

Our Ref: 181109 L JPW0888 DW WG L v0
Your Ref: 3154384

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Date: 9th November 2018

Ms K Maskell
The Planning Inspectorate
Crown Buildings
Cathays Park
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Dear Kelly

The Planning Inspectorate Reference: APP/X6910/A/16/3154384
The Developments of National Significance (Wales) Regulations 2016
Proposed Solar Park, Access and Ancillary Development at Wauntysswg Farm, Abertysswg, Rhymney, Tredegar

Further to your letter dated 5th October 2018 requesting addendums to the Landscape and Visual Appraisal ('LVA') and Baseline Heritage Impact Assessment ('BHIA') regarding the above, I enclose the following:

- Landscape and Visual Appraisal (reference: WAUN-008) Addendum (reference: 181101 R JPW0888 HD LVA addendum v0);
- Heritage Desk Based Assessment (reference: WAUN-009) – Addendum (reference: 1233-A);
- Heritage Impact Assessment Addendum Sheet (reference: 1233-B); and
- Addendum to Heritage Impact Assessment Summary Note (reference: 1233-C).

The addendums to the above reports address the key issues identified within the Local Impact Reports (LIR) of Blaenau Gwent and Caerphilly County Borough Councils and other consultation responses, within my letter dated 26th September 2018 and during the Inspector's accompanied site visit on 2nd October 2018.

Cefn Golau Cholera Cemetery Scheduled Ancient Monument

Within the LIRs and the consultation responses, the setting of the Cefn Golau Cemetery Scheduled Ancient Monument ('SAM') was identified as a key issue that required re-assessment. The LVA and BHIA addendums re-assess the key issue of effects on visual receptors and representative viewpoints at Viewpoint 5 (LVA Figure 11 – View from Cefn Golau Cholera Cemetery) and the setting of the SAM based on a detailed on-site visual assessment and review of Proposed Viewpoint 5 (LVA Figure 33) – a photomontage of the proposed development from adjacent to the SAM.

The LVA Addendum acknowledges that the original LVA Viewpoint 5 overstated the size of the site and consequently the impact of the scheme on the Cefn Golau Cemetery SAM. While the overall landscape sensitivity remains High, as confirmed with Foundations Heritage during a site visit on 30th October 2018, a detailed visual assessment on site and Proposed Viewpoint 5 has concluded that the change in the view is not prominent (the panels and 15 m lattice tower are barely visible within Proposed Viewpoint 5), with the majority of the site obscured from view by the topography and few visual receptors are affected. Consequently, the magnitude the change has been reduced

to Negligible. With a High sensitivity and a Negligible magnitude of change, there would be a Minor visual effect from this representative viewpoint (see LVA Addendum Figure 11 rev A).

The BHIA Addendum similarly undertakes a detailed re-assessment of the heritage significance of the impact of the development on the setting of the SAM. The original DBHIA considered that a substantial adverse impact would occur on views to the south from the cemetery. The consultation response from Cadw generally concurred with this level of impact. However, a further site visit undertaken on 30th October 2018 led to the reassessment of the potential effect and this is supported by Proposed Viewpoint 5. It is the opinion of Foundations Heritage that the visual impact likely to be experienced from the cemetery represents little more than a slight colour change within a very limited area. The lattice tower proposed to be located within the northern boundary of the site is also likely to be difficult to discern from the SAM. It is the conclusion of the BHIA Addendum, therefore, that the proposals would result in a negligible impact (no appreciable effect on the setting of any asset) tending to a minor adverse impact (slight visual changes to a few key aspects of historic landscape and the settings of any asset) on the setting of the SAM.

The BHIA Addendum also addresses the comments within the Cadw consultation response stating that the BHIA had not provided sufficient assessment of visual effects from receptors looking towards the cemetery. Foundations Heritage disputes that views towards the cemetery were not given sufficient weight. However, further discussion is provided and states the nature of the heritage asset is such that it comprises dark coloured headstones with a low above ground profile in an area of rough vegetation that are difficult to discern within the landscape due to the presence of far more dominating existing features in proximity to it (including Cefn Golau Cottage and the range of dilapidated agricultural buildings), even when viewed from within a very short distance.

Notwithstanding the above, Foundations Heritage's BHIA Addendum acknowledges that there are a few views towards the cemetery where there would be intervisibility with the proposed development. However, relevant views in this regard are restricted to dynamic views from the road across the panels towards the cemetery, becoming more oblique northwards towards its junction with the higher unnamed road to the east, after which no intervisibility applies. The cemetery itself can be recognised along this route only through the modern fencing that delimits it, which itself has a detracting effect on the setting of the asset. A pedestrian walking along the road would have approximately seven minutes whereby the panels and the fencing around the monument – but not the monument itself to the naked eye – are visible and this will equate to less than one minute in a vehicle, during which time it is contended that it would be almost impossible to identify the asset (see BHIA Addendum Plate 9). Indeed, the cemetery is difficult to discern in all views from the south that incorporate elements of the proposed development, with the eye being drawn to other features within the landscape including a range of derelict agricultural buildings that lie to the south of the asset, as well as Cefn Golau cottage to the northwest.

