



Land at Former Edwards Site, Llandarcy, Neath-Port Talbot SA10 6JY

Planning Application for Proposed Asphalt Plant

Landscape and Visual Appraisal

Prepared for: **Gerald D Harries & Sons Ltd**

Prepared by:

John Campion Associates Limited

2 Redwood Drive, Aston on Clun

Craven Arms, Shropshire SY7 8EZ

01588 660109

jca@larchgroup.co.uk

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1 INTRODUCTION

- 1.1 John Campion Associates Limited (JCA) have been commissioned by Gerald D Harries & Sons Ltd, under instruction from Asbri Planning, to prepare a Landscape and Visual Appraisal (LVA), in support of a full planning application for the proposed development of an asphalt plant with associated infrastructure, on land at the Former Edwards Site, Llandarcy, within the administrative area of Neath-Port Talbot Borough Council.
- 1.2 This Appraisal has been prepared by John Campion, Chartered Landscape Architect, Director of John Campion Associates Limited (JCA). He has been involved in a wide range of commissions, including major infrastructure, and building projects within designated landscapes. He has provided strategic landscape advice for major rural design projects, including within designated landscapes, and worked extensively throughout Wales on preparing and reviewing environmental impact assessments for major planning projects, especially for Natural Resources Wales and its predecessor authority, the Countryside Council for Wales. He has also appeared as a landscape expert witness for both of those government advisory bodies. He has lectured on Landscape Design, Management and Professional Practice at the University of Manchester, Edinburgh College of Art (Heriot-Watt University), Sheffield University and Bristol University. For over twenty years, he was an examiner for the final professional practice examinations of the Landscape Institute.
- 1.3 Anthony Jellard, an Associate Consultant to JCA, has contributed to the appraisal. He is a Chartered Landscape Architect with a detailed knowledge of the local landscape and extensive experience of undertaking landscape character assessments within Wales. He has worked on a wide range of development projects, including working within designated landscapes, embracing environmental assessments, housing schemes, leisure, and commercial projects.

2. SCOPE OF THE REPORT

- 2.1 This LVA has been prepared with reference to guidance, as far as it is appropriate to an appraisal of this nature, contained in:
- *“Guidelines for Landscape and Visual Impact assessment” (3rd Edition, 2013)*, published by the Landscape Institute and the Institute of Management and Environmental Assessment (GLVIA3).
GLVIA3 notes that, in an appraisal such as this for the proposed development, *‘the process is informal and there is more flexibility in the approach that is taken [compared to a full LVIA] but the essence of the approach still applies’*;
 - *LANDMAP Methodology: Guidance for Wales* (2013) published by Natural Resources Wales;
 - *“Making Sense of Place – Landscape Character Assessment Guidance,”* (2002) published by the Countryside Agency and Scottish National Heritage; and
 - *“Topic Paper 6: Techniques and Criteria for Judging Capacity and Sensitivity”* (Scottish Natural Heritage and the Countryside Agency, 2004).

Consultations

- 2.2 Pre-Application Consultations have been held with officers from the Neath-Port Talbot Borough Council (the Council), including an on-line meeting held on 23rd July 2021. A formal Pre-Application response was received from the Council in the form of an email message address to Asbri Planning dated 10th June 2021, the author being Helen Bowen.
- 2.3 A formal Landscape & Visual Impact Assessment (LVIA) has not been required by the Council through the mechanism of an Environmental Impact Assessment. This LVA is considered to be both proportionate and appropriate to be submitted in support of a detailed planning application for the site development as proposed. It is intended to address the Council's concerns over the landscape and visual aspects of the proposed development, and to assess The Site's capacity to accept the proposed development of the nature and extent envisaged without detriment to the local landscape character or without any adverse effects on significant views.

3. METHODOLOGY

Study Area

- 3.1 The Study Area for the assessment has been defined in accordance with the guidance provided in GLVIA3, which advises that the Study Area for a landscape assessment needs to cover *'The Site itself and its wider landscape context, within which the proposed development may influence landscape character'*.
- 3.2 Given the nature and the particular characteristics of the proposed development, to be sited within an existing industrial and commercial area contained by surrounding densely wooded landform and the M4 motorway on a high embankment - and with no established settlement or any individual residential properties in close proximity – no substantial effects are anticipated beyond 0.25 kilometres from the edge of The Site.
- 3.3 Wherever possible, the analysis has been objective, the residual effects quantified, and any subjective judgements have been described in clearly defined terms. Both objective analysis and subjective professional judgements are required for effective, high quality landscape and visual analysis.

Surveys

- 3.4 Detailed desktop reviews were carried out of published material relevant to the landscape of The Site and its wider context. Material included maps, photographic evidence, published historic landscape and cultural data, and adopted local planning policies and supplementary planning guidance. Fieldwork enabled the recording the nature and extent of various landscape elements such as topography, land use and vegetation. From the analysis of this combination of material, it was possible to carry out an evaluation of landscape character and assess the predicted effects of the proposed development.

Assumptions

- 3.5 Reference to 'The Site' should be interpreted as the area contained within the red line drawn to identify the proposed planning application boundary for the proposed development of The Site.

- 3.6 Predominantly, the visual assessment field survey work has been undertaken from within publicly accessible areas only: where included, views from private properties and commercial buildings are approximate and have been estimated, with reference to the nearest publicly-accessible location from which assessment could reasonably take place. Although the Council has specifically requested that an assessment viewpoint be located on the nearby section of the M4 Motorway be included¹, previous technical consultations with the highways engineering section of Neath-Port Talbot Borough Council - which acts as the highways managing agent on behalf of the Welsh Government for the M4 Motorway - confirmed that is an offence to stop on a motorway hard shoulder for the purpose of taking photographs. If an application were to be received by them for a licence to undertake such work, it would be unlikely to be granted. Even if such a licence were to be granted, the traffic management provisions which would need to be put in place to safeguard the licensed works would be disproportionately expensive. Consequently, no visual assessment viewpoint located on the motorway has been included in this LVA. This position was made clear by John Campion at the Pre-Application on-line meeting held on 23rd July 2021.

Assessment Viewpoints

- 3.7 A series of potential viewpoints, based on desktop analysis of mapped information, was selected to be representative of the various groups of receptors whose views may be affected by the proposed development. The focus, when selecting viewpoints, was on those from which *'likely significant effects'* might be experienced and taking *'an approach that is proportional to the scale of the project that is being assessed'*, in line with GLVIA3 as current best practice guidance; although it should be noted that the term 'significant' is not defined within this guidance, nor indeed within the current Environmental Assessment Regulations where a formal landscape and visual impact assessment is required. This approach involves using professional judgement and, for this appraisal, we have identified potential locations from where likely *substantial* effects could occur. These candidate viewpoints were then reviewed in the field and refined as necessary. The Pre-Application Meeting on 23rd July 2021 revealed that the Council does not employ an in-house landscape officer for planning consultations, so no dialogue with them in respect of assessment viewpoint selection has taken place.
- 3.8 A computer-generated Zone of Theoretical Visibility (ZTV) has not been produced as part of this appraisal. The proposed development site is in a low-lying location (c.7 metres Above Ordnance Datum) which is extremely well contained by combination of surrounding landform – including the nearby high M4 Motorway embankment - and existing dense and continuous mature woodland vegetation; and it is partially screened by nearby industrial and commercial buildings. The key to establishing an accurate baseline of visibility was the fieldwork survey, which was carried out by two experienced professional landscape architects - each with a detailed prior local knowledge of the local landscape - and making suitable allowances for the presence of leaf cover on deciduous trees and shrubs and its effects on potential visibility. In respect of the latter concern, the site and its locality were visited during both winter (December 2019) and summer (September 2021) thus allowing for the effects of leaves on

¹ Pre-Application Response from the Council by Helen Bowen dated 10th June 2021 - section on Visual Amenity

deciduous vegetation on the degree of visibility of the proposed development to be fully taken into consideration.

Landscape Receptor Sensitivity

- 3.9 The term 'landscape receptor' means an element or a group of elements which will be directly or indirectly affected by the proposals. Landscape receptors are physical elements or attributes of the landscape that could be affected by the development, such as landscape character, landform, water courses, woodland, groups of trees or hedgerows, land uses and field boundaries.
- 3.10 Prior to the advent of the landscape character assessment procedure now used by local authorities, the sensitivity of a given landscape receptor was often defined in terms of landscape value, which took the form of national planning designations - such as National Parks and Areas of Outstanding Natural Beauty - or local designations, such as Areas of Great Landscape Value or Special Landscape Areas. Recent assessment guidance has placed greater emphasis on those landscapes which do not benefit from national or local designations, but which may be valued locally for particular reasons.
- 3.11 The sensitivity of landscape receptors is assessed by combining judgements on the susceptibility to the type of change proposed and the value attached to the landscape, in accordance with GLVIA3, and defined in *Table 1, below*:

Table 1: Sensitivity of Landscape Receptors

Sensitivity	Landscape Type or Feature
High	An area possessing a particularly distinctive sense of place, in good condition, or highly valued for its scenic quality and/or landscape character, for example National Parks, Areas of Outstanding Natural Beauty, Heritage Coasts, Grade 1 Listed Buildings and historic parks; or an intact feature of high intrinsic value; [such as prominent trees or tree groups, forming a critical part of the landscape pattern or historic landscape pattern]; landscapes or features with a low tolerance to change of the type identified.
Medium	An area with a well-defined sense of place and/or character in moderate condition; or an area valued by designation at a local or regional level; or a partly damaged feature of high intrinsic value; or an intact feature of moderate intrinsic value [such as prominent trees or tree groups which contribute to the character of The Site, screening of views, landscape, or historic landscape pattern]; a landscape or feature which is partially tolerant of change of the type identified.
Low	An area with a poorly defined sense of place, and/or landscape character in poor condition, often not valued for its scenic quality; or a feature of low intrinsic value [such as trees and species-poor hedgerows of no special quality or function]; or a landscape or feature that is tolerant of change of the type identified.

