

LVIA COMPLIANCE STATEMENT

Job Name: Wildfox, Afan Valley
Job No: 332310590
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Prepared By: Natasha Jones, Director of Landscape Architecture
Subject: **Landscape and Visual Impact Assessment (LVIA) Compliance Statement**

1. Introduction

- 1.1. Wildfox Resorts are committed to bringing forward an adventure resort at Afan Valley, creating transformational change, landscape restoration and job creation.
- 1.2. The team have progressed ground investigations and assessed site constraints to inform detailed design. The results of the investigations have brought to light new information which has resulted in non-material changes being needed to ensure the resort is deliverable within the site constraints.
- 1.3. A 96A (non-material amendment) submission in relation to the previous planning consent (LPA ref. P2018/0493), has therefore been prepared for consideration by Neath Port Talbot Council (NPT). This Landscape and Visual Impact Assessment (LVIA) Compliance Statement has been prepared to identify whether the amendments to the Proposed Development, as set out within the 96A submission, are likely to result in new or different likely significant landscape and visual effects compared to the parameters based (worst-case) assessment provided in the 2017 ES and 2019 ES Addendum of the consented scheme.
- 1.4. The key consideration around the materiality of a proposed change is the scale of that change within the context of the development as a whole, as approved by the outline consent.
- 1.5. The site area of the consented scheme is c.132.5 hectares or c.327 acres. The description of development for the approved scheme grants permission for:

...a proposed adventure resort comprising 600 no. lodges/apartments, 100-bed hotel with associated spa, central plaza containing restaurants, leisure activities and shops, adventure activities and associated buildings (including X-sports, alpine/ski, forest activities and Trax & Trail), restaurants and associated administration and maintenance buildings and parking for approx. 850 cars, plus associated landscaping, drainage and engineering operations including re-profiling of land, boundary treatment, retaining structures, external lighting and CCTV, and diversion of public rights of way.

- 1.6. As such, it is within this substantial context that the materiality of the proposed amendments must be considered. These considerations are described and assessed in more detail below, with reference to Welsh Government guidance and in the context of the legal advice.
- 1.7. The scheme revisions have been made, taking account of the approved parameters as well as the environmental statement. Revisions have been driven by new information relating to site studies and investigations of ground conditions. The changes that have been made are shown on Parameters Plan – Drawing No 17023(90)210 Rev O and Drawing No 170239(SK) 01 Rev P – Concept Masterplan, and comprise the following:

- Amendment of the land uses proposed in the parameter zones, these mostly maintaining the zone areas' footprints other than minor changes to the shape of the Central Plaza zones; and maintaining the consented building sizes and building height parameters for each of the

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zones, except for the hotel (see below). Lodges were originally proposed within the Forest Lodge zones (central and east) and the Trax & Trail Lodges zone (west); however now lodges are proposed only within the Trails & Lodges zone (west and central), and no lodges are proposed to be within the Wildfox Forest zone (east).

- Removal of the car park from the southwest of the Site due to challenges of the ground conditions in that location; that car park being relocated to beneath the proposed hotel.
 - Amendment of the proposed internal distributor road alignment, which now reflects the existing road alignment.
 - Amendment of the building dimension parameters in the Wildfox Hotel zone (formerly known as the X-Sports Village zone), in respect of the length and width parameters. The width parameter is proposed to be increased from 40 m to 47 m. The length parameter is proposed to be amended from 115 m to 188 m length, which includes the length of the proposed hotel and the proposed relocated car park underneath it.
- 1.8. Chapter 11: Landscape and Visual Impact in the 2017 ES (the 2017 LVIA) and Chapter 11: Landscape and Visual Impact Addendum in the 2019 ES Addendum (2019 LVIA Addendum) for the Afan Valley Adventure Resort set out the assessment of likely significant landscape and visual effects of the outline Planning Permission P2018/0493 dated 18 January 2022 for the Afan Valley Adventure Resort (hereby referred to as the 2022 Permission).
- 1.9. This LVIA Compliance Statement has been prepared by a Chartered Member of the Landscape Institute (CMLI), who has reviewed the original 2017 LVIA, the 2019 LVIA Addendum and supporting plans, photographs and DTM Views, and parameter plans that were submitted in relation to the 2022 Permission.

