



Environment Information Services

Established 1972

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Report to CPRW:

Nant Mithil wind farm consultation by Bute Energy

Comments on selected documentation:

chiefly but not restricted to Environmental Statement
Chapter 5: Landscape & Visual matters

NOTE: it is not the purpose of these comments to make an alternative assessment or submit final comments: the time for this is when the formal application to PEDW is submitted – together with any changes made. The intention at this consultation stage is to appraise the application itself in response to Bute Energy's draft.

Links to the material are systematically included throughout this text to enable further reference to comments and to provide a source for future reference.

Please also note, on the following pages,

- *Text in italics is a direct quotation from the documentation*
- Key points below are highlighted yellow
- **Action points are highlighted yellow, emboldened and underlined**

a) Initial public documents not part of the formal process:

Consultation Brochure

[Bute Nant-Mithil Brochure English.pdf \(nantmithilenergypark.wales\)](#)

A public update. Grid connection route map fails to show other proposed sites (actually by Bute).

[Comparative] Visualisation Brochure

[Bute-Energy Visualisation-Brochure Bilingual v1.0-1.pdf \(nantmithilenergypark.wales\)](#)

The 31 turbine layout shows reduced visibility from selected key viewpoints (VPs) compared to the original scheme. However, turbines in the revised version are much paler and more difficult to see.

b) Public consultation material - prior to the application to PEDW:

Project Documentation Link Table

[Nant Mithil Project Documentation - Nant Mithil \(nantmithilenergypark.wales\)](#)

The key reference to documents and source of links to further detail. It is presentationally-flawed because texts are tiered as Vol 1 (text and tables), Vol 2 (Figures) and Vol 3 (Appendices).

Emboldened references within the texts are not clickable links. It is thus not possible to follow-up more detail directly in other volumes and it is extremely awkward to repeatedly open multiple pdf documents. This fundamental flaw undermines the process and makes it especially difficult for the general public, to appraise documents. **This should be changed, and a simpler mechanism set out.**

Planning Statement (PS)

[Report \(nantmithilenergypark.wales\)](#)

Easy to miss the PS which summarises many documents and relates them to planning policy.

The Design and Access Statement (DAS)

[2024-04-30 -NM-APP-007-Design-and-Access-Statement.pdf \(nantmithilenergypark.wales\)](#)

Similar in scope to the PS

Non-Technical Summary (NTS)

[2024-04-30 Non-Technical-Summary-1.pdf \(nantmithilenergypark.wales\)](#)

Site selection para 20 claims 'alignment' with pre-Assessed Areas (pAAs) – this is incorrect as admitted in 1.23 and elsewhere that site is only 'part' within – actually only c20%.

Environmental Statement (ES) - the key collection of documents

ES Ch 1 vol 1 Introduction - Text

[Chapter 1 Introduction - Nant Mithil \(nantmithilenergypark.wales\)](#)

The breath-taking cost of obtaining hard copies of the complete ES (£3,000 to £7,000) is testament to the fact that this process has got out of hand: documentation is beyond reach for the public, in hard copy and electronic formats.

ES Ch 2 vol 1 Approach to EIA - Text

[2024-04-30 Volume-1 Chapter-2- Approach-to-the-EIA.pdf \(nantmithilenergypark.wales\)](#)

2.11 - *Proportionality* - An ES should be fit for purpose and must be accessible to the consenting authority, consultees and the public. As such, it should focus on significant environmental effects to avoid being overly long in nature.

This has not been achieved – or, even, apparently, intended. **A radical re-think of presentation is required to collate documents into a format that is accessible to the public and decision-makers.**

ES Ch 2 vol 2 Figures

[2024-04-30 Volume-2 Chapter-2-Figures.pdf \(nantmithilenergypark.wales\)](#)

Fig 2.2 Cumulative developments exclude Bute's Bryn Gilwern and Aberedw, while fig 2.3 does include GreenGen wood pole line (and masses of irrelevant residential development). This is muddling and inconsistent. This point is at odds with relevant guidance, recurs throughout the ES **and should be corrected.**

ES Ch 2 vol 3 Appendices Appendix 2.1

[2024-04-30 Volume-3 Appendix-2.1 Scoping-Report.pdf \(nantmithilenergypark.wales\)](#)

Front page air photo misleadingly focuses on southern tip of site only [as do many other docs]. **This should be replaced** as it draws attention away from the area actually covered by the application.