Magnitude of Landscape Effect

- 3.12 The criteria used to assess the magnitude of landscape effects (including those on landscape character and historical landscape character and setting) are based upon the geographic extent of the area influenced, the predicted amount of physical change - and its duration and reversibility - that will occur as a result of the proposals, as described in *Table 2, below*. These are based on best practice examples and experience:

Table 2: Magnitude of Landscape Effect

Landscape Effect Magnitude	Description
Major adverse landscape effect	The proposals will be at <i>complete variance</i> with the scale, landform, pattern, or character of the landscape, and/or would <i>diminish or destroy</i> the integrity of characteristic features and their settings.
Moderate adverse landscape effect	The proposals will be <i>at odds</i> with the scale, landform, pattern, or character of the landscape and/or would cause a <i>noticeable diminution</i> of the integrity of characteristic features and their settings.
Minor adverse landscape effect	The proposals will <i>not quite fit into</i> the scale, landform, pattern, or character of the landscape and/or would cause a <i>perceptible diminution</i> of the integrity of characteristic features and their settings.
Negligible adverse landscape effect	The proposals will create a <i>barely perceptible diminution of the integrity of characteristic features and their settings</i> .
No change	The proposals will <i>not cause any change</i> to the scale, landform, pattern, or character of the landscape.
Negligible landscape beneficial effect	The proposals will provide a <i>barely perceptible enhancement of the integrity of characteristic features and their settings</i> .
Minor landscape beneficial effect	The proposals will achieve a <i>degree of fit</i> with the scale, landform, pattern, or character of the landscape and <i>make a minor contribution to enhancing</i> the character, sense of place or integrity of the landscape.
Moderate landscape beneficial effect	The proposals <i>will fit well with</i> the scale, landform, pattern, or character of the landscape and would <i>noticeably enhance</i> the character, sense of place or integrity of the landscape.
Major landscape beneficial effect	The proposals <i>will fit very well with</i> the scale, landform, pattern, or character of the landscape and would <i>restore or greatly enhance</i> the character, sense of place or scale of the landscape.

Sensitivity of Visual Receptors

- 3.13 The term 'visual receptor' means *people* - individuals and/or defined groups of people - who have the potential to be affected, directly or indirectly, by the proposals. Visual receptors are at accessible viewpoints, the sensitivity of which would be dependent on the location, the activity and expectations of the viewer, and the importance of the view. These would include viewpoints available to the users of outdoor facilities, sporting activities and users of public rights of way; viewpoints from landscape features and recognised beauty spots; viewpoints outside local properties (which would represent the view for residents); and viewpoints available to people travelling through the landscape. Views may be glimpsed and fleeting, or open and sustained.
- 3.14 The determination of the sensitivity of the visual receptors is a matter of professional judgement. The guidance in GLVIA3 recommends that the assessment of sensitivity will be dependent on:
- the location and context of a viewpoint;
 - the expectations and occupation or activity of the viewer;
 - the importance of the view (which may be determined with respect to its popularity, or the numbers of people affected, its appearance in guidebooks, on tourist maps, and in the facilities provided for its enjoyment and references to it in literature or art); and
 - the scale of the view and the extent of visibility.

Table 3: Sensitivity of Visual Receptors

Sensitivity	Visual Receptor
High	Viewers with a particular <i>interest</i> in their visual environment and/or prolonged viewing opportunities; for example, residents within their homes or in the curtilage of their property; or visitors to National Parks, Areas of Outstanding Natural Beauty, or Heritage Coasts; or walkers and riders on National Trails or on promoted regional trails.
Medium	Viewers with a <i>general interest</i> in their visual environment; for example, visitors to regionally or locally valued countryside - including Access Land and National Trust Land not within a designated landscape - and users of local open space facilities, and walkers or horse riders on local public rights of way which are not specifically promoted for their visual interest.
Low	Viewers with a <i>passing or momentary interest</i> in their everyday surroundings, for example motorists or people at their place of work, whose attention is focussed on other activities and who are therefore less susceptible to change.

- 3.15 The magnitude of visual effects depends on factors such as separation distance, the time of day, the season, the prevailing weather conditions, elevation, and aspect, as well as the duration and context of the view. The predicted level of effect has been assessed during good visibility and light conditions, therefore with the best possible view of the proposals. All assessment viewpoints were visited during December 2019 and September 2021. Proper

allowance has therefore been made for the likely visibility of the proposed development during the winter aspect, as noted at *paragraph 3.8, above*.

- 3.16 The following scale has been adopted for assessing the magnitude of visual effects, based on the degree of change to the view, or to the composition - see *Table 4, below*. This is based on best practice examples and previous experience.

Table 4: Magnitude of Visual Effect

Visual Effect Magnitude	Description
Major adverse or beneficial visual effect	The proposals will cause <i>a dominant or complete change</i> to the composition of the view, the appreciation of the landscape character, or the ability to take or enjoy the view.
Moderate adverse or beneficial visual effect	The proposals will cause a <i>clearly noticeable change</i> to the view, which would affect the composition, the appreciation of landscape character or the ability to take in or enjoy the view.
Minor adverse or beneficial visual effect	The proposals will cause a <i>perceptible change</i> to the view, but which would not materially affect the composition, the appreciation of landscape character, or the ability to take in or enjoy the view.
Negligible adverse or beneficial visual effect	The proposals will cause a <i>barely perceptible change</i> to the view, which would not affect the composition, the appreciation of landscape character, or the ability to take in or enjoy the view.
No change	The proposals will cause no change to the view.

Assessment of Overall Level of Effect

- 3.17 The scale shown in *Table 5, below*, has been adopted to assess the overall level of both landscape and visual effects and whether they are considered to be adverse, beneficial, or neutral. (*Note that neutral effects would be those where there may be a landscape or visual change, but the overall weighting of positive and negative effects is very finely balanced*). The basis of this scale is derived from professional experience. In accordance with good practice, the main aim in the reporting of the identified effects is to describe the key landscape and visual issues which are relevant to determining this planning application; for the purposes of this assessment, such effects are referred to as being *substantial*, and include overall landscape and visual effects that are assessed as being moderate or greater. It should be noted that the term 'residual effects' used in this assessment refers to those effects which are predicted, having taken into account all the proposed mitigation measures.

Table 5: Assessment of Overall Landscape or Visual Level of Effect

(It should be noted that some of assessment values below, e.g. moderate-minor, are expressed as a continuum. In these instances, our professional judgement is that the assessment of the level of effect is not sufficiently weighted as to be defined by a single value of, say, moderate or minor. Our approach follows GLVIA 3 guidance on the importance of professional judgement in landscape and visual assessment)

Magnitude of Change	Receptor Sensitivity		
	High	Medium	Low
Major	Major Adverse/Beneficial	Moderate Adverse/Beneficial	Minor Adverse/Beneficial
Moderate	Major-Moderate Adverse/Beneficial	Moderate-Minor Adverse/Beneficial	Minor Adverse/Beneficial
Minor	Moderate-Minor Adverse/Beneficial	Minor Adverse/Beneficial	Minor-Negligible Adverse/Beneficial
Negligible	Minor-Negligible Adverse/Beneficial	Negligible Adverse/Beneficial	Negligible Adverse/Beneficial

Note: Those cells shaded in blue are considered to be substantial effects.

4. BASELINE CONDITIONS

- 4.1 The baseline condition information is assembled by a process which combines the results of desktop research with those of detailed field observation and analysis.

