



LANDSCAPE & VISUAL IMPACT ASSESSMENT

**Formation of a Truck Stop, with Change of Use of Existing Dwellinghouse & Annexe to Guest Room Accommodation, with Café, and Erection of rear single-storey extension to accommodate spa facilities, together with formation of an HGV Parking Area, Internal Access Road & Associated Infrastructure
At Land at Tyn-y-Caeau, Margam Road, Margam, Port Talbot**

**On Behalf of
Recycling Plant & Machinery Limited**

**Our Ref: 1112c
Date: October 2022
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1.0 INTRODUCTION & NEED FOR LVIA

- 1.1 This Landscape & Visual Impact Assessment is made to support an Environmental Statement, which has been prepared in accordance with a screening opinion made by Planning Inspectorate (now PEDW) following receipt of an Appeal under Section 78 of the Town & Country Planning Act 1990 (as amended). The Appeal relates to the refusal of full planning permission by Neath-Port Talbot County Borough Council for the *“Formation of a Truck Stop, with Change of Use of Existing Dwellinghouse & Annexe to Guest Room Accommodation, with Café and erection of rear single-storey extension to accommodate spa facilities, together with formation of a HGV Parking Area, Internal Access Road & Associated Infrastructure”* at Land at Tyn-y-Caeau, Margam Road, Margam, Port Talbot.
- 1.2 An Environmental Statement was formally submitted to Planning Inspectorate in February 2021. It was subsequently formally assessed, and an Inspector’s *“Assessment of Environmental Statement”* (May 2021) indicates that the ES *“should include an assessment that describes the likely significant effects of the development on the environment having regard to the landscape and visual impacts of the development during construction and operation, including baseline landscape and visual receptors. The assessment should describe the significance of any change, and the likely impacts arising from the trees to be removed, including any trees that might be affected by the proposed diverging lane. The assessment should describe the methodologies used to obtain and verify information, any difficulties encountered in compiling the relevant information, and any mitigation measures during the construction and operation of the development.”*
- 1.3 A revised Environmental Statement was prepared and formally submitted to PEDW in October 2021. It includes a Section describing the landscape and visual impact of the proposed development in the context of the landscape character and visual setting at Margam. A further Inspector assessed the ES and reported his findings in December 2021. In the *“Assessment of Environmental Statement”* the Inspector noted that *“the EIA Screening Assessment did **not identify landscape and visual effects as likely to give rise to significant environmental effects**. The submitted material considers the visual impact of the development in relation to the site’s environs, key viewpoints and key landscape receptors. It also confirms that roadside site perimeter vegetation would be retained, a proposal rendered more achievable if a diverge taper to the site access is not required.”*
- The Inspector considered the methodology behind that submitted in the Landscape & Visual Impact chapter of the revised ES. He concluded that *“Chapter 10 does not set out the methodology used to assess the magnitude and significance of the landscape and visual impacts of the proposed development, including assessment of baseline conditions and evaluation of the magnitude of impacts, the sensitivity of Assessment of receptors and the significance of effects, in line with Landscape and Visual Impact*

Assessment best practice guidance. The submitted ES remains deficient in this respect.

- 1.4 The Assessment of Environmental Statement (December 2021) provides an Annex 1 and the key issues requiring revisions and attention in order to ensure that the ES can be considered complete. The content of a LVIA is one such issue, with the Inspector indicating that:

“The ES should include a systematic and objective assessment, utilising methodology established by professional best practice, which describes the likely significant effects of the development on the environment having regard to the landscape and visual impacts of the development during construction and operation. The assessment should identify baseline landscape and visual receptors; assess the host landscape and its sensitivity to change; and describe the nature and magnitude of change at representative and other key viewpoints, the sensitivity to change of the receptors concerned and the resulting significance of any change. The assessment should describe the methodologies used to obtain and verify information, any Assessment of difficulties encountered in compiling the relevant information, and any mitigation measures during the construction and operation of the development.”

- 1.5 Accordingly, this LVIA sets out to address such matters and provide an Assessment based upon the Inspector’s requirements to ensure completeness of the entire Environmental Statement. The above Appeal against the refusal of planning permission has subsequently been withdrawn, and a new and revised application for planning permission prepared. This LVIA forms part of an Environmental Statement to be considered under that submission.

2.0 SITE ANALYSIS AND CONTEXT

2.1 SITE ANALYSIS

- 2.1.1 The Application site is set off the western flank of the A48 Margam Road, upon a section of that road which runs between Junction 38 of the M4 motorway at Margam and roundabout junction with the A4241 "Harbour Way" dual carriageway to Margam Steelworks. The site is some 4 acres (1.62 hectares) in size and accommodates a detached two storey house with basement level, together with a modern two-storey detached annexe set within a surfaced yard to the far south-western corner of the site.
- 2.1.2 The property has been vacant in recent years yet nevertheless remains water-tight, with a full roof covering, window and door openings which have remained secure. The property is conspicuous by its double height bay window to the eastern side gable and high saddle roof. The host building is set out internally as a detached house with conservatory to its rear. Detached to its western side, lies a two-storey annexe constructed in recent years with bedrooms uniformly set out over both floors.
- 2.1.3 The property is accessed via a long, single width surfaced driveway which runs for several hundred metres off a gated access to the A48 road. Open semi-improved grassland lies either side of the driveway with the landform gently undulating. The perimeters of the small holding are well-defined, being continuous rows of mature deciduous and evergreen trees, which tend to encircle the site.
- 2.1.4 The property lies with open former pasture adjoining to the south, which also bounds the western flank of the A48 as it descends in dual-carriageway form from the Margam motorway interchange. A wide highway verge is to be found which is equipped with surfaced footway, which also forms part of National Cycle Route 4 and the Wales Coastal Path.
- 2.1.5 Figure 1 below illustrates the setting of Tyn-y-Caeau off the A48 Road. Figure 2 provides a Google Earth image which illustrates the property and grounds. The image also provides an indication of its proximity to the A4241 roundabout interchange which provides access to industrial uses at Margam associated with wood recycling and electricity generation. The industrial estate spine road to that nearby development passes north-west of Tyn-y-Caeau, with a turning head formed, separated from this site's perimeter by a swath of unkempt shrub.
- 2.1.6 Photographs 1-4 below provide illustrations of the existing arrangements at Tyn-y-Caeau, and specifically the existing access off the A48, and the open expanse of grassland to the foreground of the house.