Detail largely overtaken by subsequent draft ES which reflects responses from statutory consultees.

ES Ch 2 vol 3 Appendices Appendix 2.6

[2024-04-30 Volume-3 Appendix-2.6 List-of-All-Cumulative-Projects-Considered.pdf \(nantmithilenergypark.wales\)](#)

Contrary to recommended practice and PEDW Scoping Direction Table A1 unacceptably lists projects scoped out as at 'Design / Scoping' stage because 'no planning application submitted' e.g. Bute's own Green GEN Towy/Usk, Bryn Gilwern, Aberedw, Banc Du and others by different developers. The same fault is repeated in relation to various non-wind proposals. **This should be rectified.** The Table itself should also be colour-coded to assist understanding of the rationale [however defective].

ES Ch 3 vol 1 Site Selection and Design Strategy

[2024-04-30 Volume-1 Chapter-3- Site-Selection-and-Design-Strategy.pdf \(nantmithilenergypark.wales\)](#)

The 36 turbine 'so-called maximum development' scenario appears in retrospect to be more of an 'Aunt Sally' to make the final design seem less objectionable. The same goes for avoidance of so-called 'overbearing' residential impacts, implying - wrongly - that anything under that threshold is acceptable or does not require assessment. The text takes 50 paras to get to final design.

ES Ch 4 vol 1 Project Description

[2024-04-30 Volume-1 Chapter-4- Project-Description.pdf \(nantmithilenergypark.wales\)](#)

Table 4.2 Turbine dimensions diagram: the component sizes do not correspond to the stated tip heights for each of the three size-options. **This should be explained or corrected.**

ES Ch 4 vol 2 Figures

[2024-04-30 Volume-2 Chapter-4-Figures.pdf \(nantmithilenergypark.wales\)](#)

Fig 4.2 Turbine dimensions: the component sizes again do not correspond to the stated tip heights for each of the three size-options.

Figure 4.13 Open Access Land and Pre-Assessed Area for Wind Energy: almost all the various kinds of Open Access Land on site lie outside the pAA.

ES Chapter 5

The layout of material in the master documentation index is misleading and confusing because it jumps from Volume 1 items to Volume 3 items, then returning to Volume 2 items before ending with Volume 4 items. The reason appears to be that the so-called volume 2 items are actually volume 4 items.

ES Ch 5 vol 1 Landscape and Visual Amenity

[2024-04-30 Volume-1 Chapter-5 Landscape-and-Visual-Amenity.pdf \(nantmithilenergypark.wales\)](#)

5.10 The assessment radius of 2km for residential visual amenity [RVA] from the outer turbines is insufficient, especially when they are of a great size and on elevated sites (see also Appendix 5.7). **This needs re-consideration and expanding to at least 3km.**

5.12 The comprehensive RVA should be listed among the 'effects assessed in full'. It is not clear what is meant by 'indirect effects on residential and visual amenity' in the final bullet point.

5.31 >> Table 5.1 summarises Bute's responses to comments received from statutory consultees (including PEDW). **Despite PEDW's Scoping Direction the contentious role of the cumulative**

assessment does not appear in this Chapter 5 list where a full account belongs. **An explanation for this exclusion is necessary.**

5.39 refers to roads affected by the proposal. There is no reference to the role of A44 as the tourism gateway to mid-Wales (as stressed in the Hendy and Pentre Tump Inquiry decisions).

5.44 It is unrealistic to consider the fully-built but non-operational Hendy turbines as 'in construction'. That could apply to sites where a minimum of construction had taken place.

5.58 Notes re NLCA 20 'The area is very rural and largely undisturbed by industries, heavy traffic, tourism or commuters, and herein lies its timeless beauty and tranquillity'. This is an unavoidable consideration.

5.78 >> LANDMAP Table 5.2 The key aspect areas containing the site and its immediate surroundings are not drawn together out of long list in Table 5.2

It is not understood why there are no evaluations for Cultural Landscape aspect areas.