Landscape Baseline

Location and Land Use

- 4.2 The Site lies within the Former Edwards Site, an established industrial and commercial area which does not form part of any settlement. The Site is located around 0.8km to the south-east of the closest part of the settlement of Llandarcy, and around 1.2km to the south of Junction 43 of the M4 Motorway (A465T to Merthyr Tydfil, and B4290 to Llandarcy and Jersey Marine) (see Appendices, Figure JCA/01: **Landscape Context & Viewpoint Locations**).
- 4.3 The Site for the proposed development consists of a single, largely rectilinear plot of land within the location known as the Former Edwards Site (FE Site), which is comprised of 28 industrial/commercial units of varying size. The FE Site is located immediately to the south-west of the M4 Motorway, near the western end of its complex junction with the A48 (Junction 42), to the south-west of Llandarcy. In plan form, it is a long rectangle with a triangle added to the south-western side of its longer axis; the longer axis runs parallel to the alignment of the nearby M4 Motorway - that is, north-north-west to south-south-east. Access to the FE Site is via a single dedicated road leading eastwards off the B4290 Llandarcy to Jersey Marine road, which is carried over several railway lines and the Tennant Canal on a wide concrete

span bridge with solid concrete parapets. The FE Site boundary is demarcated on all sides by a tall steel palisade security fence with a galvanised finish.

- 4.4 The proposed development Site is comprised of a single parcel of land located within the central southern part of the FE Site. The Site itself is almost rectangular in plan, with two long parallel sides, and an angled boundary along the south-eastern side where it adjoins a small tidal creek known as Red Jacket Pill. It is currently in industrial/commercial use. The Site is approximately 0.774 hectares in extent. Adjoining land use to the north-west, north-east and south-west is industrial/commercial. To the south-east, is Red Jacket Pill, which abuts the south-eastern site boundary, beyond which is an extensive tract of mature dense woodland clothing the steeply rising ground near Junction 42 of the M4 Motorway (A48 to Swansea and Llansawel/Briton Ferry). Close by to the north-east is the M4 Motorway, here carried on a high embankment and crossing Red Jacket Pill by way of a large concrete viaduct. Beyond the motorway is the western bank of the tidal estuary of the River Neath (Afon Nedd). The south-western boundary of the wider industrial/commercial site is bounded by a narrow belt of mature woodland, beyond which are the Tennant Canal and operational railway lines – each flanked by belts of mature woodland of varying density – and the B4290 Llandarcy to Jersey Marine public road lies beyond these features.

Topography

- 4.5 The topography of the whole of the FE Site, and so that of the proposed development site, is noticeably flat. From interrogation of the Ordnance Survey 1:25000 scale map of the locality, it would appear that the elevation of the FE Site is around 7 metres Above Ordnance Datum (AOD).
- 4.6 Unusually, the landform on all sides of the FE Site is conspicuously man-made. To the south-west, the FE Site is bordered by a wide operational railway line corridor (3 separate tracks) and the adjacent disused Tennant Canal, with the towpath along its eastern bank. The whole of the north-eastern boundary of the FE Site has a backdrop dominated by the high embankment of the M4 Motorway, with several large gantry road signs spanning each carriageway and numerous tall lighting columns set along its central reservation at regular intervals. Close to the extreme south-eastern corner of the FE Site, the M4 Motorway is carried over Red Jacket Pill on a high concrete viaduct; and the eastbound and westbound slip roads leading to/from Junction 42, are carried on two separate lower viaducts over this watercourse. This narrow tidal creek flows in a straight line, running parallel with and adjacent to the FE Site's south-eastern boundary. Beyond the motorway, it flows through tidal flats into the main channel of the River Neath (Afon Nedd) around 230 metres to the east.
- 4.7 Beyond the motorway to the east are extensive tidal flats along both sides of the River Neath estuary and its tributary creeks. To the north-west and the south-west, beyond the railway and canal corridor and the B4290 road, the topography rises steeply to a height of 106 metres AOD to the south of the small established housing area at the southern edge of Llandarcy. Farmland occupies the open higher ground, but the south-east facing slopes of this land are densely clothed with mature woodland. To the south and south-west of the FE Site, again the topography rises abruptly, from south of the Tennant Canal and Red Jacket Pill, up to a height of 86m and 77m AOD, respectively. The high ground here is mostly occupied by the Earlswood Golf Course, but there is extensive dense and continuous woodland growing on most of the

north-west facing slopes. This high ground is also crossed by high-voltage overhead electricity lines carried on steel lattice towers, several of which break the skyline above the woodland. The western part of the extensive M4 Junction 42 cuts through this high land mass in a deep cutting, before crossing a short section of high embankment to meet the viaduct over Red Jacket Pill. The B4290 road, the railway lines, and the Tennant Canal pass through the conspicuous gap between these two areas of high ground which is comprised of very low-lying land, the southern area of which is part of Crymlyn Bog, an extensive wetland site. These characteristics are illustrated in some of the **Landscape Context Photographs** included in Figure JCA/03 In the Appendices.

Site Boundaries and Existing Site Vegetation

- 4.8 The Site is demarcated by a continuous tall steel security palisade fence with a galvanised finish. There is almost no vegetation cover within the Site, that present only being sporadic ruderal herbaceous cover along some sections of the base of the boundary fence. Naturalistic woody vegetation occurs immediately beyond the south-western boundary fence, bordering the course of Red Jacket Pill. These characteristics are illustrated in some of the **Landscape Context Photographs** included in Figure JCA/03 In the Appendices.

Existing Structures

- 4.9 There is a single, large two-storey building – currently in use as offices and workshops - located within the southern central area of The Site. This building is of a relatively modern design and constructed from brick, steel, and glass but it is unremarkable and utilitarian in appearance. The majority of the Site is covered by hardstandings of concrete or tarmac, many areas of which at the time of field survey were occupied by parked cars and commercial vehicles, including articulated lorry trailers and containers – refer to the photographs from **Viewpoint 1** at Figure JCA/04 in the Appendices.

Heritage Assets

- 4.10 This LVA deals only with the visual aspects and setting of heritage assets. It does not deal with the predicted effects on the value of any individual heritage asset. There are two Listed Buildings located in the near vicinity to the south of the FE Site, both related to man-made water features ² - see Figure JCA/01: **Landscape Context & Viewpoint Locations** in the Appendices. The 'River Lock and attached bridges at Red Jacket Pill' is a Grade II structure pre-dating the Tennant Canal, being part of a former locked navigable cut from the River Neath through to Swansea. The 'Weir on E side of Tennant Canal at Red Jacket Pill' is an engineer-designed overflow structure to allow excess canal water to drain towards the pill; this, too, is a Grade II structure. The nearest Listed Building is the 'River Lock and attached bridges at Red Jacket Pill' which is located around 50 metres to the south-south-west of the south-eastern boundary of The Site. The 'Weir on E side of Tennant Canal at Red Jacket Pill' is further away, being some 210 metres to the west-south-west of the extreme south-western part of the boundary to The Site. The visual setting of both of these heritage assets does not extend to include The Site.

² British Listed Buildings, Wales website interrogated 15th December 2020

Public Rights of Way

- 4.11 No public right of way crosses The Site. The Tennant Canal towpath, located nearby to the south-west, is publicly accessible. Adjacent to the northern side of the M4 Motorway where it passes the FE Site is a combined public footpath and cycleway, which links the public roads at Junction 43 with Llansawel/Briton Ferry to the east, utilising the viaduct which carries the A48 over the River Neath/Afon Nedd. This forms part of the National Cycle Route 4 (London to Fishguard). Extensive open views are obtainable to the north from this route, over the wide tidal river estuary towards Neath, and onwards up the lower section of the Neath valley to the high ground to the north, north-east and north-west. There are no views down into the FE Site from this route, which is at almost the same level as the motorway, because of the width of the motorway corridor embankment at this location – it is comprised of the dual three-lane carriageway, each side with a hard shoulder, and there are eastbound and westbound slip roads at the western approaches to Junction 42.

Public Roads

- 4.12 The main public road in the vicinity of The Site is the M4 Motorway, which lies adjacent to the north-eastern boundary of the FE Site. Along this section, the motorway is a very wide road corridor carried on a high embankment. The motorway crosses Red Jacket Pill on a high concrete viaduct. There are open views into The FE Site perpendicular to the direction of travel from the open westbound carriageway and the westbound slip road where they traverse the viaducts. North of Red Jacket Pill, views from the motorway into the FE Site are screened by a continuous belt of dense mature mixed coniferous and deciduous woodland vegetation growing on the motorway embankment, between the hard shoulder and the boundary fence to the FE Site.
- 4.13 To the south-west of the FE Site, beyond the Tennant Canal and the railway line corridor, is the B4290 public road linking Llandarcy with Jersey Marine. There are no views into the FE Site from this road because of intervening dense belts of woodland flanking the road, the railway lines, and the Tennant Canal, respectively.

Landscape Character Assessment

- 4.14 '*Landscape character*' is defined as a distinct and recognisable pattern of elements that occur consistently in a particular type of landscape and how people perceive it. It reflects particular combinations of geology, landform, soils, vegetation and land-use, and human settlement. It creates the particular 'sense of place' of different areas of the landscape. Landscape character has been examined through desk research, supplemented by inspection of the FE Site, the proposed development site, and fieldwork survey at various locations in the wider locality, to ascertain which areas would constitute the likely zone of visual influence of the proposed development at the FE Site.

