or in which it is considered there is such a failure;	N/A

EIA Screening Opinion

	(vii)	densely populated areas;	Afon Seiont runs along part of the western boundary of the application site beyond which lies Ysbyty Eryri and the residential estates of Tyddyn Llwydyn and Glan Seiont. Residential properties are located along Seiont Mill Road.
	(viii)	landscapes and sites of historical, cultural or archaeological significance.	No. Caernarfon World Heritage Site around 1.4km to the north-west.
3.	Types and characteristics of the potential impact		
	The likely significant effects of the development on the environment must be considered in relation to criteria set out under paragraphs 1 and 2, with regard to the impact of the development on the factors specified in regulation 4(2), taking into account—		
	a)	the magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected);	See below.
	b)	the nature of the impact;	See below.
	c)	the transboundary nature of the impact;	See below.
	d)	the intensity and complexity of the impact;	See below.
	e)	the probability of the impact;	See below.
	f)	the expected onset, duration, frequency and reversibility of the impact;	See below.

EIA Screening Opinion

	g)	the cumulation of the impact with the impact of other existing and/or approved development;	See below.
	h)	the possibility of effectively reducing the impact.	See below.

Traffic and transportation

- 3.2 At present, access to the site is available along Seiont Mill Road and along a haul route from Waunfawr Road approved as part of the use of the site as a temporary compound in connection with the Caernarfon to Bontnewydd bypass.
- 3.3 The proposal includes the creation of a new permanent vehicular access from Waunfawr Road which would serve the temporary use of the site once constructed, along with the continued use of Seiont Mill Road. The existing haul route across the land would be formalised with hardstanding to provide an internal access road.
- 3.4 A 3m footway/cycleway is proposed along part of Waunfawr Road each side of the new access leading to a 2.5m wide footway/cycleway which would run under the bridge which forms part of the Caernarfon to Bontnewydd bypass.
- 3.5 A visibility splay of 4.5m x 70m in each direction would be provided at the new access from Waunfawr Road. Improvements and alterations are also proposed to Waunfawr Road near the new vehicular access which would involve widening Waunfawr Road to provide a right-hand turn lane (ghost island) for vehicles travelling from Caernarfon.
- 3.6 A new access to serve the neighbouring property of Plas Treflan is proposed from the internal access road and the existing access to Plas Treflan from Waunfawr Road would no longer be used and would be stopped up.
- 3.7 The proposed new access from Waunfawr Road would serve to remove three existing access points; a previous agricultural access where the new access is proposed, vehicular access to Plas Treflan and the access to Seiont Quarry. The existing vehicular access from Seiont Mill Road would continue to be used for light vehicles, however, access to the site would now be shared between two access points; Seiont Mill Road and access from Waunfawr Road.
- 3.8 All light vehicles would utilise Seiont Mill Road access. It is expected that there would be between 10-15 personnel on site at any one time, in comparison with around 300 on site during the construction of the bypass. Therefore, there would be a significantly lower number of light vehicle movements utilising the Seiont Mill Road access in comparison with the period when the bypass was being constructed.

