Banc Du Energy Park.
Llangurig, Powys.

Munro Landscape.

Landscape and Visual Amenity Review.

October 2026.

For the Cambrian Mountains Society.

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1. Introduction

1.1. This appraisal of the landscape and visual effects of the proposed Banc Du Energy Park has been prepared by Kelda Platt, CMLI of Munro Landscape on behalf of the Cambrian Mountains Society (CMS). It is based on a review of the Environmental Impact Assessment (EIAR) and associated documents and visits to the proposed Energy Park site and the surrounding area. This appraisal focusses on verifying compliance with best practice, in terms of methodology of the Landscape and Visual Impact Assessment (LVIA), as well as identifying the principal landscape and visual effects of the proposed development. This appraisal does not comprise an alternative detailed LVIA.

1.2. The Applicant's LVIA terminology and methodology for levels of sensitivity, magnitude of change and levels of effects have been adopted for assessment. These are detailed within the applicant documentation, Technical Appendix 6.1 – LVIA Methodology[1].

2. The Author

2.1. This review has been prepared by Kelda Platt of Munro Landscape, a chartered member of the Landscape Institute (since 2009), with over 24 years of professional experience. Kelda is a director at Munro Landscape, which she jointly founded after a role as a part of the national landscape architect team for Forestry Commission / FLS. She has over 15 years' experience undertaking Landscape and Visual Impact Assessments (LVIAs).

3. The Proposed Development

3.1. The proposed development comprises up to six wind turbines, with maximum tip heights of 180 m (one turbine) and 200 m (five turbines), situated on the open upland of Banc Du, at the head of the Nant Bronfelan Valley, on the eastern fringes of the Cambrian Mountains. The development would have an anticipated generating capacity of approximately 40 MW. Four turbines (T01, T03, T04 and T06) would be fitted with visible

[1] RSK Environment Ltd (2025), Banc Du Energy Park Environmental Statement, Volume III, Appendix 6.1 – Methodology.

aviation lighting at hub height, with proposed intensities of 2,000/200 candela, while all six turbines would be fitted with infrared lighting.

3.2. Associated infrastructure would include approximately 4.8 km of new access tracks, upgrading of approximately 1 km of existing tracks, turbine foundations and crane hardstandings, a new site entrance from the A44, an electrical substation and control building, and underground 33 kV cables connecting the turbines to the substation. Temporary construction infrastructure would include construction compounds, laydown areas and a proposed borrow pit. The development would also involve the decommissioning of two existing farm-scale wind turbines within the Site.

3.3. The off-site grid connection does not form part of the current Development of National Significance (DNS) application and would be subject to a separate application by Green Gen Cymru. The proposed connection would comprise approximately 3.5 km of underground cabling to the proposed Rhiwlas Energy Park substation, followed by an approximately 35 km, predominantly overhead, 132 kV connection towards the proposed Vyrnwy–Frankton overhead line. The grid connection is considered separately within the Applicant's cumulative environmental assessment.

4. The Information Provided by The Applicant

4.1. The Landscape and Visual Impact Assessment (LVIA), set out in Chapter 6 of the EIAR, has been prepared with reference to the Landscape Institute's Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3). While this review broadly agrees with many of the LVIA's findings, it identifies errors in the following areas:

- The cumulative assessment contains **substantive methodological errors** and fails to apply the methodology correctly described in the appendix. This is particularly concerning given the proximity and visual interconnectedness of the Banc Du and adjacent Rhiwlas schemes. The cumulative assessment requires reassessment in

accordance with GLVIA3[2] and NatureScot's guidance, Assessing the Cumulative Landscape and Visual Impact of Onshore Wind Energy Developments(2021)[3];

- The Prince Llewelyn Ride, a long-distance equestrian route promoted by the British Horse Society (BHS), has been omitted from the visual assessment;
- This review also identifies a number of receptors for which the LVIA understates the level of effect. Collectively, these differences indicate a greater geographic extent and severity of landscape and visual effects than reported in the LVIA.

4.2. Taken together, these omissions and methodological shortcomings represent substantive deficiencies in the LVIA and demonstrate that it does not adequately follow established good practice guidance. The assessment fails to identify the full extent and significance of the likely landscape and visual effects and, in its current form, cannot be relied upon as a comprehensive assessment. Further assessment and correction are therefore required.

5. The Design of The Proposals

Site Selection

5.1. The site selection process is set out in Chapter 4 of the ES: Reasonable Alternatives Considered. The Applicant states that site selection sought to balance energy generation potential with environmental and technical constraints, planning policy and project deliverability. The initial site identification process included planning policy review, GIS constraints analysis, access and grid considerations, wind resource, ground conditions and environmental constraints. Of particular relevance to landscape and visual matters, the GIS analysis considered landscape designations, settlement patterns and Public Rights of Way. However, the description of the initial selection process provides limited evidence of consideration of landscape character, visual sensitivity or the relationship between potential development sites and surrounding landscapes. The Site itself is not located within a nationally or locally designated landscape.

[2] Landscape Institute and Institute of Environmental Management and Assessment (2013). Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3). Routledge.

[3] NatureScot (2021). Assessing the Cumulative Landscape and Visual Impact of Onshore Wind Energy Developments. March 2021.

5.2. The applicant states explicitly that *"A sufficient area of the Site must be available for an adequate number of turbines or capacity to result in a commercially viable scheme"*[4]. This establishes commercial viability as an important criterion from the outset of site selection. While commercial viability is a legitimate consideration, the emphasis placed on achieving sufficient development capacity raises questions about the extent to which landscape and visual considerations influenced the initial selection of the Site, rather than being addressed subsequently through detailed layout design. In particular, Chapter 4 provides limited evidence that the potential for large-scale turbines to dominate surrounding skylines and smaller-scale valley landscapes was a determining factor in the initial site-selection process.

Design Layout

5.3. Within the design strategy it is stated that the overall aim was to *"create a wind farm with a cohesive design that is sympathetic in form and scale to the surrounding landscape context, whilst achieving an appropriate balance between maximising renewable energy yield and minimising other environmental and technical effects.*[5]*"* Embedded mitigation measures for landscape and visual considerations are employed within the development of alternative layouts. Design objectives which relate to landscape and visual concerns are as follows:

- To ensure that turbines respond to the scale of the underlying landscape and operational, consented and proposed turbines in the surrounding context;
- To make use of natural and topographical screening of turbines and other infrastructure in key views where possible;
- To make sure that no turbine is overbearing in views from any individual residential property;
- To use the latest wind turbine technology, consisting of more efficient and larger turbines where these can be reasonably accommodated within the landscape.

[4] Banc Du Energy Park ES, Vol. II, Chapter 4: Reasonable Alternatives Considered, para. 4.3.1, p. 46.
[5] Banc Du Energy Park ES, Vol. II, Chapter 4: Reasonable Alternatives Considered, para. 4.4.2, p. 47.

5.4. The design process also identified constraints relating to residential properties, topography and Public Rights of Way (PRoWs), with the latter to be avoided so far as practicable. The Applicant describes an iterative design process involving a reduction from seven turbines at scoping stage to six in the final layout. Of particular relevance to visual amenity, the original Turbine T04 was removed following identification of overbearing visual effects, while the height of Turbine T01 was subsequently reduced from 200 m to 180 m to seek to mitigate effects on residential visual amenity.

5.5. The design evolution demonstrates that landscape and visual considerations have influenced the final layout. Nevertheless, the retention of five turbines reaching 200 m in height raises questions about the extent to which the design has successfully responded to the scale and character of the surrounding landscape. The current Welsh guidance, *Designing for Renewable Energy in Wales*, places particular emphasis on achieving a positive response to the landscape setting and recognising the increased influence of larger turbines on landscape character. The relevant consideration is therefore whether the final layout adequately responds to the particular sensitivities of the Banc Du site and surrounding landscape.