National Landscape Character Areas

- 4.15 National Landscape Character Areas (NLCAs) form the broadest scale of landscape character assessment in Wales. The information published by Natural Resources Wales (NRW) records 48 discrete NLCAs. Amongst the uses which NRW provides are the following:
- '*a summary description and list of key characteristics linked to regional identity*'

- *short narratives capturing visual, geological, habitat, historic and cultural influences.*³

4.16 The Site lies within the identified NLCA 38, *Swansea Bay*. The Summary Description of this NLCA includes the following general observations:

*‘Character is urban and suburban with large housing and industrial estates’. ‘It is a busy, noisy, ambitious urban landscape with good road and rail links to capitals Cardiff and London.’*⁴

4.17 The Site’s context appears to reflect most of the stated key characteristics of NLCA38. *Table 6, below*, provides a useful illustration of the relevant stated ‘Key Characteristics’⁵ attributed to NLCA38, noting those characteristics which are evident in the wider landscape context of the proposed development site.

Table 6: NLCAs - Key Characteristics in relation to The Site

NLCA38 Swansea Bay	Commentary on the Site Landscape Context
<i>‘Narrow coastal plain – a long lowland area, of limited width in its middle section, between uplands and the sea, and opening out into wider lowland areas at either end.’</i>	The FE Site is isolated from the coastal plain largely by man-made features, especially the M4 Motorway on its high embankment.
<i>‘Estuaries – including those of the Rivers Loughor, Tawe, Neath and Ogmore.’</i>	The extensive tidal estuary of the River Neath/Afon Nedd is close by, but not visible from the FE Site, because of the intervening motorway embankment.
<i>‘Setting of steeply rising hills – in the central section around Port Talbot, and belonging to South Wales Valleys NLCA to the north.’</i>	Steep, densely wooded hills are located close by to the south-east, south-west and north-west of the FE Site.
<i>‘Urban areas - dominated by the city of Swansea and the coalescing towns of Llanelli, Neath and Port Talbot. Swansea, with its strong architectural heritage and cultural importance forms a regional focus. Housing and business planned in large estates.’</i>	The FE Site does not lie within an urban area but is an established industrial/commercial enclave located between Llandarcy and Jersey Marine. It is not visible from either of these settlements. Importantly, the FE Site is also not visible from Llansawel/Briton Ferry or Neath, because of the M4 Motorway embankment and intervening densely wooded high ground on both sides of the River Neath/Afon Nedd.
<i>‘Major transport corridor – with main road and rail lines linking settlements along the corridor, with associated movement, busyness and noise.’</i>	The wide M4 Motorway corridor dominates the local landscape in the vicinity of the FE Site and is a major source of traffic noise and light pollution. Nearby railway lines also contribute to the noisy and busy nature of the local environment.

LANDMAP

4.18 The LANDMAP system has been developed specifically for the assessment of character in the landscape of Wales. The system was developed by the Countryside Council for Wales (now Natural Resources Wales) and has been implemented in

³ NRW website entry interrogated at 22nd September 2021; date of information is given as March 2014

⁴ *Ibid.*

⁵ NRW website entry interrogated at 22nd September 2021; date of information is given as March 2014

partnership with Local Planning Authorities throughout Wales. Much of the methodology is underpinned by earlier work carried out by the Countryside Agency – the government body formerly with statutory responsibility for England’s countryside (now Natural England) – in the preparation of their document, the ‘Character Map of England’. This has classified the whole of England by describing Landscape Character Areas (LCAs), defined as being:

“...single unique areas which are discrete geographical areas of a particular landscape type.”

- 4.19 LANDMAP, introduced in 1997, was revolutionised in 2003 with the introduction of a benchmark methodology and incorporation of a quality assurance process to ensure consistency, accuracy, and accessibility of landscape information in Wales.

- 4.20 It should also be noted that the CCW (NRW) has arrived at a working definition of landscape as follows:

“The physical reality of the environment around us, the tangible elements that give shape and diversity to our surroundings. But landscape is also the environment perceived, predominantly visually but additionally through our senses of smell, touch and hearing. Our appreciation of landscape is affected, too, by our cultural backgrounds, and by personal and professional interests. For the Countryside Council for Wales’s purposes, landscape is defined as the sum of all these components.” (CCW, 2001).⁶

- 4.21 We have therefore reviewed the Landscape Character of The Site and its landscape context using the most recent published LANDMAP Aspect Area data, in accordance with the ‘Summary advice on good practice’ in Chapter 5 of GLVIA3. This advice states, on pages 93-94, that:

‘Existing assessments must be reviewed critically as their quality may vary, some may be dated and some may not be suited to the task in hand...

..... and may need to be reviewed and interpreted to adapt them for use in LVIA, and fieldwork should check the applicability of the assessment throughout the study area and refine it where necessary.’

Although there are five constituent Aspects within the LANDMAP data, the LANDMAP methodology for landscape characterisation notes that landscape character areas are to be defined using the Visual & Sensory Aspect Area as a starting point, then refined by examining the data from other Aspects. The following landscape character descriptions are taken direct from the current published LANDMAP Collector data for the Visual & Sensory (VS) Aspect Areas, together with the other four Aspects produced as part of the LANDMAP study for this area. This information generally includes their summary description, evaluation, and classification; LANDMAP Aspects are ‘organised according to a hierarchical classification system’ consisting of four levels of increasing detail from Level 1 to Level 4, and the guidance states that ‘LANDMAP Aspect Areas must be identified to Level 3’, based upon *landform and landcover*.⁶ We have therefore provided the classification for all Aspect Areas at Level 3, in line with the above guidance. The relevant LANDMAP Visual & Sensory Aspect Areas in the vicinity of the FE Site are mapped on *Figure JCA/02: Landscape Character: LANDMAP Visual & Sensory Aspect Areas, in the Appendices*.

⁶ LANDMAP Methodology, p.3; Natural Resources Wales; 2013

- 4.22 The FE Site containing the proposed development site lies wholly within the LANDMAP Visual & Sensory Aspect Area identified as **Crymlyn NPTVS518** – with a Level 3 Classification of ‘Flat Lowland Mosaic’. This Aspect Area is divided into two sections, the much larger section being that located to the south of Jersey Marine village, with Crymlyn Bog intervening. The Summary Description of this Aspect Area is as follows:

*‘Flat lowland adjacent to A483 corridor, which dominates the area. Predominantly covered by development, industry, road and rail connections, with golf courses and other recreation facilities. Blocks of deciduous woodland help integrate the various elements and create a sense of enclosure in places. The small settlement of Jersey Marina⁷, the only settlement in the area, sits to the north of the area and is connected to the A483 by a minor road. A railway cuts through the area. Boundary treatment is varied with the development. The area appears discordant with minimal relationship between many of the elements. Change detection 2014: major new developments on both sides of A483 - Amazon and University campus – prominent’.*⁸

- 4.23 Its Overall Evaluation is ‘Low’ (four out of the five evaluation criteria are evaluated as ‘Low’, with the fifth being ‘Landscape Character’, assessed as ‘Moderate’), with the justification being:

‘This lowland landscape is typified as a mixture of discordant elements dominated by the road corridor. Woodland cover provides some cohesion to the area and surrounding landforms provide some sense of place but there are detractors.’

The classification of ‘Low’ by the LANDMAP Visual & Sensory Aspect assessor means that the Aspect Area is of little or no importance.

- 4.24 The M4 Motorway corridor adjacent to the north-eastern boundary of the FE Site has been ascribed its own V & S Aspect Area by LANDMAP. This Aspect Area is identified as being **M4 NPTVS397**. The Summary Description of this VS Aspect Area notes that this is a:

*‘Major road corridor, primarily running along edge of coastal plain/scarp, then across the Neath river mouth, creating a definite visual and physical barrier. The road is elevated above most of the surrounding landscape, facilitating distant views out. Noise, light and visual disruption from vehicles adds to the impact of the motorway as a structure, including signage etc. The road provides a strong visual line along the coastal plain. This is emphasised by the bridge/viaduct over the river Neath which disrupts the visual flow of the mouth of the estuary. Major cuttings have created rock faces which have some visual interest and drama although these are partially visually affected by wire netting and anchors.’*⁹

- 4.25 LANDMAP also evaluates this VS Aspect Area as ‘Low’, being of little or no importance, with the *Justification of the Overall Evaluation* given as follows:

*‘The M4 is a significant detractor to surrounding areas but allows impressive views of Swansea Bay, Port Talbot Works and the junction between the coastal plain and the valleys. The line of the motorway following the landform contrasts with the discordant development around and the high bridge over the Neath is a significant feature.’*¹⁰

⁷ This is a direct quotation from the LANDMAP data; we note the incorrect spelling of this village name

⁸NRW LANDMAP website entry interrogated 14th December 2020 (Data last monitored in February 2015).