EIA Screening Opinion

- 3.9 HGV's travelling to the site from the A487 would also utilise Seiont Mill Road, however, the majority of HGV's are expected to utilise the proposed new access from Waunfawr Road. The number of HGV movements along Seiont Mill Road is not expected to be any greater than the number experienced during the use of the site in association with the construction of the bypass.
- 3.10 The expected number of traffic movements associated with the proposed development based on the applicant's expectations are set out below:
- Material brought in for recycling – assume 100,000 tonnes per annum, which would equate to 5,000 loads at 20t per load;
 - Material taken out after recycling – assume 100,000 tonnes per annum, which would equate to 5,000 loads at 20t per load;
 - Aggregate brought in for production of concrete – assume 18,000 tonnes per annum, which would equate to 600 loads at 30t per load;
 - Cement brought in for production of concrete – assume 3,000 tonnes per annum, which would equate to 100 loads at 30t per load;
 - Concrete for use – assume a volume of 10,000m³ per annum, which would equate to 1,667 loads at 6m³ per load;
 - Workshop – assuming 10 loads per day, which would generate 2,780 loads.
- 3.11 This totals 15,147 loads or 30,293 goods vehicle movements (worst case assumes no 'back-loads' occur. Wherever possible, vehicles would carry a load on their return trips to reduce the numbers shown here). If evenly distributed through the year the number would be:
- 46 Weeks per year 659 movements per week
 - 5.5 Days per week 120 movements per day
 - 10 Hours per day 12 movements per hour
- 3.12 A comparison between the previous vehicles movements associated with the site (whilst used in connection with the Caernarfon to Bontnewydd bypass) in comparison to the expected vehicle movements is set out in Table 3.2.

EIA Screening Opinion

Table 3.2 Comparison between existing and proposed vehicle movements at the site

Assumptions	Existing vehicle movements (in connection to use of site in relation to Caernarfon to Bontnewydd bypass)	Expected vehicles movements associated with proposed development
Total movements per annum	56,450 movements per annum	30,293 movements per annum
46 Weeks per year	1,227 movements per week	659 movements per week
5.5 Days per week	223 movements per day	120 movements per day
10 Hours per day	22 movements per hour	12 movements per hour

- 3.13 These movements would be between both points of access to the site, but acknowledging that the majority of HGV's would utilise the access from Waunfawr Road.
- 3.14 Depending on the source of material, the delivery lorries would use routes towards Caeathro roundabout and then use the A4085 to reach the proposed new site entrance and turn off the public roads. From the entrance they would travel into the quarry, observing the speed limits and other controls set by the quarry operator.
- 3.15 The likely environmental effects of this operation have been assessed using methods contained in national guidance previously used for the original Environmental Statement and for similar documents for the bypass project. The findings of the assessment are:
- That the amount of traffic generated by the proposed import of materials is not enough to have any significant effect on local air quality (e.g. from exhaust emissions);
 - The noise from lorry traffic bringing in the materials on roads near the site would increase only marginally and this effect would not be significant;
 - The lorries would not create a noticeable increase in vibration;

EIA Screening Opinion

- Mud and other material on the public road would be prevented by the controls within the quarry route and, if necessary, by road sweepers;
- The lorries would not increase congestion or have an effect on road safety, but if the road is obstructed by parked vehicles then congestion could occur;
- The number of lorries would not be high enough to make crossing the A4085 more difficult, but could make use of the narrow footways slightly more unpleasant.

Waste

- 3.16 The proposal includes a recycling facility extending to 5,800sqm together with associated processes of screening and crushing. Materials that would be recycled on site would comprise surplus excavated soils and construction and demolition waste. The proposal assumes a throughput of 100,000 tonnes per annum, derived from projects undertaken by the applicant and by others.
- 3.17 A Waste Planning Assessment, in accordance with Annex B of TAN 21 (Waste) would be submitted with the planning application to address the need for the proposed facility and to demonstrate that it offers a sustainable waste management option, taking into account the waste hierarchy, lifecycle assessment and the proximity principle.

Landscape and visual impact

- 3.18 The proposed development would not change the landform of the application site in comparison to the existing use of the site in connection with the construction of the bypass. However, the internal haul route would be formalised with a hardcore surface. Images from nearby viewpoints could be included in an application to demonstrate the existing operations as an indicative of the temporary situation proposed as part of the application.
- 3.19 The proposed activities would lead to some delay of part of the restoration of the wider quarry site as required by planning permission C17/0011/19/MW. The restoration plan for the site is yet to be submitted and agreed with the LPA, and the earliest that such a scheme could be submitted, would be 14 November 2022. Discussions with the LPA regarding the restoration proposals are on-going. Whilst the proposal would delay the restoration of this part of the site in the short-term, the proposal does not change the existing visual impact, which would continue for a period of five years as part of this proposal.