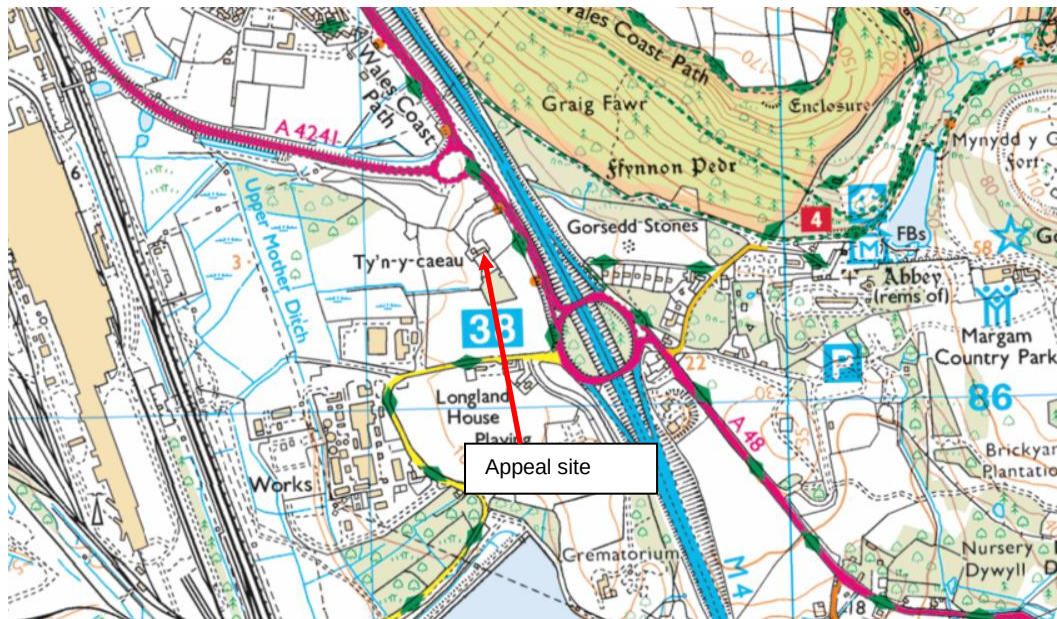


Figure 1 – Ordnance Survey Explorer Map extract

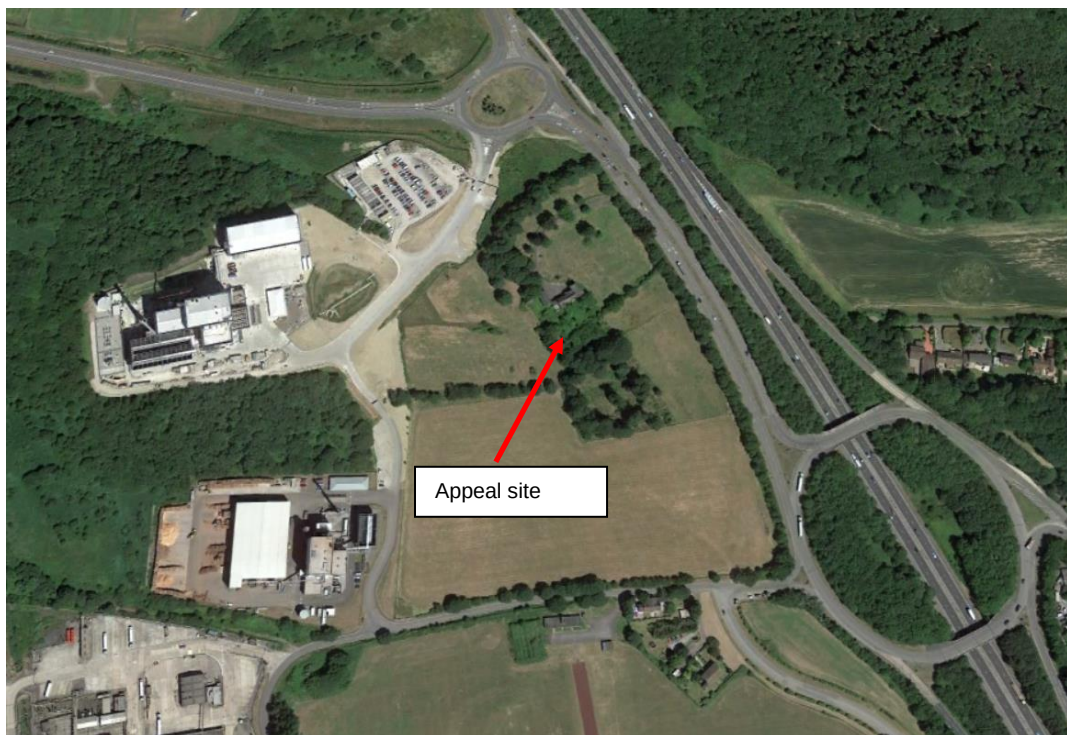


Figure 2 – Google Earth image – June 2020



Photo 1 – view of the existing buildings at Tyn-y-Caeau



Photo 2 – view of side elevation of existing house



Photo 3 – view of existing detached, two-storey Annexe



Photo 4 – view from A48 carriageway to existing site access gates



Photo 5 – existing access gates

3.0 LOCAL PLANNING POLICY & DEVELOPMENT PROPOSALS

- 3.1 The development plan in form for the purposes of Section 38(6) of the Planning & Compensation Act 2004 is the Neath-Port Talbot Local Development Plan, which was adopted in January 2016.

The appeal site is located within the Margam Moors part of Port Talbot as contained within the Plan. The Proposals Map of the LDP is reproduced below as Figure 3 and indicates the land **encircled to the north, south and west** by allocations for future strategic employment growth, under Policy EC1 and Policy W/1/1 relating to land set aside for potential In-Building Waste Treatment Facilities.

- 3.2 The site at Tyn-y-Caeau is unallocated, probably as it is held in private ownership, whereas land adjoining is held in public ownership for future employment growth. Nevertheless, it is abundantly clear that the site exhibits an established residential use, which has not questioned by the Local Planning Authority. **Therefore, in the absence of these proposals, the two buildings on site could be occupied for unfettered and permanent residential use.**

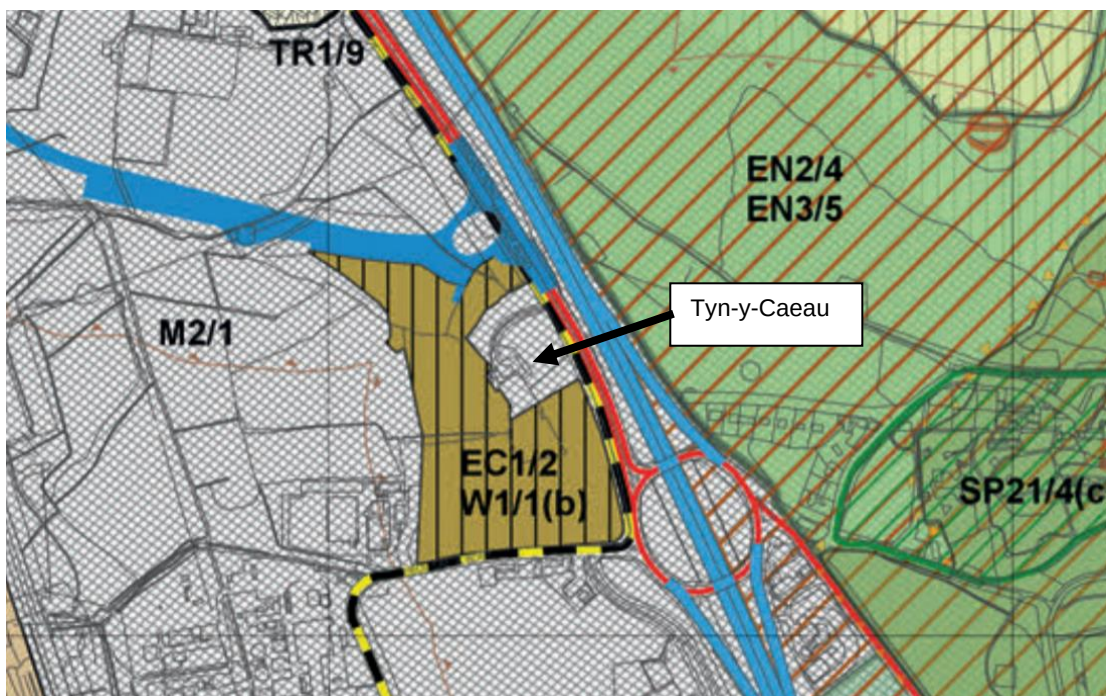


Figure 3 – LDP Proposals Map extract of Margam

- 3.3 Policy SC1 “Settlement Limits” provides exceptions by which development proposals can be considered acceptable, stating that:
“Outside settlement limits, development will only be permitted under the following circumstances:

It constitutes a sustainable small-scale employment use adjacent to a settlement limit; or, (criterion 1.), or;
*It constitutes the small-scale expansion of an existing business **or the suitable conversion of an existing building**; (criterion 3.)*

- 3.4 The Application proposals at Tyn-y-Caeau involve the **conversion** and adaptation of two existing dwellings, together with the formation of a hard-surfaced parking area for HGVs and cars. No new buildings are proposed, with the only “new construction” being the replacement of an existing rear conservatory with a single-storey extension. The external proposals as reproduced in the Proposed Site Layout plan at Figure 4 below, illustrate for the laying of hardsurfacing over approximately 30% of the southern part of the open grassland between the existing buildings and perimeter with the A48 road corridor. Those engineering works are therefore wholly ancillary and subordinate to the proposed use of the host buildings as overnight sleeping accommodation, with daytime café and spa. The proposals fall into an appropriate exception as dictated by Policy SC1, and the Council are patently incorrect to instantly dismiss the conversion proposals as detrimental to the principles of protecting the landscape and “countryside” at Margam.



Figure 4 – Proposed Site Layout Plan

3.5 Policy EC1 of the LDP earmarks “Land south of J38” as “*The strategic employment allocation at J38 lies to the south of Harbour Way and adjacent to the A48 and M4 and thus benefits from excellent road transport links. The site is near to a number of existing employment and industrial operations.*

Harbour Way passes to the north of the allocation improving the transport linkages to the site. It is anticipated that the site will be delivered over the short term.”

The Applicants note that the adjoining land encircling Tyn-y-Caeau was allocated for such employment uses, **even though two residential properties lie close to the perimeter with that allocated land**. Little consideration appears to have been given to the established use of Tyn-y-Caeau for residential purposes and any effects such future employment facilities may have upon the continued residential use.

3.6 It is noted that the LDP does not contain any direct planning policies for transport-related schemes aiming to provide for “service areas” or “roadside facilities”. Instead,

LDP Policy TR2 *Design and Access of New Development* directs all development proposals to pay regard to the need to safely access the highway network.

- 3.7 Policy BE1 “Design” is a generic development control policy, applying to all development proposals, and requires proposals to respect the character and setting of the immediate and wider locality.
- 3.8 The County Borough Council have also adopted **Supplementary Planning Guidance** in conjunction to the LDP. One important SPG relates to “**Landscape and Seascape**” (May 2018). The SPG advises that its purpose is to “*assist and guide those proposing and designing new developments and submitting a planning application, to ensure that landscape and seascape are appropriately considered, protected and where feasible enhanced within any development proposal.*” (Paragraph 1.06).
- 3.9 The SPG has formulated an identification of those areas of important landscape in the County based upon a variety of resources, but primarily using **LANDMAP** (Landscape Assessment and Decision-Making Process). Reference to the use of LANDMAP to assist in the evaluation of the effects of the development proposals at Tyn-y-Caeau is presented in the following chapter of this LVIA, particularly in its **role to provide a baseline resource** for an already identified and respected characterisation of the landscape values at and near Margam.

