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Mynydd Maen Wind Farm

Request for further information: Landscape and Visual Impact

Author	James Robson
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1 Introduction

1.1 Overview

- 1.1.1 This document has been prepared in response to a formal request for further information issued by Planning and Environment Decisions Wales (PEDW) as part of the ongoing planning application for the Mynydd Maen Wind Farm (DNS/3276725). The request forms part of the regulatory framework under Regulation 24 of the Environmental Impact Assessment (EIA) Regulations and Regulation 15(2) of the Development of National Significance (DNS) regulations. The regulations mandates consultation and submission of supplementary technical information to support the determination of the application and the formal request was made by PEDW in a letter addressed to the Applicant dated 03 June 2025.
- 1.1.2 The application has undergone consultation with statutory consultees and stakeholders, and this document aims to address specific queries and provide clarifications as requested by the appointed inspector.

1.2 Author

- 1.2.1 The technical note concerning landscape and visual matters has been prepared by the authors of the Landscape and Visual Impact Assessment (LVIA) Chapter of the Environmental Statement, at Pegasus Group. The work was led by Dale Turner. Dale holds a MSc in Environmental Impact Assessment, is an affiliate member of the Institute of Environmental Management and Assessment and has over 15 years' experience in undertaking and overseeing LVIA for energy developments, including wind energy developments. Dale was supported by the team of Chartered Landscape Architects, GIS specialists and Environmental Planners at Pegasus Group who are experienced in the production of LVIA for wind energy development and prepare work in line with the IEMA Quality Mark.
- 1.2.2 The document has been compiled and coordinated by RES.

1.3 Stakeholder Concerns

- 1.3.1 The formal request for further information from the Applicant included the following matters in relation to Landscape and Visual Impact:
- 'Significant concerns have been raised by NRW in respect of landscape and visual impacts and, in particular, the impacts on the statutory purposes of the Bannau Brycheiniog National Park.*
- 1.3.2 Specifically, in respect of visual impacts, concerns have been raised regarding:
- *The sensitivity categorisations – e.g. the representation states that it is not clear from the reasoning provided at Appendix 5.5 why receptors at VP22 and VP30 are considered to have been categorised as having a 'high sensitivity', as opposed to a 'very high sensitivity' which would result in different conclusions in respect of VP22.*
 - *The magnitude of change categorisations – e.g. NRW argues that the magnitude of change at VP35 would be 'medium', not 'low' as assessed in the LVIA which would have implications for the significance of effect at this location.*
 - *VP23 and whether it is representative of the wider area, as set out at paragraph 17 of NRW's representation.*

- 1.3.3 NRW has also raised concerns with respect to the impacts on landscape character, including concerns regarding:
- *The ‘magnitude of change’ at LCAs 9 and 12 (VPs 23 and 35), and whether VP23 is representative of the wider LCA 9 (paragraphs 20-23 of the representation).*
 - *The assessment of impacts at LCA15, including at VPs 22 and 30 (paragraphs 24 of NRW’s representation).*
 - *Concerns over the effects on the Special Qualities of the BBNP have also been outlined at paragraphs 25- 34 of NRW’s representation, whilst concerns over cumulative impacts have been outlined from paragraph 35 onwards (as well as in Torfaen CBC’s LIR). Concerns in this respect particularly relate to the fact that a number of proposed schemes have been consented since the preparation of the background evidence.*
- 1.3.4 Finally, Caerphilly CBC outlines concerns in its LIR that the effects on existing drystone walling have not been adequately considered in the evidence (paragraph 3.9).
- 1.3.5 A full rebuttal, supported by updated evidence wherever necessary, is invited in respect of all of these matters raised.’
- 1.3.6 Each of these matters is discussed in turn below in Section 2, using each of the above elements as a separate sub-section.

2 Landscape and Visual Impact

2.1 The Sensitivity Categorisations

PEDW request for further information

- 2.1.1 ‘Specifically, in respect of visual impacts, concerns have been raised regarding:

The sensitivity categorisations – e.g. the representation states that it is not clear from the reasoning provided at Appendix 5.5 why receptors at VP22 and VP30 are considered to have been categorised as having a ‘high sensitivity’, as opposed to a ‘very high sensitivity’ which would result in different conclusions in respect of VP22.’