⁹ NRW LANDMAP website, interrogated 23rd September 2021

¹⁰ *Ibid.*

- 4.26 To the east of the M4 Motorway, the land straddling the course of the River Neath/Afon Nedd is identified by LANDMAP as being **Penrhiwtyn** NPTVS891. This is a very extensive tract of lowland land which encompasses the tidal flats and low-lying land flanking the foreshore on both side of the river estuary. The Summary Description of this Aspect Area, cited verbatim, is as follows:

*'Low lying complex floodplain urban fringe around lower reaches of the River Neath. The area shows signs of previous and now declining industrial and commercial uses rubbing shoulders with a degraded pastoral agriculture. Uses include small scale docks, breakers yards, storage depots, recreational facilities, floodplain pasture, wetland vegetation, saltmarsh and scrub. Old dismantled railway lines and power lines cross the area. Paradoxically, there is only minimal public access into the site, [along the Neath canal, acting as a stretch of the Sustrans cycle network] although wide views into the area are possible from the M4 and A465. There are few dwellings. The land is predominantly open, with an exposed and threatening feel. There is significant noise on the area from industry, roads and rail.'*¹¹

- 4.27 This Aspect Area is evaluated as 'Low', being of no importance. The justification for this evaluation is given as:

*'The area has minimal visual quality being discordant and with significantly large detractors. Yet the elements present in the area do create a definite and strong identity.'*¹²

- 4.28 The high ground to the south-east and further to the west and north-west of the FE Site is identified by LANDMAP as separate V & S Aspect Area, **Gelli-bwch Hills** NPTVS229. This Aspect Area is the high ground straddling the lowland gap to the south-west of the FE Site which is occupied by Crymlyn Bog. This Aspect Area is evaluated as 'High', *being of county or regional importance*. The Summary Description includes the following observations:

*'Steep sided lowland hills rising from approx 10m AOD to 106m AOD producing significant features adjacent to the lower Neath valley. The area is predominantly grazed, including areas of grazed woodland, with significant deciduous woodland cover throughout, providing a settled lowland feel. Coniferous plantation lie on its southern extent. ...'*¹³

This description fails to mention the Earlswood Golf Course which is located within the southern area of the hill to the south-east of Crymlyn Bog and extends up to parts of the summit of the high ground.

- 4.29 On the low-lying ground close to the south-western boundary of the FE Site is another separate V & S Aspect Area identified by LANDMAP as **Crymlyn Bog** NPTVS944. The Summary Description, cited verbatim, is as follows:

*'Extensive lowland wetland to west of county borough, stretching beyond boundary. The vegetation cover is virtually consistent wetland vegetation, marshy grasses and reeds, with willow and birch scrub growth around the periphery and in clumps within the area. There are no settlements. The Tennant and disused Glan-y-wren canals run through the area, the former providing a tow path access to the southern edge of the area. Railway lines cross through the eastern extent of the area.'*¹⁴

¹¹ NRW LANDMAP website, interrogated 30th September 2021

¹² *Ibid.*

¹³ NRW LANDMAP website, interrogated 23rd September 2021

¹⁴ NRW LANDMAP website, interrogated 23rd September 2021

- 4.30 This Aspect Area is evaluated as ‘*High*’, being of county or regional importance. The justification for this evaluation is given as:

*‘Extensive lowland wetland to west of county borough, stretching beyond boundary. The vegetation cover is virtually consistent wetland vegetation, marshy grasses and reeds, with willow and birch scrub growth around the periphery and in clumps within the area. There are no settlements. The Tennant and disused Glan-y-wren canals run through the area, the former providing a tow path access to the southern edge of the area. Railway lines cross through the eastern extent of the area.’*¹⁵

The boundary between this Aspect Area and that Aspect Area which includes the FE Site runs along the Tennant Canal. A substantial gas storage site, which includes 10 very large horizontally-mounted above-ground storage tanks, is located on the closest part of the FE Site between the Crymlyn Bog Aspect Area boundary and the proposed development site.

- 4.31 LANDMAP places the FE Site within the northernmost part of the Historic Landscape Aspect Area identified as **Jersey Marine Industrial** NPTHL010. It is summarised as follows:

*‘This small coastal strip is now dominated by modern developments, including commercial businesses, such as the Amazon distribution centre, the Bay Studios film studios in the former Ford Factory and the new Bay Campus associated with Swansea University. Commerce and services have largely replaced the industry and manufacture which characterised this area in the 20th century. In historical terms, the aspect area is notable for the presence of the Tennant Canal, built along the Neath Valley to Port Tennant, Swansea and the South Wales Railway, which was built by I.K.Brunel in the 1850s to Swansea. The Towers Hotel, at the site of the former Jersey Marine Hotel includes a converted, four storey octagonal castellated tower (built in 1867). There is little evidence of earlier periods here, but the discovery of a bronze palstave and human skeleton during construction work in the 20th century provides some indication of prehistoric activity within the aspect area. The area is situated to the south of the Crymlyn Bog (HL844), to the west of Pant y Sais (HL36) and to the north of Crymlyn Burrows (HL02). The eastern boundary is formed by the M4, with the Unitary Authority boundary defining it to the west. The once extensive sand dunes of Crymlyn Burrows are now almost entirely covered by modern development, part from a small area along the coastal strip.’*¹⁶

- 4.32 This Aspect Area is evaluated as ‘*Moderate*’, being of local importance. The justification for this evaluation is given as:

‘The overall value of moderate assigned to this area reflects the limited scope of the archaeological record for this area, which is dominated by post-medieval industrial communications features (specifically, the Tennant Canal and South Wales Railway) and modern manufacturing facilities.’

- 4.33 LANDMAP places The FE Site within the very extensive Geological Landscape Aspect Area identified as **Afon Nedd** NPTGL020. This Aspect Area is described as follows:

‘NE-SW fault controlled U-shaped broad valley floodplain and channel, flanked by steep valley slopes, broadening below Neath to plain with sand flats. Alluvium in valley floor. Terraces of sand and gravel flank floodplain in upper stretch, with alluvial fans at valley mouths. Glacial sand and gravel terraces, recessional moraine at Tonna, Aberdulais and Clyne, lake sediments

¹⁵ *Ibid.*

¹⁶ NRW LANDMAP website, interrogated 28th September 2021

at Resolven. Fluvioglacial terrace below Aberdulais, broadening at Neath. Sand flats on both sides and widely meandering channel at Briton Ferry.’¹⁷

- 4.34 LANDMAP evaluates this Aspect Area as being of ‘High’ value, that is, of national or international importance. The *Justification of the Overall Evaluation* is given as follows:

‘Neath Fault Zone tectonically controlled, major glacial valley.’¹⁸

- 4.35 LANDMAP places The Site within the small, un-named Landscape Habitats Aspect Area identified as NPTLH049, which encompasses the FE Site and the nearby motorway corridor up to the edge of the estuary. This Aspect Area is described as being:

‘... areas of industrial land, mainly created on areas formerly of high biodiversity value; many small remnants of semi-natural habitat, but these mainly degraded and disturbed; numerous species of interest, including BAP species; interest elevated by close proximity to sites of high biodiversity value.’¹⁹

- 4.36 LANDMAP evaluates this Aspect Area as being of ‘Moderate’ value, that is, of local importance, with the justification for this evaluation being as follows:

‘... habitats are generally of low value, but with areas of species-rich grassland; good range of Priority Species use the area.’²⁰

The *Ecological Assessment* to be submitted in support of the planning application for the whole site development will deal with the effects on this element of the landscape resource.

Overall Landscape Sensitivity

- 4.37 Landscape sensitivity is defined by several factors, and it does not necessarily follow that a highly valued landscape or landscape feature will always be defined by a high sensitivity. Landscape designation is thus only one of several criteria that are considered in identifying the relative ‘sensitivity’ of the landscape to a proposed development. It should not be used in isolation. We have assessed the overall sensitivity of the existing landscape resource, based on the following representative criteria:

- Existing land use;
- Landscape scale and pattern;
- Landscape value²¹ and quality (condition)²²;
- Nature of views and degree of visual enclosure and openness;
- Landscape designations present; and
- Scope for mitigation.

¹⁷ *Ibid.*

¹⁸ *Ibid.*

¹⁹ *Ibid.*

²⁰ *Ibid.*

²¹ *Landscape Value* - defined by GLVIA3 as being: ‘The relative value that is attached to different landscapes by society. A landscape may be valued by different stakeholders for a whole variety of reasons.’

²² *Landscape quality (condition)* – defined by GLVIA3 as being: ‘A measure of the physical state of the landscape. It may include the extent to which typical character is represented in individual areas, the intactness of the landscape and the condition of individual elements.’

- 4.38 The overall sensitivity of a landscape is categorised as high, medium, or low for the purposes of this assessment. This assessment is derived from analysis in relation to the stated representative criteria. *Table 7, below*, provides information relating to the various criteria affecting landscape sensitivity, which is used to arrive at a final overall level of sensitivity for the local landscape.

