

High	The combined impacts of the proposed development and other cumulative developments would result in a large-scale loss or alteration to key elements of seascape/landscape character. The extent of the impact will result in a considerable change. Impacts may occur over a wide area and would likely be permanent or long-term
Medium	The combined impacts of the proposed development and other cumulative developments would result in a moderate loss or alteration to key elements of seascape/landscape character. The extent of the impact will result in a partial change to seascape/landscape character. Impacts may extend over a notable area and may be long-term.
Low	The combined impacts of the proposed development and other cumulative developments would result in a minor scale loss or alteration to key elements of seascape/landscape character. The extent of the impact will result in a slight change on seascape/landscape character. Impacts may extend over a limited area and may be medium to long-term.
Very Low	The combined effects of the proposed development and other cumulative developments would result in such a minor scale loss or alteration to key elements of seascape/landscape character that there would be no perceptible impact.

Source: Soltys Brewster

Significance of Cumulative Seascape/Landscape Effects

- 1.5.3. The third stage of the assessment establishes the significance of cumulative effects on seascape/landscape character. This is determined by combining the sensitivity (Table 1.3) of the SCA/LCA with the magnitude of cumulative impact (Table 2.1) that would occur as a result of the proposed development.
- 1.5.4. Figure 12.1 has been used as guidance in combining judgements on sensitivity and magnitude of impact to determine the significance of cumulative effects on seascape/landscape character. This is adapted from the version provided in IEMA's Special Report entitled; The State of Environmental Impact Assessment Practice in The UK (2011). The significance of cumulative effects is defined in Table 2.2.

Table 2.2: Significance of Cumulative Seascape/Landscape Effects

Significance	Description
Very Substantial	The proposed development in combination with other cumulative developments will typically have very substantial cumulative effects upon landscape character. These cumulative effects would typically result from a very high magnitude of impact on seascape/landscape character. The receiving seascape/landscape will typically have a very high sensitivity to wind farm developments.

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Substantial	The proposed development in combination with other cumulative developments will typically have substantial cumulative effects on seascape/landscape character. These cumulative effects would typically result from a high magnitude of impacts. The receiving seascape/landscape will typically have a high sensitivity to wind farm developments.
Moderate/ Substantial	The proposed development in combination with other cumulative developments will typically have moderate to substantial cumulative effects on seascape/landscape character. These cumulative effects would typically result from a medium to high magnitude of impacts. The receiving seascape/landscape will typically have a medium to high sensitivity to wind farm developments.
Moderate	The proposed development in combination with other cumulative developments will typically have moderate cumulative effects on seascape/landscape character. These cumulative effects would typically result from a medium magnitude of impacts. The receiving seascape/landscape will typically have a medium sensitivity to wind farm developments.
Slight/ Moderate	The proposed development in combination with other cumulative developments will typically have slight to moderate effects on seascape/landscape character. These cumulative effects would typically result from a low to medium magnitude of impacts. The receiving seascape/landscape will typically have a low to medium sensitivity to wind farm developments.
Slight	The proposed development in combination with cumulative developments will typically have slight cumulative effects on seascape/landscape character. These cumulative effects would typically result from low magnitude of impacts. The receiving seascape/landscape will typically have a low sensitivity to wind farm developments.
Negligible	The proposed development in combination with other cumulative developments will typically have negligible cumulative effects on seascape/landscape character. These cumulative effects would typically result from a negligible magnitude of impacts. The receiving seascape/landscape will typically have a very low sensitivity to wind farm developments.

Source: Soltys Brewster

- 1.5.5. Cumulative effects determined to have moderate-substantial landscape significance or above will be considered to be significant. Conversely, cumulative effects determined to be slight/moderate and below will be considered not significant.

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1.5.6. Where cumulative effects are determined to have moderate significance, whether these effects are significant or not significant will depend on the individual and specific mitigating circumstances and the professional opinion of the landscape specialist will determine this.

1.6. Cumulative Effects on Visual Amenity

1.6.1. The significance of cumulative effects on visual amenity will be determined by combining the sensitivity of the visual receptors with the magnitude of cumulative impact that would occur.

Sensitivity of Visual Receptors

1.6.2. The first stage in assessing the cumulative effects on seascape/landscape character is to establish the sensitivity of the visual receptors. Note that sensitivity in respect of cumulative effects would be the same as identified for individual effects and therefore the same criteria as identified in Table 1.8 would be applied.

Magnitude of Cumulative Visual Impacts

The second stage of the cumulative assessment establishes the magnitude of cumulative visual impact. The criteria for informing the magnitude of impacts are illustrated in Table 2.3:

Table 2.3: Magnitude of Cumulative Visual Impacts

Magnitude	Description
Very High	The proposed development combined with other cumulative developments would be an immediately apparent, as a very large-scale feature that would occupy a wide proportion of the view, contrasting with existing built features within the view. The proposed development combined with other cumulative developments are likely to be visually dominant and they would affect and change the overall appearance of the view to the extents that other features would become subordinate. Views of proposed development and other cumulative developments will be very long in duration.
High	The proposed development combined with other cumulative developments would be apparent, large-scale features that are likely to occupy a significant proportion of the overall view. The proposed development and other cumulative developments may contrast with existing features within the landscape. The proposed development and other cumulative developments are likely to be visually prominent to the extent that they would affect and change the appearance of a number of key existing elements within the view. Views of proposed development and other cumulative developments will be long in duration.

Medium	The proposed development and other cumulative developments would form a recognisable new element of moderate scale within the view and would be readily observed without changing the overall nature of the view. Overall quality of the view may remain intact. The proposed development and other cumulative developments are likely to be visible across a moderate proportion of the view, to the extent that wind farm development is not prominent. Views of proposed development and other cumulative developments will be moderate in duration.
Low	The proposed development and other cumulative development would form a component of small scale within the wider view that might be missed by the casual observer. Awareness of the proposed development and other cumulative developments would not have a marked impact on the overall quality of the view. Wind farm development may be visible to a limited proportion of the view, to the extent that they are not a defining element. Views are likely to be glimpsed or brief in duration.
Very Low	The proposed development with other cumulative development would be viewed at a scale that would be barely perceptible, or imperceptible, and would have no discernible impact on the overall quality of the view. The proposed development and other cumulative developments are unlikely to be visible or restricted to glimpsed or very brief views in duration.

Source: Soltys Brewster

Significance of Cumulative Visual Effects

- 1.6.3. The third stage of the assessment establishes the significance of cumulative effects on visual amenity. This is determined by combining the sensitivity (Table 1.8) of the visual receptor with the magnitude of cumulative impact (Table 2.3) that would occur as a result of the proposed development.
- 1.6.4. Figure 12.2 has been used as guidance in combining judgements on sensitivity and magnitude of impact to determine the significance of cumulative effects on visual amenity. This is adapted from the version provided in IEMA's Special Report entitled; The State of Environmental Impact Assessment Practice in The UK (2011). The significance of cumulative effects is defined in Table 2.4.

Table 2.4: Significance of Cumulative Visual Effects

Significance	Description
Very Substantial	The proposed development in combined with other cumulative developments will typically have very substantial effects upon visual amenity. These cumulative effects would typically result from a very high magnitude of impact on views. The receptor will typically have a very high sensitivity to wind farm developments.



1.5.6. Where cumulative effects are determined to have moderate significance, whether these effects are significant or not significant will depend on the individual and specific mitigating circumstances and the professional opinion of the landscape specialist will determine this.

1.6. Cumulative Effects on Visual Amenity

1.6.1. The significance of cumulative effects on visual amenity will be determined by combining the sensitivity of the visual receptors with the magnitude of cumulative impact that would occur.

Sensitivity of Visual Receptors

1.6.2. The first stage in assessing the cumulative effects on seascape/landscape character is to establish the sensitivity of the visual receptors. Note that sensitivity in respect of cumulative effects would be the same as identified for individual effects and therefore the same criteria as identified in Table 1.8 would be applied.

Magnitude of Cumulative Visual Impacts

The second stage of the cumulative assessment establishes the magnitude of cumulative visual impact. The criteria for informing the magnitude of impacts are illustrated in Table 2.3:

Table 2.3: Magnitude of Cumulative Visual Impacts

Magnitude	Description
Very High	The proposed development combined with other cumulative developments would be an immediately apparent, as a very large-scale feature that would occupy a wide proportion of the view, contrasting with existing built features within the view. The proposed development combined with other cumulative developments are likely to be visually dominant and they would affect and change the overall appearance of the view to the extents that other features would become subordinate. Views of proposed development and other cumulative developments will be very long in duration.
High	The proposed development combined with other cumulative developments would be apparent, large-scale features that are likely to occupy a significant proportion of the overall view. The proposed development and other cumulative developments may contrast with existing features within the landscape. The proposed development and other cumulative developments are likely to be visually prominent to the extent that they would affect and change the appearance of a number of key existing elements within the view. Views of proposed development and other cumulative developments will be long in duration.