The BHIA Addendum concludes that, given the generally oblique and transitory nature of the intervisibility and the virtual impossibility of appreciating the monument over these distances, views towards the cemetery from the south and southeast have no relevance in their ability to affect the significance of the asset and therefore effectively represent amenity views. Nonetheless, some consideration must be given to the effects on communal value, in that knowledge of the cemetery does not necessarily require sight of it. In assessing this communal value, the BHIA Addendum considers that the cemetery relates to Tredegar, from which it is almost certainly located to avoid any visibility and that views from the south and east would neither in the past or, broadly speaking, in the present have been relevant and do not consequently result in an appreciable effect on heritage significance. As such the effects of the proposed development from these receptors is considered negligible tending to minor adverse impact. Views from the east-west of the B4256 to the north of the cemetery have the same limited degree of intervisibility in that the proposed development would



be either not noticeable at all or would represent no more than a slight colour change to the south. As such the effects of the proposed development from this receptor is considered negligible.

In summary, therefore, in accordance with Technical Advice Note 8: Renewable Energy ('TAN 8') (June 2005) paragraph 3.15 it is considered that the proposal is not critically damaging to a listed building, ancient monument or a conservation area vista and should be supported.

Additional Viewpoint - Cefn Y Brithdir Beacon

Regarding the additional Viewpoint requested within the Caerphilly County Borough Council LIR, this has been undertaken and named Viewpoint 13 at Cefn Y Brithdir Beacon within the LVA Addendum. The viewpoint is located along the Rhymey Valley Ridgeway Walk viewing north/northeast 2.45 km from the application site (see LVA Addendum Figure 25).

The LVA addendum concludes that walkers approaching from the south would first experience the broad expansive ridgeline defining the horizon on which the blades of the three operational turbines at Pen Bryn Oer are visible. From this angle, the viewer's eye is drawn to Tafarnaubach Industrial Estate in the distance on the horizon. The western edge of the proposed development would be concealed by the intervening landform immediate to the west and southwest of the application site. However, the panels on the higher edge of the upward slopes of the valley of the proposed development would be visible from this angle, contiguous with the blocks of coniferous plantation and deciduous woodland although the proposed development itself, would not break the skyline. Energy development would stretch along the valley side with a large separation between developments. Consequently, the proposed development and the turbines would be seen in succession from this viewpoint and their effects correspondingly reduced particularly given the scale of the proposed development in this expansive landscape that set the scale of the proposal in proportion. With a High sensitivity and Low Magnitude of change there is a Moderate visual effect from Viewpoint 13.

The LVA Addendum does not affect the overall conclusion of the original LVA that there is limited inter-visibility of the proposed development with the lower-lying local valley settlements. These limit effects on visual amenity from the surrounding area. Whilst the site boundary is partly within Caerphilly County Borough and some of the site will be visible from it, actual visibility is confined, apart from two successive southerly points, to localised short distance views. The southern edge of the Brecon Beacons National Park boundary is located approximately 4 km to the north of the application site at its closest point and is not affected by the proposals. Similarly, paragraph 1.3 of Caerphilly County Borough Council's letter to the Inspectorate dated 12th October 2018 states that there is support for renewables within the LDP but not at the expense of the landscape and references Caerphilly Local Development Plan paragraph 3.11, which refers to safeguarding the landscape in The Upper Rhymney Valley in the context of being the gateway to the area and, in particular, prominence when viewed from the A465 Heads of the Valleys Road. The application site is not visible from the Heads of the Valleys Road gateway to Caerphilly County Borough. Longer range views demonstrate that the proposed development will have either no, negligible and a moderate effect from a single viewpoint on landscape character, which will be viewed by few receptors from an upland location to the south west of the site where successive and sequential views of turbines development are already available positioned in other non-statutory and locally designated Visually Important Local Landscape and Special Landscape Areas. Furthermore, there are few receptors within this secluded upland valley. Consequently, there are a very limited number of visual receptors that would undergo the highest effects. While the proposal would appear as a prominent new element within local views it would not be to such an extent that it prevents receptors enjoying views to the expansive landscape setting in which the proposal would be seen. In the long term, the decommissioning of the proposed development would result in the reversal of the landscape and visual effects associated with it, which would cease completely following removal.



Summary and Conclusion

In summary, the LVA and BHIA Addendums provide further evidence that the proposal for renewable electricity generation, which is supported in principle by national and local planning policies, will have an acceptable level of localised landscape and visual impact and will not critically damage any designated heritage asset. The proposal will also assist the Cabinet Secretary for the Environment Lesley Griffiths AM's target of Wales meeting 70% of its electricity consumption from renewable energy by 2030, announced in a statement on 28th September 2017. Furthermore, the proposal would also contribute towards the Intergovernmental Panel on Climate Change Special Report on Global Warming of 1.5 C, October 2018, recommendation to limit global warming through reducing human-caused emissions by 45% from 2010 levels by 2030, thereby contributing to the 'Well-Being Goals' set out within the Well-being of Future Generations (Wales) Act 2015. In conclusion, therefore, it is considered that the 'planning balance' weighs firmly in favour of the proposed development and we respectfully request the Inspector recommends planning permission be granted by Welsh Ministers accordingly.

I trust the enclosed is satisfactory. However, should you have any queries or require any further information please do not hesitate to contact me.

Yours sincerely
For RPS

A handwritten signature in black ink, appearing to read 'D Williams', written in a cursive style.

Dafydd Williams
Associate

cc:
Mr D Meehan (Elgin Energy EsCo Ltd)
Mr R King (Foundations Heritage)
Ms H Donnelly (RPS)