General amenity

Air quality

- 3.20 The principal guidance for the environmental assessment of road transport projects is the Design Manual for Roads and Bridges (DMRB) published by Highways England on behalf of the national transport organisations including Welsh Government. LA105 – Air quality (Rev 0 Nov 2019) deals with the assessment of air quality effects and aligns with Directive 2011/92/EU as amended by 2014/52/EU.
- 3.21 Section 2 of LA105 covers the method for assessing air quality impacts. It begins with a set of scoping criteria which shall be used to determine whether the air quality impacts of a project can be scoped out or require an assessment, and is based on the changes between the ‘do something’ traffic (with the project) and the ‘do minimum’ traffic (without the project) in the opening year ie when the proposed activity commences. The criteria are:
- 1) annual average daily traffic (AADT) $\geq 1,000$; or
 - 2) heavy duty vehicle (HDV) AADT ≥ 200 ; or
 - 3) a change in speed band; or
 - 4) a change in carriageway alignment by $\geq 5m$.
- 3.22 The proposed importation of materials involve a maximum of 330 loads per week as an average over the year, assuming the smallest capacity of vehicle. This is 659 vehicle movements per week or 120 per weekday, only 60% of the threshold value for HDV movements (criterion 2) given in LA105. There would be no change in AADT for other traffic; no change in the speed band; and no change in the carriageway alignment (criteria 1, 3 and 4).
- 3.23 The scale of traffic generated by the proposed importation of materials via the public road network is substantially lower than the threshold at which air quality effects need to be considered further. Significant effects on air quality can be ruled out.

Noise and vibration

- 3.24 Noise arising from the current concrete batching and materials recycling activities at the site was considered in detail in the Environmental Statement submitted with planning application C17/0011/19/MW. The proposal is to continue those activities in the same location, and so no change in noise arising from those activities is anticipated.

EIA Screening Opinion

No noise complaints have been received during the use of the site in connection with the Caernarfon to Bontnewydd Bypass. The total vehicle movements per annum would be substantially lower than the vehicles movements associated with the use of the site in connection with the Caernarfon to Bontnewydd bypass (see Table 3.2).

- 3.25 The proposals would generate HGV traffic on the A4085 between Caeathro roundabout and the site entrance as set out in section 3.8 – 3.12. DMRB LA111 Noise and Vibration Rev 2 (May 2020) sets out requirements for assessing and reporting the effects of highways noise and vibration from construction, operation and maintenance projects. The basic noise level arising from the addition of 120 HGV movements (60 loads) per day to the annual average daily traffic would cause an increase of approximately 1.1dB(A) in the noise source. An increase of 180 HGV movements per day, representing a busy period, would add approximately 1.7dB(A) to the noise source for short periods and bring a corresponding reduction in movements at other times. As the proposed additional operations do not involve any physical changes to the road links involved, nor changes to the attenuation (distance, other physical factors) between the noise source and the receptors, it is appropriate to consider changes in the noise source as the worst case change that could occur at receptor locations.
- 3.26 By reference to DMRB LA111, the addition of up to 120 HGV movements (60 loads) per day to the existing traffic between Caeathro roundabout and the site entrance would create a 'Minor' increase in noise at the source, at the low end of the 'Minor' magnitude category. If the frequency of movements were to be higher for short periods then the increase in noise at the source would be towards the middle of that category. DMRB LA111 goes on to state that 'Where the magnitude of change in the short term is 'negligible' at noise sensitive buildings, it shall be concluded that the noise change will not cause changes to behaviour or response to noise and as such, will not give rise to a likely significant effect.' A 'minor' magnitude of change is also classed as a 'Not significant' effect unless local circumstances set out in Table 3.60 of LA111 apply.
- 3.27 The proposal is not therefore likely to have a significant noise or vibration effect on receptors.

