



PARC CENEDLAETHOL BANNAU BRYCHEINIOG BRECON BEACONS NATIONAL PARK

Sent by e-mail to:

Neath Port Talbot County Borough Council
Mr. Steve Ball <s.ball@npt.gov.uk>

Powys County Council
<planning.consultations@powys.gov.uk>

Date: 23 April 2021

Officer: Chris O'Brien

Your Ref: NTP: 2021/0327
PCC: 21/0559/OUT

Our Ref: 21/19785/FRI /
21/19803/FRI

Proposal: *Global Centre of Rail Excellence incorporating two electrified high-speed test track loops, associated infrastructure, access works, demolitions, land reformation and landscaping and on land at and surrounding Nant Helen Surface Mine and Onllwyn Distribution Centre.*

Thank you for writing to seek the views of the Brecon Beacons National Park Authority on this planning application.

In line with Part I (10) of the Brecon Beacons National Park Authority Scheme of Delegation (*delegation to the chief executive and the planning and heritage manager*) as amended and approved by NPA 22 October 2020, my response has been authorised as that of the Authority by Stephanie Evans, Transition Director, Brecon Beacons National Park Authority.

My response is informed by a site visit undertaken on 14 April 2020 to:

- The trig point on Cribarth (SAM & Registered Common Land) (approx. SN 828143); and,
- Public Footpath north east of Henrhyd falls, near the mast shown on the OS map (approx. SN 852124).

Made during the pre-application stage, the National Park Authority's previous observations are available in:

- **Environmental Statement scoping** by letter on 18 November 2019; App Ref: P2019/5455 (NPA Ref 19/17917/FRI)
- **Pre-application consultation** by e-mail on 14 October 2020; (NPA Ref: 20/19086/SPACON)

Having identified the key issues as landscape and visual impacts, the Authority's pre-application consultation response concluded that the Authority had very significant concerns about adverse impacts on the following special qualities of the National Park, as defined in the [National Park Management Plan 2010 – 2015 managing change together](#):

- Sweeping grandeur and outstanding natural beauty;
- A National Park offering peace and tranquillity with opportunities for quiet enjoyment, inspiration, relaxation and spiritual renewal; and,
- Working, living "patchwork" of contrasting patterns, colours, and textures.

By undertaking a nighttime assessment and detailing reasons why additional mitigation planting would be ecologically inappropriate, the application has responded positively to or provided suitable clarification in respect

of some of the issues previously raised by the Authority.

However, whilst noting the National Park Authority's very significant concerns about the residual adverse effects on landscape, the applicant's position is that these are to be weighed by the decision maker in the overall planning balance.

Section 9 of volume I of the environmental statement (March 2021) (ES) provides an assessment of the likely landscape and visual effects arising from proposed development; it considers changes to the landscape character within the zone of influence, and changes to features or composition of views.

However, the ES does not address the likely effects of the development on tranquillity experienced from significant viewpoints and footpaths (public rights of way) in the National Park, or the associated cultural ecosystem services (benefits) derived from tranquillity.

The definition of Welsh Government and Natural Resources Wales, and which was adopted for [The State of Natural Resources Report 2016](#) is: *'Tranquillity is an untroubled state, which is peaceful, calm and free from unwanted disturbances. This can refer to a state of mind or a particular environment.'*

Most significantly, this issue must be considered from viewpoint 3 "the Trig point on Cribarth" and the approach to it on the footpath following the line of the former tramway.

Likely changes to features or composition of views (alone) from this viewpoint are reported as:

- From construction: **Major (Adverse)** (see ES para. 9.8.20)
- From operation year 1: **Major (Adverse)** (see ES para. 9.8.94)
- From operation year 15: **Moderate (Adverse)** (see ES para. 9.8.97)

On my site visit, I found that noise from the current workings at Nant Helen impacted adversely the tranquillity and enjoyment I experienced when climbing from Abercrave to "the Trig point on Cribarth" along the footpath, which appeared well used (Public right of way code 42/44/1 and 31/19/1)¹. The noise I found distracting and competing with birdsong and calls.

Against a future baseline (post restoration), Section 10 of the ES (Noise and vibration) does not consider or quantify the likely changes to levels, frequency and regularity of noise (in different weather conditions) from this route or viewpoint in the Brecon Beacons National Park. The impact of the noise mitigation proposed is therefore uncertain in this location.

If found to be significant, this would magnify the likely adverse impact already identified on the composition of the view from "the Trig point on Cribarth" and thereby impinge on the following special quality of the National Park in that location:

'A National Park offering peace and tranquillity with opportunities for quiet enjoyment, inspiration, relaxation and spiritual renewal.'

Section 11A (2) of the National Parks and Access to the Countryside Act 1949 is clear that:

*In exercising or performing any functions in relation to, **or so as to affect**, land in a National Park, any relevant authority shall have regard to the purposes specified in subsection (1) of section five of this Act and, if it appears that there is a conflict between those purposes, shall attach greater weight to the purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the area comprised in the National Park.*

(bold underlined emphasis added).

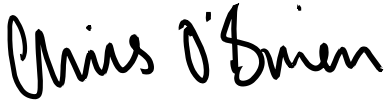
¹ See: <https://www.breconbeaconsparksociety.org/self-guided-walks/the-cribarth-ridge/>

The purposes to which you must have regard in determining the application are:

- (a) of conserving and enhancing the natural beauty, wildlife and cultural heritage of the National Park; and*
- (b) of promoting opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.*

Further work is necessary to qualify the impact of the proposal on the amenity of the National Park; in particular whether proposed noise mitigation will act, against a post restoration baseline, to safeguard the tranquility experienced at “the Trig point on Cribarth” and the approach to it from Abercrave.

Yours faithfully,



Stephanie Evans, Transition Director

Chris O'Brien MRTPI, Senior Policy Officer

Yr ydym yn croesawu gohebiaeth yn y Gymraeg. Bydd unrhyw ohebiaeth yn y Gymraeg yn cael ei ateb yn y Gymraeg a ni fydd unrhyw gyswllt trwy gyfrwng y Gymraeg yn arwain at oedi yn y mater sy'n cael ei drin.

We welcome correspondence in Welsh. Any correspondence in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in the matter being dealt with.