2. Findings of the 2017 LVIA & 2019 LVIA Addendum

2017 LVIA Summary of Findings

- 2.1. The 2017 LVIA included a Zone of Theoretical Visibility plan (ZTV) which illustrated the theoretical extent of visibility of the Parameters Plan that was in Appendix 5.1 of the 2017 ES Volume 2. The 2017 LVIA noted that development parameters had been separated into built-form, access, and landscape parameters; these being represented by Figures 11.31 and 11.32 of the 2017 LVIA (as referenced in paragraph 11.141 of the 2017 LVIA). The LVIA was supported by several Digital Terrain Model (DTM) Views which demonstrated the parameter zones draped over the DTM landform and extruded to the parameter building heights, to illustrate the visibility of the Proposed Development in key views of the Site and surrounding landscape (see Figures 11.35 to 11.43 of the LVIA).
- 2.2. The 2017 LVIA summary and conclusions were:
- Temporary, adverse effects arising from construction work across the site, ground preparation works, removal / thinning of existing trees, and the ongoing transformation of former forestry land into the proposed leisure development. The use of tall machinery such as tower cranes and piling rigs was noted as being temporary and subject to control through a construction management plan.
 - Permanent, direct and significant adverse effects upon the site and its local landscape setting at completion of the scheme.
 - Short-term operational effects that would be permanent and direct, significant adverse effects to the character of the site (LCA 14 – Foel Fawr), and to the parts of high sensitivity landscape that share an open relationship with the site, these being LCA 11 = Cwm Afan and Cwm Pelenna and LCA 13 – Foel Trawsant.

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- Long-term operational landscape effects that would be permanent, direct, and adverse significant effects to the character of the site (LCA 14 Foel Fawr).
- Short-term operational visual effects that are permanent and direct, adverse significant effects to the visual resource of the immediate valley setting which provides an open appreciation of the site as a major landform component; also, to wider views from more elevated landform which provides an open appreciation of the entire landform of the site; and views from high sensitivity landscapes would experience moderate changes to the visual resource.
- Long-term operational visual effects that would be permanent, direct, and adverse significant effects to the most immediate resource within the valley setting that affords an open appreciation of the site, and wider locations that would afford an elevated and open appreciation of the development extending across the site.

2019 LVIA Addendum Summary of Findings

- 2.3. The 2019 LVIA Addendum confirmed amendments to the previously assessed scheme and provided additional and updated information. This included updates to Figure 11.31 Development Parameters Access & Built Form, Figure 11.32 – Development Parameters Landscape, Figures 11.33 and 11.34 Landscape Sections, and Figure 11.39 – DTM View 19. The changes to the previously assessed scheme were:
- X-Sport lodges pulled back from the southern ridge line, and as a result additional structure landscaping as mixed deciduous and woodland cover;
 - Red lodges removed and replaced with a more recessive natural colour more suitable to their location; and
 - Adjustment of the proposed realignment of the existing Public Rights of Way (PROW).
- 2.4. The 2019 LVIA addendum provided additional assessment information about the likely effect on Special Landscape Areas (SLAs) and further discussion on cumulative effects, which had been requested by White Consultants (WC) on behalf of Neath Port Talbot County Borough Council (NPTCBC). Additional information regarding measurements of existing plantation, and retention / removal, as well as a plant species schedule, was included.
- 2.5. The updated assessment of landscape and visual effects included:
- Confirmation that the proposed changes to the development parameters were unlikely to alter the previously assessed landscape effects.
 - Comment that the Proposed Development would become less prominent in views from Foel Trawsnant, this being a visual setting matter.
 - Confirmation of a reduction in developable area and approximately 1.3 hectares of additional structural planting.
 - Identification of short-term, permanent, and indirect adverse landscape effects on Foel Trawsnant SLA and the Foel y Dyffryn SLA, which would be major-moderate significance but would reduce in the long term to a moderate significance of effect. It was noted that there would be parts of the SLAs that are unlikely to have intervisibility with the Proposed Development and therefore would be unlikely to receive significant effects.
 - Identification of short-term, permanent, and indirect adverse landscape effects on Mynydd y Gelli SLA that would be of moderate significance.