5.6. The selection of an upland site, of limited lateral extent, in close proximity to the populated valley areas, and with strong visual connections to adjoining upland landscapes, sits uneasily with the stated objective of "**utilising natural and topographic screening**". The Site is highly visible, with particularly strong relationships to upland landscapes to the north and west. The Welsh guidance recognises that turbines on high ground commonly form a "*new skyline silhouette*" visible over long distances, identifies proximity to settlement as a principal siting consideration, and advises that "*Particular care is needed when locating turbines close to residential communities*".[6] Views towards the ridge from the Nant Bronfelan valley immediately west of the Site and Severn Valley to the north give rise to high levels of adverse visual effect for residents and recreational receptors, including users of NCN8, the Severn Way and visitors to the Hafron Forest. More specific SNH guidance advises that larger turbines should be "*set back from more sensitive upland fringes*", while turbines on hill ridges may be "*set back from the edge*" to reduce visual

[6] DCfW (2023), *Designing for Renewable Energy in Wales*, Section 5.1: Location, pp. 28-29.

intrusion on settled lowlands.[7] This principle is further reinforced by guidance that a wind farm should be of "*minor vertical scale*" and "*minor horizontal scale*" in relation to key landscape features.[8]

5.7. The design objective of "**avoiding overbearing views from residential properties**" can be said to have been broadly achieved. However, five properties are identified as experiencing high levels of adverse visual effect, with one of those properties considered within this review to encounter 'overbearing' levels of effects, despite a reduction in turbine height (T1) within close proximity. Contributing factors include the juxtaposition of large-scale turbines against smaller-scale landscape features and the perceived continuity of landscape form between the Proposed Development and the property. Current Welsh guidance recognises that perception of turbine scale is influenced by landscape context and proximity to buildings and settlements, and states that accommodating much larger turbines will require "*exemplary design skill*".[9] It also identifies the horizontal and vertical arrangement of turbines as a primary landscape and visual design consideration and requires layouts to respond to the specific characteristics of the landscape.[10]

5.8. The proposed turbine scale and arrangement must also be considered in relation to the existing and proposed wind energy developments within the surrounding landscape. This is particularly relevant given the Applicant's stated objective of "**responding to operational, consented and proposed turbines"**. A key concern is therefore the extent to which the Proposed Development would dominate the skyline of Banc DU hill, an effect accentuated by the marked contrast in scale with the existing Bryn Blaen Wind Farm, where turbines are approximately 100 m high compared with the proposed 200 m turbines at Banc Du. This relationship also appears inconsistent with the more specific SNH guidance, which advises that *"A wind farm, if located close to another of similar design, may appear as an extension; however, if it appears at least slightly separate and of*

[7] Scottish Natural Heritage (now NatureScot) (2017), *Siting and Designing Wind Farms in the Landscape*, Version 3a, paras. 2.15 and 3.29, pp. 9 and 19.
[8] NatureScot (2017), *Siting and Designing Wind Farms in the Landscape*, Version 3a, para. 3.32, p. 20.
[9] DCfW (2023), *Designing for Renewable Energy in Wales*, Section 5.2: Scale, pp. 30-31.
[10] DCfW (2023), *Designing for Renewable Energy in Wales*, Section 5.3: Turbine Layout, pp. 30-31.

different design, it may conflict with the other development"[11]. Furthermore, this review identifies substantive errors within the cumulative assessment, which undermine confidence in the Applicant's evaluation of how successfully this design objective has been achieved. A combined assessment of the Banc Du and Rhiwlas proposals would therefore provide a more robust basis for understanding their collective influence on landscape character, turbine scale relationships and the surrounding skylines, particularly given that both developments are proposed by Bute Energy.

5.9. In terms of the site constraint to **"avoid Public Rights of Way**", this objective appears not to have been achieved. The Site is crossed by several footpaths and bridleways, with proposed access tracks, crane pads and associated infrastructure intersecting these routes. The LVIA itself acknowledges that access tracks and crane pads would cross PRoWs within the northern part of the Site and that temporary diversions or closures would be required during construction.[12] Of particular concern is the omission of the Prince Llewelyn Ride, a long-distance equestrian route which passes directly through the Proposed Development, within approximately 80 m of the nearest turbine. Significantly, the section of the Ride passing through the Site is identified for upgrading as part of the proposed access track network. The route would therefore not merely be crossed by development infrastructure but would itself be physically altered to accommodate the Proposed Development, fundamentally changing the character and experience of this section of the Ride. This is particularly relevant to the Welsh design guidance, which recognises that access and haul roads and associated infrastructure can result in greater local impacts than the turbine footprints themselves and emphasises the importance of sensitive siting and design of access roads and substations within large wind farm developments.[13] Users of the Ride would travel through the operational wind farm in very close proximity to the turbines, experiencing a sustained and dominant visual presence, alongside the introduction of an engineered access track into the upland landscape. Despite this direct relationship, the LVIA fails to identify or separately assess the Prince Llewelyn Ride as a continuous recreational receptor. Although individual viewpoints on

[11] NatureScot (2017), *Siting and Designing Wind Farms in the Landscape*, Version 3a, para. 4.11, p. 31.
[12] *Banc Du Energy Park ES*, Vol. II, Chapter 6: Landscape and Visual, para. 6.5.46, p. 35.
[13] DCfW (2023), *Designing for Renewable Energy in Wales*, Section 5.14: Local Physical Impacts.

other on-site PRoWs are assessed, these do not adequately represent the sequential experience of equestrian users travelling through the development. The detailed recreational route assessment instead concentrates on routes including the Wye Valley Walk, Cambrian Way, Severn Way and Glyndwr's Way.[14] The omission is particularly concerning given that the route would be both physically altered and subject to substantial visual change. Accordingly, the Applicant has failed to demonstrate that its stated objective of avoiding PRoWs has been achieved, while the absence of a specific assessment of the Prince Llewelyn Ride represents a substantive deficiency in the LVIA.

6. Guidance in Relation to Landscape and Visual Matters

6.1. As identified in the preceding section, the 2023 *Designing for Renewable Energy in Wales*[15] (hereafter referred to as the 'current design guidance') provides the current high-level guidance for the siting and design of renewable energy development in Wales, replacing the earlier 2014 *Designing Wind Farms in Wales* guidance.[16] The current design guidance recognises that the increasing scale of wind turbines may result in "*a change of emphasis from turbines considered as features in a landscape to turbines much more defining the landscape character*" (Section 5.2, p. 32). Acceptance that wind energy development may substantially alter landscape character does not, however, remove the requirement to avoid unacceptable effects. Future Wales Policy 18 continues to require consideration of unacceptable adverse impacts, including those relating to the surrounding landscape, visual receptors, nearby communities and individual dwellings.

6.2. The earlier 2014 Welsh guidance contains more detailed advice on the siting and layout of wind farms, including consideration of turbine size and scale, perspective, focal features, settlement, woodland and ancillary infrastructure. Where relevant, this more detailed guidance is referred to below to assist in understanding how the high levels of landscape and visual effect identified for the Proposed Development might have been reduced through siting and design. The 2014 guidance itself notes that application of these design

[14] *Banc Du Energy Park ES*, Vol. II, Chapter 6: Landscape and Visual, Table 6-18, pp. 101–102.
[15] DCfW (2023), *Designing for Renewable Energy in Wales*.
[16] DCfW (2014), *Designing Wind Farms in Wales*.

principles has "*an important influence on reducing the overall landscape and visual impacts of a wind farm*" and explains that its design principles follow "*the same format as SNH guidance for 'Siting and Design of windfarms in the landscape*'", adapted to the Welsh landscape context.[17] This provides a clear basis for also referring, where useful, to the more detailed SNH guidance. The SNH guidance is therefore used as supplementary best-practice guidance where it develops the same established siting and design principles in greater detail, rather than as a substitute for the current Welsh guidance.

7. Effects on Landscape Character

7.1. The Proposed Development occupies a transitional location at the western edge of the extensive, remote and open landscape of **NLCA21 Bryniau'r Canolbarth / Cambrian Mountains National Landscape Character Area (NLCA).** To the east sits the more enclosed and varied landscape of **NLCA 20 Bryniau Sir Faesyfed** / **Radnorshire Hills,** with rounded hills, ridges and enclosed farmland and valleys. Dividing these upland landscapes are the upper Wye and Severn Valleys, depicted more clearly within more detailed characterisation classified within Powys County Council Landscape Assessment mapping. The form of Banc Du is evident within these characterisations as a constrained and small-scale upland area, bounded to three sides by the smaller scale valley landscape. NatureScot guidance specifically recognises that "*Areas of transition between landscape character types are often particularly sensitive*", including transitions from lower-lying settled landscapes to upland foothills and scarp slopes.[18] The Site's transitional position therefore increases its susceptibility to change, as development has the potential to affect not only the character of the host upland landscape, but also the visual and perceptual relationship between the enclosing uplands and the Wye and upper Severn Valley below.

[17] Design Commission for Wales (2014), Designing Wind Farms in Wales, Section 3: Siting and Design of Wind Farms, p. 9.
[18] NatureScot (2017), *Siting and Designing Wind Farms in the Landscape*, Version 3a, para. 3.6, p. 14.