5.105 >> Visual baseline Conditions

5.107 Fails to mention the range of proposed wind schemes noted in PEDW's Scoping Direction.

5.113 Table 5.4 Contains misleading references to relevant roads, listing distant end-points e.g. A44 between Monkland and Llangurig: This draws attention away from the relevant section.

5.117 Table 5.6 It is not clear why some areas of Open Access Land are only represented by selected VPs when there is also a landscape impact on the whole area as a resource. For substantial areas, there should be a cross-reference to appropriate text elsewhere.

5.118 >> and Table 5.7 which lists the 31 representative viewpoints.

For consistency and to enable locations to be located physically, all VPs should be illustrated by day-time PMs (photomontages and not just wirelines).

At this point in the narrative, the ES fails to address the general needs of visual receptors, lay individuals, residents, visitors, or 'receptors' – however they may be described. They have only the complex and 'professional' visualisations in a later part of the ES to rely on, and are for practical purposes patronised and left at an unjustified disadvantage by the lack of sufficient introductory non-professional material.

To allow public participation in the process and locate the VPs, individual visualisations for each VP should be provided for general users to include a single landscape-format photomontage at each VP (and at any additional or modified locations). It should be made clear that this was for general evaluation purposes, as distinct from the formal role set out at in ES Figures 5.26 – 5.57. Appropriate viewing distances should be stated for A4 if viewed in a report format capable of being used in the field, and for A3 for more detailed use. **This material should be notated in such a way that the location of the VPs could easily be determined and visited. It should be accompanied by one or more suitably-scaled location maps to show all the VPS together so that any omissions or more suitable locations may be appreciated.**

Collectively, these defects represent a glaring omission, because there is no simple document which enables readers of the ES to locate the viewpoints at a suitable, and uncomplicated, scale.

This must be remedied to enable a suitable appreciation of the detailed illustrative material at ES Ch 5 vol 4.

Subject to the scale limitations of the current material, comments on the locations of the VPs are made below, together with suggestions for additional positions. The ES material showing VP locations is too small-scale to be used on its own, so this has had to be checked on an OS base-map.

The Table below is constructed from the range of material in ES Table 5.7 and is not available in this simplified form in the ES. The current range of viewpoints is broadly adequate, but should be supplemented in the light of any specific requests from interested parties and PEDW. CPRW and Cadw suggestions are set out as Viewpoints A and B – as explained below.

VP	Location	Grid Ref	Km
1	Water-break-its-neck	182 600	1.11
2	Heart of Wales Trail	180 684	1.13
3	A44 E of Castell Crugerydd	163 592	1.19
4	A483 Llanfihangel Rhydithon	160 673	1.29
5	Black Mixen	196 644	1.67
6	A44 Fforest Inn	171 585	1.75
7	Dolau	143 670	2.25
8	Llandegley A44	139 629	2.29
9	Heart of Wales Trail nr Pales	137 641	2.36
10	A488 Bleddfa	207 683	2.41
11	A481 Rhewey	150 576	3.11
12	Llandegley Rocks	131 618	3.16
13	Bwlch-Ilwyn Bank	118 599	4.37
14	A44 bridge Penybont	113 642	4.61
15	Llanfihangel Hill	186 554	5.05
16	Caergynan Bank	136 713	5.81
17	Glyndwr's Way Llanlluest	191 741	5.73
18	Crossgates	088 651	6.96
19	Old Radnor	250 591	7.37
20	Evenjobb B4357	262 626	8.25
21	Castle Bank	088 562	8.53
22	Hergest Ridge	254 563	8.95
23	ODP Castle Ring Pen Offa	271 636	9.12
24	Ridge N of Knighton	282 736	11.54
25	ODP S of Newcastle	249 796	13.85
26	A44 Lyonshall - Kington	322 562	15.07
27	Bury Ditches	328 838	21.77
28	Hay Bluff	244 367	24.72
AP1	A44 S of Llandegley	142 621	2.09
AP2	BOAT S of W-b-i-Neck	182 600	1.14
AP3	Hundred House	113 544	7.74
N2	Space Guard Centre	306 702	12.52

CH03	Shepherd's Tump Round Barrow	155 653	Adjacent to site
A	Cowlod (CPRW)	165 637	Within the site
B	Drum Ddu (CPRW)	970 603	19.00

CH03 is shown on ES figures as suggested by Cadw, but does not appear in the documentation.