Appendix 2:
Cumulative Wind Farm Developments

Name	Distance to nearest Y Bryn turbine (km)	No. of Turbines	Hub Height (m)	Tip Height (m)
Operational				
Mynydd Brombil	1.63	4	60	100
Pen-y-Cymoedd	2.92	76	89.5	143.5
Ffynnon Oer	4.12	16	58	93
Llynfi Afan Renewable Energy Park	4.37	12	78	118
Newlands Wind Farm	4.83	1	46.90	77
Land South of Gelli Las Farm	5.75	1	30	45
Site of Former Water Tower Stormy Down Aerodrome	8.37	1	80	125
Newton Down	8.46	7	77.5/97.4	130/149.9
Parc Stormy Down	8.47	1	87.5	125
Haregrove Farm	8.66	1	30	45
Pant-y-Wal Ext	10.90	8	80	125
Pant-y-Wal	11.89	10	70	115
Fforch Nest1/2	12.41	11	70	115
Swansea Bay Waste Waterworks	12.51	1		79
Maerdy	12.84	8	80	125
Maesgwyn	13.48	13	70/80	110-125
Queens Docks	13.52	2	50	77
Mynydd Bwlfa	13.81	12	70/80	115/125
Maesgwyn Ext	14.16	1	80	125
Ford Motor Company	14.40	1	55	79



Name	Distance to nearest Y Bryn turbine (km)	No. of Turbines	Hub Height (m)	Tip Height (m)
Ferndale	14.96	8	51	76
Taff Ely	14.97	20	35	53.5
Mynydd Portref	16.06	11	49/60	75/86
Mynydd Portref Extension	16.80	6	70	110
Hill House Wind Farm	16.97	1	50	77
Mynydd y Gwrhyd (resubmission)	19.51	2	59	100
Mynachdy Farm 1	20.45	1	35	67
Mynydd y Bettws	20.51	15	110	
Mynydd-y-Gwair (resubmission)	20.51	16	80	127
Mynachdy Farm 2	20.54	1	35	67
West of Rhiwfelin Fach Farm	20.77	1	61.5	77
Cefn Forest Farm	26.03	1	75	102
Pen Bryn Oer	32.54	3	71.5	110
Oakdale Business Park	36.04	2	80	130
G24 Innovations Turbine	41.59	1	95	140
Consented				
Foel Trawsnant	0.20	11	100	145**
Melin Court	6.48	5	100	145
Maesgwyn Extension (Phase 2)	13.15	4	80	125
Nant-y-Gwyddon Landfill Site	14.19	1	85	122
Taff Ely (Repowering)	15.09	7	69	110
Graig Fatha	18.58	1	75	125
Llwyncelyn	19.84	2	75	125***
Pen-y-Fan (Ind. Est.)	36.71	1	85	111

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Name	Distance to nearest Y Bryn turbine (km)	No. of Turbines	Hub Height (m)	Tip Height (m)
In Planning				
Upper Ogmores (RES)	6.95	7	97.4	150
Pant y Wal Extension (Phase 2)	11.80	2	80	125
Llwyncelyn (resubmission)	19.84	2	80	138.5

Source: Saltys Brewster/Natural Power Consultants
*If any of the cells are left blank it's because we were unable to source the data.
** Consent subject to S106 agreement
*** It is assumed that original consent superseded by Llywncelyn (resubmission) application

Y Bryn Wind Farm
Appendix 2: Cumulative Wind Farm Developments
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Appendix 3:

Residential Visual Amenity Assessment (RVAA) Methodology

1.1. Scope

A separate *Residential Visual Amenity Assessment (RVAA)* for properties up to 2km from the outermost turbines of the proposed Y Bryn Wind Farm will be produced and provided as a separate appendix to the SLVIA.

The RVAA will focus on **private views** and **private visual amenity** from residential properties.

1.1. Methodology

The methodology for the RVAA will follow the *LI Technical Guidance Note 2/19 Residential Visual Amenity Assessment (RVAA)*. However, the guidance is not prescriptive, and it recognises that every project will require its own set of criteria and thresholds, tailored to suit local conditions, circumstances and the potential scale of impacts. The methodology outlined below has, therefore, been adapted to reflect the extent and number of potential residential receptors within the immediate context of the study area.

It will comprise the following steps:

Step 1: Define the RVAA study area and identify properties and property groupings to be assessed.

- A desk-based study to locate, name and map onto an OS base map at 1:10 000 scale residential properties that fall within 2km of a proposed turbine. Where possible, commercial and other non-residential uses will be identified and excluded from the RVAA.
- A desk and field-based appraisal/analysis and scoping exercise to identify broad groupings of properties likely to share common baseline visual characteristics. This exercise will also aim to identify properties where visibility can be clearly excluded from the RVAA and will be informed by ZTV's, mapping and aerial photos. Broad factors to be considered at this stage will include:
 - Topography/aspect/orientation/landform.
 - Vegetation patterns.
 - Settlement pattern/form. A variety of properties exist within the study area, including, individual properties and farmsteads, traditional terraces extending along and up the valley sides, post war estates and more recent infill development.
- A property location plan will be prepared to show the location of properties/property groupings to be included in the RVAA.
- Prepare a schedule of properties/property groupings to be included in the RVAA.
- Provide a rationale for the properties/property groupings identified and the extent of the study area to be included within the RVAA.

Step 2: Evaluate baseline residential visual amenity of properties/property groups within the agreed study area.

- Review and describe the broad existing baseline visual conditions of properties/property groups within the study area through desk and field study, including an appraisal of the general type, nature, extent and quality of views that may be experienced 'in the round' (combined or all-round visual amenity experience

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at, or from a property/property group) from the property/property groupings as a whole. This will include consideration of:

- The proximity of and relationship to surrounding landform, landcover and visual foci.
- The broad nature of existing views from properties/property groupings, including whether views are of primary/secondary importance.
- Cumulative effects/views relating to existing operational wind energy developments.

Step 3: Assess change to visual amenity of properties and identify properties requiring further assessment (Step 4).

- Prepare a detailed ZTV's at hub and tip height within the 2km study area to further establish the broad nature and extent of visibility from each property/property group (or individual property where appropriate).
- Undertake a further 'scoping' exercise through desk and field-based assessment from publicly accessible locations to identify and exclude from the assessment properties/property groups unlikely to experience significant visibility of the proposed windfarm, through consideration of baseline visual characteristics, the detailed ZTV and wirelines where necessary.
- Assess the likely change in terms of magnitude and significance of effects and the change to visual amenity of remaining properties/property groups, (properties/property groups where significant visibility is possible). The assessment would be carried out from publicly accessible locations representing the worse-case scenarios wherever possible within each grouping or near to properties. The assessment will consider aspects such as:
 - a. Distance from the development. In general terms the greater the distance, the lower the magnitude of change, as the wind farm will become less evident or significant within the view.
 - b. Type/nature of available views.
 - c. The number and proportion of the turbines and extent of the wind farm that will be visible from the property or group of properties.
 - d. Predominately the fewer turbines or proportion of turbines that are visible, the less the magnitude of effects.
 - e. Prominence of the Proposed Development in views. Typically, the more prominent the turbines the greater the magnitude of effects.
 - f. The proportion of the view that is affected by the wind farm. If the extent of the view from the property/group of properties is occupied by turbines then the magnitude of effects are likely to be higher than if turbines are visible within only a small proportion of the view.
 - g. The scale and character of the landscape in which the wind farm will be viewed. Effects may be greater in an intimate, small-scale landscape where the turbines are dominant within the landscape as opposed to a simple, large scale landscape where the turbines may be viewed at a more appropriate scale.
 - h. Orientation of the view towards the wind farm in relation to the main or secondary views from the property/group of properties. Views that have direct views towards the wind farm are likely to have a higher magnitude of effects than properties with an indirect/oblique or secondary view of the wind farm.
 - i. Other existing and consented wind farms and built structures within the view.
 - j. Planned mitigation to reduce potential visual impact and to integrate the proposed development.

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- Identify individual properties/property groups where significant effects warrant further detailed assessment in Step 4 below. (i.e. where predicted effects may breach the Visual Amenity Threshold).
- Consider cumulative effects on visual amenity in relation to existing operational wind farms.

Step 4: Detailed assessment of individual properties/property groups identified in Step 3 as having the greatest magnitude of change such that the Residential Visual Amenity Threshold may be engaged.

- Individual properties/property groups identified in Step 3 as having the greatest magnitude of change, (i.e. the worst-case scenarios within each grouping) will be identified and assessed in further detail, through desk-based assessment and a site visit to within the curtilage of each property/group of properties. A judgement will then be made as to whether predicted effects are likely to reach or exceed the RVA threshold.
- A description of effects will be provided for properties/property groupings, supplemented with 90° wireline from each of the properties/group of properties to illustrate the view of the Proposed Development.

Criteria for assessment of effects

The **sensitivity** of visual receptors to change will be considered to be high for residents whose main or primary view from their property will be in the same direction as the Proposed Development or where the properties within the group are predominantly orientated towards the Proposed Development. Where the main or primary view of individual properties, or from where the properties within the group are predominantly orientated away from the Proposed Development (i.e. secondary view), the sensitivity of visual receptors to change will be considered to be medium. Where views towards the development from either primary or secondary views are typically screened by topography and/or vegetation, the sensitivity of visual receptors to change will be considered to be low.

Magnitude of effect on visual amenity (i.e. views and visual appreciation and enjoyment of the landscape) will be categorised as very high, high, medium, low and very low and is defined in Table 1.1 below.

Magnitude of Visual Effects

Table 1.1: Magnitude of Visual Effect

Magnitude	Description
Very High	The proposed development would be an immediately apparent feature from the property/group of properties that would occupy a wide proportion of the view, contrasting with existing built features. It would affect and change the overall appearance of the view and to which other features would become subordinate. Development is likely to be visually dominant.
High	The proposed development would be an apparent feature that is likely to occupy a significant proportion of the overall view from the property/group of properties. The development may contrast with existing features within the landscape. The proposed development is likely to be visually prominent to the extent that it would affect and change the appearance of a number of key existing elements within the view from the property/group of properties.
Medium	The proposed development would form a recognisable new element within the overall view from the property/group of properties and would be readily observed without changing the overall nature of the view. Overall quality of the view may remain intact. Development is likely to be visible although not prominent.