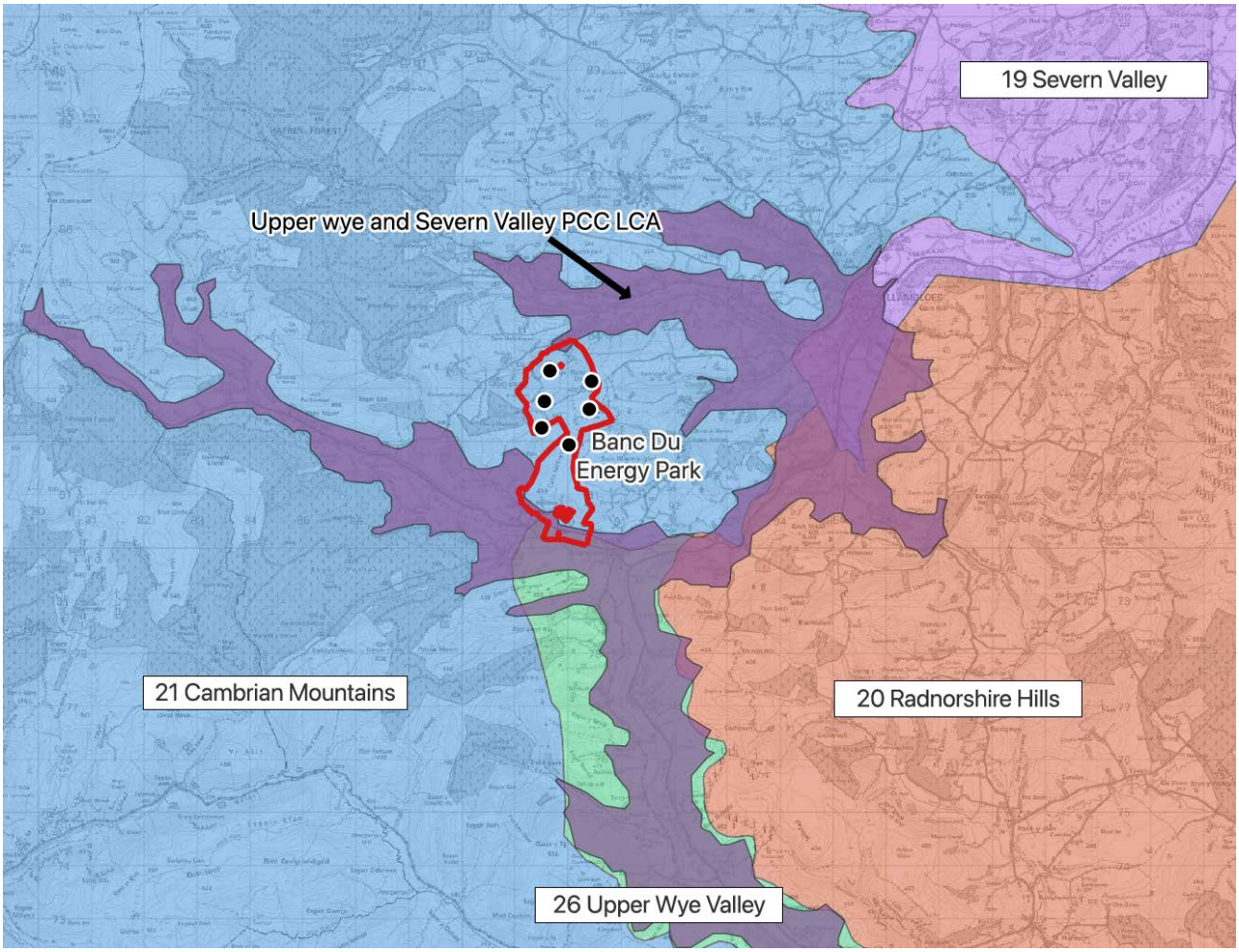

Figure 1: *National Landscape Character Areas and Powys CC LCA 30 – Upper Wye and Severn Valleys*
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7.2. Landscape character effects are assessed using the smaller landscape units identified in the Powys County Council Local Landscape Character Assessment,[19] which sit within the broader National Landscape Character Areas (NLCAs). Within Ceredigion, where there is no equivalent local landscape character assessment, the LVIA uses LANDMAP aspect areas as the basis for assessment for these areas to the west. The Applicant identifies significant effects across the host and adjoining landscape unit LCA 30, extending to approximately 3.6 km from the proposed turbines within LCA 23: Llyn Clywedog to the east of Marsh's Pool, to the eastern extents of the host LCA. This represents a relatively small geographical extent of effects which contributes to the applicant's conclusion of effects being largely localised in nature.

[19] Powys County Council (2022) Local Landscape Character Assessment for the Powys Local Development Plan Area.

7.3. This review finds that significant effects would **extend more widely** than identified by the Applicant, reaching approximately 6 km to the north within LCA 23, where the Proposed Development would appear as an incongruous feature within the pastoral landscape and intrude upon views across Llyn Clywedog Reservoir. Within LCA 30, this review also identifies a southward extension of significant effects, beyond those determined by the Applicant to the west and north of the Proposed Development. Furthermore, this review identifies additional significant adverse effects within **four further landscape character areas**: LCA 24, LCA 31, LCA 34 and LCA 37, with a wider spread of effects identified to 7km to the east within the elevated uplands of LCA 31 Bwlch-y-sarnau Uplands, at Gorn Hill. Collectively, these findings indicate a substantially greater geographical extent of significant landscape character effects than reported in the Applicant's LVIA.

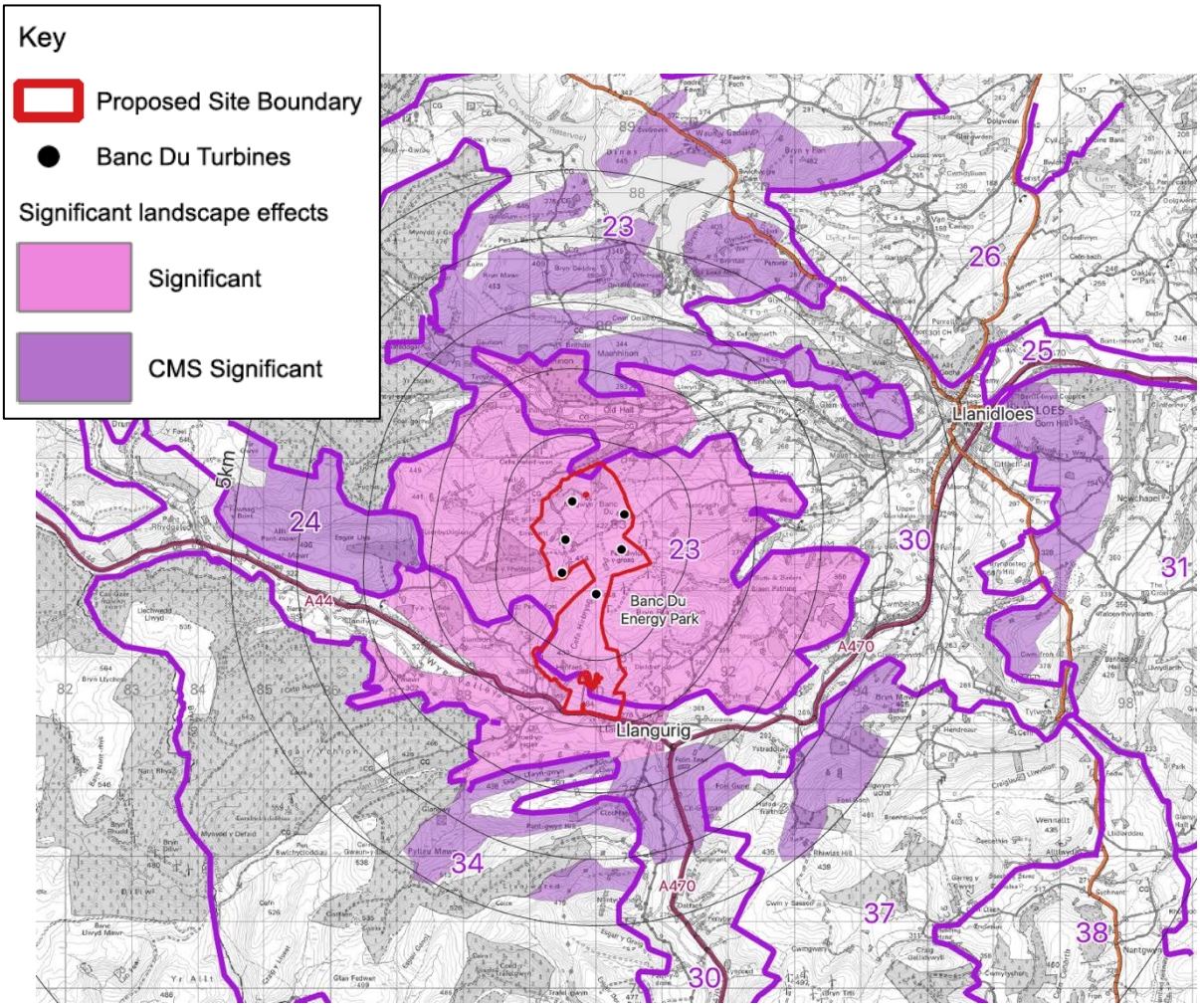

Figure 2: *Significant Landscape Effects*

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Landscape Character Area (LCA) 23: Llyn Clywedog

7.4. LCA 23: Llyn Clywedog comprises an extensive upland landscape of rolling plateaux, prominent hills and dissecting valleys, centred on the distinctive, sinuous form of Llyn Clywedog Reservoir. The landscape has a strong sense of openness, remoteness and exposure across its elevated areas, contrasting with the more enclosed reservoir and valley settings. The area has considerable historic and recreational interest, including former lead-mining landscapes, Glyndwr's Way and numerous Public Rights of Way. Panoramic views across the surrounding uplands and the scenic composition of Llyn Clywedog are particularly valued characteristics. The Proposed Development is sited within the smaller, southern portion of this LCA, to the south of the dividing element of the Upper Severn Valley. This review agrees with the applicant's assessment of **Medium sensitivity**.