Viewpoint 'A' is requested by CPRW at the major intersection of routes within the site; there is no reason to forego VPs in the heart of the proposal. Viewpoint 'B' is required to represent the range of views from Open Access land in the Cambrian Mountains and by doing so to include a perspective over Llandrindod Wells.

It should be noted that in this response to consultation, no attempt is made to make any comment on the visual effects at the VPs. This can and will only be done after the documentation is finalised by the applicants and accepted by PEDW at the formal application stage.

5.133 >> Identification of Developments to be included in the Cumulative Assessment.

This should not be confined to developments in Scenarios A and B - as explained in comments above re Scoping.

5.152 - 5.185 Assessment of Construction Effects. This long and densely arranged section impedes the flow of the narrative and **should be relocated as an Appendix.**

5.186 >> Assessment of Operational effects

In contrast, this is the heart of the matter, as summarised in 5.188

5.189 – 5. 206 Landscape Effects [to be read in conjunction with **Appendix 5.4** - inconveniently in a separate volume]

5.207 – 5. Visual effects [to be read in conjunction with **Appendix 5.5** - inconveniently in a separate volume]

5.209 summarises significant visual effects – but does not explain that they are to be considered adverse. It also fails to state the distances from the nearest turbine, and offers no rationale other than reference to the separate Appendix 5.5.

By contrast, the topic-based text (though referenced to the VPS) describes effects on a range of receptor-groups, and landscapes at 5.211 – 5.242. Readers are referred to Appendix 5.5, but to present all this material prior to and separate from the visual material in Appendix 5 - and inconveniently detached from it - prevents readers from understanding all these long lists.

5.245 – 5.276 Assessment of Cumulative Effects

Some of the techniques (such as paired ZTVs) are of little relevance when the inadequate scoping (see above) of cumulative assessments restricts this topic (and is contrary to PEDW's Scoping Direction). This should be completely re-written to include the required scope.

5.277 – 5.283 Residential Visual Amenity Assessment (RVA) see also Appendix 5.7.

5.302 Tabular summaries of effects.

All these Tables – for landscape and then for visual effects – are fatally flawed because the cumulative column in every case is invalidated by being confined to the so-called Scenarios A and B which restrict assessment - contrary to the Scoping Direction from PEDW and other advice.

NOTE: The initial three figures in ES volume 4 are wrongly indexed in the master key as being in Volume 2, just adding to the confused and complex structure. This does appear to explain why they are located – apparently out of numerical order – after the list of volume 3 material. Apart from this error, there appear to be no relevant items in ES Chapter 5 volume 2.

ES Ch 5 vol 3 Appendix 5.1 Methodology

[2024-04-30 Volume-3 Appendix-5.1 LVIA-Methodology.pdf \(nantmithilenergypark.wales\)](#)

A.13 *'With regard to wind energy development, whilst there is a broad spectrum of response from the strongly positive to the strongly negative, an assessment is required to take an objective approach. Therefore, to cover the 'maximum' or 'worst case' situation, likely landscape and visual effects, including cumulative effects, relating to commercial scale wind farms are generally assumed to be adverse (negative).'*

This is an important underlying statement and needs to be clearly recognised in the ensuing analysis.

Landscape effects

A.28 > Landscape value refers to LANDMAP and includes its overall evaluation scoring system.

However, A.33 Table A.5 relegates the four-fold landscape value overall evaluation in LANDMAP (Table A.4) to a three-fold division by merging LANDMAP's 'Outstanding' tier into a single 'High' tier. There is also no provision in this structure for introducing 'intermediate levels', mentioned later at A.35. This could have the effect of 'watering-down' the available evidence and reducing the value of landscapes affected by the proposal unless it is more clearly stated that the resulting 'High' category should be interpreted accordingly. Further text at A.44 - A.45 plus Table A.8 does not provide this flexibility.

A.38 – 40 Size and scale of effect. The four-fold division caters for Large – Medium – Small – Barely perceptible but does not make provision for changes locally greater than Large.