The SPG reveals that **LANDMAP** has been used to designate “Special Landscape Areas” and “Green Wedges” within the LDP, which in the case of Margam has expanded upon CADW’s designation of ‘*Mynydd Margam*’ as a Registered Landscape of Special Historic Interest [Cadw Ref HLW(WGI/MGI)2].

3.10 DEVELOPMENT PROPOSALS

The proposals seek to provide for a commercial Truck Stop set within the southern part of Tyn-y-Caeau off Margam Road. The proposals will make use of the existing buildings, by forming a transport hub and service area for HGV drivers and other motorists. The existing two-storey buildings will **continue to accommodate overnight residential use** but in the form of 8 paying guest rooms, coupled with a café, and serving bar at ground and lower floor levels. The proposals involve the removal of the rear conservatory to form an extension, introducing spa facilities for overnight guests. An additional 8 guest rooms can be provided within the two-storey annexe.

- 3.11 The proposals would allow for all guests to utilise the ground floor café which extends into the basement area where a licenced bar will function. The ground floor could also provide meeting facilities and networking opportunities with those rooms let out to motorists also enjoying the other facilities at Tyn-y-Caeau.

The proposed site layout reveals that HGV parking can take place away from the expansive tree perimeters and their respective root protection zones. Parking for 20 HGVs can take place about the eastern and central areas within the site, whilst still allowing the majority of open pasture to remain undeveloped. Appropriate sustainable drainage measures are proposed to ensure pollution control of ground waters and the effective disposal of surface water.

An existing small stone outbuilding off the western perimeter is to be retained and adapted for use as a dedicated bat roost, following the discovery of bats foraging within the attic void of the host dwelling.

- 3.12 Highway improvements are proposed at the existing access. A deceleration lane is proposed along an 80 metres long stretch of the near edge of the A48 carriageway to enable all visiting vehicles to be able to slow down when entering the site. The A48 carriageway is dualled throughout its length from Junction 38 to the roundabout with the A4241, and consequently “one-way and northbound” in the sense of vehicle movement when accessing and egressing Tyn-y-Caeau. Radii at the existing access is to be substantially widened to 20 metres with each access and egress lane formed to a width of 6 metres. Such improvements and carriageway widening will still allow the interrupted use of the adjacent footway for pedestrians, which is also used as part of National Cycle Route 4. Visibility splays of 4.5 metres by 160 metres can be provided, to accord with the 50 mph speed limit along this section of A road, although it should be emphasised that all traffic is effectively decelerating as it passes Tyn-y-Caeau as drivers approach the A4241 roundabout.
- 3.13 The existing internal surfaced driveway is proposed to be widened to 7.3 metres width for the first 20 metres before reverting to single width with a circulatory one-way system deployed within the site itself.

4.0 Landscape & Visual Methodology for Assessment

- 4.1 Guidance and advice on Landscape and Visual Impact Assessment is available in the “**Guidelines for Landscape and Visual Impact Assessment**” published by the Landscape Institute (April 2013). It indicates that “*Landscape and Visual Impact Assessment (LVIA) is a tool used to identify and assess the significance of and the effects of change resulting from development on both the landscape as an environmental resource in its own right and on people's views and visual amenity.*”
- 4.2 The Guidelines indicate that the initial step in LVIA is to establish the baseline landscape and visual conditions. The information collected will, when reviewed alongside the description of the proposed development, form the basis for the identification and description of the changes that will result in the landscape and visual effects of the proposal:
- For the landscape baseline the aim is to provide an understanding of the landscape in the area that may be affected - its constituent elements, its character and the way this varies spatially, its geographic extent, its history (which may require its own specialist study), its condition, the way the landscape is experienced, and the value attached to it.
 - For the visual baseline, the aim is to establish the area in which the development may be visible, the different groups of people who may experience views of the development, the places where they will be affected and the nature of the views and visual amenity at those points.
- 4.3 The Guidance indicates that the level of detail provided should be that which is reasonably required to assess the likely significant effects. It should be appropriate and proportional to the scale and type of development and the type and significance of the landscape and visual effects likely to occur.
- The Guidance indicates that an LVIA should always take on board and refer to published evidence-based documents. In the case of those published documents relating to the site at Margam, it is considered that the following are of relevance:
- **LANDMAP character assessment**
 - **Neath-Port Talbot Local Development Plan (2016)**
 - **Neath-Port Talbot Supplementary Planning Guidance “Landscape and Seascape” (May 2018)**
- 4.4 In addition, this LVIA has taken on board any **Heritage Assets** in the locality, namely:
- Scheduled Ancient Monuments - GM163, GM477 and GM488
 - Listed Buildings – Margam Castle, Abbey and Orangery
 - Conservation Area – Margam Park
 - CADW Registered Landscape of Outstanding Historic Interest - Crymlyn Burrows, Kenfig and Margam Burrows

- CADW Registered Landscape of Special Historic Interest - Mynydd Margam
- Special / Important Public Rights of Way - St Illtyd's Walk & Wales Coastal Path

4.5 This LVIA has therefore taken on board this advice and used the above published evidence to form "baseline conditions" to inform this Assessment of the effects of the proposals for a Truck Stop at Tyn-y-Caeau.

It is borne out in the application proposals that the "*construction*" and "*operation*" of the proposed Truck Stop merely amounts to use of existing buildings, **which will undergo very little visual change**. An area of hard surfacing is being introduced over the southern third area of the holding, and the existing access is being modified and adapted to improve vehicular access. The detailing of the effects of such change in the landscape are therefore presented in that context. This is particularly evident in that the original screening of Landscape matters under the provisions of Environmental Impact Assessment Regulations **did not highlight nor identify landscape and visual impact effects as likely to give rise to significant environmental effects**.

5.0 Existing Baseline Conditions – Landscape Effects

5.1 Study Area

A Study Boundary Area has been established to consider the landscape effects at Margam. It is based upon guidance provided by Natural Resources Wales in their publication of the LANDMAP designations. It specifically uses NRW past experience of development and uses the height of new development as a guide for adjudging the visual impact of a proposal upon the landscape. Such guidance has been typically used for taller projects such as windfarms, power stations, large industrial projects, involving high commercial buildings and structures. Of course, in the case of Tyn-y-Caeau, **no new building is proposed**, with works merely concentrated upon forming HGV parking areas, providing improved access facilities, and a retention of as many perimeter trees as possible given their health value. **The NRW Landmap advises that for structures under 25 metres height, a Study Area of 3.0 kilometres should be deployed.**

5.2 In the case of centring the Study Area at the site near Margam, such a 3.0 km radius takes to include the seaward slopes of Brombil Mountain to the east of the site, Margam Registered Landscapes of Historic and Special Interest to the east and southeast, Margam Moors and Eglwys Nunydd Reservoir to the south and south-west, Margam Steelworks to the west and settlement of Margam / Taibach to the north.

Figures 5 & 6 below illustrates a 3 kilometres study area centred from Tyn-y-Caeau.

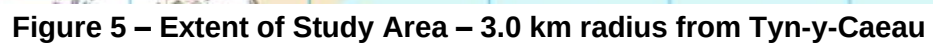




Figure 6 - Extent of Study Area – 3.0 km radius from Tyn-y-Caeau

5.3 LANDMAP Classifications

Consideration has been paid to the NRW's publication **Landscape Assessment and Decision-Making Process (LANDMAP)**. It forms a 'whole landscape' approach that covers all landscapes, designated and non-designated. It identifies key landscape characteristics and qualities that can be used to aid planning policy and decisions. The guidance states that the use of all five layers of information, namely:

- **Historic Landscape,**
- **Visual and Sensory,**
- **Cultural Landscape,**
- **Geological Landscape, and**
- **Landscape Habitats,** can be used to promote sustainable landscape decision making, giving all five layers equal consideration.

- 5.4 LANDMAP evaluations range from a local to a national scale of landscape importance as follows:

Outstanding: nationally important landscape

High: regional or county importance

Moderate: local importance

Low: low importance in the LANDMAP dataset

- 5.5 An examination has taken place of each of the five landscape layers produced by NRW, as applicable in the Study Area. The "**Visual and Sensory Landscape**" extract for the defined Search Area is reproduced as Figure 7 below, with the Appeal site identified by a red arrow. It illustrates that the site itself is located in an area defined as of "**Low**" importance, with the M4 Motorway acting as a defining edge to the change in landscape value to the east where the high value afforded to the Registered Historic Gardens of Margam Park with tracts of adjoining ancient woodland are respected, before the landscape rises in topography but also depreciates in value upon Mynydd Brombil.