RES response

- 2.1.2 Viewpoint 22 (ES Figure 5.58) represents receptors on the massif of Blorenges and in particular users of the Cambrian Way as it passes the trig point at the highest point of the hill.
- 2.1.3 Viewpoint 30 (ES Figure 5.66) represents receptors on the massif of Mynydd Garn-Wen and in particular users of the Cambrian Way as it passes the trig point at the highest point of the southern section of the hill.
- 2.1.4 In each case the viewpoints lie within the Bannau Brycheiniog National Park, with VP 30 located just on the National Park boundary, as illustrated on Figure 5.9. The receptors at both viewpoints were identified as having a ‘high’ sensitivity (LVIA Table 5.8).
- 2.1.5 The sensitivity of visual receptors in the LVIA has been based on a 5 point scale from very low to very high (LVIA Appendix 5.1). Almost all visual receptors within the Bannau Brycheiniog National Park fall under the ‘high’ sensitivity category, befitting the status of the designated landscape. However, in addition, it is considered appropriate to further designate receptors at the most sensitive locations within the National Park as ‘very high’ sensitivity, to reflect their status. It is not however the case that

all receptors within the National Park should automatically be ascribed this higher sensitivity and a 'high' sensitivity remains the appropriate sensitivity for users throughout the majority of the National Park, with the exception of the most important locations for views and visual amenity.

- 2.1.6 The Assessment Criteria at Appendix 5.1 describes the approach to the identification of sensitivity of visual receptors and explains the difference between 'high' sensitivity receptors, such as those at Viewpoints 22 and 30 and 'very high' sensitivity viewpoints, such as VP24 - Pen y Fan. Appendix 5.1 identifies that '*users of long distance or recreational trails and other sign posted walks*' are 'high' sensitivity receptors. This therefore includes both VPs 22 and 30 which are located on the Cambrian Way. Appendix 5.1 also identifies that one of the potential signifiers of 'very high' sensitivity visual receptors are '*people at recognised vantage points (often with interpretation boards)*'. In the case of VPs 22 and 30, it was determined that neither location was a specific recognised vantage point, in the same manner as a viewpoint such as the summit of Pen y Fan.
- 2.1.7 The overall visual effect identified for Viewpoint 22 was 'moderate', which in that instance was judged to be not-significant. This in part reflected the distance between the viewpoint and the nearest turbine at over 6.4km, the relatively limited proportion of the horizontal angle of view taken up by the turbines, the well-designed nature of the turbine layout, and the wide open panorama in which the turbines would be seen.
- 2.1.8 The overall visual effect identified for Viewpoint 30 was 'moderate-major', which comprises a significant effect. When compared with the judgement for Viewpoint 22, this primarily relates to the closer proximity of the viewpoint to the nearest turbine at 4.6km, compared with 6.4km, which results in the turbines forming a slightly more notable element in the view than that viewpoint.

2.2 The Magnitude of Change Categorisations

PEDW request for further information

- 2.2.1 'Specifically, in respect of visual impacts, concerns have been raised regarding:

The magnitude of change categorisations – e.g. NRW argues that the magnitude of change at VP35 would be 'medium', not 'low' as assessed in the LVIA which would have implications for the significance of effect at this location.'

RES response

- 2.2.2 Viewpoint 35 (ES Figure 5.71) represents receptors at Ysgyrd fawr and in particular users of the Beacons Way as it passes the trig point at the highest point of the hill.
- 2.2.3 The magnitude of change to visual receptors was identified in the LVIA using a 5 point scale from very low to very high.
- 2.2.4 The magnitude of change to visual receptors at VP35 was identified as being 'low' (LVIA Table 5.8). This primarily reflected the distance between the viewpoint and the nearest turbine at over 20km, and the limited proportion of both the vertical and the horizontal angle of view taken up by the turbines, as a result. It also reflected the well-designed nature of the turbine layout, and the wide open panorama in which the turbines would be seen.
- 2.2.5 It is important to recognise that the visualisations prepared for Viewpoint 35 illustrate both the best-case conditions in terms of potential visibility towards the turbines and also show the turbines at their brightest possible colour in the view, assuming the sun would be reflecting off them to the greatest degree. In reality the atmospheric conditions are likely to be such that the visibility would be far less

than that illustrated in the photomontage on the vast majority of days of the year, or times of the day as the sun moves around the sky.