A.41 Duration of Landscape Effect. In a three-fold division, 'turbines or other operational structures lasting more than 10 years' are classed as the maximum 'Long-term' effect. Given that the proposal is for 40 years operation plus additional time for preparation and decommissioning, this seems inadequate. A further tier of 'extended long-term' would be more appropriate.

Visual effects

A.70 refers to an overall judgement on the magnitude of visual change on a four-fold scheme of High – Medium – Low – Barely Perceptible. While it refers in Table A.13 to intermediate levels of low-medium and medium high it should also have a greater than High category, particularly necessary given the size and number of the proposed turbines, and the fact that changes are for the proposed period of 40+ years.

A.74 explains how the non-numeric factors may be combined but creates an imbalanced set of possibilities with two categories below Moderate and only one above. This should be extended to allow for the possibility of a further case above Major. Even though the likelihood of this being reached is not great, it would allow for the possibility of a further intermediate category.

Cumulative Assessment

A.78 defines the purpose of cumulative assessment in terms of other consented or proposed windfarms, but fails to include existing schemes in the overall scope. This is assumed to be a drafting error as the source, NatureScot guidance, is not limited in this way.

A.80 correctly widens the scope to include other developments which may introduce similar effects.

A.85 and A.86 refer to PINS Advice Note 17 [AN17] and NatureScot guidance which refer to widening the scope of cumulative assessments beyond ‘Scenarios A & B’. Nevertheless, AN 17 - 4.1 includes *existing plans and projects that are ‘reasonably foreseeable’*.

A.87 then offers a defence for the exclusion of Bute’s five specified proposals in the area (Aberedw, Banc Du, Bryn Gilwern, Rhiwlas and Green GEN Towy-Usk) *‘but these had not reached **statutory consultation stage** by the cumulative cut-off date and so it will be for those Proposed Developments to include consideration of the Proposed Development in their assessments. This has been agreed with Planning and Environment Decisions Wales (PEDW) and Powys County Council.’*

There seems no evidence for this claim, or explanation of the context.

A.89 states that **the cumulative cut-off date** is 19th December 2023.

The question then arises – *‘what **is** the statutory consultation stage?’* It has to be the point at which PEDW receives a Scoping Report from applicants complete with a draft ES for public consultation, together with a request for any further Scoping Direction. That is precisely the stage now reached in this case. However, as shown below from the PEDW applications website, the Scoping Request and draft ES stage was already reached in relation to the five cited Bute projects in advance of the cut-off date. The ensuing Scoping Direction was issued in 2022 for two of the cases, and then early in 2024 for the remaining three.

	Scoping request and draft ES	Scoping Direction from PEDW
Aberedw	5-12-23	8-4-24
Bryn Gilwern	7-12-23	8-4-24
Banc Du	18-7-22	17-11-22
Rhiwlas	18-7-22	11-11-22
Green GEN Towy-Usk	23-10-23	15-2-24

ES Ch 5 vol 3 Appendix 5.2 ZTV Methodology

[2024-04-30_Volume-3_Appendix-5.2_ZTV-Mapping-and-Visualisation-Methodology.pdf](https://nantmithilenergypark.wales/2024-04-30_Volume-3_Appendix-5.2_ZTV-Mapping-and-Visualisation-Methodology.pdf)
(nantmithilenergypark.wales)

No technical comments. Concern is about the presentation of material rather than its compilation

ES Ch 5 vol 3 Appendix 5.3 ZTV Landscape Units and LANDMAP

[2024-04.pdf \(nantmithilenergypark.wales\)](#)

Link seems incompletely named, but does work.

A.5 refers to Powys County Council updated LCA (Landscape Character Assessment).

A.21 Text referring to GN46 is unclear, due perhaps to the inclusion of the first word 'Whilst'.

Evaluation in Table A.2 is complex and difficult to appreciate without relevant map alongside. Conclusions are probably acceptable.

ES Ch 5 vol 3 Appendix 5.4 Landscape Assessment Tables

[2024-04-30 Volume-3 Appendix-5.4 Landscape-Assessment-Tables.pdf \(nantmithilenergypark.wales\)](#)

Detailed and necessary source material. Further comments may be made to PEDW at submission.