Ecology and biodiversity

- 3.28 There are a range of statutory and non-statutory nature conservation sites within a distance of 5km. Chapter 9 of the Environmental Statement that accompanied planning application C17/0011/19/MW identified that bats use a roost on the fringes of the

EIA Screening Opinion

scheme and otter use the river corridor, while a range of bird species use the site and setting.

- 3.29 The proposed activities would be confined to the former brickworks site currently in use under planning permission C17/0011/19/MW, and to the use of the proposed access which is currently in use as a haul route associated with the construction of the bypass. The materials to be imported and recycled are the same in nature to those currently processed from the bypass site. Controls on noise, dust and other emissions to air, the prevention of pollution and the drainage of surface water would all continue to apply. There is therefore no reason for any significant impact on ecology and biodiversity.
- 3.30 A separate Habitat Regulations Assessment will be carried out in accordance with the regulations, as there are 'Natura 2000' sites within 5km. The conclusions of this assessment are anticipated to be that Likely Significant Effects can be ruled out, the same as the conclusion reached for the application C17/0011/19/MW, due to the nature of the proposed activities and the distance to the features of these sites.
- 3.31 The proposed activities would not extend to the zone designated as a Regionally Important Geological Site and would have no effect on it.

Drainage and the water environment

- 3.32 Due to the proximity of Afon Seiont, the Natural Resources Wales Development Advice Maps (DAM) identify that the north-western extent of the site and the quarry void fall within a C2 flood risk area – an area which is at flood risk, without significant infrastructure defence. The remainder of the site is within flood zone A, which is at little risk of flooding.
- 3.33 Fluvial flooding from the Afon Seiont is the main potential source of flood risk at this site. The site is shown to be flood free during all events up to and including the 1% AEP plus 30% climate change event. Shallow depth flooding (less than 260mm) is estimated in the northern extent of the site (the C2 flood risk area) during the 0.1% AEP event with a maximum flood level of 14.19m AOD.
- 3.34 The proposed recycling facility will accommodate soil, construction and demolition waste and as such is classified as a waste disposal site, a classification considered to be 'highly vulnerable' development in accordance with Figure 2 of the Welsh Government's Technical Advice Note 15 – Development and Flood Risk (TAN15).

EIA Screening Opinion

- 3.35 The proposed recycling facility will be located in the higher southern extent of the site and outside of the 0.1% annual probability flood extent (i.e within Flood Zone A).
- 3.36 The remaining elements of the development are considered to be 'less vulnerable' development in accordance with Figure 2 of the Welsh Government's Technical Advice Note 15 – Development and Flood Risk (TAN15).
- 3.37 TAN15 states that less vulnerable development can be considered in Flood Zone C2 subject to the application of the TAN15 Justification Test and satisfying specific TAN15 acceptability criteria. The specific TAN15 'acceptability criteria' are assessed in the Flood Consequence Assessment (FCA).
- 3.38 The proposed external storage area is shown to be within the 0.1% AEP flood extent. The flood depths and velocities are within the tolerable flooding limits set out by A1.15 of TAN15.
- 3.39 The proposed site access road is flood free during all considered events. Waunfawr Road which provides access to the site is also shown to be flood free.
- 3.40 No ground raising is proposed within the flood extent. The development will therefore not remove flood storage space from the floodplain and will not increase flood risk elsewhere.
- 3.41 Consultation has been on-going with Natural Resources Wales in relation to flood risk and a FCA has been prepared.
- 3.42 It is proposed for foul drainage to connect to Welsh Water's main sewer for a temporary period of up to five years.

Site ground conditions and contamination

- 3.43 Consultation with NRW has raised that given the historic uses of the site, contamination may be present. A Site Condition Report and Ground Contamination Investigation and Risk Assessment by e-geo solutions, Report reference E0756.SCRGCRA.R1, January 2016 has been completed and shared with NRW who has advised that the following conditions are included on any planning permission granted:
- 3.44 Condition 1 - If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy

EIA Screening Opinion

detailing how this unsuspected contamination shall be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be carried out as approved.