- 2.2.6 Viewpoint 35 was one of the locations deemed to be of ‘very high’ sensitivity due to the specific nature of the views from the notable highpoint reached at this location. Even with this level of sensitivity ascribed to the location, it remains our view that there would not be a significant effect on visual receptors at Ysgryd fawr. The turbines would be seen as a very small part of a wide open panorama, clearly located in the landscape beyond the National Park.

2.3 Viewpoint 23 and its Representation

PEDW request for further information

- 2.3.1 ‘Specifically, in respect of visual impacts, concerns have been raised regarding:

VP23 and whether it is representative of the wider area, as set out at paragraph 17 of NRW’s representation’

RES response

Paragraph 17 of NRW’s representation states as follows:

‘Whilst we agree that effects at VPs 23 and 24 are unlikely to be significant, we consider that people at locations nearby to VP 23 (away from the road) may experience potentially significant adverse visual effects. For example, across the open uplands of Mynyddoedd Llangatwg and Llangynidr, where, at locations such as the trig point, all 13 turbines would be visible at hub height and settlement south of the BBNP would not be.’

- 2.3.2 Viewpoint 23 (ES Figure 5.59) represents receptors on the B4560 as it runs across Mynydd Llangynidr and Mynydd Llangatwg, passing broadly at the point where the two hillsides converge, with Mynydd Llangynidr to the west of the road and Mynydd Llangatwg to the east of the road. It is welcomed that NRW agree that effects on VP23 would not be significant.
- 2.3.3 LVIA Figure 5.6 illustrates the hub height visibility of the proposed turbines. This confirms that potential visibility within the National Park boundary in the vicinity of VP23 is limited to only small sections of the landscape, primarily on Mynydd Llangynidr.
- 2.3.4 It is not possible to have viewpoints covering every single location from which the turbines may be visible, so it is usual practice for nearby viewpoints to be used to help inform the judgements for nearby receptors. In this case, the visualisations for VP23 provide a very helpful guide to the likely views of the turbines from elsewhere on Mynydd Llangynidr and Mynydd Llangatwg where there would be visibility of the turbines. It is acknowledged that there is part of Mynydd Llangynidr where there may be slightly more hub visibility than VP23, but that does not mean that the scale and location of the turbines in VP23 does not provide a helpful guide to aid the assessment of effects in these areas.
- 2.3.5 VP 23 was ascribed a ‘high’ sensitivity (LVIA Table 5.8), which is the same sensitivity as would be ascribed to the wider nearby areas of Mynydd Llangynidr and Mynydd Llangatwg where there would be visibility of the turbines. It was also assessed as having a ‘medium-low’ magnitude of change. This in part reflected the distance between the viewpoint and the nearest turbine at 19km, the relatively limited proportion of the horizontal angle of view taken up by the turbines, the well-designed nature of the turbine layout, and the wide open panorama in which the turbines would be seen. An overall level of effect of ‘moderate-minor’ was identified for viewpoint 23, which is not significant, and it is

considered that this effect would apply equally to those nearby areas of Mynydd Llangynidr and Mynydd Llangatwg where there would be visibility of the turbines.

2.4 The Magnitude of Change at LCAs 9 and 12

PEDW request for further information

'NRW has also raised concerns with respect to the impacts on landscape character, including concerns regarding:

The 'magnitude of change' at LCAs 9 and 12 (VPs 23 and 35), and whether VP23 is representative of the wider LCA 9 (paragraphs 20-23 of the representation)'

RES response

- 2.4.1 The LVIA identifies that Bannau Brycheiniog National Park LCAs 9 and 12 would both experience a 'very low' magnitude of change, and no greater than a 'minor' effect on landscape character (LVIA Table 5.7). It is important to note the very limited theoretical visibility of the turbines that would occur within both LCA 9 and LCA 12, as illustrated on LVIA Figure 5.74, plus the notable distances between the LCAs and the turbines. With LCA 9, the entirety of the theoretical visibility lies at over 15km from the nearest turbine, with the greater proportion lying over 20km away. With LCA 12 the only area of theoretical visibility of any note is the small area around the upper slopes of Ysgyrd fawr, which lies at around 20km from the turbines.
- 2.4.2 The magnitude of change to both LCA 9 and LCA 12 was clearly addressed at paragraphs 5.7.133 and 5.7.137 of the LVIA and this analysis is reproduced again below:

LCA 9

'Effects would be limited to the southern part of the LCA, particularly south-facing slopes and upland plateau areas such as that represented by Viewpoint 23. The parts of the LCA with the greatest theoretical visibility of the proposed wind farm are generally those which are already influenced by intervisibility with settlement to the south of the National Park. Although the proposed wind farm introduces new elements, given the distance from the LCA they would not be considered notable and would lead to a very low magnitude of change to the character of the LCA overall'.

