



Cyngor Castell-nedd Port Talbot
Neath Port Talbot Council

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Your ref Eich cyf: CAS-03852-P7V7S1
Our ref Ein cyf: P2025/0343

FAO Robert Sparey, Planning & Environment Manager
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BY EMAIL ONLY

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Dear Mr Sparey

Project Name: Upper Lliw Energy Project

Site Address: Land at Upper Lliw, Swansea

Proposed Development: Installation of approximately 20 wind turbines and associated ancillary development

I write in regards to your letter dated 9 May 2025, which consults Neath Port Talbot CBC as an adjoining LPA on the scope of the EIA for the above mentioned proposed DNS renewable energy project. Consideration has been given to the information provided in the EIA Scoping Report prepared by RPS on behalf of Cenin Renewables Ltd. Our comments are set out below in response to the relevant chapters and with reference to Schedule 4 of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 ('the 2017 EIA Regulations').

Chapter 1: Introduction

No comment.

Chapter 2: The Site and the Proposed Development

We note that the development site lies wholly within the administrative boundary of Swansea Council.

Chapter 3: General Approach to EIA

No comment.

Chapter 4: Scope of Assessment

No comment.

Chapter 5: Landscape and Visual Impact Assessment

Anne Priscott Associates Ltd, a Chartered Landscape Architect, is commissioned by Neath Port Talbot CBC to review and advise the LPA in relation to landscape and visual impact assessment matters ('LVIA') for DNS projects. Given the proximity of the application site to its boundary, the proposed LVIA must include consideration and assessment of impact from viewpoints within NPTBC. Should they wish to, the developer is invited to enter into a Planning Performance Agreement with the LPA to agree locations for these.

The Zone of Theoretical Visibility (ZTV) map should identify all key receptors such as long distance trails and public rights of way, and include baseline photos from all identified viewpoints.

The LPA agrees that LANDMAP information should be used to inform the value and susceptibility of landscape. LANDMAP information has evaluations for all key aspects and management guidelines can indicate sensitivities/susceptibilities.

The following principles should be taken into consideration in the assessment and will be used by NPTCBC to assess the LVIA findings:

- All special qualities are of high value and important whether physical, historical, cultural or perceptual.
- Special qualities can be affected by development in a designated area's setting and this in turn can affect the primary statutory purpose. Developments within the setting of designated landscapes should therefore be assessed in the same way as those developments within an area.
- The likely change and effect on each special quality should be assessed separately and should not be averaged out when summarised.
- Special qualities may be used to inform the value of landscape receptors (character areas/types) or visual receptors i.e. people in an LVIA but the effects on the special qualities should still be assessed separately.
- The effect on special qualities can be important even if the geographical area/extent where they are affected is limited. Sometimes the most important special qualities relate to essentially linear features such as coasts, escarpment edges and ridge tops so the areas affected relative to the overall size of the designated area should not be used to diminish the attributed importance of effect.
- The proportion of the total number of special qualities affected should not be used as a means of minimising effects on the designation's purpose.

- A qualitative narrative approach should be used considering the importance of the special qualities affected and clearly addressing if the designation is conserved, enhanced or harmed by the proposed development or whether there is no effect.
- The assessment should be transparent, clearly formatted and proportionate i.e. the scope and level of detail should be consistent with the size and complexity of a given development.

The assessment for each special quality in scope should:

- Describe likely changes caused by the development at each phase.
- Assess if the nature of effect is beneficial, neutral or adverse and why.
- Assess the duration of effect.
- Assess if changes are important and if they conserve, enhance or harm the special quality.

In respect of cumulative effects, it is recommended that the following principles should be taken into consideration where assessing the effects on special qualities and the consequent harm to the statutory purpose of National Parks and AONBs:

- The landscape baseline against which cumulative effects should be assessed is without the existing, consented and proposed developments to be assessed.
- The focus should be on the most relevant developments such as those closest to the proposals and to the National Park.
- Combined cumulative assessments should reflect what receptors in the designated areas see and experience in total. (This can inform qualities such as panoramic views and tranquillity).
- The two main assessments which are required are combined and additional cumulative effects as set out below.
- The approach to combined cumulative effects is to consider the total effects of all agreed developments on the special qualities in addition to landscape character and visual receptors.
- A measure of a significant effect is where the developments combined become a key characteristic and/or a dominant characteristic and whether this is compatible with special qualities.
- The approach to additional cumulative effects is to consider the contributory effects of the proposed development to the overall effect of all agreed developments on the special qualities. This could be a percentage or proportion.

The important cumulative effects on special qualities should be summarised with predicted duration. This is the main factor in coming to a judgement on the overall level of cumulative harm.

NRW's views on the appropriateness of the proposed 27km outer study area limit should be sought. Based on recent offshore energy strategic environmental assessment (OESEA), research studies of offshore wind energy seascape and landscape visual impact assessments (SLVIAs) demonstrate that significant effects can occur *at least* 20km away from 200m high turbines (1:100 ratio).

Chapter 6: Traffic and Transport

The following highway concerns have been identified:

1. A copy of the full Transport Impact Assessment is required for review.
2. Scoping route of traffic (including deliveries) to and from the site using NPTCBC's adopted highway network is required, together with timings of deliveries. Off-site works may be required as a consequence to facilitate these deliveries and the applicant is advised a RSA Stage 1 – 4 will be required.
3. Proposed delivery route on NPTCBC adopted highway network may be subjected to a condition surveys before commencement of any heavy good deliveries to and from the site this includes items such as culverts. These surveys may be completed annually throughout the life of the planning consent and any defects/damage to the existing highway resulting in frequent use of HGV's will be remediated by the applicant or a financial contribution to the Council shall be made to allow the Councils highway department to make good the damage.

Chapter 7: Hydrology and Flood Risk

No comment.

Chapter 8: Geology and Hydrogeology

The site lies within an area of historic mining activity beneath the ground and unauthorised opencast works. Full site investigation works for the scheme proposal will be required and further advice sought from the Mining Remediation Authority.

Chapter 9: Biodiversity

The development must maintain and enhance biodiversity and in so doing promote the resilience of ecosystems, as required by Future Wales Policy 9 and the Environment (Wales) Act 2016. It must also demonstrate how the DECCA Framework and Step-Wise Approach has been considered, in accordance with PPW12 requirements.

Please also refer to any NRW comments received.

Chapter 10: Ornithology

Please refer to any NRW comments received in this regard.

Chapter 11: Noise

The Local Authority offers no comment on this issue as we have no in house expertise in this field.

Chapter 12: Shadow Flicker

The Local Authority offers no comment on this issue as we have no in house expertise in this field.

Chapter 13: Socioeconomics

No comment.

Chapter 14: Historic Environment

The Local Authority offers no comment on this issue as we have no in house expertise in this field. Please refer to any Cadw comments received in this regard.

Yours sincerely

Claire Hall
Senior Planner
Neath Port Talbot County Borough Council