

RES Ltd

Upper Ogmore Wind Farm Landscape and Visual Response to Local Impact Reports

Prepared by LUC
March 2021



RES Ltd

Upper Ogmores Wind Farm

Landscape and Visual Response to Local Impact Reports

Project Number
11453

Version	Status	Prepared	Checked	Approved	Date
1.	Issue	P. Macrae	S. Oxley	P. Macrae	16.03.2021

Bristol
Edinburgh
Glasgow
London
Manchester

landuse.co.uk

Land Use Consultants Ltd
Registered in England
Registered number 2549296
Registered office:
250 Waterloo Road
London SE1 8RD

100% recycled paper

Landscape Design
Strategic Planning & Assessment
Development Planning
Urban Design & Masterplanning
Environmental Impact Assessment
Landscape Planning & Assessment
Landscape Management
Ecology
Historic Environment
GIS & Visualisation



Contents

Chapter 1

Landscape and Visual Response to Local Impact Reports **1**

Introduction	1
Bridgend LIR	1
Neath Port Talbot LIR	4
Other comments	4
Conclusion	4

Chapter 1

Landscape and Visual Response to Local Impact Reports

Introduction

1.1 LUC undertook the landscape and visual impact assessment (LVIA) for the proposed Upper Ogmere Wind Farm in 2018. The LVIA forms part of the Environmental Statement (ES) submitted with the consent application to the Planning Inspectorate (PINS) in November 2020 (PINS reference DNS/3213662).

1.2 In March 2021 RES commissioned LUC to review the Local Impact Reports (LIRs) provided by Bridgend County Borough Council (BCBC) and Neath Port Talbot Council (NPTC) in response to the submitted application. This short report presents our review of the landscape and visual matters raised by the Councils, and provides our response, drawing on the material within the submitted LVIA.

Bridgend LIR

Baseline

1.3 BCBC highlight relevant landscape baseline and planning documents in Section 6 of their LIR, including the Landscape Character Assessment for Bridgend County Borough (2013),¹ and the SPG 20 Renewables in the Landscape (2015),² particularly the sensitivity assessment contained in the latter. These documents are referred to in the LVIA, as BCBC acknowledge at paragraph 9.2.

1.4 At paragraph 6.12, BCBC list four landscape character areas (LCAs). For clarity, it should be noted that the proposed development is located in only one of these: the Mynydd Llangeinwyr Uplands. The others are adjacent or close to the site as shown in ES Figure 5.5.

1.5 BCBC quote extensively from the landscape character assessment and the sensitivity assessment. It should be noted that both these documents were completed prior to the construction of Llynfi Afan Wind Farm, and the changes in the landscape and views which this development has brought.

1.6 It should also be noted that, as with all strategic landscape assessments, the landscape sensitivity assessment includes an important caveat (page 88):

¹ LUC (2013) Landscape Character Assessment for Bridgend County Borough. Bridgend County Borough Council.

² Bridgend County Borough Council (2015) SPG20 Renewables in the Landscape: Supplementary Planning Guidance

"Please note that while this LCA assessment for wind and solar PV development provides an initial indication of landscape sensitivity and guidance for accommodating developments in the landscape, it should not be interpreted as a definitive statement on the suitability of individual sites for a particular development. All developments will need to be assessed on their own merits."

1.7 The sensitivity assessment concludes that the sensitivity of the Mynydd Llangeinwyr Uplands LCA as a whole, without the presence of Llynfi Afan Wind Farm, is high. The LVIA includes a more site-specific and up-to-date assessment of landscape sensitivity that reaches a different conclusion, as set out in paragraph 5.69 of the ES.

1.8 On page 13 of the LIR, BCBC add emphasis to the quoted sensitivity assessment text, highlighting that the Mynydd Llangeinwyr Uplands LCA is largely within the Northern Uplands Special Landscape Area (SLA). Since the SLAs were defined in 2010,³ wind farm development has been consented at Pant-y-Wal and Fforch Nest within the SLA, and at Llynfi Afan immediately adjacent.

1.9 Section 6 of the LIR concludes, at page 14, with a list of the guidance for wind energy development within the Mynydd Llangeinwyr Uplands, taken from the SPG. However, BCBC do not state that the proposed development will be in conflict with any of this guidance.