Magnitude	Description
Low	The proposed development will form a component of the wider view that might be missed. Awareness of the development will not have a marked effect on the overall quality of the view from the property/group of properties. Development may be visible although not prominent.
Very Low	The proposed development will be barely perceptible, or imperceptible, and will have no marked effect on the overall quality of the view from the property/group of properties.

Source: Saltys Brewster

Criteria to gauge the **significance** of visual effects will be dependent on the magnitude of visual change, and the relationship between visual sensitivity as detailed below in Table 1.2.

Significance of Visual Effects

Table 1.2: Significance of Visual Effects

Significance	Description
Major	The proposed development would affect existing views from the property/group of properties.to the extent that defining visual elements would become subservient within the view. When viewed within the context of the landscape, the proposed development is likely to be seen to conflict with existing visual amenity. Receptors are likely to be categorised as being of high sensitivity.
Major - Moderate	The proposed development would be visually prominent from the property/group of properties, which may lead to the loss of some essential landscape features which contribute to the visual character or quality of the view. Receptors are more likely to be categorised as being of medium or high sensitivity.
Moderate	The proposed development would result in some alteration to landscape features which contribute to the existing visual character or quality, but the overall integrity of the landscape and its visual qualities are maintained. The proposed development may be suitably absorbed or accommodated within the view from the property/group of properties, alongside existing visual elements. Receptors are likely to be categorised as being of medium sensitivity
Moderate - Minor	The proposed development would be visually integrated within the existing landscape without the loss of essential landscape features which contribute to the visual character or quality of the view from the property/group of properties. Receptors are more likely to be categorised as being of medium or low sensitivity, although not exclusively so.
Minor	The development would be integrated into the existing landscape without having a material effect upon the distinctive and valued characteristics of the view from the property/group of properties. Receptors are likely to be categorised as being of low sensitivity.

Source: Saltys Brewster

Properties/groups from where effects are determined to have major or major-moderate visual significance will be considered to be significant. Conversely any locations where it is determined that visual effects have minor or moderate to minor visual significance, will be considered to be not significant. Where effects are determined to be of moderate visual significance, whether these effects are significant or not significant will depend on the individual and specific mitigating circumstances relating to each property.

Cumulative Effects in RVAA

The magnitude of cumulative visual effect is dependent on a number of factors, including:



- The size or scale of the cumulative effect that has been identified;
- The geographical extent of the cumulative effects identified;
- The visual relationship between the Proposed Development and other existing operational developments that form the cumulative baseline, including separation distances between them;
- The nature of the cumulative baseline, i.e. the presence, appearance and intervisibility of other existing operational wind farms that are considered within the cumulative assessment;
- The scale and character of the landscape in which the proposed development will be viewed alongside the other operational developments that form the cumulative baseline;
- The nature of available views, including angle of view, prominence, screening elements, elevation, and distance from the viewpoint location;
- The number of cumulative developments within the same arc of vision from the viewpoint.

Table 1.3 below outlines the general principles that are used to inform and guide the magnitude of cumulative visual effects:

Magnitude of Cumulative Visual Effects

Table 1.3: Magnitude of Cumulative Visual Effects

Magnitude	Description
Very High	The proposed development combined with other cumulative developments would be an immediately apparent feature that would occupy a wide proportion of the view from the property/group of properties, contrasting with existing built features within the view. They would affect and change the overall appearance of the view and to which other features would become subordinate. Development is likely to be visually dominant from the properties/group of properties.
High	The proposed development combined with other cumulative development would be an apparent feature that is likely to occupy a significant proportion of the overall view, from the property/group of properties and may contrast with existing features within the landscape. The proposed development combined with other cumulative developments are likely to be visually prominent to the extent that they would affect and change the appearance of a number of key existing elements within the view.
Medium	The proposed development combined with other cumulative developments would form a recognizable new element within the overall view, from the property/group of properties and would be readily observed without changing the overall nature of the view. Overall quality of the view may remain intact. Cumulative developments are likely to be visible although not prominent.
Low	The proposed development combined with other cumulative developments would form a component of the wider view from the property/group of properties. Awareness of the development and other cumulative developments would not have a marked effect on the overall quality of the view. Cumulative development may be visible although not prominent.
Very Low	The proposed development combined with other cumulative developments would be barely perceptible, or imperceptible, and would have no marked effect on the overall quality of the view from the property/group of properties.



Source: Soltys Brewster

The significance of cumulative visual effects is dependent on the points considered within the appraisal of sensitive receptors, the factors that influence the magnitude of cumulative visual effects, and the relationship between visual sensitivity and magnitude of cumulative visual effect.

Table 1.4 below outlines the general principles that are used to inform and guide the assessment of the significance of cumulative visual effects.

Significance of Visual Cumulative Effects

Table Error! No text of specified style in document..4: Significance of Cumulative Effects

Significance	Description
Major	The proposed development combined with other cumulative developments would affect existing views from the property/group of properties to the extent that defining visual elements would become subservient within the view. When viewed within the context of the landscape, the proposed development combined with other cumulative developments are likely to be seen to conflict with existing visual amenity. Receptors are likely to be categorised as being of high sensitivity.
Major - Moderate	The proposed development combined with other cumulative developments would be visually prominent from the property/group of properties, which may lead to the loss of some essential landscape features which contribute to the visual character or quality of the view. Receptors are more likely to be categorised as being of medium or high sensitivity.
Moderate	The proposed development combined with other cumulative developments would result in some alteration to landscape features which contribute to the existing visual character or quality, but the overall integrity of the landscape and its visual qualities are maintained. The proposed development combined with other cumulative developments may be suitably absorbed or accommodated within the view from the property/group of properties, alongside existing visual elements. Receptors are likely to be categorised as being of medium sensitivity
Moderate - Minor	The proposed development combined with other cumulative developments would be visually integrated within the existing landscape without major changes to the essential landscape features that contribute to the visual character or quality of the view from the property/group of properties. Receptors are more likely to be categorised as being of medium or low sensitivity, although not exclusively so.
Minor	The development combined with other cumulative developments would be integrated into the existing landscape without having a material effect upon the distinctive and valued characteristics of the view from the property/group of properties. Receptors are likely to be categorised as being of low sensitivity.

Source: Soltys Brewster

Properties from where cumulative effects are determined to have major or major-moderate cumulative visual significance will be considered to be significant. Conversely any property where it is determined that visual effects have minor or minor-moderate cumulative visual significance, will be considered to be not significant.

Where cumulative effects are determined to be of medium visual significance, whether these effects are significant or not significant will depend on the individual and specific mitigating circumstances relating to each viewpoint. For

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example, effects from a viewpoint may be considered to be of moderate visual significance. However, the broad nature of the view in which the proposed development and other cumulative baseline wind farms will be seen may reduce these effects to an extent where effects will still be considered to be medium though not considered to be significant

13 October 2021



FAO Nicola Lake
Neath Port Talbot County Borough Council
The Quays,
Brunel Way,
Neath,
SA11 2GG

Landscape Architects
Assessment
Planning
Design

UK & Ireland

Dear Nicola

RE: Y Bryn Wind Farm

Following your comments on the proposed Y Bryn Wind Farm, which were included within Appendix 1 of the EIA Scoping Direction (dated 08/03/21), please find below our response to your queries (shown in blue) which were raised in relation to the Landscape and Visual chapter of the Environmental Statement (ES).

Question 14: Do consultees agree that assessing the maximum hub height available for the tip height in question is appropriate?

The higher the hub height, the smaller the blade length and therefore blade sweep area. This means that the likely visual effect of a turbine 250m tall with a larger blade sweep is likely to be greater. It is suggested that the ZTVs are based on a maximum blade tip height and maximum hub height but that the visual impact assessment takes into account the maximum sweep area (as in the Rochdale envelope approach). It would be very helpful to have clear drawings illustrating the two types of turbines- one with the highest hub height and one with the largest blade length. As mentioned above, our view is that the 250m high turbines are likely to be too large for this site and a more realistic alternative should also be considered to inform decision-makers. Preferably, an assessment of smaller sized turbines only should be taken forward.

As requested,, we will produce a ZTV based on the maximum blade tip height and also a ZTV based on the maximum hub height available for the proposed turbine models. The assessment of effects on seascape/landscape and visual amenity, including all visualisations will be based on the maximum blade tip height for the turbine models available.

Question 15: Do you agree with the proposed size of the study area?

The outer 45km study area appears to be reasonable for development of this scale. The concern of NPTCBC and BCBC is on the likely significant effects more locally and therefore sufficient detailed assessment should be carried out for an inner study area of 15km supported by mapping and information at a more detailed scale such as ZTVs, viewpoints and constraints.

While we note that you consider a 45 km radius study area to be reasonable, as requested, a more detailed assessment of effects on landscape character and visual amenity, within a 15 km inner study area will be included within the SLVIA ES chapter.

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This will be supported by mapping information, ZTVs and, viewpoints.

Question 16: Do consultees agree with the number, location and receptor types that have been selected as the representative viewpoints in order to assess the effects on visual amenity within the study area?