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- Identification that the Northern Uplands SLA and the Vale of Neath SLA were unlikely to receive significant adverse landscape effects.
- Identification of a reduction in visual effects on views from the public rights of way and access land associated with Foel Trawsnant and Foel y Dyffryn represented by View 19 in the 2017 LVIA, to a short-term visual effect of moderate significance which would further reduce in the long-term due to maturing structural planting, to a visual adverse effect of minor significance.
- Confirmation that the 2017 LVIA had assumed that recessive colours would be utilised for the lodges, therefore the change from red lodges to lodges with recessive colours resulted in no change to the assessment in the 2019 LVIA Addendum.
- Reduction of overall cumulative effects because of the omission of the Caeru solar farm from baseline, as that would not be implemented.
- Comment about likely cumulative effects of the Proposed Development with existing windfarm developments within the surrounding valley setting, in that the different types of development would be experienced in different ways and variable effects to character and appearance of the surrounding valley setting. It was noted that their combined effects would be notable and likely to be of significance to the planning decision making process.

3. Baseline Conditions

- 3.1. The landscape and visual baseline conditions of the site and the area surrounding the site have not materially changed from those reported in the 2017 LVIA and 2019 LVIA Addendum.

4. Appraisal of LVIA Compliance

- 4.1. The 2017 LVIA and 2019 LVIA Addendum were informed by a Digital Terrain Model (DTM). The DTM draped mapped parameter zones over the landform and extruded those parameter zones up to the parameter building heights, to illustrate and consider the extent of potential visibility of the Proposed Development parameters in views of the Site and surrounding landscape; and a Zone of Theoretical Visibility (ZTV) Plan, which was based on the DTM, was provided with the 2017 LVIA. The 2017 LVIA states at paragraph 11.192, “*The DTM has been used as a reference in the assessment of visual effects for each representative view.*” DTM Views, to illustrate the Proposed Development in key views, were provided in Figures 11.35 to 11.43 of the 2017 LVIA; and the DTM View 19 was updated in the 2019 LVIA Addendum.
- 4.2. Therefore, the 2017 LVIA and 2019 LVIA Addendum are understood to have considered the worst-case extent of Proposed Development in terms of the parameter heights applied across the mapped parameter zone areas.

Amendment of Land Uses Within Parameter Zones

- 4.3. The proposed revised land uses within parameter zones would remain primarily within the consented parameters for zone areas (i.e. the footprint of those zones), other than minor changes to the shape of the Central Plaza zones linked to the realignment of the road to its existing route; and within the consented parameter building heights and buildings’ width/lengths, other than the hotel (see paragraphs 4.7 to 4.10 below). Lodges were originally proposed within the Forest Lodge zones (central and east) and the Trax & Trail Lodges zone (west); now lodges are proposed only within the Trails & Lodges zone (west and central), and no lodges are proposed within the Wildfox Forest zone (east). However, the proposed Wildfox Forest zone buildings’ parameters remain unchanged.

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- 4.4. The minor changes to the shape of the Central Plaza East zones would not result in new or different landscape or visual effects being assessed. Noting that the 2017 LVIA and 2019 LVIA Addendum considered the extent of potential visibility of the parameter zones, draped over landform and extruded to parameter heights, it is considered that proposing lodges within the Trails & Lodges zone only, and removing lodges from the Wildfox Forest zone but retaining the consented building parameters for facilities buildings within that zone, would not result in greater landscape or visual effects than those assessed in the 2017 LVIA and 2019 LVIA Addendum.
- 4.5. It is therefore considered that there would be no changes to the assessment of landscape and visual likely significant effects arising from the Proposed Development, due to the proposed land uses amendment.

