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Summary Proof of Evidence
Landscape and Visual Issues

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In respect of Appeal concerning
7 Wind Turbines on land off A44
South West of Llandegley,
Llandrindod Wells

On behalf of
Campaign for
the Protection of Rural Wales

Appeal ref
APP/T6850/A/17/3176128
LPA ref
P/2014/0672

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Summary and Conclusions

Qualifications and Experience

1. My name is Michelle Bolger. I am a Chartered Landscape Architect and Director of Michelle Bolger Expert Landscape Consultancy. I have a degree and a Diploma in Landscape Architecture from Greenwich University and I am a Chartered Member of the Landscape Institute. I also have a degree in English from Durham University and a Postgraduate Certificate in Education from London University. I am Chair of the Landscape Institute's Education and Membership Committee and a Trustee on the Landscape Institute Board. I have previously worked as a Senior Associate for Gillespies LLP and Liz Lake Associates.
2. I have prepared Landscape / Townscape and Visual Impact Assessments (L/TVIA) to accompany planning applications for a range of projects. I have delivered two sessions on LVIA for Planning Inspectorate training days. Over the last fourteen years, I have presented evidence at appeal, call-in and local plan inquiries on behalf of Appellants, Local Planning Authorities and local action groups regarding landscape and visual impacts. I have given evidence at more than 25 inquiries in England, Wales and Scotland with regard to wind turbine development

Landscape Planning Context

3. Planning Policy Wales Edition 9 (2016) (PPW 9) (CD POL-19) states that '*The natural heritage and valued landscapes of Wales are not confined to statutorily designated sites but extend across all of Wales - to urban areas, the countryside and the coast*'¹ The aim of the Welsh Government is to maximise the benefits of wind turbine development (WTD) whilst '*minimising potential environmental and social impacts*'.² In order to minimise adverse landscape impacts PPW requires developers to be '*sensitive to local circumstances, including siting in relation to local landform*'³ and to give careful consideration to '*location, scale, design and other measures*'⁴
4. Technical Advice Note (TAN) 8: Planning for Renewable Energy (2005) (CD POL-20) identifies the most appropriate locations for large scale WTD; known as the Strategic Search Areas (SSAs). The application site is not in an SSA.

¹ Planning Policy Wales Edition 7 - July 2014 Paragraph 5.1.1

² Planning Policy Wales Edition 9 - November 2016 Paragraph 12.8.6

³ Planning Policy Wales Edition 9 - November 2016 Paragraph 12.8.14

⁴ Planning Policy Wales Edition 9 - November 2016 Paragraph 12.10.3

Methodology

5. The methodology used in my evidence is based on GLVIA3. Landscape effects are effects on the fabric and character of the landscape whilst visual effects are effects on people's amenity. GLVIA3 recommends that the sensitivity of a site is a combination of its susceptibility to the development proposed and the value placed on the landscape. *Using LANDMAP for Landscape and Visual Impact Assessment of Onshore Wind Turbines* (LANDMAP Guidance Note 3) sets out the role of LANDMAP in assessing the impact of WTD.
6. A large number of landscape sensitivity studies have been undertaken regarding wind turbine development and there is a consensus about those attributes that increase a landscape's susceptibility to wind turbine development and those that decrease it, as for example in Annex D of TAN 8.
7. The following attributes are generally considered to be indicators of the degree of susceptibility that a landscape has to WTD:
 - Scale and Enclosure
 - Landform and Topography
 - Land Cover Pattern
 - Settlement Pattern and Density
 - Visible Built Structures
 - Landmarks
 - Skyline
 - Visual Connections with Adjacent Landscapes
 - Remoteness and Tranquility
8. The Landscape and Visual Impact Assessment contained in the Environment Statement (LVIA) does not identify any WTD specific criteria.