The range of viewpoints located within NPTCBC and BCBC areas have been assessed through desk study and site visits. Overall, it is considered that most of the viewpoints are helpful but a fuller picture of effects on the Llynfi valley, coastal area, heritage assets and cumulative effects is needed to understand the impact of this very large development. Detailed comments on the existing proposed viewpoints are as follows:

VP	Location	Notes/Comments
1	Evans Terrace, Caerau.	Appears Reasonable
2	Maesteg Golf Course	Appears Reasonable
3	Bryn, Play area	Appears Reasonable
4	Brynna Road, Cwmafan	Appears Reasonable
5	Rhiwlas, Neath	Appears Reasonable provided that structures and vegetation in the foreground are avoided
8	Margam Park (Deer Park)	Appears reasonable provided it is by the seat with a clear view towards wind farm
10	St Illtyd's Way National Trail, near Cynonville	Appears reasonable provided that vegetation in the foreground does not restrict the view
13	Junction of Heol Gelli Lenor and Brynllwarch, Maesteg	Appears Reasonable
16	The Princess Margaret Way, Aberavon	Appears Reasonable
17	Margam Park	Appears Reasonable
19	Wales Coast Path, Rest Bay/Royal Porthcawl Golf Club, Porthcawl.	Appears Reasonable
20	Bridgend Circular Walk, Bryncoch	Appears Reasonable – least important of the viewpoints selected but may demonstrate views from a representative distance
21	Sarn Helen, Aberdulais	It is noted that the location is just outside the open access land and to the side of Sarn Helen. Usually viewpoints on private land are not valid. Does the consultant consider the viewpoint represents the reasonable worst case of views from the above receptors?
22	Baxter Terrace, Glyncorrwg	Appears Reasonable

To give a fuller picture of the development in its context and to cover sensitive receptors as mentioned above the following additional viewpoints are proposed:

Viewpoint reference	Eastings	Northings	Notes/justification
A	280106	185792	Margam Park visitor access road to explore range of visibility within HPG/residential receptors to south - to inform LVIA and cultural heritage assessments.
B	280160	181110	Kenfig Burrows registered historic landscape/ Kenfig visitors carpark/ Wales Coast Path- to inform LVIA and cultural heritage assessments.
C	281943	192051	Bryn- east- to explore effects on residents on this side of the village and inform RVAA and effects on St Illtyd's Walk and Cwm Farteg.
D	283680	187700	Ogwr Ridgeway Walk/ nearby Y Bwlwarcaw hillfort and Roman Camp setting to inform LVIA and cultural heritage assessments
E	286171	195028	Cemetery/ view from eastern edge of Maesteg/ associated eastern Llynfi valley slopes to show development more fully in context of the Llynfi valley.
F	285704	188789	Llangynwyd Conservation Area (south of cross)- nearby heritage and visual receptor and distinctive hilltop village to inform LVIA and cultural heritage assessments.
G	287620	199357	A4063 users/residents on southern edge of Croeserw/ open access land/to explore cumulative effects with windfarms to the east
H	289775	187495	Bettws- consider settlements at a medium distance with clear views of the development
Note: Tolerance of GPS references could be up to 10m- worst case viewpoint needs to be selected			

The Residential Visual Amenity Assessment (RVAA) study area at 1.5km is not illustrated in the scoping report. A review of this distance appears to show that it excludes part of Bryn, settlement on the east side of the Llynfi valley which is more likely to have views of turbines and some isolated rural properties that may have also have direct nearby views. Guidance set out in TGN2/19 Residential Visual Amenity Assessment, Landscape Institute, March 2019 mentions wind turbines at 150m and taller (4.6) when discussing realistic buffers but these turbines at 250m are significantly larger. It goes on to state (4.7): 'When assessing relatively conspicuous structures such as wind turbines, and depending on local landscape characteristics, a preliminary study area of approximately 1.5-2km radius may initially be appropriate in order to begin identifying properties to include in a RVAA.' (This report emphasis)

The public inquiry decision for Mynydd Marchywel wind farm in NPT found that its five turbines at 126.5 m high breached the RVA threshold of acceptability with wind turbines at a distance of 920m-2.4km from a property. The wind farm was refused. Taking into consideration the above, our view is that distance of 2km should be scoped for the RVAA. A mix of individual properties and groups of properties should be assessed as appropriate, depending on distance and arrangement.

We note your request for 8no. additional viewpoints from within the study area (6no. of which, included within White Consultant report Table 2 are located within the boundary of Bridgend County Borough Council (BCBC)), in order for you gain a fuller picture of the development in its context and to cover sensitive receptors. We propose to include seven of the eight viewpoints requested. Please note that we propose to exclude a viewpoint from *A4063 users/residents on southern edge of Croeserw (VP G)* and which is located within BCBC due to its close proximity to VP1 – Evans Terrace, Caerau., which is located approximately 1.3 km to the north east.

The additional viewpoints to be included are noted in the table below, along with a full list of the viewpoints that we propose to include within the SLVIA chapter of the ES and which incorporates all the additional viewpoints requested from all statutory consultees, plus 5no. viewpoints to be included as part of the seascape assessment.

Please note that we propose to replace the original VP20 that was included in the Scoping Report and which is located on Bridgend Circular Walk, Bryncoch (OS 290961, 183470), with a viewpoint and as suggested by NPCBC from the village of Bettws (Viewpoint H) as referred to in White Consultant's report Table 2). This is located at a distance of approximately 4 km away from VP20. The location to Viewpoint 21 from Sarn Helen, Aberdulais has also been adjusted slightly to ensure that it is within open access land.

VP	Location	OS Co-ordinates		Distance from Nearest Turbine (km)	Wireline	Photomontage
		x	y			
1	Evans Terrace, Caerau.	285601	193880	2.04	Y	Y
2	Maesteg Golf Course	283616	191592	0.95	Y	Y
3	Bryn, (Play area, off Neath Road).	281616	191592	1.49	Y	Y
4	Brynna Road, Cwmafan	277535	192500	4.28	Y	Y
5	Rhiwlas, Neath	274240	198775	9.41	Y	Y
6	Mumbles Hill, Swansea	262781	187443	17.96	Y	Y
7	Gower Way National Trail, Cefn Bryn	249418	189883	31.24	Y	N
8	Margam Park (Deer Park)	281391	186390	2.25	Y	Y
9	Ogof-Ffynnon-Ddu (BBNP)	287452	216032	22.33	Y	N
10	St Illtyd's Way National Trail, near Cynonville	281835	195244	1.60	Y	Y
11	Wales Coast Path, Ogmoresby-Sea	286146	175100	13.77	Y	Y
12	Twmbarlwm	324198	192624	40.56	Y	N
13	Junction of Heol Gelli Lenor and Brynllwarch,	284793	190339	2.17	Y	Y

	Maesteg					
14	Swansea Promenade, Black Pill	261996	190610	18.70	Y	Y
15	Clwyd Road, Pen-Lan, Swansea	264710	195785	17.24	Y	Y
16	The Princess Margaret Way, Aberavon	273832	190276	6.90	Y	Y
17	Margam Park	280636	186001	2.86	Y	Y
18	Pen-y-Fan (BBNP)	301202	221547	32.72	Y	N
19	Wales Coast Path, Rest Bay/Royal Porthcawl Golf Club, Porthcawl.	279990	178709	10.06	Y	Y
20	Bettws	290961	183470	9.51	Y	Y
21	Sarn Helen, Aberdulais	279491	202151	8.74	Y	Y
22	Baxter Terrace, Glynccorrwg	287629	199343	6.74	Y	Y
23	Margam Park (Access Road)	280104	185810	3.28	Y	Y
24	Wales Coast Path, Kenfig Burrows	279807	181080	7.78	Y	Y
25	Bryn East, picnic area opposite Royal Oak PH	281943	192050	1.20	Y	Y
26	Ogwr Ridgeway Walk, near Bwlwarcaw Hill Fort	283680	187700	1.12	Y	Y
27	Cemetery, eastern edge of Maesteg	286321	191520	3.02	Y	Y
28	Llangynwyd	285745	188793	2.68	Y	Y
29	Oxwich Point	251216	185077	29.73	Y	N
30	Nash Point, Glamorgan Heritage Coast	291191	169275	20.92	Y	N
31	Esgair Hir, Brecon Beacons Way National Trail (BBNP)	277735	220298	26.85	Y	N
32	Open Water off Mumbles	262996	189390	17.66	Y	N
33	South of Porthcawl Marina	281987	173999	14.50	Y	N
34	Bristol Channel	258573	174494	26.64	Y	N
35	Mouth of River	270487	190509	10.25	Y	N

	Neath					
36	Outer Swansea Bay/Bristol Channel	254300	174769	30.05	Y	N

With regards to the study area for the Residential Visual Amenity Assessment (RVAA), as requested we will increase the study area to include all properties/groups of properties within a 2k m radius rather than 1.5 km radius. A methodology for undertaking the assessment and which is based on *LI TGN 2/19 – Residential Visual Amenity Assessment (RVAA)* is included in Appendix 3.

Question 17: Do consultees agree with the methodology used to determine which wind farms are to be included within the cumulative assessment and also agree with the list provided in Table 12.8?

Cumulative impact assessments can be large and confusing and it is important that the most important cumulative effects are addressed clearly. Those that are most important are those with existing or consented turbines, at closer distances and juxtapositions, where there is a large sweep of turbines visible and where receptors (especially residential) have developments on two or more sides.

Additional viewpoints have been selected in this response to better reflect the potential for cumulative effects eg at Croeserw. The list of windfarms to be considered in Table 12.8 appear to have one of two errors. It is understood that Foel Trawsnant has been consented. The difference in size of turbine and the adjacency of this proposal are of particular concern.