7.5. The Applicant's LVIA identifies a High magnitude of change within the southern part of this LCA to 3.6km, reflecting the introduction of large-scale turbines into a landscape already influenced by wind energy development, but where their scale would contrast strongly with upland pasture and smaller woodland blocks. This results in a Moderate-Major and Significant level of effect. Beyond this area, the Applicant determines a Medium magnitude of change extending to approximately 6 km, reducing to Low at greater distances. This review considers that a Medium-High magnitude of change would be encountered to approximately 6 km, extending the geographical extent of significant adverse effects, as illustrated by Viewpoints 8 and 21. The Applicant suggests that the Proposed Development would have limited influence on views of Llyn Clywedog Reservoir. However, **Viewpoint 8** demonstrates a strong and direct visual relationship between the turbines and the reservoir landscape, particularly from areas of visibility along its northern side. **Viewpoint 21** further illustrates the awkward composition of the Proposed Development when viewed from the north. The turbines would appear unevenly arranged, with Turbine T1 stepping down into the smaller-scale pastoral landscape, creating an irregular composition characterised by turbine stacking and a pronounced contrast in scale with the existing Bryn Blaen turbines. These relationships would accentuate the prominence of the Proposed Development and introduce a discordant

element into the established landscape pattern. Significant effects at **Moderate / major** (to 2km) **and Moderate,** would be experienced to a distance of 6km.

Figure 3: ***Viewpoint 8: Llyn Clywedog viewpoint.***
Source: RSK, Rhiwlas Energy Park Environmental Statement, Volume IV, Figure 6-27f, Viewpoint 8: Llyn Clywedog viewpoint. (2025). Reproduced for the purposes of independent landscape and visual assessment and critical review.

Figure 4: ***Viewpoint 21: Pen y Gaer Camp.***
Source: RSK, Rhiwlas Energy Park Environmental Statement, Volume IV, Figure 6-40h, Viewpoint 21: Pen y Gaer Camp. (2025). Reproduced for the purposes of independent landscape and visual assessment and critical review.

Landscape Character Area (LCA) 24: Plynlimon

7.6. LCA 24: Plynlimon comprises an extensive, open and exposed upland moorland landscape within the Cambrian Mountains, characterised by broad plateaux, prominent ridges, rocky outcrops and steep escarpments. The Plynlimon ridge includes the highest point in Mid-Wales at Pumlumon Fawr, an iconic and distinctive upland landmark of scenic, cultural and recreational importance. Land cover is dominated by heathland, blanket bog and rough

grazing, with limited woodland and an absence of significant settlement. The landscape possesses a strong sense of remoteness, tranquillity and wildness, reinforced by expansive skies and long-distance panoramic views across the surrounding uplands. Its distinctive qualities include the culturally significant sources of the Rivers Wye and Severn, important upland habitats and numerous recreational routes, including Glyndwr's Way and the Cambrian Way. The open upland skylines and uninterrupted views towards the surrounding mountain ranges are particularly valued characteristics. This review agrees with the applicant's assessment of **Medium-high sensitivity**.

7.7. There is extensive intervisibility with the Proposed Development from within this LCA, reflecting its elevated character and strong visual connections with the adjoining upland landscape of the Proposed Site. The turbines would form a prominent feature along the eastern skyline, with their scale and presence illustrated by Viewpoint 20. The prominence of the development would remain readily apparent at distances of approximately 11.5 km to the west, as represented by Viewpoint 12. The LCA is characterised by strong perceptions of remoteness and tranquillity, with expansive, long-distance views forming a defining characteristic. Within the eastern portions of the LCA, the Proposed Development would notably erode these qualities, with the scale of the turbines challenging perceptions of the scale of the surrounding hill forms through their marked contrast with both the existing Bryn Blaen turbines and the smaller-scale landscape features below. This review disagrees with the Applicant's characterisation of the Proposed Development as occupying a distant ridgeline, given that visibility would occur from within the LCA at distances as close as 2.3 km. Furthermore, this review does not concur that the Proposed Development would complement the existing Bryn Blaen Wind Farm. At approximately twice the turbine height, the proposed turbines would introduce a substantial contrast in scale, disrupting the established, relatively consistent rhythm of the Bryn Blaen layout and creating a discordant composition along the upland skyline. This review disagrees with the Applicant assessment of Medium-low magnitude and non-significant effects for this LCA, judging this to be at Medium level to 5km, resulting in **Moderate and Significant** levels of effects.

Landscape Character Area (LCA) 30: Upper Wye and Severn Valleys

7.8. LCA 30: Upper Wye and Severn Valleys comprises a settled pastoral valley landscape, characterised by small-scale enclosed fields, mature hedgerows, wooded river corridors and scattered farmsteads. The valley system cuts through and is enclosed by the surrounding upland landscapes, with strong visual and perceptual connections to the adjoining hillsides and their prominent enclosing skylines, particularly from elevated valley slopes. These relationships are fundamental to the landscape's character, contrasting the intimate, settled valley floors with the more open and exposed uplands. The LCA also possesses valued scenic, recreational and historic qualities. This review agrees with the Applicant's assessment of **High sensitivity**, reflecting the distinctive valley character, its relationship with the surrounding uplands and its susceptibility to large-scale development.

7.9. The Proposed Development would be visible from parts of this LCA to the north and south of the adjoining upland area. The proposed turbines would occupy prominent positions along the skyline, contrasting markedly in scale with the smaller existing Bryn Blaen turbines. Views from within the LCA are illustrated by Viewpoints 5, 6, 7, 20 and 23. The Applicant identifies the highest levels of effect within the western Wye Valley, between Llangurig and Llanifyny, and to the north along the Upper Severn Valley, between Llwyn Derw and Geufron, where a Medium-High magnitude of change is determined.

Figure 5: ***Viewpoint 5: Minor road near Geufron.***
Source: RSK, Rhiwlas Energy Park Environmental Statement, Volume IV, Figure 6-24e, Viewpoint 5: Minor road near Geufron. (2025). Reproduced for the purposes of independent landscape and visual assessment and critical review.

7.10. Viewpoint 20 illustrates the stark contrast in scale between the existing and proposed turbines, with the Proposed Development appearing dominant in relation to the scale and height of the surrounding hills. **Viewpoint 5** further illustrates the strong visual contrast between the proposed turbines and the pastoral valley setting, where the development would appear incongruous within the smaller-scale landscape. These effects would undermine key characteristics of the LCA, including *"attractive views within the valleys"* and "*a sheltered pastoral valley with a sense of enclosure"*.[20]

7.11. Within the Upper Wye Valley, south of Llangurig, where the Applicant identifies only a Medium-Low magnitude of change, this review considers that a Medium magnitude would be experienced, as represented by Viewpoint 6. The Applicant cites reducing factors, stating that "*the Proposed Development turbines would appear relatively evenly spread, following the contours of the underlying landform and complementing the overall arrangement of turbines when taken together with Bryn Blaen."*[21] Furthermore, the Applicant considers that avoiding the leading ridgelines would minimise encroachment upon the valley landscape. However, views from the Upper Wye Valley, south of Llangurig, reveal the Proposed Development occupying a prominent position along the enclosing upland skyline, its visual presence accentuated by the framing effect of the valley landform. The turbines would form an uneven composition, with a marked contrast in height and scale against the existing Bryn Blaen turbines, resulting in a strong and discordant visual presence. This review therefore considers that the Proposed Development would form a prominent new element within the landscape, notably altering the visual relationship between the settled valley and its enclosing uplands. A Medium magnitude of change is consequently considered appropriate, extending approximately 4 km south of Llangurig, with resulting **Moderate-Major and significant** effects for this area, as well as the Applicant determined **Major levels of effects** to the west and north.