Table 7: Overall Sensitivity of the Development Site and the Local Landscape to the Proposed Development

LANDSCAPE ELEMENT	DESCRIPTION
Land Use	The FE Site consists of a single parcel of land comprised of multiple units all in industrial or commercial use. Adjoining land use adjacent and nearby to the north-west and west is operational railway lines and a disused canal. To the south-west, on the low-lying land in the gap between wooded hills, is the extensive Crymlyn Bog, a nature conservation wetland. Woodland occupies the great majority of the surrounding high ground to the north-west, west, and south-east.
Scale and Pattern	The Site is located on low-lying and flat enclosed by higher ground on three sides - north-west, west, and south-east - and the M4 Motorway embankment to the north-east. The enclosing FE Site is a discrete industrial/commercial site of medium scale, not forming part of any settlement. The scale of the landscape of the surrounding high ground is large and the enclosing motorway embankment, widened to accommodate the Junction 42 slip roads, is also a large-scale feature. The landscape pattern locally is simple, with hillsides which are densely and continuously wooded dominating the backdrop. The motorway embankment also has a substantial woodland component.
Value and Quality	The Site has been assessed overall by the Visual & Sensory LANDMAP assessor as being of <i>low</i> value – that is, of little or no importance - having placed it within the Crymlyn Aspect Area. The Adjacent Aspect Area to the north-east is also assessed as being of low value. Close by to the south-west - centred on the rarely occurring wetland landscape of the Crymlyn Bog- is an Aspect Area of high value, largely determined by its rarity within the County Borough. The wooded hillsides to the north-west and south-east are also of high value.
Nature of Views	As a consequence of the local topography and the very low-lying nature of the whole of the FE Site, there are no views out from The Site except up the higher surrounding ground. Similarly, views down into The Site are limited to areas in very close proximity or from the short open section of the M4 Motorway where it crosses the Red Jacket Pill viaduct. There is very little public access to the wooded higher ground and none from which views of The Site are obtainable.

LANDSCAPE ELEMENT	DESCRIPTION
Landscape Designations	There are no landscape designations present within or around The Site.
Scope for Mitigation	Design of the proposed development so that is it wholly contained within the established FE Site. The height of the proposed smokestack which will form part of the plant structure will be the minimum required to achieve appropriate functionality so that it will not form a prominent feature rising above the nearby high motorway embankment. Potential for some landscape treatment within and around the Site where practicable.
Overall Landscape Sensitivity of Site: in relation to ability to accommodate development of the scale, nature and extent proposed	Low <i>Reasoning:</i> The Site lies wholly within an established industrial/commercial area – the FE Site - which does not form part of any settlement. It lies within a LANDMAP Visual & Sensory Aspect Area classified by the LANDMAP VS Assessor as being of <i>low</i> value (being of little or no importance). The FE Site is adjacent to the M4 Motorway corridor, which is sufficiently distinctive as to merit its own V & S Aspect Area, again assessed as being of <i>low</i> value. <i>High</i> value VS Aspect Areas lie adjacent to the north-west, south-west and south-east but their value is strongly influenced by their rarity, or size and their physical disposition, and the fact that most of their land is unsettled. The FE Site is substantially enclosed by a steeply rising and heavily-wooded land backdrop to the north-west, west, and south-east – and by the high motorway embankment to the north-east. Development of the scale and type proposed would not be out of character in this context. The proposed development could be readily assimilated within the local landscape setting.

Visual Baseline

Visual Receptors

- 4.39 *Residential receptors* are amongst the most sensitive to visual impacts. There are no residential receptors which would be affected by the proposed development, an observation acknowledged by the Council in its Pre-Application response dated 10th June 2021.
- 4.40 *Public Rights of Way:* There are no public rights of way crossing the FE Site. There will be some direct close-range views perpendicular to the direction of travel from the nearby Tennant Canal towpath right of way, which runs parallel to the south-western boundary of the FE Site. However, from this route views of the proposed development will be substantially screened, by a combination of the large gas storage tanks located within the south-western area of the FE Site and the woodland and scrub vegetation flanking the canal corridor.
- 4.41 *Designated Access Land:* There is no Designated Access Land in the locality. The nearest such land is at Giant's Grave at the north-western edge of Llansawel/Briton Ferry. Views into the

FE Site from this locality are screened by extensive, dense young woodland growing within the Access Land and the wooded embankment of the M4 Motorway.

- 4.42 *Surrounding Public Roads:* At close range, there will be only a short section of open views down into the FE Site from the M4 Motorway westbound carriageway where it crosses the Red Jacket Pill viaduct. Views from the motorway further south and to the north of the viaduct are screened by flanking woodland and scrub vegetation. There are no views down into the FE Site from the eastbound carriageway. There are no views into the FE Site from the B4290 road from Llandarcy to Jersey Marine because of the screening effects of a series of belts of dense woodland and scrub flanking this road, the railway lines, and the Tennant Canal.

5. THE PROPOSED DEVELOPMENT

- 5.1 The elements of the proposed development are described in more detail elsewhere in documents submitted in support of the planning application for the site development, in particular the *Planning Statement*.
- 5.2 The essential parts of the proposed development which have implications for the assessment of landscape and visual effects are understood to be as follows:
- An asphalt plant (at present the plan is for a 'Polygonmach 120TH' type of plant). Bitumen and, where required, filler would be delivered in tankers and blown or pumped into suitable tanks/silos;
 - Batches of asphalt would then be stored in vertical silos ready for collection by heavy goods vehicles with up to a maximum load weight of 20 tonnes despatched;
 - The following items of plant/machinery and infrastructure:
 - Cold Feed Hoppers;
 - Dryer Drum;
 - Mixing Tower;
 - Skip system;
 - Finished product storage silos;
 - Bitumen Storage Tanks;
 - Conveyors;
 - Motor Control Cabin;
 - LPG Gas storage tanks, and;
 - Weighbridge and control cabin;
 - Staff, offices, and welfare facilities are all to be located within the existing workshop and office facilities, the existing large building within the Site, which is to be retained.
- 5.3 Since the production of asphalt requires the application of heat, a smoke stack will also form an integral part of the required infrastructure. It is understood that this stack will be at virtually the same height as the tallest element of the asphalt plant structures – around 25.6 metres, maximum, at its highest point (*refer to the General Arrangement Drawing submitted in support of the planning application*). This structure would be higher than the road level on the nearby section of the M4 Motorway embankment. The existing large, flat-roofed workshops and offices building within the Site - which is to be retained - is approximately 6.75 metres high to roof level, with two large vents/stacks protruding a further c. 2 metres above roof level at its western end.

- 5.4 There will be landscape and visual effects both during and after construction.

Mitigation

- 5.5 There are essentially two categories of mitigation measures:

- Primary measures that intrinsically comprise part of the development design through an iterative process;
- Secondary measures designed to specifically address the remaining (residual) negative (adverse) impacts of the final development proposals.

This landscape and visual appraisal relates to the predicted residual effects which remain with both primary and secondary mitigation measures in place.

- 5.6 Primary measures for the proposed development include:

- The siting of the proposed development in an established industrial/commercial location which does not form part of any settlement. This location fits within the existing structure of the landscape, the land is low-lying and is extremely well contained by local higher ground to the north-west, west, and south-east, which is extensively wooded, and by the nearby high motorway embankment to the north-east, also extensively wooded;

Secondary measures include:

- An appropriate landscape treatment to those areas of the site where such mitigation measures are practicable.

6. MAGNITUDE AND OVERALL LEVEL OF EFFECTS

Elements of the Proposed Development which have the Potential to cause Landscape and/or Visual Effects

- 6.1 The following is a schedule of the main elements of the proposed development that have the potential to cause landscape and/or visual effects:

- Site clearance works; erection of site compound; creation of temporary materials storage facilities; construction of the associated drainage infrastructure, temporary access routes and structures; and associated movement of vehicles, plant, and machinery;
- Potential effects on the present landscape character of The Site and the surrounding area;
- Potential effects on public visual receptors in the landscape.

Assessment of Effects on the Landscape Resource

- 6.2 Landscape effects are defined as changes in the elements, characteristics, and qualities of the landscape because of development. These effects can be positive, negative, or neutral. When identifying, and assessing landscape change, it is important to consider the existing trends for change within the landscape, which may be due to natural processes or human activities.
- 6.3 There will be effects on the landscape fabric of The Site during the construction phase because of site clearance and associated ground disturbance, excavations, temporary site works, and the activities of machinery such as earthmovers, etc. Disturbance will be short term, and all temporarily affected surfaces will be restored on completion of construction.