The turbines on the coastal plain south of Margam and those east of Porthcawl (eg Stormy Down) appear to have been omitted. These affect perceptions in these areas and should be considered. To minimise work possibly all these turbines should be considered together in relation to the development.

The comments relating to the sensitivity of landscape to effects below (relating to Table 12.2) also apply to cumulative effects. The factors that make a landscape more or less susceptible to a series of developments, especially of different sizes and design, are not set out. This is important to understand how the judgements are reached. There are only three categories of sensitivity which means that there is a significant difference between the descriptors of high, medium and low with intermediate categories effectively being omitted. This does not reflect the complexity of most landscapes. Five categories are suggested.

The magnitude of cumulative landscape effects (Table 12.9) correctly identifies that the combined effects of the proposed development and other wind turbine developments should be considered. This should be assessed against the baseline of no wind turbines on the basis of the temporary nature of the development, albeit long-term. However, the contribution of Y Bryn to the cumulative effect should also be described in terms of relationship with other windfarms including relative size of turbine.

The significance of cumulative landscape effects (Table 12.10) has a very high threshold of significance and the definitions for major and major/moderate are very similar. It is considered that the definitions will tend to lead to under estimation of significant effects.

The Magnitude of cumulative visual effects (Table 12.11), as with landscape effects, correctly identifies that the combined effects of the proposed development and other wind turbine developments should be considered. However, the contribution of Y Bryn to the cumulative visual effect should also be described in terms of the juxtaposition and relationship with other windfarms including relationship with the viewer (e.g. on either

side), the percentage field of view etc.

The significance of cumulative visual effects (Table 12.7) includes a definition of ‘the loss of some essential landscape features’ in the major/moderate category. This statement does not make sense as wind turbines usually do not lead to the ‘loss of features’, just substantial modification of the view.

To clarify in relation to the response within the Simon White Report to this question, the P2014/0825 – Foel Trawsnant application for the Installation of 11 wind turbines with a maximum tip height of 145m to generate up to 33 MW, together with ancillary development including substation and control building, on site underground electrical cables, stone site access tracks, temporary construction compounds, turbine foundations and temporary crane pads was determined by the Planning Committee on the 24 September 2019 to grant conditional planning permission subject to the signing of S106 agreement. However to date the S106 Agreement has not been completed and as such the decision has not been issued. However in November 2020 the applicants stated that they were still seeking the signatures of people who had an interest in the land in order to complete the agreement.

The report also refers to an existing wind turbine located within the Margam coast plane. The planning permission for the wind turbines is P2013/0300.

We note your comments regarding the current status of the Foel Trawsnant Wind Farm development and also the wind turbines located on the Margam coastal plain. This development will be included within the cumulative assessment.

With regards to comments made concerning the cumulative methodology, please refer to Appendix 1 of this letter, which includes an updated methodology. An updated list of the cumulative developments to be included within the assessment is provided in Appendix 2

Question 18: Do the consultees agree with the proposed approach to assess the effects on landscape character and visual amenity?

The following comments are made on the guidance set out in 12.2.1

- The Guide to Assessment of Cumulative Effects of Wind Farm Developments, ETSU (2000) is very dated and should be given little, if any, weight. The SNH 2012 guidance is more helpful in this regard.
- LANDMAP Information Guidance Note 3 has been superseded by Natural Resources Wales Guidance Note 046 ‘Using LANDMAP in Landscape and Visual Impact Assessments (LVIA)’, January 2021. Note that Cultural Landscape Services succeeds Cultural landscape.
- The Visual Representation of Development Proposals TAN 06/19 should be dated September 2019.
- Seascape effects should be considered in line with the documents set out in the seascape section below.

Landscape

The sensitivity of landscape (Table 12.2) is not described as combining the susceptibility of a given landscape to a particular type of development with value in line with GLVIA3. The factors that make a landscape more or less susceptible to a particular type and scale of development are not set out. This is important to understand how the judgements are reached. There are only three categories of sensitivity which means that there is a significant difference between the descriptors of high, medium and low with intermediate categories effectively being omitted. This does not reflect the complexity of most landscapes. Five categories are suggested. The magnitude of landscape effects (Table 12.3) does not include the criteria of the proposed development becoming a dominant or key characteristic of an area. The definitions of high and high/medium are very similar with the latter being too high a

threshold.

The significance of landscape effects (Table 12.4) appears to use the term ‘element’ where characteristic would be more appropriate and in line with standard guidance definitions. An element is the hedgerow or a tree etc. The combination of sensitivity and magnitude of effect should be in line with the IEMA diagram in Appendix A.

Seascape

The effects on seascape are not addressed in the assessment. The ZTV clearly indicates uninterrupted visibility across Swansea Bay, along the southern coast of Gower and across the Bristol Channel to Exmoor. The proposed heights of turbines are so large that they are likely to modify the coastal backcloth to the seascape.

The assessment should address the effects on seascape character areas at the appropriate scale. This may be the national marine character areas in Wales- 25,26, 27 and 28, but consideration should also be given to using the local seascape character assessment for the Gower and Swansea Bay to inform qualities and potential effects, and possibly refine areas for assessment if required.

The method for assessing effects should take into consideration GLVIA 3 and ‘An Approach to assessing seascape sensitivity’, Marine Management Organisation, (MMO1204), 2020. NRW Stage 1- Ready reckoner of visual effects related to turbine size, report number 315 relates to research on offshore wind farms and views from the coast. However, it may be helpful in establishing yardsticks for likely effects the large-scale onshore developments relatively close to the coast.

Visual Amenity

The sensitivity of visual receptors (Table 12.5) does not mention visitors to the coast, heritage assets and country parks, all of whom would be high sensitivity. It is assumed that medium sensitivity receptors would include users of B roads. As with the landscape sensitivity, only three categories do not reflect the range of sensitivities of receptors and users of motorways and A roads may be considered medium/low, not low. The significance of the visual effects (Table 12.7) indicates that defining visual elements would become subservient within the view. Presumably this means that the development would be a dominant feature?

It is agreed that some effects of moderate significance could be significant. The method does not mention that where a series of linked moderate effects occur (e.g. along the footpath) that this may make the combined views significant. The combination of sensitivity and magnitude of effect should be in line with the IEMA diagram in Appendix A.

LVIA outputs

The following comments are made on the figures:

- All map figures should be prepared to cover the 45km study area and separate more detailed maps showing a 15km study area (possibly with the addition of the western edge of Swansea Bay and associated intervisible backcloth).
- It is assumed that the non-statutory landscape designations will include Special Landscape Areas.
- The access and movement figures should include access land.
- LANDMAP should include aspect areas in line with updated Natural Resources Wales Guidance Note 046 ‘Using LANDMAP in Landscape and Visual Impact Assessments (LVIA)’, January 2021. The change to cultural landscape services should be noted.
- Character Areas- the method for defining these has not been identified or are they National?
- Blade tip and hub height ZTVs should be at 15km with a 1:25k OS base as well as 45km with a 1:50k base. They should include bare ground and landcover versions to accommodate possible changes in tree cover over the life of the development.
- Viewpoints should be shown as points to give an accurate indication of their location.

- Viewpoint visualisations should include the additional viewpoints suggested in Table 2.
 - Photomontages should include a range of key views to be agreed. They should not necessarily be limited to 10 as such a large scale development is proposed and may necessitate more.
 - The height of the turbines may necessitate the use of portrait photos in some locations to ensure that full of the height of the turbine is covered.
 - Photomontages should include A3 single frame views where possible to allow for ease of printing by third parties and decision-makers and for taking on site. A good example is the Lethans A3 viewpoint pack (see sample in Appendix B).
 - The cumulative ZTVs should also be carried out at 15km radius on 1:25k OS mapping for the closest wind turbine developments.
- 5.32. In addition, the following information is regarded as important in understanding effects:
- Seascape character areas at national and local level.
 - Forestry resource/management plans are needed showing the phasing of removal and/or replanting of the forest plantation surrounding the proposed wind farm to clearly inform how this may open up or reduce views during the lifetime of the development, or at least 10 years. Expected tree growth rates for proposed species would be helpful.
 - Proposed mitigation.
 - Elevations of proposed turbines showing alternatives with highest hub height and with the largest blade circumference.
 - Location and details of access roads, battery storage and other ancillary infrastructure.
 - Though some of the above will not be part of the LVIA they should be part of the overall description of the development.

We note your comments regarding the guidance, methodology and the requirement for a seascape assessment, therefore please find attached Appendix 1, which sets out our revised methodology for undertaking a Seascape/Landscape Visual Impact Assessment (SLVIA).

We also note your comments regarding the figures to be included as part of the SLVIA and confirm that these will be addressed/included as part of the final SLVIA. Special Landscape Areas will be included as a non-statutory designation within the assessment/figures and access land will be also be included within the figure that includes recreational footpaths/trails. Landscape Character Areas will be derived from published Landscape Character Assessments and LANDMAP data.

With regards to the comments concerning the ZTVs, these will be produced for the 45 km and 15 km study areas, however these will be produced based on ‘bare ground’ only. Given the size of the study area and the amount of vegetation cover within it, it is considered that it would be difficult to accurately illustrate. Any changes in visibility due to changes in landcover will be assessed through field work surveys. This approach is recommended within paragraph 6.10 of GLVIA 3.