Existing Landscape Character

9. The site falls within National Landscape Character Area (NLCA) 20: Radnorshire Hills which is described as having *'breathtaking and varied'*⁵ topography and being *'very rural and largely undisturbed by industries, heavy traffic, tourism or commuters, and herein lies its timeless beauty and tranquillity'*.⁶
10. The site forms part of an undulating upland area (300-340m AOD) enclosed by higher land. Immediately north and west of the site (1.2km) is a narrow craggy ridge that features the distinctive outcrops of Llandegley Rocks, (436m AOD). A Scheduled Ancient Monument (SAM), the Iron Age Llandegley Rocks Hillfort is located at the northern end of the ridge, overlooking the site. To the north-east lies the contrasting domed landform of Radnor Forest, to the south high ground that includes Gwaunceste Hill. (MB Figure 01) Within the bowl created by these landforms the topography is locally undulating and the fieldscape is varied.
11. With regard to LANDMAP assessments the site is located in:
 - VSLAA RDNRV5112 Upland Moor, North of Hundred House that has a **moderate** overall evaluation. The VSAA is identified as having attractive views to and from adjacent hills and no detracting views either in or out.
 - HLAA RDNRHL427 Gelli Hill that has an **outstanding** overall evaluation due to the relatively undisturbed survival of both prehistoric and medieval remains.
 - GLAA RDNRGL663 Camnant that has a **high** overall evaluation as it forms a distinctive part of an outstanding geological formation.
12. With regard to the overall character of the landscape the most distinctive feature is the varied and picturesque outline of Llandegley Rocks which has been a notable landmark and a visitor attraction since at least the 18th century. The site is located in a bowl, surrounded by higher land including Llandegley Rocks and the edge of Radnor Forest, and is representative of Radnorshire's varied topography. Within the bowl the topography is locally undulating and the fieldscape is varied. The sense of openness is strong as is the sense of being away from the confines and pressures of other, more urbanised landscapes. The landscape surrounding the site is relatively free of man made structures.

⁵ Page 2, NLCA 20 Radnorshire Hills, Natural Resources Wales.

⁶ Page 2, NLCA 20 Radnorshire Hills, Natural Resources Wales Page 3

13. The A44 is a well-used tourist route from England into Wales and the landscape surrounding the site can be appreciated from the A44, in particular the distinctive profile of Llandegley Rocks which provides a memorable backdrop to the fieldscape of hedgerow-enclosed pastures by small rivers and streams, a view that has been enjoyed for more than a hundred years.
14. The area surrounding the site is particularly rich in Public Rights of Way and is crossed by a Byway Open to All Traffic (BOAT). (MB Figure 05) The PRowWs allow local people and visitors, on foot and on horseback, to enjoy the variety in the landscape; Llandegley Rocks, the enclosing form of Radnor Forest and the small-scale landscape of the fields.

Landscape Value

15. GLVIA3 requires an assessment of landscape value in advance of an assessment of landscape susceptibility. Box 5.1 on Page 84 in provides a list of factors that can be useful in indicating landscape value. I have assessed them as follows:
 - Landscape Quality - medium
 - Scenic Quality - high
 - Rarity - high
 - Representativeness - medium/high
 - Conservation Interests - high/outstanding
 - Recreation value - high
 - Perceptual aspects - high
16. Overall, I consider the landscape value of the site and the immediately surrounding landscape to be **high** due in particular to:
 - The presence of the distinctive profile of Llandegley Rocks;
 - The presence of a rich and varied assemblage of historical landscape elements; and
 - The network of PRowW that cross the site and spread out through the surrounding landscape.