[20]Powys County Council (2022), Local Landscape Character Assessment for the Powys Local Development Plan Area, LCA 30: Upper Wye and Severn Valleys. P. 6.

[21] *Banc Du Energy Park ES*, Vol. II, Chapter 6: Landscape and Visual, para. 6.9.68, p. 76

Landscape Character Area (LCA) 31: Bwlch-y-sarnau Uplands

7.12. The LCA comprises an elevated upland landscape of undulating hills, plateaus and prominent ridgelines, dissected by small stream valleys. Extensive conifer plantations dominate much of the landscape, interspersed with large-scale pastoral fields, occasional deciduous woodland and smaller, irregular hedgerow-enclosed fields in the north. Settlement is sparse, comprising scattered farmsteads, small hamlets and the village of Bwlch-y-sarnau. The landscape retains a rural and remote character, with dark night skies and expansive views across surrounding valleys and adjacent uplands, where not restricted by forestry. This review agrees with the Applicant's assessment of **Medium-High sensitivity.**

7.13. The Applicant's LVIA determines a Medium-low magnitude of change within this LCA, resulting in Moderate and non-significant levels of effect. However, strong visual connectivity with the Proposed Development would be experienced within the north - western part of the LCA, where the proposed turbines would appear prominently on the adjacent hillsides, introducing a notable developed feature and adversely affecting key landscape qualities, including expansive views across surrounding valleys and the strong visual relationship with adjacent elevated landscapes. This review identifies a limited area of elevated ground around Gorn Hill and extending southwards, within approximately 7 km of the Proposed Development, where a Medium magnitude of change is considered appropriate. This would result in a **Moderate and significant** level of adverse effect.

Landscape Character Area (LCA) 34: Elenydd Uplands

7.14. The Elenydd Uplands comprise an extensive, elevated plateau to the south and west of the upper Wye Valley, characterised by open moorland, sparse settlement and limited accessibility. The landscape has a strong sense of wildness, remoteness and tranquillity, with expansive views across the surrounding uplands and valleys. Its elevated and exposed character creates a strong visual relationship with the adjacent Uplands. The openness of the landscape, extensive skylines and absence of modern development contribute to its distinctive perceptual qualities. The LCA also forms part of the Elan Valley

International Dark Sky Park, with the long distance route of the Wye Valley Walk passing through the north-west portion of the LCA, within proximity to the Proposed Development. This review agrees with the Applicant's assessment of **Medium-High sensitivity**.

7.15. The Applicant's LVIA determines a Medium-low magnitude of change throughout this LCA, resulting in **Moderate and non-significant** levels of effect. Views towards the Proposed Development are represented by Viewpoints 3 and 24, located along the Wye Valley Walk in elevated positions affording clear views of the full array of proposed turbines. The proposed turbines would appear larger and more widely spread than those at the existing Bryn Blaen site, exerting greater dominance over the scale of the hillside below and introducing a strong sense of development along the northern skyline. From Viewpoint 24, the Proposed Development would form a prominent element within views to the north, interrupting longer-distance views towards the Eryri mountains. This would adversely affect key landscape qualities, including the sense of being "*open and exposed, with a sense of place*", the "*long views*" and the character of a "*remote and tranquil area*"[22]. Within the northernmost part of this LCA, this review disagrees with the Applicant's assertion that the Proposed Development would be experienced "*along a distant, upland ridgeline*". Rather, within approximately 5 km, it would form a principal element of the northern skyline and exert a strong influence on views from this LCA. Accordingly, this review determines a Medium magnitude of change, resulting in **Moderate and significant** levels of effect.

Landscape Character Area (LCA) 37: Drysgol Uplands

7.16. The Drysgol Uplands comprise two distinct areas of elevated plateau and hills. The Proposed Development is located approximately 3km to the north of the western portion. The landscape is characterised by open, exposed uplands, dissected by steep-sided valleys with a more enclosed pastoral character. Its key perceptual qualities include a sense of remoteness and wildness across the higher plateaux, tranquillity within the valleys and

[22]Powys County Council (2022), Local Landscape Character Assessment for the Powys Local Development Plan Area,LCA 34: Elenydd Uplands. P.5.

expansive views across the surrounding landscapes. Bryn Titli Wind Farm is an existing feature of the upland landscape. The open upland character and skylines are identified as key sensitivities, together with the long views gained in all directions.

7.17. Landscape sensitivity is assessed by the Applicant as **Medium-low**, despite the presence of Visual and Sensory aspect areas evaluated as High by LANDMAP within the northernmost parts of the LCA adjoining the Proposed Development. This assessment is based on a Low susceptibility to change, which the Applicant considers to be moderated by the existing influence of wind energy development within both LCA 37 and the host landscape. However, this review considers susceptibility to be Medium, reflecting the limited extent and influence of existing wind energy development. The existing turbines (at 54 m) are of a scale that is accommodated within the landscape, rather than dominating its character or setting. Accordingly, this review determines a higher overall level of landscape sensitivity, assessed as **Medium.**

Figure 6: ***Image from Bridleway on Bryn Mawr, within LCA 37.*** *GR 295027E, 280280N. The existing Bryn Blaen turbines are visible, with limited presence within the wider landscape context.*

7.18. The Applicant's assessment determines a Medium-low magnitude of change throughout this LCA, resulting in Minor and non-significant levels of effect. Although there are no representative viewpoints within the LCA, the scale and prominence of the Proposed Development from elevated locations at approximately 4.3 km would be comparable to that illustrated by Viewpoint 24, with the proposed turbines appearing

prominently above the landform and forming a dominant feature across the Banc Du hillside. This review considers a **Medium magnitude of change** to be more appropriate, reflecting the erosion of long-distance views and the sense of remoteness and wildness, with the Proposed Development appearing in relatively close proximity and exerting a strong influence on the surrounding landscape character. Accordingly, this review determines a **Moderate and significant level of adverse effect**.

8. Effects on Designated Landscapes

Special Landscape Area – SLA 12: Northern Uplands

8.1. This review agrees with the applicant's finding that there would be no significant adverse effects on SLA 12: Northern Uplands. The SLA is valued for its expansive upland landscape, distinctive rugged moorland centred on Pumlumon, historic landscape interest and qualities of tranquillity, wildness and remoteness. Panoramic views from the elevated summits and ridges are also an important aspect of its landscape character.

8.2. Although intervisibility would occur within LCA 34 and LCA 24, including from the Pumlumon summits and flanks, the resulting visual effects would not necessarily translate into significant effects on the SLA as a whole. The Proposed Development would introduce a new feature within easterly views, but the assessment considers that this would not fundamentally alter the appreciation of the expansive upland landform, distinctive landscape pattern or prevailing perceptions of remoteness and tranquillity. The key qualities underpinning the SLA designation would therefore remain legible, although localised cumulative visual effects would occur, as identified elsewhere in this review. These include Moderate-Major and significant effects from the summit of Pumlumon Fawr under the application scenario, where the Proposed Development would be perceived alongside the Rhiwlas Energy Park proposals as a single, larger wind energy development.

9. Visual Effects

9.1. ZTV mapping (Figures 6.6 to 6.16[23]) shows that the proposed Banc Du Energy Park would have extensive theoretical visibility across the host landscape and throughout much of the surrounding area up to 5 km, with more fragmented but still notable visibility beyond. This reflects the elevated position of the Proposed Site, its connectivity with adjoining upland topography, and strong visual connections with surrounding valleys. The scale of the proposed turbines, combined with the prominence of the selected site, results in high levels of visibility and presents challenges in containing effects within the wider landscape.

9.2. Significant effects are identified within the settled landscape to the west of the Proposed Development, along the Nant Bronfelan valley, affecting dispersed residential properties along the minor road. Moderate-Major and significant levels of effect are also determined for residential receptors within the upper Severn Valley, extending from the Geufron area to Glan-y-nant. Residents within this part of the valley would experience views of the proposed turbines along the skyline of the valley sides, appearing large in scale relative to the smaller field pattern and introducing a dominant developed presence within the rural landscape. These effects would also be experienced by recreational receptors travelling along NCN8, which follows this section of the valley, as well as sections of the Severn Way.

9.3. Recreational receptors would experience a widespread pattern of significant adverse effects, particularly along the Wye Valley Walk and National Cycle Route 8 (NCN8). Effects on NCN8 are represented by Viewpoints 5, 6, 9 and 23, where the route follows the upper Severn Valley, as described above, providing access to the popular Hafren Forest area. Further visibility would be experienced along sections of the route crossing elevated ground to the east of the Proposed Development and continuing south beyond Llangurig. Significant adverse effects are identified along approximately 19 km of NCN8, representing a substantial change in the character of the visual experience. The Applicant's assessment also identifies significant adverse effects along 8.6 km of the Wye Valley Walk. This route would be particularly affected due to the slower pace of travel and its elevated alignment

[23] Banc Du *Energy Park ES*, Vol. IV, Figures 6.6 to 6.16.

along the valley sides, initially approaching Llangurig from the west before continuing south towards Rhayader, passing directly alongside the Proposed Development on the southern side of the upper Wye Valley. The route is generally walked from north to south, following the course of the river, with clear views towards the Proposed Development experienced across much of the affected section.