Regarding the points made about the visualisations, as noted we will take portrait photography where required to ensure that the full height of the turbine is covered. These will be produced following best practice guidance and therefore will include A3 single frame views. However, please note that it is proposed not to include any cumulative wirelines/photographs in the 360° (4 x 90°) where there are no turbines visible. In addition, from viewpoints where the extent of the proposed turbines exceeds a horizontal field of view of 53.5°, then the proposed development will be illustrated in the wirelines/photomontages with a horizontal field of view of 90°/180° with a cylindrical rather than planar projection.

Removal of forestry associated with the wind farm (if visible) only will be illustrated on the photomontages. Forestry removal as shown on NRW’s Forestry Design Plan not directly associated with Y Bryn Wind Farm or that lie outside of the site boundary will be

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illustrated on visualisations from viewpoints where it is deemed necessary to illustrate any potential changes in the view due as a result of felling. Any potential effects on landscape character and visual amenity as a result of felling will also be described within the assessment text.

Question 19: Do consultees see value to any particular enhancement measures?

In addition to those comments within the White Consulting Report (Appendix 1), it is noted that within the UK there are only two buildings with a height in excess of 250m – The Shard (310m) and The Helter-Skelter, Twentytwo, The Pinnacle (278m). There are a further 7 buildings within the Greater London and Tower Hamlets areas that have heights ranging from 236m to 205m. While it is acknowledged that the current proposal is for wind turbines and not buildings, it is seeking consideration for the erection of 26 turbines that would each have a height of 250m located within a semi-rural area surrounded by small scale settlements, historic features, registered historic landscapes and Historic Parks and Gardens. The scale of the proposed development would mean that it is difficult to see how it would not wholly and completely dominate the surrounding environment, to what could only be considered an unacceptable degree and to the detriment of the amenity of that environment, communities and the residents who live there. For these reasons any assessment of the visual impacts associated with the proposed development must be extensive and comprehensive, rather than the streamlined approach suggested by the applicants.

Comments noted.

Yours sincerely

Richard Cole

- Encs:
- Appendix 1: Seascape/Landscape Visual Impact Assessment (SLVIA) Methodology
 - Appendix 2: Cumulative Wind Farm Developments
 - Appendix 3: Residential Visual Amenity Assessment (RVAA) Methodology



13 October 2021



FAO Hannah Roberts
National Resources Wales
Maes Newydd,
Llandarcy,
Neath Port Talbot,
SA10 6JQ

Landscape Architects
Assessment
Planning
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UK & Ireland

Dear Hannah

RE: Y Bryn Wind Farm

Following your comments on the proposed Y Bryn Wind Farm, which were included within Appendix 1 of the EIA Scoping Direction (dated 08/03/21), please find below our response to your queries (shown in blue) which were raised in relation to the Landscape and Visual chapter of the Environmental Statement (ES).

Q14: Do consultees agree that assessing the maximum hub height available for the tip height in question is appropriate?

We suggest that the combination of maximum blade tip and hub height need to be assessed for the worst-case scenario. It is the overall scale of the turbines, including the height and swept area of the blades and scale of hub/column that affects visual impact. The maximum size of turbine potentially to be used should be assessed.

We note that you suggest that a combination of maximum blade tip height and hub height needs to be assessed. Please note that, in order to illustrate the correct height of the turbines within the visualisations (for wirelines and photomontages) either the maximum hub height or maximum rotor diameter will need to be used. If the maximum hub and rotor diameter are used together then the turbine will not be shown at the correct height i.e. the turbine will be shown larger than is proposed.

Using the maximum rotor diameter available for the proposed turbine size is standard practice and in addition, both NPTCBC and BCBC have confirmed in their responses that maximum rotor diameter should be used to assess the effects on landscape character and visual amenity. We therefore propose to illustrate the turbines shown within the visualisations, based on the maximum rotor diameter for the turbine available, with the corresponding hub height that will give the correct tip height. However, for the ZTVs we will base the ZTV to Hub Height on the maximum hub height available and the maximum rotor diameter available for the ZTV to Blade Tip Height. Please can you confirm that this is acceptable.

Q16: Do consultees agree with the number, location and receptor types that have been selected as the representative viewpoints in order to assess the effects on visual amenity within the study area?

We advise that a photograph, wireline and photomontage from viewpoints in the Gower AONB and BBNP should be included in the assessment, given the scale of the development

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and sensitivities of these areas. We suggest an additional viewpoint from the Y Mynydd Du area of the BBNP to cover potential impacts on this part of the area.

With regards to the additional viewpoints requested from the Gower AONB, please note that we have already included two viewpoints from within the AONB, from Mumbles Hill, Swansea and the Gower Way National Trail, Cefn Bryn. In addition to these viewpoints, we propose to include an additional viewpoint from Oxwich Point (Easting and Northing 251216, 185077). In terms of views from the Brecon Beacons National Park, we propose to include an additional viewpoint from the Beacons Way National Trail, at Esgair Hir (Easting and Northing 277735, 220298), which will illustrate views from Y Mynydd Du area of the Brecon Beacons National Park.

For your information, please find in the table below a full list of the viewpoints that we propose to include within the Seascape Landscape Visual Impact Assessment (SLVIA) chapter of the ES and which incorporates the additional viewpoints requested from all statutory consultees.

Please note that the viewpoint from Esgair Hir and Oxwich Bay are approximately 27 km and 30 km respectively to the nearest turbine and will, in our opinion, be best represented as wirelines accompanied by photographs, and therefore the preparation of a photomontages from these locations has been excluded.

VP	Location	OS Co-ordinates		Distance from Nearest Turbine (km)	Wireline	Photomontage
		x	y			
1	Evans Terrace, Caerau.	285601	193880	2.04	Y	Y
2	Maesteg Golf Course	283616	191592	0.95	Y	Y
3	Bryn, (Play area, off Neath Road).	281616	191592	1.49	Y	Y
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6	Mumbles Hill, Swansea	262781	187443	17.96	Y	Y
7	Gower Way National Trail, Cefn Bryn	249418	189883	31.24	Y	N
8	Margam Park (Deer Park)	281391	186390	2.25	Y	Y
9	Ogof-Ffynnon-Ddu (BBNP)	287452	216032	22.33	Y	N
10	St Illtyd's Way National Trail, near Cynonville	281835	195244	1.60	Y	Y
11	Wales Coast Path,	286146	175100	13.77	Y	Y

	Ogmore-by-Sea					
12	Twmbarlwm	324198	192624	40.56	Y	N
13	Junction of Heol Gelli Lenor and Brynllwarch, Maesteg	284793	190339	2.17	Y	Y
14	Swansea Promenade, Black Pill	261996	190610	18.70	Y	Y
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20	Bettws	290961	183470	9.51	Y	Y
21	Sarn Helen, Aberdulais	279491	202151	8.74	Y	Y
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27	Cemetery, eastern edge of Maesteg	286321	191520	3.02	Y	Y
28	Llangynwyd	285745	188793	2.68	Y	Y
29	Oxwich Point	251216	185077	29.73	Y	N
30	Nash Point, Glamorgan Heritage Coast	291191	169275	20.92	Y	N

31	Esgair Hir, Brecon Beacons Way National Trail (BBNP)	277735	220298	26.85	Y	N
32	Open Water off Mumbles	262996	189390	17.66	Y	N
33	South of Porthcawl Marina	281987	173999	14.50	Y	N
34	Bristol Channel	258573	174494	26.64	Y	N
35	Mouth of River Neath	270487	190509	10.25	Y	N
36	Outer Swansea Bay/Bristol Channel	254300	174769	30.05	Y	N

Q17: Do consultees agree with the methodology used to determine which wind farms are to be included within the cumulative assessment and also agree with the list provided in Table 12.

We consider the methodology generally sound, subject to the above comments. Section 12.4.13 states that the intention is to produce photomontages from only 10 viewpoints. This seems a small number considering the scale of development and likely to require reconsideration following stakeholder comments.

As noted in the table above, from the 31no.viewpoints which are now to be assessed, it is proposed to produce a photomontage from twenty-four. Please note that paragraph 8.15 of GLVIA 3 states that “it will not usually be possible to produce a visualisation from every viewpoint” and paragraph 160 of SNH’s Visual Representation of Wind Farms, Version 2.2 (February 2017) notes that “Given the limitations of depicting turbines in photomontages, their production will usually be of most value for views within 20km of a wind farm site, for turbines up to 150 metres high to blade tip. At distances greater than this it can be difficult to represent the turbines well on a photomontage”.

While we acknowledge that the proposed turbines are greater than 150 m to blade tip, we believe that the above still stand true, as with long range views, atmospheric conditions, such as haze, typically reduces the clarity of the view. Therefore, we have excluded photomontages from the 12no. viewpoints that are greater than 20 km away from the nearest turbine. Please note that for practical reasons no viewpoint photography and therefore photomontages will be produced for the 5no. viewpoints located within the open waters of Swansea Bay. However, wirelines will be prepared to illustrate the proposed turbines from the selected locations. Please also note that it is proposed not to include any cumulative wirelines/photographs in the 360° (4 x 90°) where there are no turbines visible. In addition, from viewpoints where the extent of the proposed turbines exceeds a horizontal field of view of 53.5°, then the proposed development will be illustrated in the wirelines/photomontages with a horizontal field of view of 90°/180° with a cylindrical rather than planar projection.

With regards to the cumulative wind farms to be included within the assessment, please find attached in Appendix 2 an updated list of the developments.

Q18: Do the consultees agree with the proposed approach to assess the effects on landscape character and visual amenity?