Effects on Landscape Character

1.10 Section 9 of the LIR sets out BCBC's view on landscape and visual impacts. The LIR indicates agreement with the method, scope and baseline of the LVIA (paragraphs 9.1 and 9.2 of the LIR).

1.11 Attention is drawn to the assessment of effects on individual LCAs within the LVIA appendices (e.g. LIR paragraph 9.4), but not to the overview in Chapter 5 of the ES which draws the various assessments together and concludes that *"significant effects on landscape character are likely to be experienced across an area extending no more than 2 km from the proposed turbines, and much less to the north and west."* (ES paragraph 5.123).

1.12 The significant effects of the proposed development, noted in paragraphs 9.4 to 9.14, are therefore highly localised. Paragraph 9.11 of the LIR refers to 'impacts on residents', although landscape receptors are considered as a resource in their own right according to LVIA guidance, and effects on people are considered separately under visual assessment.

1.13 Paragraphs 9.16 and 9.17 refer to the TAN 8 Strategic Search Area, though this has now been replaced by the 'Pre-Assessed Area' under the recently adopted National Development Framework (NDF).⁴ This is shown in Figure 5.30 accompanying the request to vary the DNS application, and shows that the whole site is within the Pre-Assessed Area.

1.14 Policy 17 of the NDF states that: *"In Pre-Assessed Areas for Wind Energy the Welsh Government has already modelled the likely impact on the landscape and has found them to be capable of accommodating development in an acceptable way. There is a presumption in favour of large-scale wind energy development (including repowering) in these areas, subject to the criteria in policy 18."*

1.15 Policy 18 does not include consideration of landscape impacts for proposals within a Pre-Assessed Area, although it does include consideration of *"visual impacts on nearby communities and individual dwellings."*

1.16 Finally in relation to landscape effects, BCBC highlight the potential of the proposed development to impact on the SLA designation. In discussing mitigation by design, it is suggested at paragraph 9.21 that *"most of the changes have been made in response to technical issues relating to geological instability and radio links rather than the impacts on the landscape."* In fact a number of changes to the layout were made in response to landscape (and visual) effects, as set out in ES paragraphs 2.37 – 2.40. Key changes that were specifically designed to provide landscape and visual mitigation included the repositioning of several turbines away from the Ogmored valley, the removal of turbine 8, and the reduction in tip height of three of the turbines.

1.17 Paragraph 9.22 of the LIR acknowledges the *"significant wind farm development"* that has taken place within and adjacent to the SLA, and suggests that the *"capacity of this landscape to accommodate further development must be a significant consideration."* The concept of the landscape having an inherent 'carrying capacity' for development is now somewhat dated, with guidance from Natural England and others preferring the term sensitivity.⁵ The sensitivity of a landscape to change can be objectively assessed, and has been within the LVIA as noted above.

1.18 An assessment of 'landscape capacity' must also consider the need for development and the acceptability of landscape change, and so cannot be objectively assessed on the sole basis of landscape attributes. This assessment would have to consider the wording of NDF Policy 17 in relation to

³ TACP (2010) Designation of Special Landscape Areas. Bridgend County Borough Council.

⁴ Welsh Government (2021) Future Wales: The National Plan 2020.

⁵ See for example Natural England (2019) An Approach to Landscape Sensitivity Assessment. Page 7.

the Pre-Assessed Area which now covers the site of the proposed development.

1.19 In summary, BCBC do not state that any of the assessed impacts on the landscape character of the area are unacceptable in nature. The LIR largely agrees with the approach and findings of the LVIA, which concludes that the effects of the proposed development on landscape character will be localised to an area within 2 km of the turbines.

Effects on Visual Amenity

1.20 At paragraphs 9.24 to 9.31, BCBC discuss the potential for 'visual dominance', which may affect the residential amenity or 'living conditions' at nearby properties, although they do not name any specific locations where they believe this could be the case.