LCA 12

- 2.4.3 'The proposed wind farm would be seen on the distant ridge that forms the backdrop to south-westerly views. Residential development in Abergavenny in the intervening valley landscape is a noticeable element of the view towards the site, as illustrated by Viewpoint 35. The turbines would appear as distant features on the horizon, clearly separated on the opposite side of the valley from the National Park. At distances of approximately 20 km away, the scale of change would be very small, affecting a very small geographic extent of views experienced from the LCA. Where the proposed wind farm would be visible, the landscape character is already influenced by the settlement of Abergavenny, leading to a very low magnitude of change to the character of the LCA and no greater than a minor effect during

construction and operation to the character of available views to the south of the area that would not be significant’.

- 2.4.4 It is noted that NRW make reference to the indicative descriptor of a ‘very low’ magnitude of change to landscape character set out in the Assessment Criteria at Appendix 5.1, stating that they do not agree that it would apply to the impact on LCA 9 and LCA 12.
- 2.4.5 The indicative descriptor of a ‘very low’ magnitude of change to landscape character set out in the Assessment Criteria at Appendix 5.1 is as follows:
- 2.4.6 *‘No notable loss or alteration to existing landscape features; no notable introduction of new features into the landscape; and negligible change to the key physical and/or perceptual attributes of the landscape’*
- 2.4.7 It is considered that this does indeed apply to LCA 9 and LCA 12 when these areas are taken as a whole. Unlike with the assessment of an individual viewpoint location, the assessment of an LCA is about the experience across the whole of the LCA and the extent to which the LCA would have potential views of the turbines is an important element of this. In the case of LCA 9, large areas of the LCA would have no visibility of the turbines at all. This is even more applicable to LCA 12, where almost the entirety of the LCA would have no visibility. In addition, it is also considered that nature of the impact needed to bring about a change to the landscape character of an area is different to that which is needed to bring about a change to visual amenity. This is because the appreciation of landscape character is about more than just the view towards a distant development, it is about the wider perceptual attributes which define an area, many of which relate more to the nature of the immediate surroundings. Any development located over 15km away from an LCA therefore has a very limited potential to impact the primary characteristics of that LCA.

2.5 The Assessment of Impacts at LCA 15

PEDW request for further information

‘NRW has also raised concerns with respect to the impacts on landscape character, including concerns regarding:

The assessment of impacts at LCA15, including at VPs 22 and 30 (paragraphs 24 of NRW’s representation)’

RES response

- 2.5.1 The LVIA identifies that Bannau Brycheiniog National Park LCA 15 would experience a ‘low’ magnitude of change, and no greater than a ‘moderate’ effect on landscape character, that would not be significant (LVIA Table 5.7).
- 2.5.2 It is welcomed that NRW agree that *‘the majority of southern part of the LCA’* would experience *‘no effects’*. It is not however agreed that there would be a significant effect on LCA 15. Whilst the LVIA identified there would be a significant effect on the visual amenity of receptors at VP30, this is very different from there being a significant effect on the LCA as a whole, or even that part of the LCA in the vicinity of the viewpoint.
- 2.5.3 This is because the appreciation of landscape character is about more than just the view towards a development, which in the case of VP30 is over 6km away, it is about the wider perceptual attributes which define an area, many of which relate more to the nature of the immediate surroundings.

Therefore, whilst it is acknowledged that there would be a significant visual effect at VP30, this does not automatically equate to a significant effect on landscape character.

- 2.5.4 As recognised by NRW, the majority of southern part of the LCA would experience no effects at all to the landscape character, by virtue of having no visibility of the Proposed Development. This is illustrated on LVIA Figure 5.74 which provides an overview of the BBNP LCAs on a blade tip ZTV. Indeed, Figure 5.74 shows that there would be little or no visibility from almost the entirety of LCA 15, with the exception of the areas around VPs 22 and 30. Furthermore, the area around VP22 is located at over 13km from the Proposed Development, which serves to notably reduce the potential impact of the turbines.
- 2.5.5 Whilst the LVIA does identify a significant visual effect at VP30, it is considered that the assessment of a 'moderate' effect on the landscape character of LCA 15, that would not be significant, remains appropriate.