Effects on Landscape Character

- 6.4 The great majority of The Site lies within the LANDMAP Visual & Sensory Aspect Area identified as **Crymlyn** NPTVS518. This has been identified as a lowland Aspect Area and evaluated as being *low* – that is, of little or no importance. In our opinion, the character of The Site is strongly characterised by its low-level setting, enclosed on three sides by dense and continuous woodland – mostly growing on steep hillsides – and by the nearby M4 Motorway embankment. The FE Site is an established industrial/commercial site quite separate from any settlement. These characteristics can be seen in the **Landscape Context Photographs** included in Figure JCA/03 In the Appendices. We have therefore ascribed a level of landscape sensitivity which is *low*. There will be a *minor* magnitude of change on this *low* sensitivity landscape, resulting in a *minor-negligible adverse level of effect* during construction. At the end of construction, and when any mitigation landscape scheme has become established, there will remain a minor magnitude of change, resulting in an *overall minor-negligible adverse level of residual effect* which is therefore *not substantial*.
- 6.5 With regard to the adjacent V & S Aspect Area to the north-west and south-east, **Gelli-bwch Hills** NPTVS229, which is evaluated as *high*, the great difference in elevation between the FE Site and these features means that there would be *no effect* on the landscape character of the surrounding wooded hills arising from the proposed development.
- 6.6 The remaining nearby V & S Aspect Area, **Crymlyn Bog** NPTVS944, is effectively separated from the FE Site by the railway lines and the Tennant Canal, all of which are flanked by belts of dense scrub and woodland, including the FE Site boundary. Consequently, there would be *no effect* on this low-lying Aspect Area.

Massing and Scale in the Surrounding Landscape

- 6.7 The proposal is for a small scale development which is entirely within an existing industrial/commercial site and separate from any settlement, a location which we consider has a *low* sensitivity to the type of development being proposed. The existing offices and workshops building is to be retained and refurbished. There are large and conspicuous man-made structures located on various plots within the FE Site, notably large above-ground gas storage tanks. The magnitude of change would be *negligible adverse*. It would not have a detrimental effect upon the existing settlement pattern of the surrounding area or on the land on the nearby high ground to the north-west, west, and south-east. Overall, it is considered that the massing and scale of the proposed development would have a *negligible adverse* residual landscape effect which is therefore *not substantial*.

Physical Landscape Effects on Topography

- 6.8 The construction of the proposed development will not involve significant local alterations to ground levels. The flat site is assessed as being of *low* sensitivity. Therefore the magnitude of physical change to topography arising from the proposed development is assessed as being *negligible*, resulting in a *negligible adverse* landscape effect which is therefore *not substantial*.

Vegetation

- 6.9 There is little or no vegetation growing within The Site.

Public Rights of Way

- 6.10 The existing public right of way along the Tennant Canal towpath close to the FE Site's south-western boundary will be unaffected by the proposed development. The existing footpath and cycleway along the northern side of the M4 Motorway eastbound carriageway will also be unaffected by the proposed development.

Overall Landscape Effects

Overall Landscape Sensitivity

- 6.11 We have ascribed a level of overall landscape sensitivity of *low* to the FE Site, which wholly contains the proposed development site. Its landscape sensitivity is strongly influenced by its position at a very much lower elevation than the surrounding areas of the higher sensitivity on the wooded hillsides and is separated from the higher sensitivity low-lying Crymlyn Bog to the south-west by railway lines and the Tennant Canal. The LANDMAP V & S Assessor has included the FE Site within the Crymlyn lowland Aspect Area and has ascribed a *low* evaluation to it.

Overall Magnitude of Change

- 6.12 Whilst the existing office and workshops building will be retained and refurbished, construction of the proposed asphalt plant and its associated infrastructure will involve a *major* magnitude of change on The Site itself. However, there will only be a *moderate* magnitude of change to the encompassing FE Site, and a *minor* magnitude of change on the FE Site's vicinity.

Overall Magnitude and Level of Landscape Effects

- 6.13 Given the justifiably ascribed *low* sensitivity of the landscape receptor, and the *major* landscape magnitude of change, the predicted overall level of effect on the landscape of The Site itself is *minor adverse*, and so not *substantial*. The proposals constitute a land use which is compatible with the surrounding land uses on the FE Site and which can be assimilated by the enclosed character of the landscape in this part of Neath Port Talbot.

Assessment of Visual Effects of Proposed Development

General

- 6.14 Visual effects are defined as changes in the appearance of the landscape because of development. These can be positive (beneficial or an improvement), or negative (i.e. adverse or a detraction). The assessment of visual effects describes:
- The changes in the character of the available views resulting from the development;
 - The changes in the visual amenity of the visual receptors.

A series of representative viewpoints have been established to inform the visual assessment (see *Appendices: Illustrations, Figures JCA/04 to /07, inclusive*). The summary of the predicted visual effects from these viewpoints is set out in *Table 8, below*.

Table 8: Viewpoint Assessment Summary

VP Nr	Location and Distance from site boundary (and Ordnance Survey Grid Reference)	Designation	Receptor(s)	Sensitivity	Magnitude of Effect [During Construction/ At Completion/ With Mitigation]	Overall Level of Visual Effect [During Construction/ At Completion/ With Mitigation]
1	Access road adjacent to The Site (SO 7262 9484) Adjacent to The Site boundary	Private Estate Access Road	Road Users	Low	Major adverse Major adverse Moderate adverse	Minor adverse Minor adverse Minor adverse <i>Not Substantial</i>
2	Access road at SE corner of the FE Site (SO 7277 9484) c. 110 metres from The Site	Private Estate Access Road	Road Users	Low	Moderate adverse Moderate adverse Moderate adverse	Minor adverse Minor adverse Minor adverse <i>Not Substantial</i>
3	Public road and footway on the bridge carrying the access road leading onto the FE Site from the B4290 (SO 7244 9513) c. 225 metres NW of The Site boundary	Publicly accessible road (not maintained at public expense)	Road Users	Low	Minor adverse Minor adverse Minor adverse	Minor-negligible adverse Minor-negligible adverse Minor-negligible adverse <i>Not substantial</i>
4	Junction of Giant's Grave Road and Highfield Road, Brynhyfryd (SO 7378 9490) c. 1.13 kms east- north-east of The Site boundary	Public Road through residential area	Residential Road Users	High Medium	No change	<i>No change</i>

Note: Where two levels of receptor sensitivity apply at a given viewpoint, we have only assessed the higher level of sensitivity, as representing the worst-case scenario.

Residential Receptors

- 6.15 Residential receptors are amongst the most sensitive to visual effects. In accordance with GLVIA 3rd Edition, the assessment of visual effects is based on the likely view(s) from ground floor rooms that are normally occupied during daylight hours, or from within the curtilage of these properties.
- 6.16 The only area of houses which has any views towards the FE Site is situated in a small section at the edge of the south-western district of Brynhyfryd in Llansawel/Briton Ferry. This is because of the low-lying nature of the FE Site and the fact that viewpoints need to be of a significantly higher elevation to be able to see into it. In addition, there are extensive tracts of intervening high ground, many of them densely wooded, between Llansawel/Briton Ferry and the FE Site.
- 6.17 We have included a visual assessment viewpoint from the edge of Brynhyfryd, located at the junction of Highfield Road and Giant's Grave Road (Ordnance Survey Grid Reference SO 7378 9490). The photograph from **Viewpoint 4** at Figure JCA/07 in the Appendices illustrates the view westwards from this elevated location. The FE Site is completely screened by intervening landform and woodland cover. It is possible that the top of the smokestack at the proposed asphalt plant will be visible above the vegetation growing on the nearby M4 Motorway embankment, but this feature will be barely discernible at this separation distance. Consequently, there would be *no effects* on the views obtainable by residents in this locality.

Public Rights of Way

- 6.18 There will be some effects on views from the Tennant Canal towpath which runs parallel to and just outside the south-western boundary of the FE Site. These views would be partial views of the proposed development, seen at close range and perpendicular to the direction of travel. The views would be most apparent during winter, with the absence of leaves on deciduous trees and shrubs. The greater degree of permanent screening would be that caused by the very large above-ground gas storage tanks located on the intervening land in the south-western area of the FE Site. These features dominate the local views into the FE Site from the west. This towpath is a local public right of way and it is not promoted. Its visual receptor sensitivity is assessed as being *medium*. The change in views from the footpath during construction along that section close to The FE Site would be *moderate adverse*. On completion, the change in view would remain as *moderate adverse*, even when any landscape mitigation measures have been implemented. For these reasons, the overall level of visual effects here are assessed as being *moderate-minor adverse* during construction and remaining at this level even with the limited effects of appropriate landscape mitigation works. The residual visual effects on this *medium* sensitivity receptor are therefore *not substantial*.

Public Roads

- 6.19 The main public road which will have open views of the proposed development at close range is the M4 Motorway where it crosses the high viaduct over Red Jacket Pill close to the south-eastern corner of the FE Site. This busy trunk road is a *low* sensitivity receptor, as a consequence of its location outside the national park and the substantially urban and industrial views from the road between Llandarcy and Llansawel/Briton Ferry. The photograph

taken from **Viewpoint 2** at the south-eastern corner of the FE Site below the western end of the Red Jacket Pill viaduct illustrates the nature and extent of the FE Site – *refer to Figure JCA/05 in the Appendices*. This location is around 110 metres east of the nearest part of the boundary of The Site. The only open views are from this section of the motorway, around 150 metres long; and the views down into the FE Site are at an oblique angle for westbound road users only. There are expansive views to the north from this section of motorway across the middle section of the River Neath/Afon Neath estuary towards the higher ground to the north. Views to the south and south-west are constrained by the wooded hills to the west. The change in such views from the M4 Motorway during construction would be *moderate adverse*. On completion, the change in view would reduce to *minor adverse* and remain at that level. For these reasons, the residual visual effects on this *low* sensitivity receptor are assessed as being *minor-negligible adverse* and therefore *not substantial*.