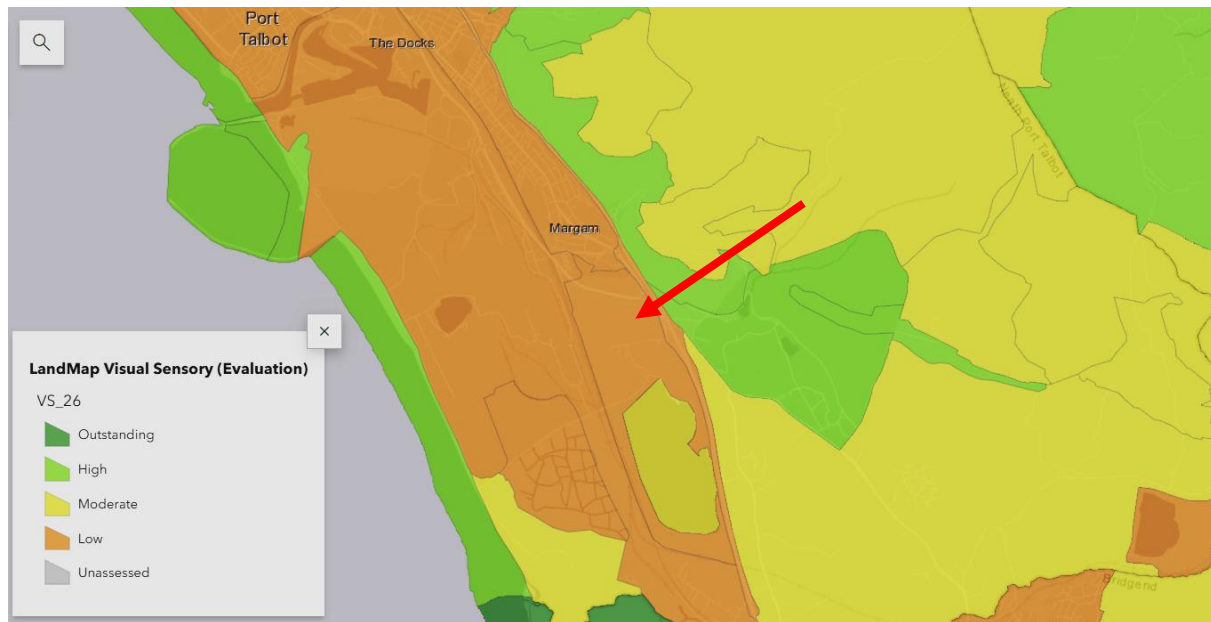


Figure 7 – Visual & Sensory Landscape Evaluation

- 5.6 The **Geological Landscape** Evaluation layer repeats the “**Low**” to “**Moderate**” classification of land off the western flank of the motorway and identifies the “**High**” value afforded to the historic parkland at Margam Castle and grounds, as shown in Figure 8 below.

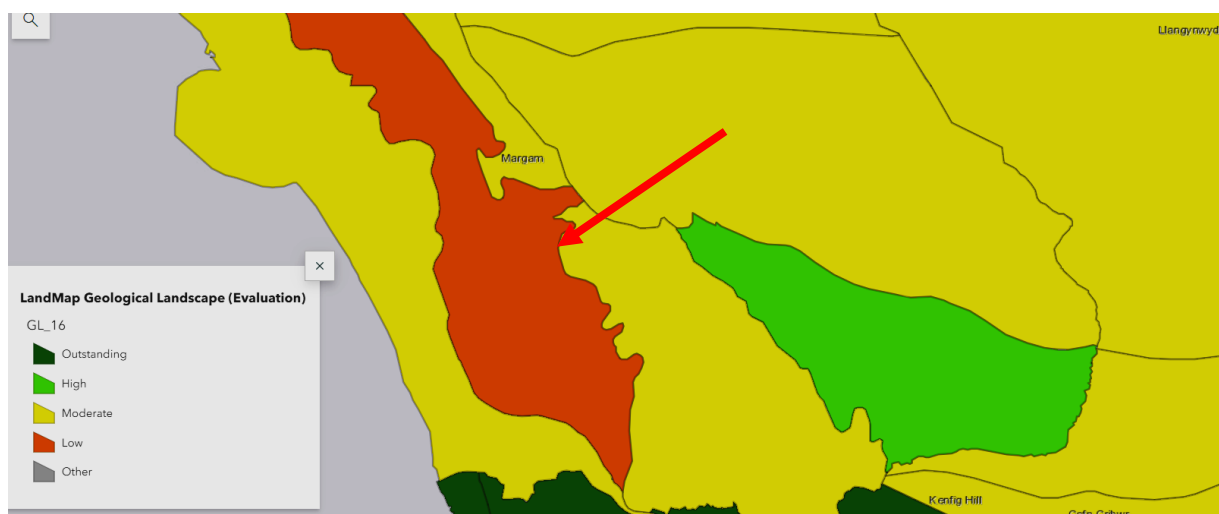


Figure 8 – Geological Landscape Evaluation

- 5.7 The **Landscape Habitats** Evaluation is shown at Figure 9 below, and illustrates a more varied evaluation, with the site part of a series of lowland fields noted overall for marshy grassland set between the motorway and main rail line, with the reservoir shown to the south of equal “**High**” evaluation.



Figure 9 – Landscape Habitats Evaluation

- 5.8 The fourth LANDMAP landscape layer focusses upon “**Historic Landscape**” and as revealed at Figure 10 indicates that the post war industrial growth of the Margam locality has rendered the landscape west of the motorway to Margam Sands as “**Moderate**”. The historic designations associated with Margam Park, its Registered Historic status, Conservation Area and individual Scheduled Ancient Monuments at higher ground rightly achieve “**Outstanding**” evaluation status.

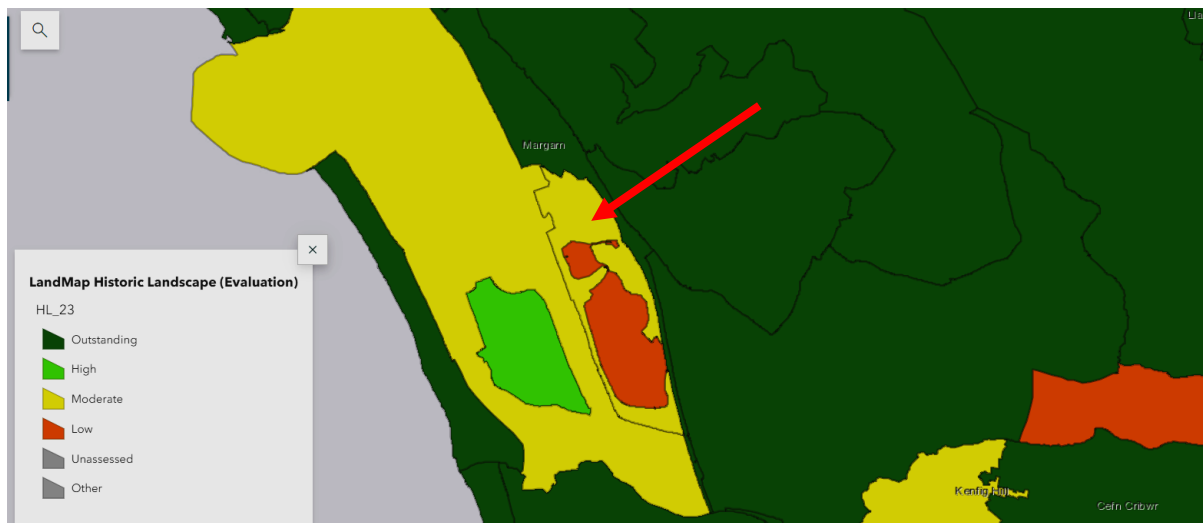


Figure 10 – Historic Landscape Evaluation

- 5.9 Finally the “**Cultural Landscape**” has been evaluated by NRW Landmap and reveals the extent to which the landscape at Tyn-y-Caeau is part of a network of open, lowland enclosures, which is largely flat to undulating, with the urban form of Margam to the north and west beyond Harbour Way. Upland grazing dominates to the east upon Mynydd Brombil, with lowland parkland at the historic Margam Park unsurprisingly characterised to the south-east.



Figure 11 – Cultural Landscape Evaluation

5.10 NPT Supplementary Planning Guidance “Landscape Character Areas”

The Council’s SPG “*Landscape and Seascape*” (May 2018) indicates at Paragraph 3.2.1 that “*Landscape and Visual Impact Assessment (LVIA) will often be required as part of the Environmental Impact Assessment (EIA) process for many proposals but should be undertaken in all cases where there is likely to be a significant landscape or seascape impact from a proposal.*” In the case of the proposals at Tyn-y-Caeau, the **landscape effects have not been adjudged as of significant environmental concern** as concluded by the formal screening opinion undertaken by PEDW.