2.6 Effects on the Special Qualities of the BBNP

PEDW request for further information

'Concerns over the effects on the Special Qualities of the BBNP have also been outlined at paragraphs 25-34 of NRW's representation, whilst concerns over cumulative impacts have been outlined from paragraph 35 onwards (as well as in Torfaen CBC's LIR). Concerns in this respect particularly relate to the fact that a number of proposed schemes have been consented since the preparation of the background evidence'

RES response

- 2.6.1 With regard to the effects on the Special Qualities of the BBNP, it is noted that NRW make comments in relation to several of the Special Qualities which are discussed in turn below:
- 2.6.2 'sweeping grandeur & outstanding natural beauty': NRW consider that there would be significant effects on this special quality and that this is demonstrated by the visual effects on Viewpoints 22 and 30. This is not agreed. It is considered that from all locations in the BBNP the ability to appreciate the 'sweeping grandeur & outstanding natural beauty' of the National Park would remain. Viewpoint 22 (ES Figure 5.58) is located at over 13km from the Proposed Development. The views towards the Proposed Development are of a wide, open panorama, with the National Park landscape in the foreground and middle distance of the view, before the Proposed Development would then be seen in the landscape beyond the National Park. It is also important to remember that the remainder of the 270 degree angle of the view from the viewpoint, not facing towards the site, also looks across the National Park landscape, including towards the heart of the National Park, and would not be affected by the Proposed Development. Viewpoint 30 (ES Figure 5.66) is located over 6km away from the Proposed Development on the boundary of the National Park. The view towards the Proposed Development looks out from the National Park and includes notable visibility of existing residential development in the valleys beneath the National Park, with the Proposed Development then seen in the higher ground on the opposite side of the valley.
- 2.6.3 'peace, tranquillity & darkness': NRW consider that the Proposed Development would 'erode the visual tranquillity', albeit it is not clear whether they consider that this would equate to a significant effect on the 'peace, tranquillity & darkness' special quality. As part of their discussion of this matter, they set out that they consider the Park would detract from the 'relative freedom from intrusive visual disturbance and human influence' at various locations including Viewpoints 30 and 35. With respect to these two viewpoints in particular, it is very difficult to understand how NRW can have reached this

conclusion when in both instances there are notable views of residential development in the valleys which can be clearly seen in the view towards the Proposed Development from the viewpoints. It is considered that from all locations in the BBNP the ability to appreciate the ‘peace, tranquillity & darkness’ of the National Park would not be significantly affected by the Proposed Development, noting again how limited any visibility from the BBNP would be, with reference to LVIA Figure 5.74.

- 2.6.4 ‘sounds, sights, smells & tastes’: NRW suggest that part of this quality relates to ‘A feeling of vitality and wellbeing that comes from enjoying the National Park’s ... rural setting, ...’. (inter alia), which therefore in their view has the potential to be affected by the Proposed Development. Again, it is not clear whether they consider that this would equate to a significant effect on the ‘sounds, sights, smells & tastes’ special quality. Nonetheless it is considered that no such significant effects would arise to the special quality, in part because there would be no effect on sounds, smells or tastes, and also because there would be no effects on views within the National Park, only views of a development outside of the National Park, which would be seen as part of a wider panorama, often with views of existing residential development in the valleys below.
- 2.6.5 With regard to cumulative effects, the LVIA included a cumulative assessment (LVIA paragraph 5.7.323 onwards) which was based on a cut-off date for information of 31st May 2024. As noted by NRW, since this time, both the ‘Manmoel’ and ‘Twyn Hywel’ schemes, which were at in-planning stage for the purpose of the LVIA, have been consented. The ‘Pen March’ scheme, which was also at the in-planning stage, has now been refused. It is not unusual for the cumulative situation to evolve between the preparation of the LVIA and the examination of the planning application. However, in this instance, there are no new schemes which have come forward requiring assessment that were not previously considered in the LVIA that would have potential to bring about significant cumulative effects, only a change in status of the schemes which have been assessed.
- 2.6.6 NRW discuss the potential cumulative effects in their response, where it appears that the only area where they identify a different effect to the LVIA is in relation to the overall totality of the impact on LCAs 12 and 15, where they suggest the combined effect of all the schemes would be significant. Whilst this was not the judgement in the LVIA, even if the effects were deemed to be significant it is important to note that the greater part of the effects on LCAs 12 and 15 would generally be brought about by other cumulative sites, not the Proposed Development. As illustrated on LVIA Figure 5.30, the Mynydd Llanhilleth scheme, for example, lies much closer to LCA 12 and 15, with its turbines being more visible from several of the Viewpoints in the BBNP, including VP 30. Similarly, the Manmoel scheme would also be more visible from several of the Viewpoints in the BBNP, including VP 23.