- 6.20 The only other public road with close-range views into the FE Site is the FE Site access road from the B4290 linking Llandarcy and Jersey Marine. This is the sole access to the FE Site. The photograph taken from **Viewpoint 3** shows the nature of the views into the FE Site from the northern end of the concrete bridge over the Tennant Canal and the railway lines which run to the south-west of the FE Site – *refer to Figure JCA/06 in the Appendices*. There are only partial views of The Site from here, at an oblique angle to the direction of northbound travel, seen through vegetation flanking the FE Site and the perimeter steel palisade security fence. This road is a *low* sensitivity receptor, being a local road which only provides access to an industrial/commercial site and not a through route. The magnitude of change in the view from this road during construction would be *minor adverse*. On completion, the change in view would remain *minor adverse*, given the limited opportunities within and around The Site for mitigation by landscape treatment. For these reasons, the residual visual effects on this *low* sensitivity receptor are *minor-negligible adverse* and therefore not substantial.

7. CUMULATIVE EFFECTS

- 7.1 Whilst the 2013 edition of the GLVIA provides more guidance on cumulative landscape and visual effects, the definition contained in the 2002 Edition of the GLVIA is still relevant. Those guidelines defined cumulative landscape and visual effects as those that:
'Result from additional changes to the landscape or visual amenity caused by the proposed development in conjunction with other development (associated with or separate to it), or actions that occurred in the past, present or are likely to occur in the foreseeable future'.
- 7.2 Best practice Cumulative Landscape and Visual Impact Assessment guidance contained in the 3rd Edition GLVIA, Page 133, states that the baseline for assessing cumulative and visual effects should include those schemes and additional potential schemes that are not yet present in the landscape but are at various stages in the development and consenting process, including schemes with planning consent and schemes that are the subject of a valid planning application that has yet to be determined. Schemes that are at a pre-planning or scoping stage are not generally considered in the assessment of cumulative effects.
- 7.3 Using these guidelines, we are not aware of any other planning applications relating to this area of Neath Port Talbot.

- 7.4 The cumulative effects of the proposed development are therefore only those in addition to the existing established industrial/commercial FE Site area, to which the proposed development would be a moderate local modification. The magnitude of change would be *moderate*. The cumulative effects would be a very local effect, assessed as being *moderate-minor adverse* and not substantial.

8. LEGISLATION AND PLANNING POLICY

- 8.1 This section highlights those aspects of current planning policy which are relevant to the landscape and visual appraisal of the proposed development. There are also short commentaries on how the development relates to the specific policies.

National Landscape Planning Related Policy

- 8.2 *Planning Policy Wales, Edition 11, February 2021 (PPW11)* provides the current relevant national planning policy context. The development approach takes full account of this guidance. The design has been informed by a proper understanding of the context and character of the landscape and their contribution to placemaking. The objective has been to minimise adverse effects and optimise the potential benefits to the local landscape character. A sustainable development can be achieved in landscape terms.

- 8.3 At Paragraph 6.3.3, PPW 11 states that:
'Considering landscape at the outset of formulating strategies and policies in development plans and when proposing development is key to sustaining and enhancing their special qualities, and delivering the maximum well-being benefits for present and future generations as well as helping to deliver an effective and integrated approach to natural resource management over the long term.'

JCA Commentary:

- 8.4 The FE Site is not part of any settlement, and it is an established industrial/commercial site served by its own dedicated access road, which is not a through route. It is not visible from any residential properties, either close by or at a distance. The scale and siting of the proposed development would not have any substantial adverse effects upon local landscape character beyond The Site and its immediate environs. The landscape character of the FE Site is not the same as that on the surrounding higher ground and the low-lying land to the south-west. There would therefore be no adverse effects upon the higher value land in the wider context of The Site.

Neath Port Talbot Local Development Plan Adopted January 2016

- 8.5 Planning Policy is interpreted at a more local level by the current Neath Port Talbot Local Development Plan, Adopted January 2016.
- 8.6 Policies relevant to landscape issues in the LDP include the following relevant (*text in bold for our emphasis*) sections of :
'Policy BE1: Design

All development proposals will be expected to demonstrate high quality design which fully takes into account the natural, historic and built environmental context and contributes to the creation of attractive, sustainable places.

Proposals will only be permitted where all of the following criteria, where relevant, are satisfied:

- 1. It complements and enhances the character and appearance of the site, building or area in terms of siting, appearance, scale, height, massing and elevation treatment;*
- 2. It respects the context of the site and its place within the local landscape, including its impact on the important arterial gateways into the County Borough, its effects on townscape and the local historic and cultural heritage and it takes account of the site topography and prominent skylines or ridges;*
- 3. It utilises materials appropriate to its surroundings and incorporates hard and soft landscaping and screening where appropriate;*
- 4. It would not have a significant adverse impact on highway safety, the amenity of occupiers of adjacent land or the community;*
- 5. Important local features (including buildings, amenity areas, green spaces and green infrastructure, biodiversity and ecological connectivity) are retained and enhanced as far as possible;*
- 6. It achieves and creates attractive, safe places and public spaces, taking account of 'Secured by Design' principles (including where appropriate natural surveillance, visibility, well lit environments and areas of public movement);*
- 7. It plays a full role in achieving and enhancing an integrated transport and communications network promoting the interests of pedestrians, cyclists and public transport and ensures linkages with the existing surrounding community;*
- 8. It uses resources, including land and energy, as efficiently as possible through:*
 - (a) Making the best and most efficient use of the land available through being of appropriate density taking into account the character and appearance of the area, normally a minimum of 35 dwellings per hectare in the Coastal Corridor Strategy Area or a minimum of 30 dwellings per hectare in the Valleys Strategy Area;*
 - (b) The layout and form of the development does not preclude the reasonable use of other adjacent land;*
 - (c) Developing brownfield land in preference to greenfield land where possible;*
 - (d) Minimising building exposure while maximising solar gain.*
- 9. Its drainage systems are designed to limit surface water run-off and flood risk and prevent pollution;*
- 10. The layout and design of the development achieves inclusive design by ensuring barrier free environments, allowing access by all and making full provision for people with disabilities.'*

JCA Commentary:

- 8.7 The Site lies within an established industrial/commercial site and is separate from any settlement. The proposed development would take place wholly within an existing industrial/commercial plot within the FE Site, utilising an existing office and workshops building which would be refurbished. There would be no effect on an arterial gateway to Neath Port Talbot Borough. The scale and siting of the proposed development would not have substantial adverse effects upon local landscape character. No skyline or important ridge line. would be affected. No residential properties would experience adverse effects on their visual amenity. There would

be no wider unacceptable loss of visual amenity. It would not impact unacceptably on the visual setting of any heritage asset. There would be limited scope for landscape enhancement measures to be implemented within and around The Site.

9. CONCLUSIONS

- 9.1 A detailed Landscape and Visual Appraisal has been carried out of the likely landscape and visual effects of the proposed development on land at the FE Site, Llandarcy. This study has been carried out in accordance with nationally agreed 'best practice' standards of landscape and visual assessment. It has involved an examination of various published data relevant to The Site, including maps, aerial photographs, and planning background information. A detailed inspection has been made of The FE Site and its context, looking at its present characteristics and condition and at the potential development effects. A detailed study of nearby landscape and heritage features in respect of their visual settings has also been carried out.
- 9.2 Landscape and visual effects likely to arise from the development as envisaged have been assessed, taking into account the predicted effects during construction stage, immediately after completion of construction, and when appropriate and reasonable mitigation measures have become established.
- 9.3 The Site does not lie within any settlement boundary.
- 9.4 There will be no substantial permanent alterations to the local topography of The Site to accommodate the proposed development.
- 9.5 No substantial adverse effects on residential properties have been identified – there are no residential receptors either in close proximity to the FE Site or at medium range.
- 9.6 No effects on the visual setting of any designated or non-designated heritage asset has been identified.
- 9.7 No substantial residual visual effects on users of either the national or local road network have been identified.
- 9.8 The users of the only public right of way which will experience any residual visual effects are those travelling the Tennant Canal towpath and these effects would not be substantial.
- 9.9 The overall conclusion of this landscape and visual assessment is that the proposed development will appear as only a moderate scale modification to an established busy industrial/commercial site which is substantially screened from view, by reason of its low-lying elevation and much of the nearby much higher ground, most of which is clothed in dense and continuous woodland. The M4 Motorway embankment screen

the site from open views across the estuary from the north. The Site has the capacity, in landscape and visual terms, to accept the proposed development as envisaged without detriment to its landscape character or that of the nearby land on all sides.