Landscape Sensitivity

17. The sensitivity of the receiving landscape is a combination of the susceptibility of the site and the surrounding landscape to the development proposed and the value placed on the site and the surrounding landscape.
18. With regard to WTD the site and the surrounding landscape have the following susceptibility:
- **Scale and enclosure. Medium-high** susceptibility as the surrounding landscape is a complex landscape enclosed by areas of higher land. (LVIA Vps 4, 5 and 9)
 - **Landform and topography. High** susceptibility due to the potential for harm to the distinctive profile of Llandegley Rocks, and the presence of surrounding elevated land. (PRV Vp 2 & PRV Vp 3)
 - **Land cover pattern: High** susceptibility as there is no extensive area of uniform ground cover but rather a complex and varied mix.
 - **Settlement Pattern and Density. Low/medium** susceptibility as settlement is sparse.
 - **Visible Built Structures. High** susceptibility as the surrounding landscape is generally free from large scale infrastructure.
 - **Landmarks. High** susceptibility due to the frequent occurrence of historic features where views have been identified as important.
 - **Skyline. High** susceptibility due to the potential for harm to the distinctive skyline formed by Llandegley Rocks
 - **Visual Connections with Adjacent Landscapes. Medium/high** susceptibility due to the contribution that the site makes to the character of views from local high viewpoints such as Llandegley Rocks (MB Vp E & PRV Vp 2) Gwaunceste Hill (LVIA Vp 9) and the edge of Radnor Forest (PRV Vp 3).
 - **Remoteness and Tranquillity. High** susceptibility due to a strong sense of traditional rurality, historic character and general lack of large scale activity or development.
19. The site and the surrounding landscape have **high** value and **high** susceptibility to wind turbine development. The sensitivity of the landscape is a combination of those judgements and the site and the surrounding landscape has **high** sensitivity to WTD of the scale and in the location proposed.

Landscape Character Effects

20. Hendy WTD, would have a **major adverse** effect on the prominence of the distinctive profile of Llandegley Rocks and harm their landmark function. (ES Vps 4 & 5 and PRV Vps 3 & 4). Hendy WTD, would disrupt an intact landscape and would diminish the sense of a long established rural landscape. (ES Vps 4, 5, & 7 and MB Vp G)
21. The Historic Environment Desk Based (HEDB) Study identifies significant harm to the landscape setting of at least three SAMs as well as lesser harm to other SAMs. Taken together this is significant harm to the historic character of an outstanding historic landscape. With the turbines in place LANDMAP could not reach the conclusion that part of the justification for an outstanding overall evaluation was that the rich assemblage of historic landscape elements had survived '*in a relatively undisturbed condition.*' Hendy WTD would have a **major adverse effect** on the Gelli Hill HLAA.
22. Hendy WTD would result in a **major adverse** impact on landscape character contrary to the implicit objective of TAN 8 to maintain the landscape character.

Effects on Landscape Fabric

23. There would be significant effects on the landscape fabric of the site due to the imposition of the proposed access tracks, which do not respond to the existing grain of the landscape. The tracks would be very visible and would disrupt the use of PRoWs. The tracks would include cuttings of nearly 12m, embankments of up to 7m and 3.5m retaining structures. MB Appendix 5 includes some photographs taken during the final stages of the construction of Bryn Blaen WTD. The volume of cut for Hendy WTD is more than four times that required for Bryn Blaen WTD and the volume of fill more than double.

Visual Effects

24. The presence of the turbines in Llandegley Rhos would bring about a **major adverse** change to the visual amenity of walkers, equestrians, cyclists and drivers in the vicinity of the turbines. Although the local topography, 'the bowl' in which the turbines are located does limit wider effects of the turbines it is generally acknowledge that significant effects resulting from wind turbines are most likely to be found within 6km of the turbines. What is important, therefore is the current visual environment within 6km and the visual receptors likely to experience the change. With regard to the current landscape, the Visual and Sensory assessments for all the Aspect Areas from which the turbines would be visible is that there are currently attractive views in and out and no detractive views, in or out.
25. With regard to the presence of visual receptors, the network of PRowS that cross the site and spread out into the surrounding landscape means that there is potential for significant adverse harm to visual amenity from a wide range of locations. In particular the visual experience of using the BOAT for walkers and equestrians will be entirely altered. Not only will views of the turbines dominate the entire length of the Boat from Pye Corner to the minor road near Pawl-hir but the embankments and cuttings for the access tracks will also have a major adverse impact on the visual experience of the section of the BOAT that crosses the site.

Conclusion

26. I consider that the landscape and visual harm that would result from the Hendy WTD would be as a direct result of the choice of location in a distinctive, generally unspoilt landscape. I consider that the Hendy WTD is not sensitive to local circumstances and has not sought to minimise adverse impacts through careful consideration of location.



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