- 3.45 Justification: To ensure the risks associated with previously unsuspected contamination at the site are dealt with through a remediation strategy, to minimise the risk to both future users of the land and neighbouring land, and to ensure that the development can be carried out safely without unacceptable risks. A site investigation may not uncover all instances of contamination and this condition ensures that contamination encountered during the development phase is dealt with appropriately.
- 3.46 Condition 2 - No infiltration of surface water drainage into the ground is permitted other than with the express written consent of the local planning authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters. The development shall be carried out in accordance with the approval details.
- 3.47 Justification: To prevent both new and existing development from contributing to or being put at unacceptable risk from or being adversely affected by unacceptable levels of water pollution.
- 3.48 Consultation with NRW has also raised the need for any facility requiring a car park of over 50 vehicles would also require an oil interceptor installation in order to protect the sensitive receptor of the Afon Seiont and the sensitivity of groundwater. The proposed development would not provide more than 50 car parking spaces for vehicles.

4. Conclusion

- 4.1 In considering the EIA Regulations and the likely environmental effects of the proposed development set out in this request for EIA Screening Opinion, it is suggested that the proposed development can be screened as development not requiring the submission of an Environmental Statement.
- 4.2 The planning application would be accompanied by a suite of non-EIA reports to include:
- Flood Consequence Assessment
 - Ground Contamination Assessment
 - Note in relation to noise and vibration
 - Note in relation to biodiversity
 - Note in relation to transport movements
 - Waste Planning Assessment.

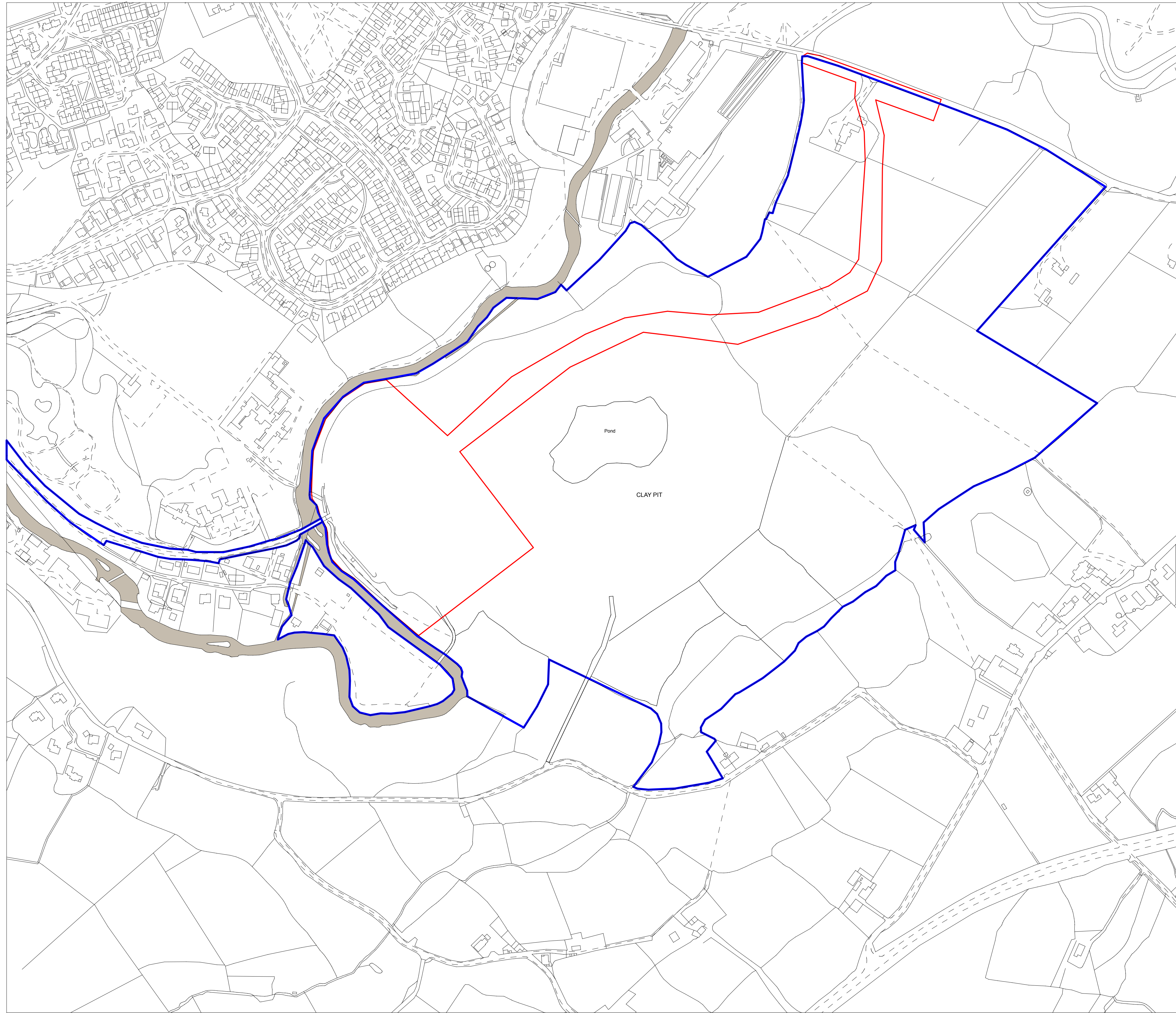
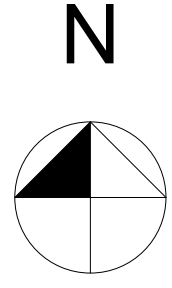
CADNANT