- 5.11 The SPG highlights “Special Landscape Areas” that have been defined in the LDP under Policy EN2. An extract from the Margam SLA is reproduced as Figure 12 below and covers a very broad area stretching east of the M4 motorway, encompassing Mynydd Margam, Mynydd Brombil, and descends to the lowland mosaic farmland associated with Margam Park, and its fine architectural-period buildings of Castle, Abbey, Orangery and walled gardens and enclosures, with associated open vistas of a formal deer park.

The positioning of the site at Tyn-y-Caeau is highlighted, being physically segregated by the motorway, and taking upon a landscape which is remarkably different in landscape form, which has been largely given over to industrial development and urban growth.

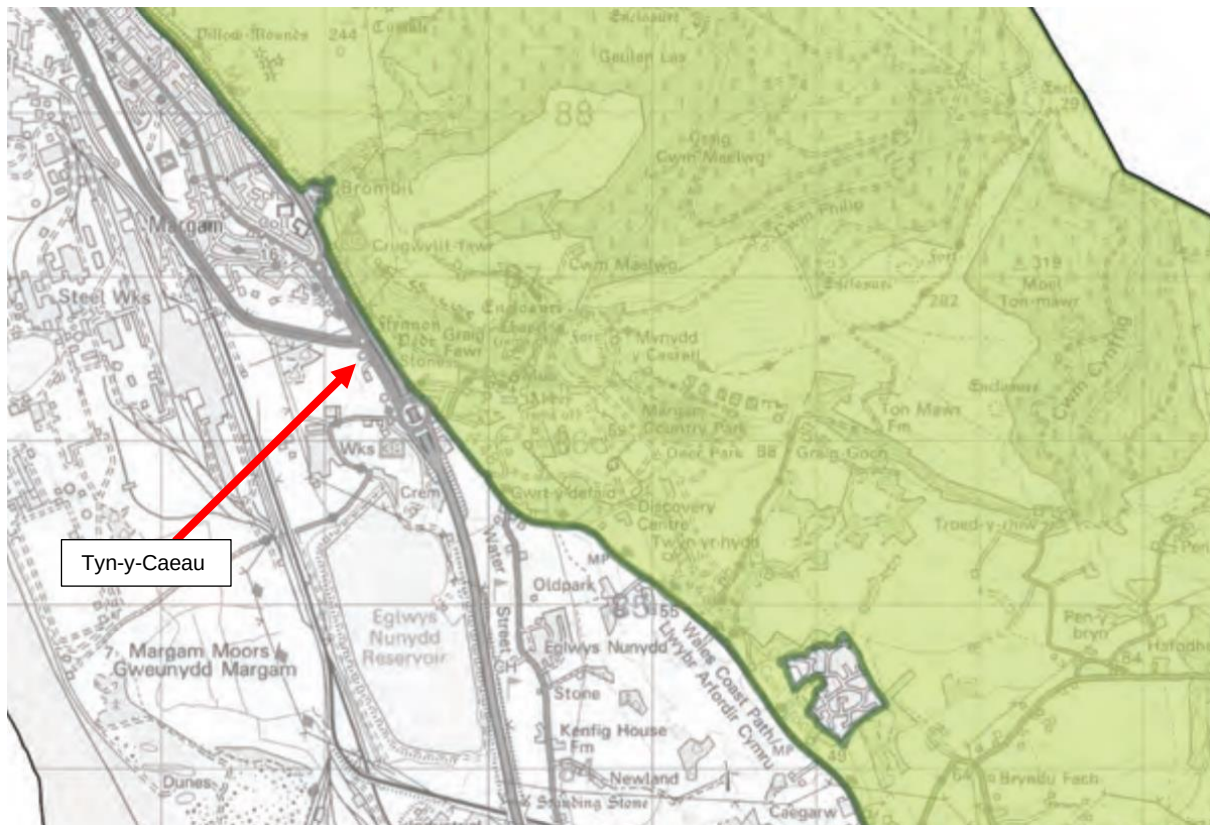


Figure 12 – Margam Special Landscape Area, as defined by Policy EN2 of the NPT LDP

SLA4 Margam Features and Characteristics

- Mynydd Margam is a broad, low lying plateau of NE dipping Productive Coal Formation mudstones and coals between South Wales Pennant Formation escarpment and E-W Millstone Grit ridge to the South, dissected by shallow, alluvium filled valleys of tributaries and the main Cynfig valley. It includes mine workings and the proposed deep mine.
- Cultural features in the landscape include evidence of prehistoric and later agricultural practices, rural settlements and contemporary forestry activities.
- It is an evolved landscape containing multi-period cultural expressions untrammelled by industrial exploitation - extensive archaeological evidence of land husbandry, now given over to forestry interspersed with some small farms and thus is a comparatively rare example of a surviving relict landscape.
- The SLA, which contains Margam Park, with its exceptional examples of architecture; its history as a major Cistercian Abbey and the wider monastic landholdings, provides a combination of high grade historic visitor attraction and a variety of multi-period pleasure grounds. It contains cultural elements dating from pre-history through every period up to the 21st century.
- Whilst the SLA contains areas of forested upland these are important to the overall historical context of the area and could be managed to enhance the landscape quality of the wider area.
- The scenic quality of the area is enhanced by the historic buildings of the Park and the backdrop of scarp creating a sheltered setting which link visually and provide the integrity of the whole. The sense of place for the park is initially prompted with boundary walls and entrance gates. The historic core and deer park make this area unique within the County.

- 5.12 The LDP and SPG also refer to “Green Wedges” defined under Policy EN3, with a significant area designated at Margam. Green Wedges are “*designated areas of countryside where development is more strictly controlled in order to maintain openness and prevent the coalescence of settlements.*”
PPW sets out the purpose of green wedges as being to:
Prevent the coalescence of large towns and cities with other settlements;
Manage urban form through controlled expansion of urban areas;
Assist in safeguarding the countryside from encroachment;
Protect the setting of an urban area; and
Assist in urban regeneration by encouraging the recycling of derelict and other urban land.”

Figure 13 below illustrates an extract from the LDP Margam Green Wedge, and it is again noted that the site at Tyn-y-Caeau falls outside the designation, with the motorway corridor providing the defining boundary to the part of the landscape afforded greater classification and ultimately more protection under the LDP and SPG.

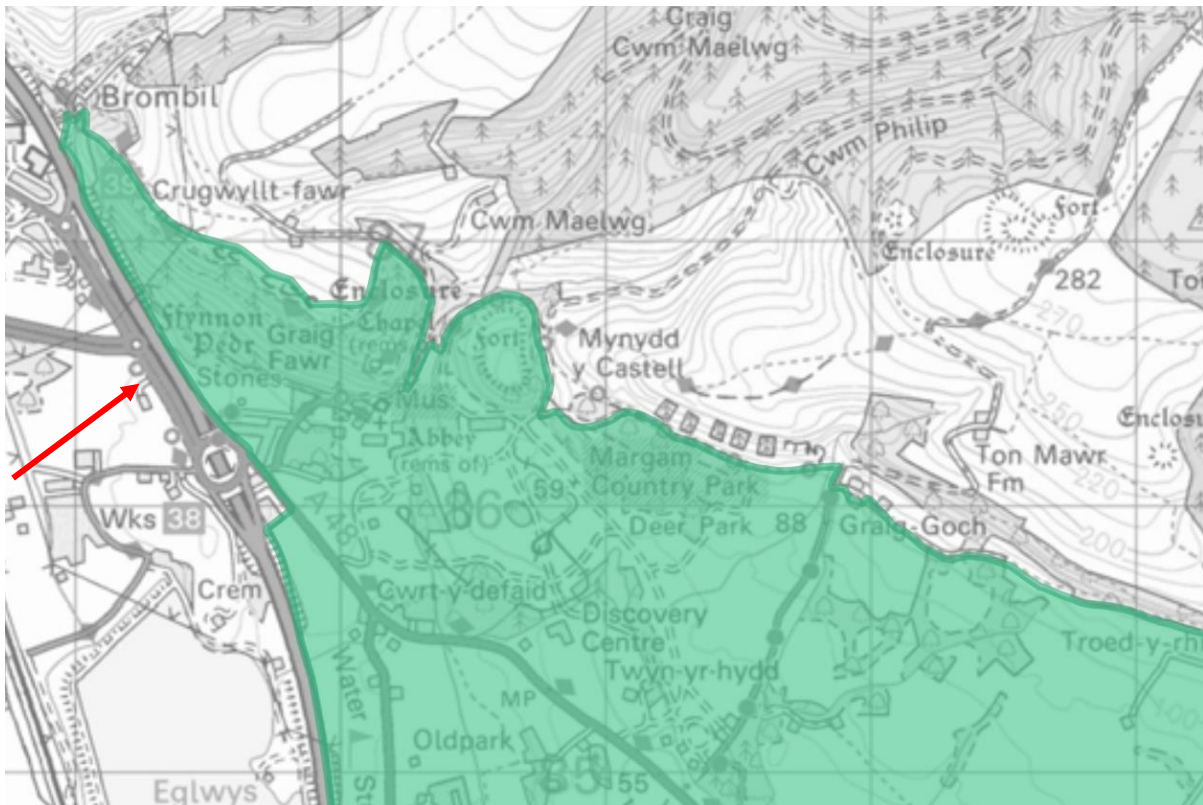


Figure 13 – extract from Margam Green Wedge as defined in the NPT LDP

- 5.13 Neath-Port Talbot CBC in collaboration with Natural Resources Wales produced a “*Neath-Port Talbot Landscape Assessment*” in 2004, which is widely referred to in the 2018 SPG and ultimately guided the designation of Special Landscape Areas and Green Wedges in the adopted LDP.