2.7 Existing Drystone Walling

PEDW request for further information

‘Finally, Caerphilly CBC outlines concerns in its LIR that the effects on existing drystone walling have not been adequately considered in the evidence (paragraph 3.9)’

RES response

- 2.7.1 It is important to highlight the limited nature of the works to the drystone wall on the Abercarn mountain road which Caerphilly CBC refer to. Figure 10.3 of the ES sets out that two short sections of the wall only (40m and 17m) would be removed, not the full wall, which in total amounts to around 800m. Furthermore, the removal of the short sections of the wall would only be temporary for the duration of the abnormal load movements within the construction phase, not a permanent impact. The removed sections would then be reinstated back to the same condition following completion of

the abnormal loads. In this regard it is not considered there would be any significant effects to landscape character that would arise from these works.

3 Living Conditions

3.1 Residential Visual Amenity Assessment

PEDW request for further information

The formal request for further information from the Applicant included the following matters in relation to Living Conditions which relate to visual impact:

‘Torfaen CBC has raised concerns regarding the Residential Visual Amenity Assessment (RVAA) and, in particular, the negative impacts associated with both: Turbine 9/ The Square, Upper Cwmbran; and Pantygasseg. These include concerns relating to cumulative impacts. The applicant is requested to provide a response to those concerns.’

RES response

- 3.1.1 With regard to the potential visual effects on residents in The Square, Upper Cwmbran, these were specifically assessed in the Residential Visual Amenity Assessment (RVAA) which formed Appendix 5.6 to the LVIA. As noted by Torfaen CBC in their LIR, a ‘moderate’ visual effect was identified on these residents, which was identified to be significant. Torfaen CBC suggest that:
- 3.1.2 *‘The submitted photomontage does not give a full picture when viewed from the properties, it is considered this turbine (9) could result in a negative visual impact on residents in this locality’.*
- 3.1.3 However, it is not clear on what basis they are suggesting the photomontage does not give a clear picture as they provide no further discussion to explain their position. It is the applicant’s position that the visualisation provided from The Square provides a helpful illustration of the likely visibility of the turbines from the area. In particular, with regard to how it illustrates the highly limited visibility of any of the turbines other than T9, which itself would be seen set back on to the ridge above the properties. It is not disputed that there would be some visual effect on the residents of The Square, as was recognised with the moderate, significant visual effect identified in the LVIA. However, as noted in the RVAA, it is the applicant’s position that those effects which would arise would not be such as to meet the residential amenity threshold and would not be overbearing on the residents of the properties.
- 3.1.4 With regard to the potential visual effects on residents in Pantygasseg, these were also specifically assessed in the RVAA which formed Appendix 5.6 to the LVIA, which identified a ‘major’ significant visual effect. Again, therefore it is not disputed that there would be visual effect on the residents of Pantygasseg, however, as noted in the RVAA, it is the applicant’s position that those effects which would arise would not be such as to meet the residential amenity threshold and would not be overbearing on the residents of the properties. It is also acknowledged that there may also be the potential for some visual effects from the Mynydd Llanhilleth wind farm, were it to be consented.

However, even accounting for this potential cumulative visibility it is not considered that the residential amenity threshold would be met.

4 Conclusion

- 4.1.1 RES remains committed to constructive engagement throughout the planning process and welcomes the opportunity to meet with stakeholders, consultees, and interested parties. We are happy to address any outstanding, maintained, or emerging concerns as part of the next round of consultation.
- 4.1.2 Our aim is to work collaboratively toward a shared understanding and to identify areas of common ground ahead of the hearing. We believe this approach will support a transparent and informed dialogue ultimately contributing to a robust and balanced decision-making process.