We note the proposals under section 12.4.14 and advise that changes to forestry as shown on the Forest Design Plans need to be presented on drawings overlaid with the wind farm proposals and forestry proposals associated with the development, as well as being described, to allow a detailed picture to be analysed. It may be that annotated photographs would be required in some instances.

Removal of forestry associated with the wind farm (if visible) only will be illustrated on the photomontages. Forestry removal as shown on NRW’s Forestry Design Plan not directly associated with Y Bryn Wind Farm or that lie outside of the site boundary will be illustrated on visualisations from viewpoints where it is deemed necessary to illustrate any potential changes in the view due as a result of felling. Any potential effects on landscape character and visual amenity as a result of felling will also be described within the assessment text. In addition to your response to the specific questions within the Scoping Report, several other more general points were also raised in your response, which are addressed below:

- I. We advise that changes to landscape character and the way the landscape is experienced also includes the scenic qualities of views from a landscape at a distance from a development and impacts on perceptual qualities such as tranquillity, wildness and remoteness.*

Perceptual qualities will be will be considered within our descriptions of each Landscape Character Area. These will be established during the baseline assessment and will be informed by field assessment and desktop studies of available published material, including existing landscape character assessments and LANDMAP data.

Cadw and the Glamorgan Gwent Archaeological Trusts (GGAT) should be consulted with regard to Historic Landscapes on the Register of Historic Landscapes in Wales, of which there are several in the Study Area.

Noted

- II. We note that aviation lighting will be required for turbines of this scale, as confirmed in section 20.2.12. Night-time photographs/photomontages would therefore be required in this case and acknowledge that section 12.4.13 states that key night-time visualisations would be produced.*

To confirm it is proposed that of the 36no. viewpoint locations assessed as part of the SLVIA, 5no. will be chosen to be included within the aviation lighting assessment. Night time photomontages will be prepared from all 5no. viewpoints.

- III. The Melincourt windfarm, Resolven, which was approved in 2014 under Neath Port Talbot County Borough Council planning reference P2014/0883 should also be included in Table 12.8: Cumulative Wind Farms.*

To confirm, the Melincourt Wind Farm, near Resolven will be included as part of the cumulative assessment.

- IV. Our advice on this chapter relates to the potential impacts on the Gower Area of Outstanding Natural Beauty (AONB) and Brecon Beacons National Park (BBNP).*
 - LANDMAP - guidance note has now been updated.
 - Reference should be made to the respective Management Plans of the Gower AONB AND BBNP including their special qualities, when assessing impacts on these landscape

A3.3.23 SWANSEA COUNCIL LVIA CONSULTATION LETTER – OCTOBER 2021

• Additionally, a seascape assessment should be included in the EIA as the proposal could impact on the seascape to the south. A local seascape character assessment has been produced for Carmarthen Bay, Gower and Swansea Bay which may aid your assessment.

We note that the LANDMAP Guidance Note 3 has been updated with Guidance Note 46 and this current guidance will be followed within the SLVIA.

Reference will be made to all relevant management plans including the Gower AONB and Brecon Beacons National Park (BBNP) Management Plans.

We propose to include a seascape character and visual amenity and the methodology for this is included within Appendix 1. Please note that the methodology for the SLVIA included in Appendix 1 has been revised since the issue of the Scoping Report. These amendments were made to take account of all comments received by the Statutory Consultees.

Yours sincerely

Richard Cole

Encs:
Appendix 1: Seascape/Landscape Visual Impact Assessment (SLVIA) Methodology
Appendix 2: Cumulative Wind Farm Developments
Appendix 3: Residential Visual Amenity Assessment (RVAA) Methodology

13 October 2021



FAO Chris Lindley
Swansea Council
Planning & City Regeneration
Civic Centre
Oystermouth Road,
Swansea
SA1 3SN

Landscape Architects
Assessment
Planning
Design

UK & Ireland

Dear Chris
RE: Y Bryn Wind Farm

Following your comments on the proposed Y Bryn Wind Farm, which were included within Appendix 1 of the EIA Scoping Direction (dated 08/03/21), please find below our response to the queries raised in your letter dated 22nd February 2021.

We note your request for an additional viewpoint to be included within the Seascape Landscape Visual Impact Assessment (SLVIA) to take account of potential impacts on the Gower AONB and across Swansea Bay and therefore propose to include a viewpoint from Oxwich Point (Easting and Northing 251216, 185077). Please note that this viewpoint is located approximately 30 km from the nearest proposed turbine and therefore in our opinion, will be best represented as a wireline and accompanied by a photograph, and consequently the preparation of photomontage from this location has been excluded.

For your information, please find in the table below a full list of the viewpoints that we propose to include within the SLVIA chapter of the ES and which incorporates the additional viewpoints requested from all statutory consultees.

VP	Location	OS Co-ordinates		Distance from Nearest Turbine (km)	Wireline	Photomontage
		x	y			
1	Evans Terrace, Caerau.	285601	193880	2.04	Y	Y
2	Maesteg Golf Course	283616	191592	0.95	Y	Y
3	Bryn, (Play area, off Neath Road).	281616	191592	1.49	Y	Y
4	Brynna Road, Cwmafan	277535	192500	4.28	Y	Y
5	Rhiwlas, Neath	274240	198775	9.41	Y	Y
6	Mumbles Hill, Swansea	262781	187443	17.96	Y	Y
7	Gower Way National	249418	189883	31.24	Y	N

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United Kingdom CF64 2AA

Registration No: 6262312
Soltys Brewster Consulting is the trading name of Soltys Brewster Consulting Ltd

For Appendix 1, 2 and 3 of this letter, see Bridgend Oct 21 letter.

	Trail, Cefn Bryn					
8	Margam Park (Deer Park)	281391	186390	2.25	Y	Y
9	Ogof-Ffynnon-Ddu (BBNP)	287452	216032	22.33	Y	N
10	St Illtyd's Way National Trail, near Cynonville	281835	195244	1.60	Y	Y
11	Wales Coast Path, Ogmore-by-Sea	286146	175100	13.77	Y	Y
12	Twmbarlwm	324198	192624	40.56	Y	N
13	Junction of Heol Gelli Lenor and Brynllwarch, Maesteg	284793	190339	2.17	Y	Y
14	Swansea Promenade, Black Pill	261996	190610	18.70	Y	Y
15	Clwyd Road, Pen-Lan, Swansea	264710	195785	17.24	Y	Y
16	The Princess Margaret Way, Aberavon	273832	190276	6.90	Y	Y
17	Margam Park	280636	186001	2.86	Y	Y
18	Pen-y-Fan (BBNP)	301202	221547	32.72	Y	N
19	Wales Coast Path, Rest Bay/Royal Porthcawl Golf Club, Porthcawl.	279990	178709	10.06	Y	Y
20	Bettws	290961	183470	9.51	Y	Y
21	Sarn Helen, Aberdulais	279491	202151	8.74	Y	Y
22	Baxter Terrace, Glyncorrwg	287629	199343	6.74	Y	Y
23	Margam Park (Access Road)	280104	185810	3.28	Y	Y
24	Wales Coast Path, Kenfig Burrows	279807	181080	7.78	Y	Y
25	Bryn East, picnic area opposite Royal Oak PH	281943	192050	1.20	Y	Y
26	Ogwr	283680	187700	1.12	Y	Y

	Ridgeway Walk, near Bwlwarcu Hill Fort					
27	Cemetery, eastern edge of Maesteg	286321	191520	3.02	Y	Y
28	Llangynwyd	285745	188793	2.68	Y	Y
29	Oxwich Point	251216	185077	29.73	Y	N
30	Nash Point, Glamorgan Heritage Coast	291191	169275	20.92	Y	N
31	Esgair Hir, Brecon Beacons Way National Trail (BBNP)	277735	220298	26.85	Y	N
32	Open Water off Mumbles	262996	189390	17.66	Y	N
33	South of Porthcawl Marina	281987	173999	14.50	Y	N
34	Bristol Channel	258573	174494	26.64	Y	N
35	Mouth of River Neath	270487	190509	10.25	Y	N
36	Outer Swansea Bay/Bristol Channel	254300	174769	30.05	Y	N

We note your comments regarding the Gower Landscape Character Assessment 2013 and confirm that this will be referenced within the assessment. In addition to assessing the effects on landscape character and visual amenity, following comments by yourselves and other comments we have received, we are proposing to include an assessment on seascape character and visual amenity. The Carmarthen Bay, Gower and Swansea Bay Local Seascape Character Assessment will be referenced within the assessment.

Following the above, please find attached (Appendix 1) an amended copy of the proposed SLVIA methodology, which has been updated following comments from statutory consultees. If you have any comments regarding the revised methodology, I would be grateful if you could let me know.

Yours sincerely

Richard Cole

Encs:
Appendix 1: Seascape/Landscape Visual Impact Assessment (SLVIA) Methodology

For Appendix 1 of this letter, see Bridgend Oct 21 letter.

A3.3.24 VALE OF GLAMORGAN LVIA CONSULTATION LETTER – OCTOBER 2021

13 October 2021



FAO John Marks
Vale of Glamorgan Council
Regeneration and Planning,
Dock Office,
Barry Docks,
Barry,
CF63 4RT

Landscape Architects
Assessment
Planning
Design

UK & Ireland

Dear John
RE: Y Bryn Wind Farm

Following your comments on the proposed Y Bryn Wind Farm, which were included within Appendix 1 of the EIA Scoping Direction (dated 08/03/21), please find below our response to the queries raised in your email dated 8th March 2021.