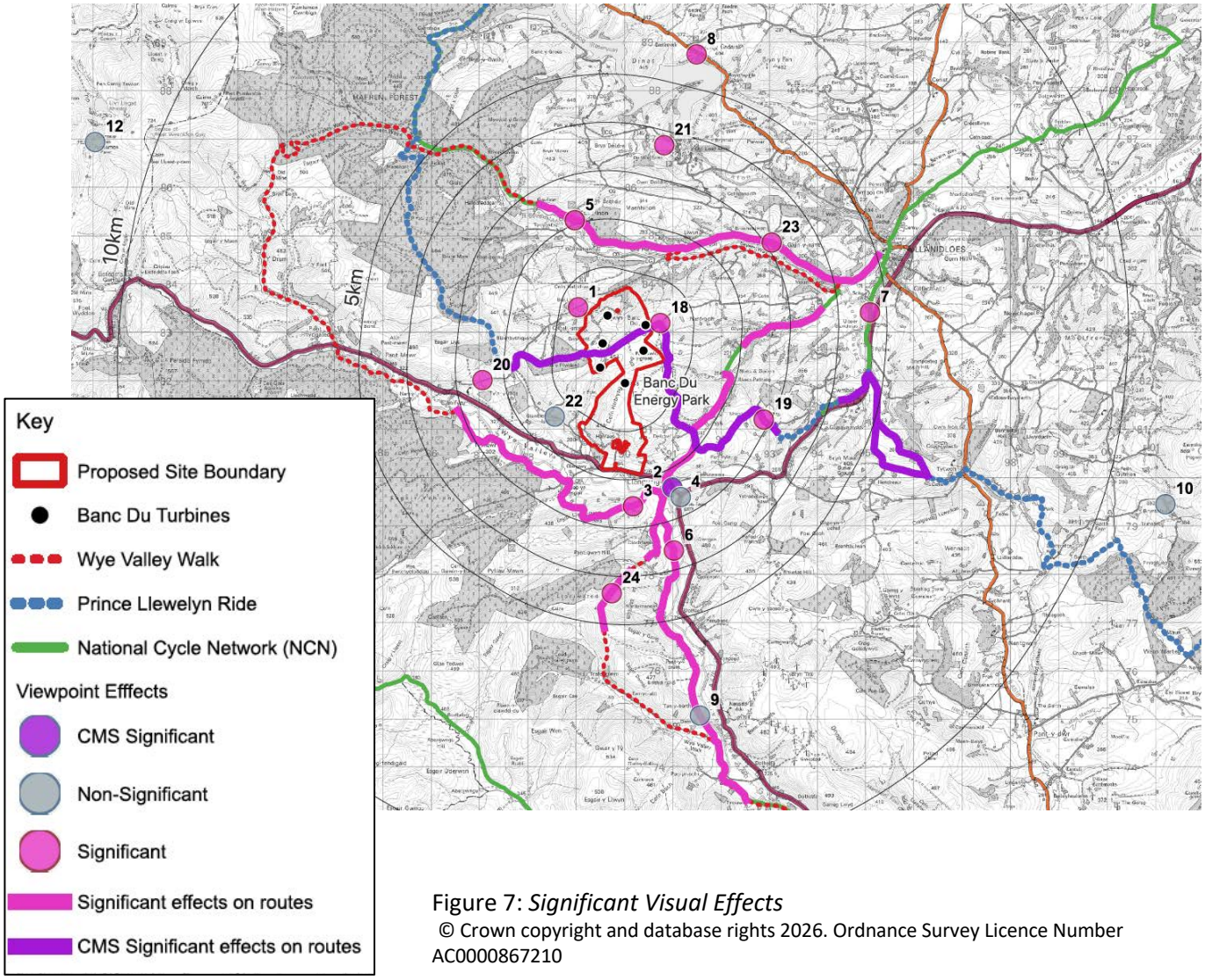

Figure 7: *Significant Visual Effects*
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9.4. The omission of the long-distance equestrian route of the Prince Llewelyn ride results in a lack of representation for impacts upon this user group within the area. The route passes directly through the site, with significant adverse effects determined along 14.5km of the trail and **Major levels for a 4km section** of this extent.

Viewpoints

9.5. This review assesses an increase in the number of viewpoints experiencing significant adverse effects, with additional significant adverse effects for Viewpoint 2: Llangurig. The Applicant concludes that 12 of the 24 viewpoints would experience significant adverse effects, extending to a distance of 5.7 km, as represented by Viewpoint 8. In terms of levels of effects, this review determines that a number of viewpoints have been assessed conservatively, with higher levels determined for four further viewpoints, at Viewpoints 6, 8, 20 and 21.

Viewpoint 2: Llangurig

9.6. This viewpoint is located on the A44 to the south of the village of Llangurig, within the residential area. The road directs views to the hillsides enclosing the north side of the village, with pastoral fields rising to a low skyline, with minor influence from the tips of two of the existing Bryn Blaen turbines. This review agrees with the Applicant's assessment of **High sensitivity**.

9.7. The Applicant's LVIA determines a Medium-low magnitude of change, resulting in **Moderate and non-significant** levels of effect. Although only one turbine would be clearly visible, the Proposed Development would form a prominent feature within views to the north. The scale of the turbine blades above the hillside, combined with their apparent proximity and movement, would create a conspicuous and eye-catching feature. This would represent a marked change from the existing view, and accordingly, this review determines a **Medium magnitude of change**, resulting in a **Moderate-Major and significant level of adverse effect**.

Settlement

9.8. The Applicant's LVIA concludes that visibility is limited across most of the main settlements within the study area, with only Llangurig and Llanidloes taken forward for detailed assessment. This review agrees with determinations of non-significant effects for

Llangurig, but with **Moderate-Major and significant** effects for the settlement of Llanidloes. However, there is little representation for the dispersed settlement along the upper Severn valley (including dwellings at Geufron, Old Hall and Glan-y-nant), where a significant number of residents would be heavily affected by the proposals. Between Five and six turbines are illustrated to be consistently within views, when reviewing ZTV mapping for this area. Residences along this valley are generally sited to the north side of the valley, to obtain open views and aspect to the south, gaining direct views towards the Proposed Development. Viewpoints 5 and 23 represent views along this valley section, with **Moderate-Major** levels of visual effects recorded.

Figure 8: ***Image from upper Severn Valley.*** *GR 291785E, 284894N. Illustrating the dispersed settlement with views to the Proposed Development on Banc Du hill (left of view). The valley setting is determined to encounter **Major** levels of adverse effects.*

9.9. A portion of this area also falls within the Residential Visual Amenity Assessment study area, due to falling within a 2km distance from the nearest turbine. A total of sixteen properties are assessed within the RVAA, with medium and **Moderate-Major** levels of effects determined for ten of these residences. Overall, this represents an extensive settled area, which would encounter up to Moderate-Major levels of effects.

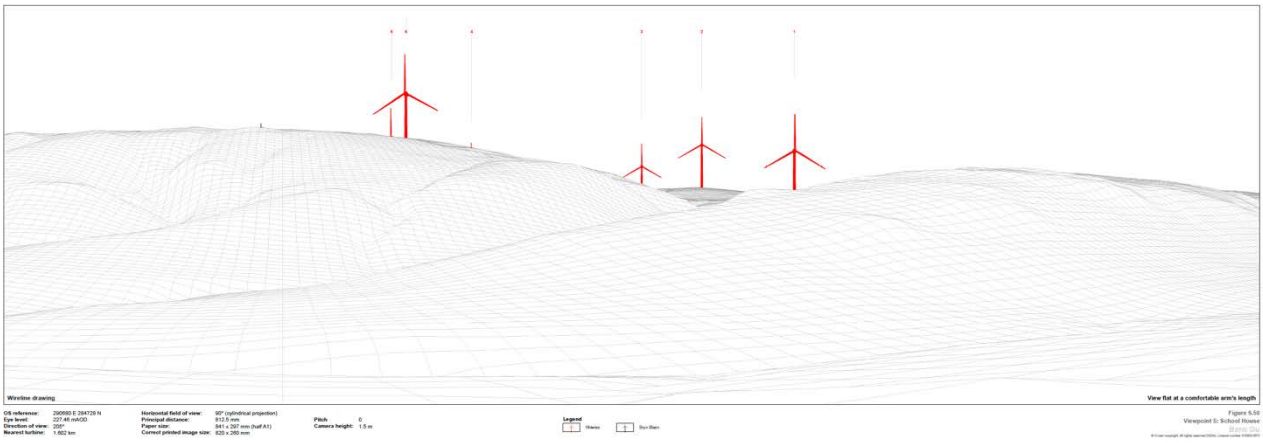

Figure 9: ***Residential Viewpoint 5: School House.***
Source: RSK, Rhiwlas Energy Park Environmental Statement, Volume III, Appendix 6-3, Figure 6.50: Viewpoint 5: School House. (2025). Reproduced for the purposes of independent landscape and visual assessment and critical review.