PLANNING

Conwy | 20 Connaught House, Riverside Business Park, Benarth Road, Conwy LL32 8UB
| 01492 581800

Chester | Aldford House, Bell Meadow Business Park, Pulford, Chester CH4 9EP
| 01244 621007

www.cadnantplanning.co.uk



BDA

BRIO design + architecture

The Studio · Ty Larch · Llangoed · Beaumaris · Anglesey
t: 07467376066 e: phil@brio.co.uk w: www.brrio-design.co.uk

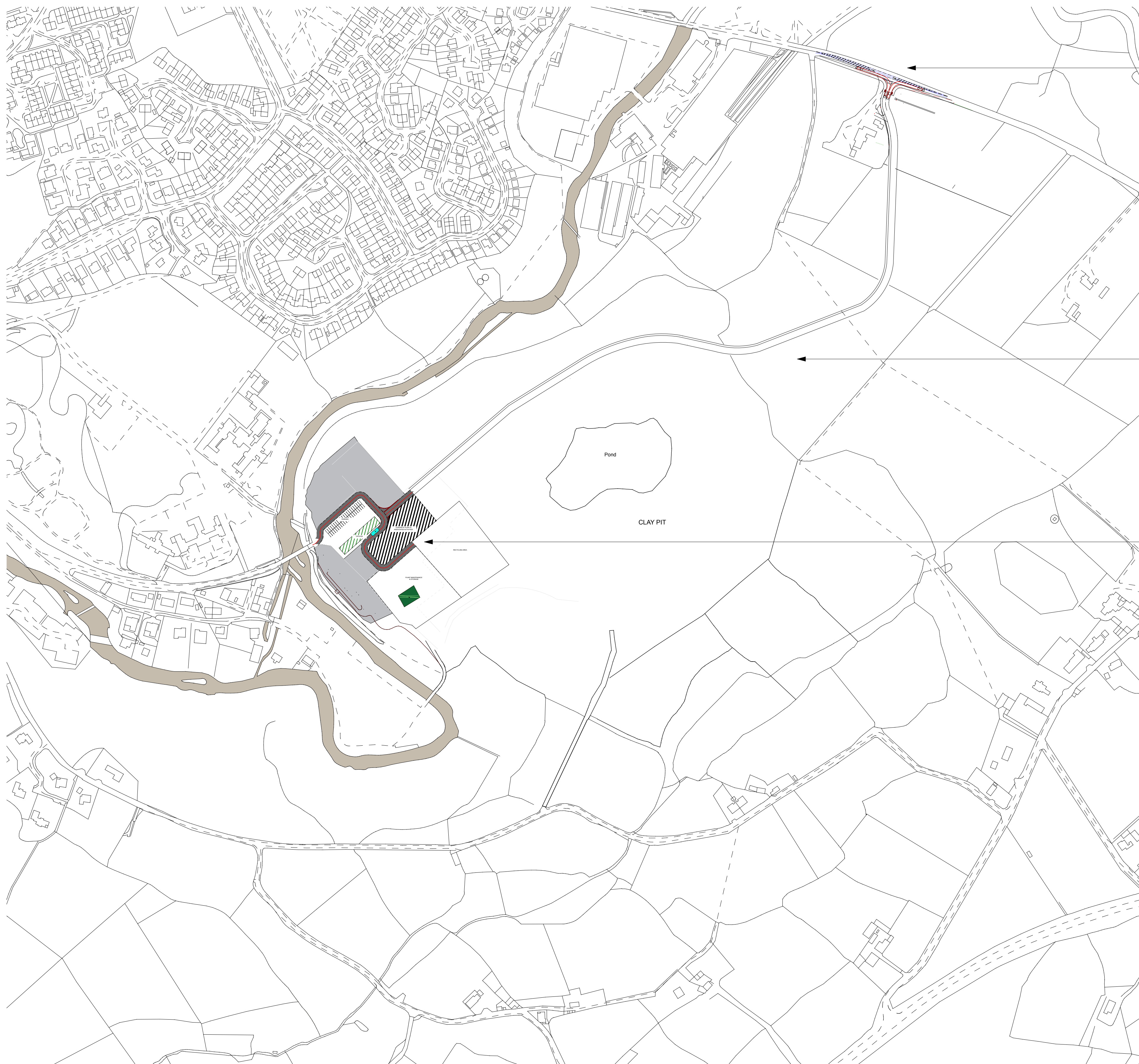
Proposed temporary storage

**Seiont Quarry
Caernarfon, Gwynedd**

Site Location

project	drawing status	date	
PN324	Preliminary	15/11/2021	
originator	scale @ A1	number	rev
PJ	1:2500	A.SITE	

This document and its design content is copyright ©. It shall be read in conjunction with all other associated project information including models, specifications, schedules and related consultants documents. Do not scale from documents. All dimensions to be checked on site. Immediately report any discrepancies, errors or omissions on this document to the Originator. If in doubt ASK.



Proposed new access-
please refer to Proposed
New access drawing/
details

Access road

Proposed new site
compound- please refer
to Proposed New Site
Compound drawing/
details

Pond

CLAY PIT

1:2500

Proposed Site Layout

1

BDA

BRIO design + architecture

The Studio · Ty Larch · Llangoed · Beaumaris · Anglesey
t: 07467376066 e: philjones.01@hotmail.com w: www.brio-design.co.uk

Proposed temporary storage
Seiont Quarry
Caernarfon, Gwynedd

Proposed Site Layout

project	drawing status	date	
PN324	Preliminary	15/11/2021	
originator	scale @ A1	number	rev
PJ	1:2500	A.02.03	

This document and its design content is copyright ©. It shall be read in conjunction with all other associated project information including models, specifications, schedules and related consultants documents. Do not scale from documents. All dimensions to be checked on site. Immediately report any discrepancies, errors or omissions on this document to the Originator. If in doubt ASK.