The Study was able to define 53 “**Landscape Character Areas**” across the County Borough, and in particular characterises the locality about Margam into differing LCAs.

- 5.14 **The site at Tyn-y-Caeau falls into LCA01 “Margam Marsh”**, with the landscape off the eastern flank of the motorway falling into LCA03 “Margam Country Park”, with LCA04 “Coedhirwaun” to the south-east beyond the roundabout junction of Junction 38. Mynydd Brombil is defined under LCA06 to the north-east, with the urban form of Margam, Taibach and TATA Steelworks defined under LCA49 and LCA50 respectively.

The LCA01 at Margam Marsh provides a definition of the landscape classification of the area extracted from LANDMAP landscape classifications as shown below, and as already discussed above in preceding paragraphs.

Evaluation

No	Character Area	Visual and Sensory Aspect Areas	Geological Landscape Aspect Areas	Landscape Habitats Aspect Areas	Historic Landscape Aspect Areas	Cultural Landscape Aspect Areas
1	Margam Marsh	1 - l 3 - l	32 - l	73 - h 68 - h	1 56 58	3 - h 4 - h

It again highlights that the site at Tyn-y-Caeau is classified as in a landscape which possesses **low** Visual and Sensory and Geological Landscape attributes, but **high** Landscape Habitat and Cultural Landscape Aspects.

6.0 Methodology for Systematic and Objective Assessment of Effects upon Landscape – Visual Effects

- 6.1 A formal Assessment Criteria has accordingly been established to ascertain the likely visual effects of the proposed development upon the prevailing landscape within the defined Search Area. The above Baseline Conditions relating to published public landscape evidence has guided the writer and valuer to understand the important and relevant landscape attributes and classifications near the site.
- 6.2 To guide that assessment, advice contained within the “**Guidelines for Landscape and Visual Impact Assessment**” published by the Landscape Institute (April 2013), has again been used to quantify and evaluate **the level of resultant visual effect**, under the following factors:
- The **sensitivity** of landscape receptors (aspects of the landscape resource that have the potential to be affected by the proposal) and visual receptors (people whose views may be affected), which is dependent upon the value attached to the aspect of landscape or view and its susceptibility to harm due to the development proposal.
 - The **magnitude** of an effect (the change brought about by the development proposal), which depends upon the scale and geographical extent of the change, and its duration and reversibility.
 - The **significance** of an effect, which depends on the receptor’s sensitivity and the magnitude of the effect.
- 6.2 The component parts of each of these factors have been combined and described using word scales. A five-point “significance” scale has been deployed - **very low, low, medium, high, and very high**, and each of these ratings is accordingly defined in the assessment methodology.

Those significant scale categorisations are defined as follows:

Landscape & Visual Sensitivity Classifications:

Very High:

The view has intentional association with surroundings and maybe recorded in published material relating to an accessible heritage asset. It may be viewed from a nationally designated right of way and from protected position in a planning policy designation.

High

The view is of clear value but may not be formally recognised.

Medium

The view is not widely promoted or recorded in published sources.

Low

The view is clearly lesser value than similar views from nearby visual receptors that may be more accessible.

Very Low

The view may be affected by many landscape detractors and unlikely to be valued.

Magnitude of Change posed by Development:**Very High**

A total loss and / or major alteration to key receptors of the landscape baseline. Brings an addition of elements that strongly conflict or integrate with the landscape baseline. The visual effect is a substantial change to the baseline, forming a new, defining focus and having a defining influence on the view.

High

Poses a notable loss, alteration and / or addition to one or more key landscape receptors and characteristics of the landscape baseline. The change could pose prominent conflicting elements. The visual effect would be that the additions are clearly noticeable, and part of the view would be fundamentally altered.

Medium

There would be a partial loss and / or alteration to one or more key landscape receptors and characteristics. It would provide the addition of elements that are evident but do not necessarily conflict with the key characteristics of the existing landscape. The visual effect of the proposed development will form a new and recognisable element within the view which is likely to be recognised by the receptor.

Low

There would be a minor loss or alteration to one or more key landscape receptors and / or characteristics. Any additional elements may not be uncharacteristic within the existing landscape. The visual effect of the proposed development will form a minor constituent of the view being partially visible or at sufficient distance to be a small component.

Very Low

The would be a barely discernible loss or alteration to key components of the landscape, with the addition of elements not uncharacteristic within the existing landscape. The visual effect of the proposed development will form a barely noticeable component of the view, and the view whilst slightly altered would be similar to the baseline.

- 6.3 The above significance scales have been considered and adjudged during a walkover of various public viewpoints within the Study Area in late April 2022. That walkover was undertaken in good weather conditions, being dry with varying cloud, light wind and at early afternoon hours with the sun at its highest for that time of year.

The conclusions were determined using a combination of quantitative (objective) and qualitative (subjective) methods. The assessment has used professional judgement gained over a period in excess of 30 years by the writer as a practising Chartered Town Planner, being a Full Member of the Royal Town Planning Institute (MRTPI).

- 6.4 The area of study for the visual assessment extends to the whole of the area from which the Development Site and its proposed scheme is visible. This is hereinafter referred to as the “**visual envelope**” or “**zone of visual influence**.”

The type of view can be described as one of the following types:

- a) No View: truncated / curtailed / no view of the Site or it is difficult to perceive, or;
- b) Partial View: a view of part of the Site, or a filtered view of the Site, or a distant view where the Site is perceived as a small part of the view, or;
- c) Open View: a clear view of a significant proportion of the Site within the wider landscape.

7.0 Results of Visual Assessment within Zone of Visual Influence

- 7.1 The proposed development will see the former house and annex at Tyn-y-Caeau converted into a café and guest room accommodation with parts of the grounds used as parking for HGVs. The Applicants have since publication of the original ES discovered evidence which reveals that a 2005 planning permission to use the property as a Guest House, with extension to former studio apartments. **The detached former studios have already been completed for such Guest House usage.**
- 7.2 The external changes to the former house and annex will be minor and the main visual change will be the movement and parking of vehicles. Nevertheless, the site at Tyn-y-Caeau is encircled by high and mature vegetation, almost exclusively by deciduous trees. Those trees and hedgerows have undergone a professional arboriculture assessment by RTAC Surveys, who conducted two tree surveys in June 2020 and October 2021 respectively. The results of that Tree Survey are contained within the Environment Statement which this LVIA forms part thereof. However, it is considered important to present the conclusions of that Survey Report into this visual assessment exercise, as it carries significant weight in how, and if, the existing site can be viewed with the majority of those perimeter tree specimens retained. The scheme proposes replacement planting where any perimeter specimens are required to be felled as a result of disease, death or poor health and stature. Figure 14 provides an indication of the retained trees at Tyn-y-Caeau as part of the scheme. It should be noted that they

Figure 14 – Tree Protection Plan illustrating proposed development

An examination has taken place of potential public vantage points from which a view of the site at Tyn-y-Caeau can be achieved. The site lies with a road frontage upon a primary road, the A48, and also Harbour Way (A4241) to the north. Sections of those routes within this part of Margam also form part of the Wales Coastal Path and National Cycle Network Route 4: “Celtic Trail”.

Views have also been sought from the adjacent M4 Motorway, particularly from the elevated roundabout at Junction 38. Heol Cae'r Bont to the south of the site which provides access to the Longlands Lane playing fields and BOC Plant.

- 7.4 The Zone of Visual Influence also encompasses the nearby Registered Historic Park at Margam, and views from been sought from near the Scheduled Ancient Monuments and Listed Buildings at that venue.