ES Ch 5 vol 3 Appendix 5.5 Visual Assessment Tables

[2024-04-30 Volume-3 Appendix-5.5 Visual-Assessment-Tables.pdf \(nantmithilenergypark.wales\)](#)

Detailed and necessary source material. Further comments may be made to PEDW at submission.

ES Ch 5 vol 3 Appendix 5.6 Assessment of Designated Landscapes

[2024-04-30 Volume-3 Appendix-5.6 Assessment-of-Designated-Landscapes.pdf \(nantmithilenergypark.wales\)](#)

Detailed and necessary source material. Further comments may be made to PEDW at submission.

ES Ch 5 vol 3 Appendix 5.7 Residential Visual Amenity (RVA) Assessment Part 1

[2024-04-30 Volume-3 Appendix-5.7 Residential-Visual-Amenity-Assessment-RVAA.pdf \(nantmithilenergypark.wales\)](#)

Detailed and necessary exercise. Further comments may be made to PEDW at submission. These subdivisions of the RVAA should be labelled 'Appendix 5.7 (1) , 5.7 (2)and Part 1 , Part 2' etc to avoid confusion and make access to the data easier.

ES Ch 5 vol 3 Appendix 5.7 Residential Visual Amenity (RVA) Assessment Part 2

[2024-04-30 Volume-3 Appendix-5.7 Figures-A5.7.1-to-Figure-A5.7.3-1.pdf \(nantmithilenergypark.wales\)](#)

Detailed and necessary exercise. Further comments may be made to PEDW at submission.

ES Ch 5 vol 3 Appendix 5.7 Residential Visual Amenity (RVA) Assessment Part 3

[2024-04-30 Volume-3 Appendix-5.7 Figures-A5.7.4-to-Figure-A5.7.20-1.pdf \(nantmithilenergypark.wales\)](#)

Detailed and necessary exercise, but perhaps overdone. Further comments may be made to PEDW at submission.

ES Ch 5 vol 3 Appendix 5.7 Residential Visual Amenity (RVA) Assessment Part 4

[2024-04-30 Volume-3 Appendix-5.7 Figures-A5.7.21-to-Figure-A5.7.36.pdf \(nantmithilenergypark.wales\)](#)

Detailed and necessary exercise. Further comments may be made to PEDW at submission.

ES Ch 5 vol 3 Appendix 5.7 Residential Visual Amenity (RVA) Assessment Part 5

[2024-04-30 Volume-3 Appendix-5.7 Figures-A5.7.37-to-Figure-A5.7.51-1.pdf \(nantmithilenergypark.wales\)](#)

Detailed and necessary exercise. Further comments may be made to PEDW at submission.

ES Ch 5 vol 3 Appendix 5.7 Residential Visual Amenity (RVA) Assessment Part 6

[2024-04-30 Volume-3 Appendix-5.7 Figures-A5.7.52-to-Figure-A5.7.68-1.pdf \(nantmithilenergypark.wales\)](#)

Detailed and necessary exercise. Further comments may be made to PEDW at submission.

ES Ch 5 vol 3 Appendix 5.8 Aviation Lighting Impact Assessment Part 1

[2024-04-30 Volume-3 Appendix-5.8 Aviation-Lighting-Impact-Assessment.pdf \(nantmithilenergypark.wales\)](#)

Detailed and necessary exercise. Further comments may be made to PEDW at submission.

ES Ch 5 vol 3 Appendix 5.8 Aviation Lighting Impact Assessment Part 2

[2024-04-30 Volume-3 Appendix-5.8 Figures-A5.8.1-to-Figure-A5.8.8.pdf \(nantmithilenergypark.wales\)](#)

Detailed and necessary exercise. Further comments may be made to PEDW at submission.

ES Ch 5 vol 4 Landscape and Visual Amenity Part 1

NOTE: The initial three figures in ES volume 4 appear to be wrongly indexed in the master key as being in Volume 2, out of numerical order and after the list of volume 3 material.

[2024-04-30 Volume-4 Figure-5.1-to-Figure-5.9.pdf \(nantmithilenergypark.wales\)](#)

[Wrongly indexed as in volume 2] Various topics

Figure 5.1 reveals how peripheral the site is in relation to the pAA (the Pre-assessed Area for Wind Energy) . There is no text elsewhere to explain why the site was selected in such a location which fails to reflect Welsh Government policy. The VPs can be appreciated in relation to various other factors but the scale is (understandably) insufficient to appraise their locations in more detail.