Relocation of Car Parking

- 4.6. The removal of the proposed visitors' car parking from the middle valley slopes at the southwest of the Site due to challenges of ground conditions, and the relocation of that visitor car parking to beneath the proposed hotel within the Wildfox Hotel zone (formerly the X-Sports Village zone), would remove short-term visibility of visitor car parking on the sloping landform, in people's views from the west and southwest; though the remainder of the Proposed Development would be visible as previously described in the 2017 LVIA and 2019 LVIA Addendum.
- 4.7. The Entrance and Wildfox Terrain zone is proposed in place of the former car park area. Parameters for proposed buildings in this zone remain unchanged from the consented parameters.
- 4.8. As the Entrance and Wildfox Terrain zone would remain in accordance with the consented parameters of the former Car Park zone area, including building sizes and heights, the likely landscape and visual effects would remain as those identified in the worst-case assessment of the 2017 LVIA and 2019 LVIA Addendum. The proposed relocation of the car park would not lead to new or different likely significant landscape or visual effects.

Internal Distributor Road Alignment

- 4.9. The proposed internal distributor road alignment has been amended to reflect the existing road alignment of the Site. It is considered that the likely landscape and visual effects would remain as those identified in the 2017 LVIA and 2019 LVIA Addendum. The proposed change to the internal distributor road alignment would not lead to new or different likely significant landscape or visual effects.

Amendment of Building Dimension Parameters in X-Sports Village Zone

- 4.10. The proposed hotel and apartments were originally proposed within the eastern Central Plaza Zone, on the upper plateau central to the Site. Paragraph 11.142 of the 2017 LVIA notes that the development within the Central Plaza was restricted to a maximum building height parameter of 15 m above existing ground level. Paragraph 11.143 of the 2017 LVIA notes that the X-Sports Village zone was also located on the central plateau with building height restricted to 12 m above existing ground level.
- 4.11. The X-Sports Village zone is now named the Wildfox Hotel zone, and the amendment of the building dimensions in this zone relates only to length and width parameters. For the purpose of clarity, the building height parameter remains at 12m maximum for this Wildfox Hotel zone.

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- 4.12. The width parameter of buildings in the Wildfox Hotel zone is proposed to be increased from 40 m to 47 m to accommodate the undercroft car park decks beneath the hotel. The proposed hotel building and apartment building are proposed to be connected by a light, glazed bridge structure at the first floor level. The use of a glazed bridge to connect the main hotel building and the apartment building would maintain the visual separation of these buildings in views. The length parameter has been amended from 115 m to 188 m, which includes the length of the proposed hotel and the car park underneath it. The width of the proposed apartment building is 16.3 m width and 45.5 m length, which is within the proposed amended building parameters of 47 m width and 188 m length.
- 4.13. Whilst individual buildings were not assessed in the 2017 LVIA and 2019 LVIA Addendum, the development parameters were mapped within the DTM. The DTM, which was used as a reference in the assessment of visual effects for each view in the LVIA, draped the parameter zones over the landform and extruded those parameter zones up to the maximum parameter building heights.
- 4.14. Because there is no proposed change to the maximum building height parameter of 12m for the Wildfox Hotel zone, and because the proposed hotel buildings within the Wildfox Hotel zone parameter area would still be located on the central plateau of the Site, although they are in a different location to the consented parameter plan, it is considered that the likely landscape and visual effects would remain as those identified in the 2017 LVIA and 2019 LVIA Addendum, and therefore this change would not lead to new or different likely significant landscape or visual effects.

5. Conclusion

- 5.1. A review of the 96A submission information and the proposed changes as shown on **Parameters Plan – Drawing No 17023(90)210 Rev O** and Concept Masterplan **Drawing No 170239(SK) 01 Rev P**, together with a review of the 2017 LVIA and 2019 LVIA Addendum, has determined that the revised amendments are not considered to be likely to result in new or different likely significant landscape and visual effects compared to the consented scheme assessment provided in the 2017 LVIA and 2019 LVIA Addendum.

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Stantec 10 Queen Square Bristol BS1 4NT
T: +44 (0)117 332 7840 E: bristol@stantec.com