The Wales Coastal Path, combined with the historic St. Illtyd's Walk upon elevated ground about Mynydd Margam and Mynydd Brombil, is highly accessible at Margam. The upland trail takes walkers past Scheduled Ancient Monuments at Half Moon Camp and Hen Eglwys and accordingly views have been sought from those important historical sites. Figure 15 indicates positions on an Ordnance Survey Explorer Map base of where such photographic views have been established. **Significance scale scoring has accordingly been deployed from those positions and reported at Paragraph 7.6 below.**

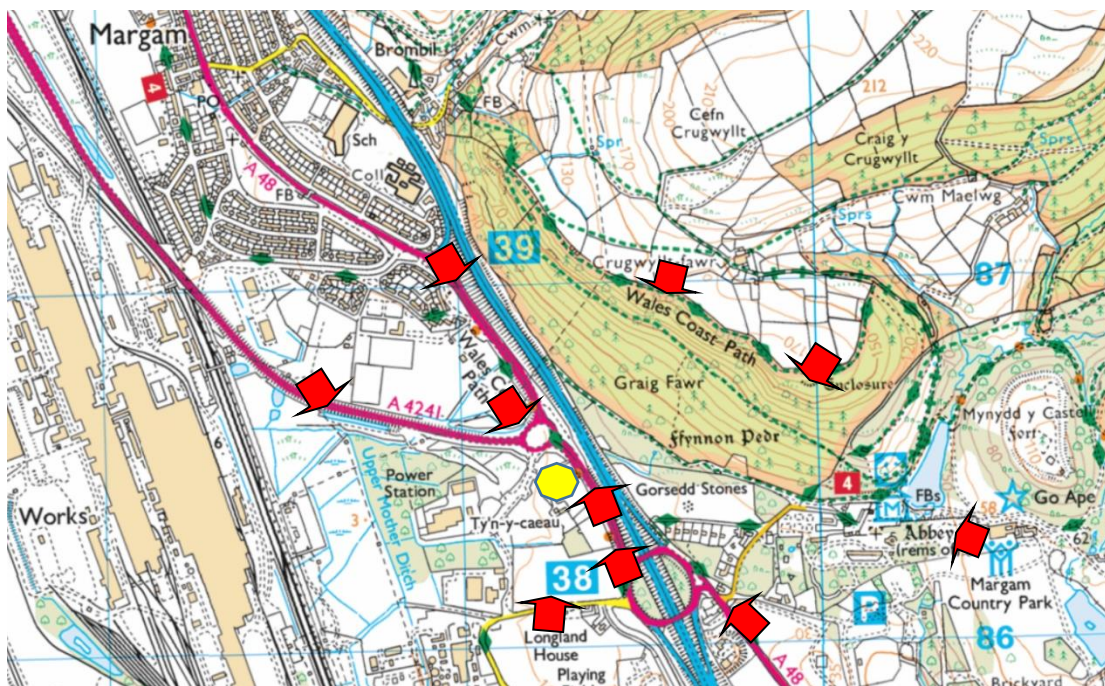


Figure 15 – OS Explorer Map with positions of photographic views in relation to site

- 7.5 Views from lower ground near the Application site have been established. The LANDMAP classifications rightly recognise that the landscape character of views from the M4 and A48 are “low” in evaluation. Nevertheless, they illustrate a level to undulating landscape west of the road corridors which benefit from established and mature vegetation, more often being planted specimens at a time when the motorway was constructed in the late 1960s / early 1970s.

Photographs have also been taken from Longlands Lane to the south, the A48 at Margam Country Park and Wales Coastal Path upon Mynydd Margam.

Each photo is numbered as follows with an indication of the OS Grid reference point taken from, approximate Ground Contour AOD, and approximate distance to Appeal site boundary, and shown as Table 1 below.

Photo No.	Location	OS Grid ref	Level AOD(m)	Distance to site (m)
5	J38 roundabout	795 863	22	214
6	A48 northbound	794 864	17	70
7	Harbour Way roundabout	792 866	10	60
8	A48 Abbots Close	791 869	10	460
9	A4241 south eastbound	788 865	7	430
10	Longlands Lane	793 862	20	245
11	A48 Margam Park access	799 858	30	830
12	Margam Castle	805 863	58	1110
13	Coastal Path / Half Moon	797 868	170	565
14	Coastal Path	801 868	165	630

Table 1 – Photo Positions and Distance to Appeal Site



Photo 5 – view from northbound carriageway of A48 at elevated Junction 38 Margam

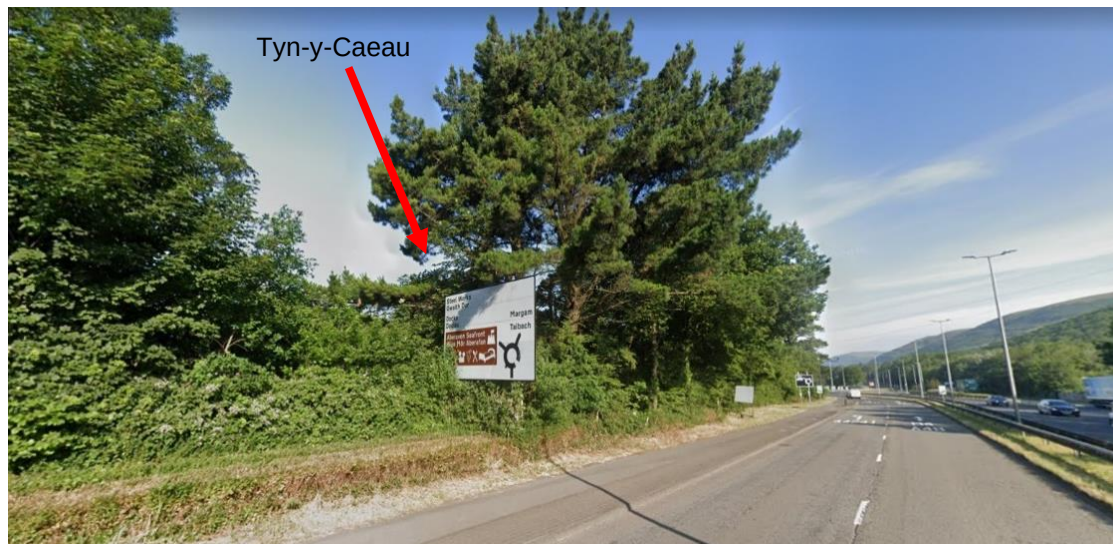


Photo 6 – view of northbound carriageway at mid-position between J38 and Harbour Way Junction



Photo 7 – view looking south towards northern perimeter of Tyn-y-Caeau from A48 / A4241 Roundabout



Photo 8 – View from A48 near Abbots Close viewing south



Photo 9 – view south-east bound on Harbour Way (A4241) towards Mynydd Brombil and A48 roundabout



Photo 10 – view from Longlands Lane looking south over adjoining employment allocated site

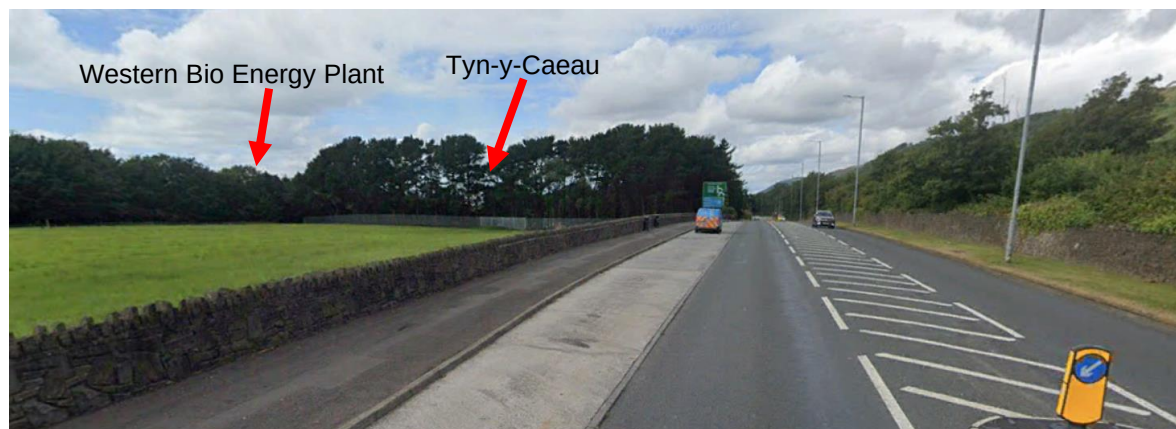


Photo 11 – A48 near Margam Country Park access looking west



Photo 12 – view from Margam Castle garden terrace looking west towards Port Talbot