1.21 BCBC correctly state, at 9.27, that *"if a wind farm is present in main views from receptors that this in itself does not demonstrate material harm to living conditions."* However, it is also the case that a significant effect on visual amenity, as experienced by residential receptors, does not demonstrate material harm to living conditions.⁶

1.22 Wind farm applications may be accompanied by a Residential Visual Amenity Assessment (RVAA) which provides evidence in relation to these effects. No RVAA was undertaken for the proposed development, as it was considered *"not likely to be so overbearing or dominating as experienced from any individual property as to result in unacceptable living conditions"* (ES paragraph 5.34). RVAA was not requested by BCBC (or any other consultee) during consultation on the approach to LVIA (see ES Table 5.1).

1.23 In 2019, after the completion of the LVIA, the Landscape Institute published good practice guidance on this topic. The guidance makes clear that residential visual amenity should not be confused with residential amenity or living conditions. Effects on the latter are a planning matter and require consideration of a range of other factors.⁷

1.24 The stated purpose of RVAA is to determine whether effects on residential visual amenity are such that there may be implications for residential amenity as a whole: this is termed the Residential Visual Amenity Threshold. The guidance does not define how this threshold can be determined, but offers a range of considerations (paragraph 4.14), including:

- Proximity to the development;
- Nature and direction of the view;

- Aspect of the property; and
- Scale of change in the view.

1.25 These points are also summarised at paragraph 9.27 of the LIR. The following paragraph refers to the LVIA, which predicts significant effects on views from Blaengarw to the south-west, and Nant-y-moel and Price Town to the south-east. The photomontage view for Viewpoint 5, Ogmores Terrace, Nant-y-moel, is included in the LIR: this can be viewed at full size in ES Figure 5.16.

1.26 Paragraph 9.30 of the LIR goes on to state that: *"consideration must be given as to whether the cumulative impact of the development together with the Pant y Wal scheme, above the eastern valley side, would so change the views and outlook for residents as to diminish their living conditions and amenities."*

1.27 Within Nant-y-moel, the closest street is Garon Terrace, just over 1.2 km south-west of turbine 6. Houses here, and in neighbouring Llewellyn Street, face east away from the wind farm, and are at the foot of a steep wooded slope. More open views may be available from houses on Station Road and on the A4061, as these houses face west, around 1.3-1.5 km from turbine 6. The turbines will be to the north-west, set back on the slope, and would not be 'dominant' in main views from these houses due to distance, angle of view, and intervening landform and woodland.

1.28 Viewpoint 5 is around 1.9 km from the wind farm, in a location chosen for the open outlook across the houses. Other views are contained within the narrow streets of the village. The orientation of the valley means that most houses face to the south-west, therefore the turbines are unlikely to be seen in main views.

1.29 From Price Town, more of the turbines are theoretically visible, and a small number of houses have views oriented to the north-west towards the site. However, these houses are over 2 km from the closest turbine, which will be set back on the ridge and as such is unlikely to be visually dominant.

1.30 Pant y Wal Wind Farm is visible on the ridge to the south-east of Price Town, in the opposite direction of view to Upper Ogmores. The Pant y Wal turbines are around 1.6 km from houses in Price Town and 2.2 km from Viewpoint 5. Due to the topography and orientation of the settlements, houses that have views towards Pant y Wal are unlikely to have views of Upper Ogmores, and vice-versa, although both wind farms will be visible as people move around the settlement.

1.31 The effects of the proposed development on views from these settlements, including consideration of Pant y Wal, are

⁶ Landscape Institute (2019) Residential Visual Amenity Assessment. Technical Guidance Note 02/19. Paragraph 1.6.

⁷ Landscape Institute (2019) Residential Visual Amenity Assessment. Technical Guidance Note 02/19. Paragraph 1.8.

described at paragraphs 5.140-5.141 of the ES. Although significant effects are predicted, there is no indication that these effects would be so overwhelming at any dwellings, as to trigger the Residential Visual Amenity Threshold, and therefore there are no substantive implications for the living conditions of residents of Nant-y-moel and Price Town.

1.32 Paragraph 9.31 of the LIR notes that the LVIA predicts significant effects at Blaengarw, and recommends that the visual impacts on properties at Pwllcarn Terrace are considered.