We note your request for an additional viewpoint to be included within the Seascape Landscape Visual Impact Assessment (SLVIA) to take account of potential impacts on the Glamorgan Heritage Coast and therefore propose to include a viewpoint from Nash Point (easting and northing, 291191, 169275). Please note that this viewpoint is located approximately 21 km from the nearest proposed turbine and therefore in our opinion, will be best represented as a wireline, and accompanied by a photograph and consequently the preparation of photomontage from this location has been excluded.

For your information, please find in the table below a full list of the viewpoints that we propose to include within the SLVIA chapter of the ES and which incorporates the additional viewpoints requested from all statutory consultees.

VP	Location	OS Co-ordinates		Distance from Nearest Turbine (km)	Wireline	Photomontage
		x	y			
1	Evans Terrace, Caerau.	285601	193880	2.04	Y	Y
2	Maesteg Golf Course	283616	191592	0.95	Y	Y
3	Bryn, (Play area, off Neath Road).	281616	191592	1.49	Y	Y
4	Brynna Road, Cwmafan	277535	192500	4.28	Y	Y
5	Rhiwlas, Neath	274240	198775	9.41	Y	Y
6	Mumbles Hill, Swansea	262781	187443	17.96	Y	Y
7	Gower Way National Trail,	249418	189883	31.24	Y	N

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	Cefn Bryn					
8	Margam Park (Deer Park)	281391	186390	2.25	Y	Y
9	Ogof-Ffynnon-Ddu (BBNP)	287452	216032	22.33	Y	N
10	St Illtyd's Way National Trail, near Cynonville	281835	195244	1.60	Y	Y
11	Wales Coast Path, Ogmere-by-Sea	286146	175100	13.77	Y	Y
12	Twmbarlwm	324198	192624	40.56	Y	N
13	Junction of Heol Gelli Lenor and Brynllwarch, Maesteg	284793	190339	2.17	Y	Y
14	Swansea Promenade, Black Pill	261996	190610	18.70	Y	Y
15	Clwyd Road, Pen-Lan, Swansea	264710	195785	17.24	Y	Y
16	The Princess Margaret Way, Aberavon	273832	190276	6.90	Y	Y
17	Margam Park	280636	186001	2.86	Y	Y
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20	Bettws	290961	183470	9.51	Y	Y
21	Sarn Helen, Aberdulais	279491	202151	8.74	Y	Y
22	Baxter Terrace, Glynccorrwg	287629	199343	6.74	Y	Y
23	Margam Park (Access Road)	280104	185810	3.28	Y	Y
24	Wales Coast Path, Kenfig Burrows	279807	181080	7.78	Y	Y
25	Bryn East, picnic area opposite Royal Oak PH	281943	192050	1.20	Y	Y
26	Ogwr Ridgeway Walk, near Bwlwarcau Hill Fort	283680	187700	1.12	Y	Y
27	Cemetery, eastern edge of Maesteg	286321	191520	3.02	Y	Y
28	Llangynwyd	285745	188793	2.68	Y	Y

29	Oxwich Point	251216	185077	29.73	Y	N
30	Nash Point, Glamorgan Heritage Coast	291191	169275	20.92	Y	N
31	Esgair Hir, Brecon Beacons Way National Trail (BBNP)	277735	220298	26.85	Y	N
32	Open Water off Mumbles	262996	189390	17.66	Y	N
33	South of Porthcawl Marina	281987	173999	14.50	Y	N
34	Bristol Channel	258573	174494	26.64	Y	N
35	Mouth of River Neath	270487	190509	10.25	Y	N
36	Outer Swansea Bay/Bristol Channel	254300	174769	30.05	Y	N

In addition to the above, please find attached (Appendix 1) an amended copy of the proposed SLVIA methodology, which has been updated following comments from statutory consultees, which for your information now includes for a seascape assessment. If you have any comments regarding the revised methodology, I would be grateful if you could let me know.

Yours sincerely

Richard Cole

Encs:
Appendix 1: Seascape/Landscape Visual Impact Assessment (SLVIA) Methodology

A3.3.25 SWANSEA COUNCIL RESPONSE TO LVIA CONSULTATION LETTER - OCTOBER

Rafe Osborne

From: Chris Lindley <[REDACTED]>
Sent: 14 October 2021 17:35
To: Richard Cole
Cc: Ffion Edwards; Rafe Osborne; Trevor Hunter; Greg Vaughan
Subject: Re: Y Bryn Wind Farm - Scoping Response SC Comments

Diolch Richard

I note the contents of the revised methodology and have no further comments to make at this time.

Cofion

Chris

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From: Richard Cole <[REDACTED]>
Sent: Wednesday, October 13, 2021 3:09:39 PM
To: Chris Lindley <[REDACTED]>
Cc: Ffion Edwards <[REDACTED]>; Rafe Osborne <[REDACTED]>; Trevor Hunter <[REDACTED]>; Greg Vaughan <[REDACTED]>
Subject: Y Bryn Wind Farm - Scoping Response SC Comments

CAUTION: External email - Do not click links/open attachments unless you recognise the sender and know the content is safe

Dear Chris,

Following your comments on the proposed Y Bryn Wind Farm, which were included within Appendix 1 of the EIA Scoping Direction, please find attached a letter containing our response to your queries and corresponding appendices that are referenced within my letter.

Any queries regarding the attached, please do not hesitate to contact me.

Regards,

Richard

Richard Cole
Associate Director
Mobile: [REDACTED]

soltysbrewster

UK Tel: [REDACTED] Ireland Tel: [REDACTED]

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2021

For Appendix 1 of this letter, see Bridgend Oct 21 letter.

A3.3.26 NPTCBC RESPONSE TO LVIA CONSULTATION LETTER - NOVEMBER 2021



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Mae'r e-bost hwn ac unrhyw ffeiliau a drosglwyddir gydag ef yn gyfrinachol ac at ddefnydd yr unigolyn neu'r corff y cyfeiriwyd hwy atynt yn unig. Os ydych wedi derbyn yr e-bost hwn mewn camgymeriad, dylech hysbysu'r person a anfonodd yr e-bost ar unwaith. Hefyd, sylwera nad oes unrhyw sicrwydd nad yw'r e-bost hwn neu unrhyw ymgyssylltiad yn rhydd o firws ac nad yw chwaith wedi'i ryng-gipio na'i newid.

From: Richard Cole <[redacted]>
Sent: 08 November 2021 15:57
To: Nicola Lake <[redacted]>
Cc: Ffion Edwards <[redacted]>; Rafe Osborne <[redacted]>; Trevor Hunter <[redacted]>; Greg Vaughan <[redacted]>
Subject: RE: Y Bryn Wind Farm - Scoping Response NPT Comments

Hi Nicola,

Following my email and letter of the 13/10/21 regarding our response to your Scoping comments, I was wondering if you have managed to review them yet?

If you have, I would be grateful if you could let me know whether you have any further comments?

Regards,

Richard

Richard Cole
Associate Director
Mobile: [redacted]

soltysbrewster

UK Tel: [redacted] Ireland Tel: [redacted]

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Rafe Osborne

To: Steve Ball
Subject: RE: Y Bryn Wind Farm - Scoping Response NPT Comments

From: Steve Ball <[redacted]>
Sent: 09 November 2021 10:57
To: [redacted] <[redacted]>; Ffion Edwards <[redacted]>; Rafe Osborne <[redacted]>; Trevor Hunter' <[redacted]>; [redacted] <[redacted]>
Cc: Steven Jenkins <[redacted]>; Nicola Lake <[redacted]>; Ceri Morris <[redacted]>
Subject: RE: Y Bryn Wind Farm - Scoping Response NPT Comments

Dear Richard

Nicky has passed on your email to me in which you have requested a response to your earlier emailed scoping comments.

Given that your proposal has been recently amended and additional public consultation undertaken, our landscape advisor would need to review your comments alongside these amended proposals.

Please be aware that to respond to any such matters formally we would need to engage further with our landscape advisor (in conjunction with Bridgend CBC) which I consider should be part of formal pre-application discussions, and such formal appointment is dependent at this stage on reaching agreement on the terms of a Planning Performance Agreement (PPA) with Coreolis. I am soon to communicate further with Trefor and Ben Lewis on this point so that hopefully agreement can be reached to move such matters forward.

We have also made it clear to Trefor that BCBC and NPT are seeking as far as practicable to work collaboratively for the overall benefit of the DNS process, and therefore I am sure both LPAs would be expecting a formal request for pre-application advice to be made, covering all aspects of the proposal, not just LVIA. We can then review together with our landscape advisor and respond in due course. You may therefore wish to also advise on your timescales for any response that may be expected once agreement is reached.

In the meantime, we will engage further with our advisor so that he is aware of your further request and can programme appropriate time to review now further details are available of your amended scheme.

Regards

Steve

Steve Ball

Development Manager - Planning / Rheolwr Datblygu - Cynllunio
Neath Port Talbot County Borough Council/ Cyngor Bwrdeistref Sirol Castell-nedd Port Talbot Tel/Ffôn: 01639 686727

Email / E-bost: [redacted]

We welcome correspondence in Welsh and will deal with Welsh and English correspondence to the same standards and timescales. Croesewir gohebiaeth yn y Gymraeg a byddwn yn ymdrin â gohebiaeth Gymraeg a Saesneg i'r un safonau ac amserlenni

If you would like to use Welsh when dealing with the Council please click [here](#)
Os hoffech ddefnyddio'r Gymraeg wrth ddelio â'r Cyngor os gwelwch yn dda cliciwch [yma](#)