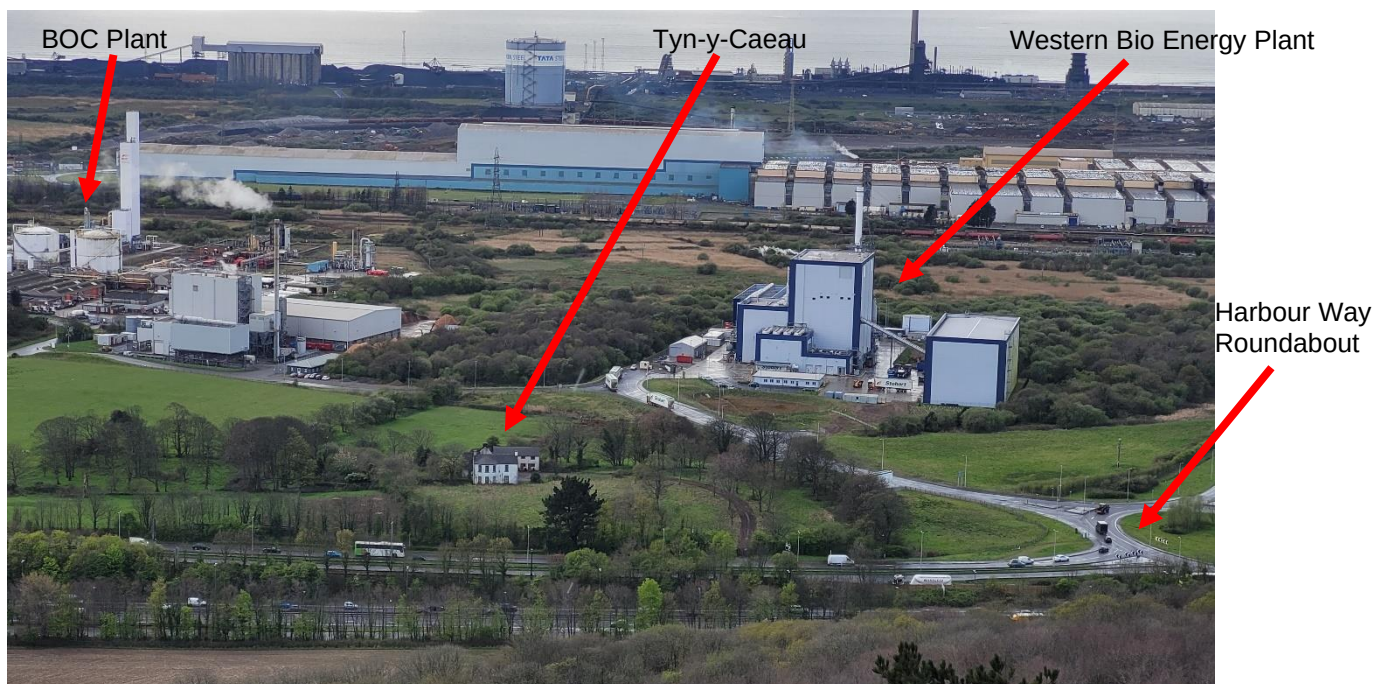


Photo 13 – view from near Half Moon Camp looking west from Wales Coastal Path

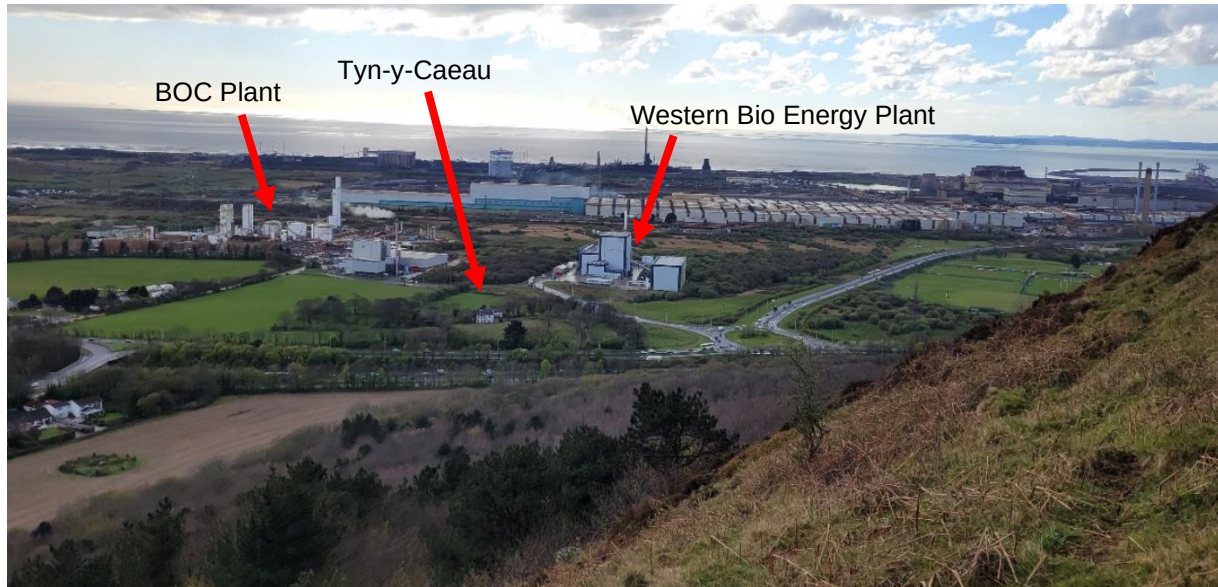


Photo 14 – view from higher ground at Wales Coastal Path of lowland plateau at Margam to Swansea Bay

7.6 Significance Scales Scoring

Table 2 below provides an analysis of the significance scoring concluded from the above 10 photographic positions taken within the Zone of Visual Influence. The viewpoints have been evaluated dependent upon the location **Sensitivity** in the landscape, and **Magnitude** of change posed by the proposed development, and an overall conclusion as to the **Significance** of the change presented to the landscape and visual impact.

Photo No.	Location	Sensitivity of Position	Magnitude Effect	Significance
5	J38 roundabout	Low	Low	Low
6	A48 northbound	Low	Low	Low
7	Harbour Way roundabout	Low	Medium	Low
8	A48 Abbots Close	Low	Very Low	Very Low
9	A4241 south-eastbound	Low	Very Low	Very Low
10	Longlands Lane	Low	Very Low	Very Low
11	A48 Margam Park access	High	Very Low	Very Low
12	Margam Castle	Very High	Very Low	Very Low
13	Coastal Path / Half Moon	High	Medium	Low
14	Coastal Path	High	Low	Low

Table 2 – Photo Views and resultant Significance Scoring Conclusions

7.7 From lower ground, closer to the site, off the A48 and Harbour Way, the landscape is one of road corridors enveloped by high continuous tree-lined perimeters. The prevailing landscape is of lowland field enclosures but dominated by the presence of established and very tall industrial plant and buildings, which rise considerably above the high tree line.

The retention of the nearside trees to the site with the A48, and confirmed to remain following the proposal to introduce a diverging lane, by the Transport Assessment which accompanies the Environmental Statement, is hugely significant. Views from passing motorists, pedestrians and cyclists will be of a continued high vegetated and continuous boundary to the A48 side of the site. The trees as existing completely screen any views of the two buildings at the site which are set back some 82 metres from the highway edge. The introduction of HGV parking areas off the inner field side of this perimeter

vegetation will also be screened at close quarters, but also at mid and long range vantage points as evidence by the above photographic view positions.

- 7.8 This lowlands landscape character is continued at Longlands Lane to the south, but the intervening tree perimeters across all boundaries of the fields to the south of the site add further natural screening to the point, meaning that it is difficult to pin-point the Tyn-y-Caeau buildings in the landscape.
- 7.9 The landscape at Margam Park is “outstanding” as classified by LANDMAP, as is the A48 approach with wider open pasture evidently acting as a rural foreground to the Park and Historic Gardens. The long range impression of Tyn-y-Caeau at some 1.1 kilometres distance from the focal Castle is nevertheless insignificant. The high, dense copses of trees and vegetation about the M4 and A48 prohibit any view, let alone magnitude of effect upon the setting of Margam Park.
- 7.10 From higher, elevated ground upon the Wales Coastal Path at Mynydd Brombil, the walker is able to look down upon Tyn-y-Caeau and observe the setting of the house and annexe at a setback position. An appreciation will be gained of the proposed presence of parked HGVs to the southern third of the open curtilage of the site. Nevertheless, the photographic images at Photo 13 and 14 illustrate the **overwhelming backdrop** of heavy, domineering industry within the transformed lowland landscape between the motorway and Swansea Bay seafront at Margam Sands. The loss of part of a grassed curtilage at Tyn-y-Caeau will be inconsequential to the viewer, whose focus and attention will remain upon the physical mass and scale of the TATA steelworks, BOC Plant and Western Bio Energy Plants.
- 7.11 This Assessment Report has sought to provide an analysis of the overriding landscape and visual effects posed by the proposed development. The introduction of a proposed Truck Stop which seeks to utilise two very modest existing buildings at Tyn-y-Caeau, but also form a modest HGV parking area within part of its grounds, is considered to be visually in effect “**inconsequential or very low**”. This effect takes place in a lowland landscape classified as “low” by LANDMAP, and the Council’s own Local Development Plan and Supplementary Planning Guidance. The Assessment has also demonstrated that any visual effect from adjoining or nearby Landscape Character Areas, which are regarded as ranging from “moderate” to “outstanding” are also inconsequential, and as such the proposals do not pose any visual detriment nor harm to matters of national or local landscape importance.