ES Ch 5 vol 4 Landscape and Visual Amenity Part 2

[2024-04-30 Volume-4 Figure-5.10-to-Figure-5.13.pdf \(nantmithilenergypark.wales\)](#)

[Wrongly indexed as in volume 2]

LANDMAP, Designated Areas and Dark Skies

Useful background material

ES Ch 5 vol 4 Landscape and Visual Amenity Part 3

[2024-04-30 Volume-4 Figure-5.14-to-Figure-5.25.pdf \(nantmithilenergypark.wales\)](#)

[Wrongly indexed as in volume 2]

Cumulative ZTV scenarios.

Figures 5.17 and 5.18 show incorrect selection of other windfarms - only Scenarios A & B

This should include material on Bute's latest schemes lodged with PEDW (as noted above).

ES Ch 5 vol 4 Visualisations (at View Points) Figures 5.26 – 5.57

There are then 28 individual VP visualisation files - plus 4 variants. Each has to be opened separately, but the process, once started, is brisk. The clarity of views is mostly good. VP2 is wrongly described as north of the A488, rather than south. **The arrangement of potentially cumulative views prior to the principal view confuses the issue; the actual view should come first.**

At this consultation stage it is not relevant or possible to provide an alternative assessment of the visual impacts at each location. **The complex presentation is currently unacceptable without the set of additional simple single-frame images which should be included to address the VP selection in Appendix 5.7.**

The following extracts - with relevant paragraph numbers - from the cited SNH (now NatureScot) Visual Representation of Wind Farms Guidance document (2017) are relevant to several VPs and are referenced below in relation to those which contravene the guidance:

89 *Most importantly, the location chosen must avoid the view of the wind farm being misrepresented by the inclusion of atypical local features, such as a single tree in the foreground. Where this has mistakenly occurred, the viewpoint location should be revised and the photographs retaken.*

90 Viewpoints should be free from any avoidable foreground objects and other obstructions such as fences, walls, gates, roadways, road furniture, summit cairns and unnecessary foreground, trees, shrubs or foliage unless these are typical of the view. It is also important that viewpoints are publicly accessible, for example not within private property.

Visualisations which require re-appraisal for these and other reasons are indicated below:

VP	Location	Contrary to SNH guidance	Comment
1	Water-break-its-neck		Photomontage required
2	Heart of Wales Trail	yes	Intrusive tree, fence-posts
3	A44 E of Castell Crugerydd		
4	A483 Llanfihangel Rhydithon	yes	Unacceptable position, multiple distractions
5	Black Mixen		
6	A44 Fforest Inn	yes	Distractions – road signs
7	Dolau	yes	Unacceptable position, multiple distractions
8	Llandegley A44	yes	Clutter – should be FROM village, not OF it
9	Heart of Wales Trail nr Pales	yes	Partial clutter – needs repositioning
10	A488 Bleddfa	yes	Clutter – should be FROM village, not OF it
11	A481 Rhewey		
12	Llandegley Rocks		
13	Bwlch-llwyn Bank		Photomontage required
14	A44 bridge Penybont	yes	Clutter – should be FROM village, not OF it
15	Llanfihangel Hill		Photomontage required
16	Caergyman Bank		
17	Glyndwr's Way Llanlluest	yes	Fence-posts
18	Crossgates	yes	Clutter – should be FROM village, not OF it
19	Old Radnor		Turbines too pale
20	Evenjobb B4357		Photomontage required
21	Castle Bank		Photomontage required
22	Hergest Ridge		Turbines too pale
23	ODP Castle Ring Pen Offa		Photomontage required
24	Ridge N of Knighton		Photomontage required
25	ODP S of Newcastle	yes	Fence-posts
26	A44 Lyonshall - Kington		Turbines too pale
27	Bury Ditches		Turbines too pale
28	Hay Bluff		Turbines too pale
AP1	A44 S of Llandegley		Photomontage required for daytime comparison
AP2	BOAT S of W-b-i-Neck		Photomontage required
AP3	Hundred House		Photomontage required
N2	Space Guard Centre		Photomontage required for daytime comparison