Figure 10: ***Image from School House.*** *GR 290710E, 284746N. Representative of properties along the upper Severn Valley, access to Hafron Forest, NCN 8 and Severn Way. The aspect of residences face to the south with main focus onto the hillside of Banc Du, with small scale pastoral field patterning contrasting to the large-scale proposed turbines sited to within the skyline.*

Routes

9.10. This review agrees with the Applicant's findings that the Proposed Development would not result in significant visual effects along the majority of the main transport routes within the study area, with effects largely concentrated along minor roads and recreational routes traversing the surrounding landscape. In particular, significant effects along the upper Severn Valley, as discussed above in relation to residential receptors, and across the open commons, as represented by Viewpoints 1 and 20, would affect both local

communities and visitors to the area. These effects are particularly relevant given the increasing interest from outwith the region as a tourist destination, focussing on recreational access to the Hafren Forest area.

The Wye Valley Walk

9.11. The Wye Valley Walk is a 136-mile (218 km) long-distance recreational route following the River Wye from its source in the Cambrian Mountains to Chepstow. The route is promoted in a north-to-south direction, following the river downstream, although it can be walked in either direction. The early stages traverse the exposed uplands near Pumlumon, with extensive views across the surrounding moorland, before descending through the upper Wye Valley towards Llangurig. The route alternates between enclosed riverside landscapes, woodland, pastoral farmland and elevated sections offering expansive views across the surrounding hills. South of Llangurig, the route climbs onto the uplands around Nantyhendy Hill, providing panoramic views across the Wye Valley and surrounding upland landscape, before descending through the Dernol Valley and Gilfach Nature Reserve towards Rhayader.

9.12. The route travels in a relatively elevated position within proximity to the Proposed Development, gaining views towards much of the development over extended sections. Views from the route are represented by Viewpoints 3 and 24. There is broad visibility between Llanifyny and Llangurig and continuing as the trail gains height within the hillsides behind Clochfaen. Further visibility opens upon gaining the ridge at Llaniwared Hill, with expansive views represented from this point by Viewpoint 24.

9.13. The Applicant assesses these sections of the route as experiencing significant adverse visual effects at Moderate-Major levels, extending over approximately 8.6 km. These effects arise largely from the interaction of the Proposed Development with the smaller-scale landscape of the upper Wye Valley, where the presence of field patterns and scattered dwellings provides a strong sense of scale against which the turbines would appear disproportionately large and dominant within the landscape setting. This is clearly illustrated by Viewpoint 3, where the proposed turbines would rise prominently above

dwellings on the hillside below, within a landscape characterised by pastoral fields and a relatively intimate landscape scale. In this context, the turbines would not benefit from the sense of openness and expansiveness associated with larger-scale upland landscapes, which can help to accommodate their scale and reduce their perceived visual dominance.

9.14. Within a cumulative application scenario that includes the proposed Rhiwlas scheme, adverse visual effects upon the Wye Valley Walk would be reinforced along the Llanifyny to Llaniwared section of the route. Users would experience a sense of encirclement when passing between the two proposed developments, with their combined influence creating a wind farm landscape across this section of the trail and the surrounding area of LCA 34. Within an additional effects scenario, the magnitude of effect attributable to the Proposed Banc Du Development would remain at Medium levels, notwithstanding the increased influence of wind farm development across the surrounding hillsides. This reflects the substantial contribution of the Proposed Development to the cumulative effects, particularly through its extension of large-scale turbine development along the upland skylines and the resulting perception of a more continuous pattern of wind farm development to the east and north.

National Cycle Route 8 (NCN8)

9.15. National Cycle Route 8 follows minor roads between Llanidloes and Llangurig, crossing the undulating landscape between the Severn and Wye valleys. The route also extends westwards from Llanidloes, following the narrower valley landscape towards Hafren Forest, with views represented by Viewpoints 5 and 23. South of Llangurig, the route follows a quiet minor road along the western side of the Wye Valley, with views represented by Viewpoints 6 and 9. Throughout these sections, regular views of the Proposed Development would be experienced at varying distances, with the turbines appearing as prominent features along the skylines and upper hillsides of the Wye and Severn valley landscapes. Collectively, these sections extend over approximately 19 km of the route, which effectively encircles the Proposed Development across its northern, western and southern extents.

9.16. The Applicant identifies the route as being of Medium-High sensitivity, with which this review concurs. The Applicant assesses the magnitude of visual effects as Medium across all the sections identified above, resulting in Moderate and Significant adverse visual effects. This review agrees with these findings, recognising the extensive and recurring visibility of the Proposed Development across approximately 19 km of the route, and its prominent influence upon views experienced by cyclists travelling through the surrounding valley landscapes.

9.17. Within a cumulative application scenario, the combined influence of the Proposed Banc Du Development and the proposed Rhiwlas scheme would result in a geographical expansion of adverse visual effects, with sequential views of either development along substantial sections of National Cycle Route 8. These effects would be particularly reinforced between Llanidloes and Llangurig, where the route passes between the two proposed schemes, creating a sense of encirclement by wind farm development. Within an additional effects scenario, the Proposed Banc Du Development would continue to contribute similar levels of adverse visual effects along this section, reflecting its prominent influence and the increased sense of encirclement experienced by route users. South of Llangurig, the additional effects attributable to the Proposed Development would be reduced, owing to the stronger influence of the proposed Rhiwlas scheme when travelling southwards. Between Llanidloes and Geufron, the additional effects of the Proposed Banc Du Development would remain at Medium levels, extending the geographical extent of significant adverse visual effects beyond those associated with the proposed Rhiwlas scheme alone. Overall, within the cumulative application scenario, the Proposed Banc Du Development would contribute **Moderate to Moderate-Major** and Significant adverse visual effects, representing a substantial factor in extending the geographical extent of significant effects across approximately 19 km of this strategic recreational route.

9.18. As detailed in Section 11 (Cumulative Effects), these findings differ substantially from those of the Applicant's LVIA, primarily due to the misapplication of the assessment methodology. Rather than assessing the individual effects attributable to the Proposed Banc Du Development against each distinct cumulative baseline, the Applicant's

assessment focuses on the perceived interaction between developments, thereby failing to adequately identify the additional effects arising from the Proposed Development within each cumulative scenario.

The Prince Llewelyn Ride

9.19. The Prince Llewelyn Ride is a 130 km long-distance equestrian route promoted by the British Horse Society (BHS) as part of the national bridleway network. The route has been omitted from the Applicant's visual baseline and is therefore not considered within the LVIA. Extending east to west across Mid Wales, from Lloyney on the Powys/Shropshire border to Borth and Ynyslas on the Ceredigion coast, the route passes directly through the Proposed Development approximately halfway along its length, at a closest distance of just 80 m from the nearest turbine. Equestrian users experience views from a more elevated position than pedestrians and are therefore generally less affected by localised screening, potentially increasing their exposure to the Proposed Development. The **sensitivity the route is assessed as Medium-High**, reflecting its Medium-High value as a regionally important equestrian route, combined with High susceptibility arising from the importance of landscape character and views to the recreational experience of riders.

9.20. Users of the route would experience close-range views of the proposed turbines along the approximately 1.5 km section that traverses the Proposed Site, with further impacts arising from the upgrading of the route surface itself, which forms part of the internal access infrastructure of the Proposed Development. Visual effects along this section are illustrated by Viewpoint 18: Shepherd's Hut, minor road on Banc Du, where the proposed turbines would be visible at full height, including to their bases, on either side of the route. Although the existing Bryn Blaen turbines already exert some influence upon views from the route, their greater separation distance and substantially smaller scale mean that they do not create the sense of enclosure and crowding that would arise from the Proposed Development. The introduction of substantially larger turbines in close proximity to the route would fundamentally alter the visual experience of riders, creating an overwhelming presence within the surrounding landscape. A High magnitude of change

and Major and Significant adverse visual effects are therefore determined along this section, with **Major effects extending across approximately 4 km** of the route in total.