1.33 The north end of Pwllcarn Terrace is around 1.2 km to the south-west of turbine 1. The terrace faces south-east across the valley, while the turbines would be seen in views north-east towards the head of the valley. Viewpoint 4 illustrates the appearance of the wind farm from a park within the village, and a house near Pwllcarn Terrace can be seen in the left hand side of the view in Figure 5.15.2 of the ES. From Pwllcarn Terrace itself, turbines 1 and 7 will be visible at the head of the valley, set back from the ridge, with turbine 2 seen lower on the skyline and other turbines not visible. Turbines will be visible to people moving between Pwllcarn Terrace and Blaengarw, but are not considered to be visually dominant in main views from any properties. Effects would not be so overwhelming at any dwellings as to trigger the Residential Visual Amenity Threshold.

1.34 Paragraph 9.32 refers to significant effects on recreational receptors, and these are as described in the LVIA. Paragraph 9.33 appears to confuse significant effects on views with effects on living conditions, stating: *"the proposed development will have a negative impact on the living conditions of residents of the Upper Ogmere Valley and the users of the recreational receptors at Mynydd Llangeinwyr and Craig Ogwr."* It is not possible to affect living conditions of recreational receptors, and it is assumed this should read 'impact on visual amenity', as is described in the LVIA. The LVIA discusses effects on visual amenity at settlements in paragraphs 5.138-5.145 of the ES, and effects on visual amenity of recreational receptors at paragraphs 5.146-5.152.

1.35 The LVIA recognises that the landscape and visual effects are considered to be adverse, or negative. Paragraph 5.24 in Appendix 5.2 to the ES states that *"taking a precautionary stance, potential effects are assumed to be adverse unless otherwise specifically stated in the text."*

1.36 After raising the prospect of the turbines being visually dominant, BCBC appear to conclude at paragraph 9.30 that the turbines would not 'dominate outlook'. BCBC do not state that the identified effects are unacceptable, and the LIR presents no evidence to suggest that there will be any effects on living conditions as a result of views of the wind turbines. The findings of the LVIA can therefore be considered reliable.

Neath Port Talbot LIR

1.37 NPTC set out their views on landscape and visual effects in section 8 of their LIR, drawing on the findings of the LVIA in relation to receptors located within Neath Port Talbot.

1.38 At paragraph 8.8 of the LIR, NPTC conclude that *"through the introduction of substantial new manmade structures into the landscape, the development would have a negative impact upon the landscape character areas within NPT."*

1.39 At paragraph 8.15 of the LIR, in relation to visual effects, NPTC state: *"whilst the development will introduce more wind turbines to the area, views to the proposed development would be read in conjunction with the existing Llynfi Afan wind farm. Nevertheless the introduction of seven substantial new manmade structures within the area would still be considered to have a negative impact."*

1.40 As above, the LVIA recognises that the landscape and visual effects are considered to be adverse, or negative. NPTC therefore do not appear to substantively disagree with the content or findings of the LVIA, which confirms that:

- there will be no significant effects on landscape character areas within Neath Port Talbot; and
- significant (moderate) effects on views within Neath Port Talbot will be limited to road users and recreational users at the hairpin bend on the A4107 (Viewpoint 1) and residential receptors in the uppermost part of Blaengwynfi (Viewpoint 6), with other visual effects in Neath Port Talbot being not significant.

Other comments

1.41 Natural Resources Wales has not commented on the landscape and visual effects of the proposed development.

1.42 Other than general objections, only one specific landscape and visual issue has been raised in other comments, which concerns effects on the view from Pwllcarn Terrace, Blaengarw. This location is discussed in relation to the BCBC LIR above.

Conclusion

1.43 The LIRs, and other submitted comments, do not raise new issues that have not been fully addressed in the LVIA. Although both Councils identify negative effects on landscape character and visual amenity, these are as set out in the LVIA, and will be limited in nature and extent. The LIRs indicate general agreement with the method, scope and baseline of the LVIA. BCBC draw attention to potential effects on landscape character and the 'capacity' of the SLA, although these must be considered in light of the adopted NDF. BCBC also raise

the possibility of impacts on 'living conditions', although there is no evidence that the visual effects of turbines at any property will be so overwhelming that the Residential Visual Amenity Threshold would be triggered.

1.44 In summary, the LIRs do not present substantive objections to the landscape and visual effects of the proposed development, although they raise points of detail that have been covered within the LVIA. The LVIA submitted within the ES can be considered a robust and reliable statement of the effects of the proposed development.