9.21. Along sections of the route to the east of the Proposed Development, the turbines would remain prominent within the surrounding landscape, with visual effects illustrated by Viewpoint 19 at Marsh's Pool. A Medium magnitude of change is determined, resulting in Moderate and Significant adverse visual effects. Further east, the Prince Llewelyn Ride traverses elevated ground between Cwmbelan and Cefn, where the Proposed Development would continue to exert a prominent influence upon views. The apparent scale and prominence of the turbines would be comparable to those illustrated by Viewpoint 8, situated at a similar distance from the Proposed Development. A Medium magnitude of change is therefore also determined along this section. Overall, significant adverse visual effects would extend across approximately 14.5 km of the route, representing a substantial and sustained impact upon the visual experience of riders over a notable proportion of the Ride.

9.22. Within a cumulative application scenario that includes the proposed Rhiwlas scheme, the **combined effects** would extend the length of the Prince Llewelyn Ride experiencing significant adverse visual effects to approximately 18 km, reflecting the sequential visibility of both developments as riders pass through areas influenced by each scheme in turn. As discussed in relation to the Wye Valley Walk, the combined influence of these developments would substantially alter the character of the surrounding landscape, creating a more extensive landscape characterised by wind farm development along this section of the Ride.

9.23. Within an **additional effects** scenario, assessing the introduction of the Proposed Banc Du Development into a baseline that includes the proposed Rhiwlas scheme, the additional effects attributable to Banc Du would be reduced along sections further east. However, effects around Marsh's Pool would increase, owing to the introduction of large-scale turbines at the opposite end of the pool from the proposed Rhiwlas scheme. This would effectively enclose the pool between two areas of large-scale wind energy development, intensifying the sense of encirclement and resulting in **Moderate-Major and**

Significant adverse visual effects. Within the Proposed Site itself, the additional effects attributable to Banc Du would remain at the **Major and Significant** levels identified in the main assessment, reflecting the dominant presence of the turbines in close proximity to the route.

10. Residential Visual Amenity

10.1. The Residential Visual Amenity Assessment (RVAA) identifies 79 individual properties within a 2 km radius of the Proposed Site. The assessment broadly follows established best practice methodology, as set out within GLVIA3[24] and the associated technical guidance[25]. Of these, 50 properties were taken forward for detailed assessment, with five determined to experience a High magnitude of change and Major adverse visual effects. All five properties are located within the Nant Bronfelan Valley, immediately to the west of the Proposed Development, where their principal outlooks are generally orientated towards Banc Du hill. These properties lie between approximately 74 m and 1.4 km from the nearest proposed turbine.

10.2. As discussed in paragraph 9.16 of this review, a greater concentration of residential properties is located along the upper Severn Valley, between Geufron and Glan-y-nant. Those falling within the 2 km RVAA study area are generally assessed by the Applicant as experiencing a Medium magnitude of change and Moderate-Major adverse visual effects, reflecting the prominent influence of the Proposed Development upon residential views across this section of the valley.

10.3. This review concurs with the findings of the Applicant's RVAA but further determines that one property, assessed as experiencing a High magnitude of change and Major adverse visual effects, would reach the Residential Visual Amenity Threshold. This concerns Property 67: Beili, located just 74 m from the nearest proposed turbine, in a

[24] Landscape Institute and Institute of Environmental Management & Assessment (2013), Guidelines for Landscape and Visual Impact Assessment, 3rd Edition (GLVIA3), Routledge.
[25] Landscape Institute (2019), Residential Visual Amenity Assessment (RVAA), Technical Guidance Note 02/19, March 2019.

clear and elevated position on the western side of the Nant Bronfelan Valley. The principal outlook from the property is directed towards the Proposed Site, while its access track is also exposed to views of the development when arriving at and departing from the property.

10.4. The property was originally identified as having a financial involvement with the Proposed Development, which may help explain the positioning of Turbine 1, stepping down into the valley landscape and creating a particularly strong visual relationship with both the lower valley and the populated western slopes. Following clarification of the property's ownership, the Applicant reduced the height of Turbine 1 from 200 m to 180 m to mitigate visual effects. However, all six turbines would be visible from the property, with Turbine 1 visible to its base and appearing exceptionally close and remaining large in scale against the setting. From this location, the turbines would be seen against the field-patterned valley slopes, with little visual association with the larger-scale upland landscape beyond that might otherwise help accommodate their scale.

10.5. The strong visual connection across the valley, uninterrupted by intervening landform or vegetation, would create a profound sense of being within the development itself, rather than simply being situated nearby. The proximity, scale and distribution of the turbines would fundamentally alter the outlook and experience of the property, creating an overwhelming and pervasive presence. This review therefore concludes that the Step 4 threshold considerations identified within the RVAA guidance, namely "inescapably dominant" and "unpleasantly encroaching", would be met, and that the effects upon Property 67 would exceed the Residential Visual Amenity Threshold.

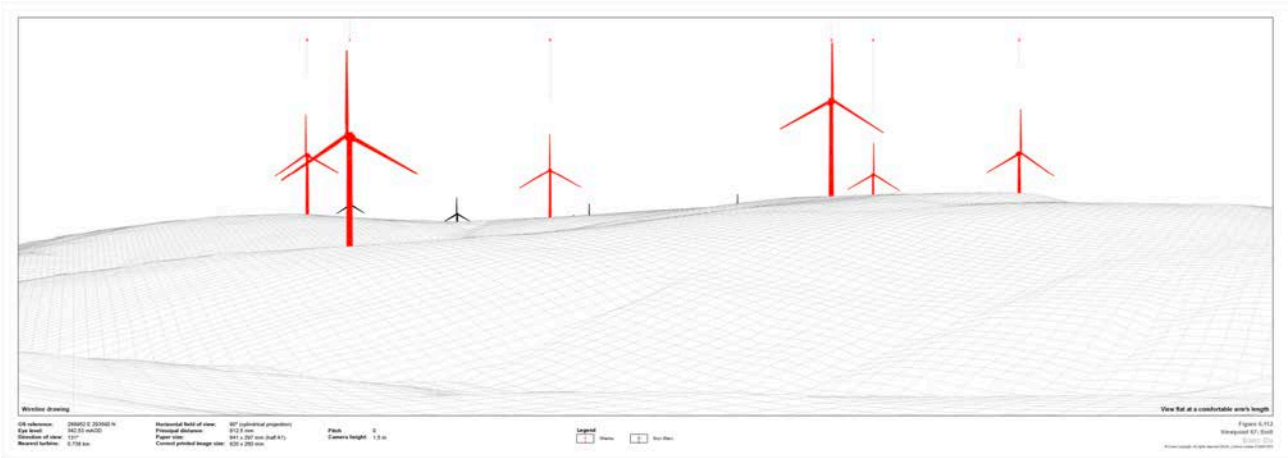

Figure 11: ***Residential Viewpoint 67: Beili.***
Source: RSK, Rhiwlas Energy Park Environmental Statement, Volume III, Appendix 6-3, Figure 6.112: Viewpoint 67: Beili. (2025). Reproduced for the purposes of independent landscape and visual assessment and critical review.

Figure 12: ***Image from Beili.*** *GR 288957E, 283588N. Depicting the pastoral, smaller-scale landscape setting of the Proposed Development, as viewed from the Nant Bronfelan Valley, and the continuity of landform across the valley, which contributes to the perception of development encroaching upon this property.*

Two existing Bryn Blaen turbines to hub height and one individual wind turbine are visual within the view (shown in black within the wireline above). The individual turbine to the right of the view would be required to be decommissioned prior to construction of Banc Du.

11.Aviation lighting

11.1. The Applicant's assessment of visible aviation lighting concludes that the Proposed Development would result in a Negligible magnitude of change and Minor, non-significant effects upon the Elan Valley International Dark Sky Park, increasing to a Low magnitude of change and Moderate-Minor, non-significant effects under the application cumulative scenario with Rhiwlas Energy Park. The assessment acknowledges the High sensitivity of the designation but places considerable emphasis on the absence of visibility from the five promoted stargazing locations and the limited accessibility of elevated areas where turbine lighting would be visible.

11.2. However, this review considers that greater weight should be afforded to the wider nocturnal landscape and perceptual qualities underpinning the designation, rather than concentrating principally on recognised viewing locations. The introduction of aviation lighting along previously dark upland horizons would alter the experience of darkness and remoteness, particularly where lighting from Banc Du and Rhiwlas would occupy an increased extent of the skyline. Furthermore, concerns identified within section 12 (below) of this review, regarding the Applicant's application of cumulative assessment methodology are equally relevant to the assessment of aviation lighting. The cumulative judgements should therefore be reconsidered, alongside an assessment of the combined effects of both developments, to establish their collective influence upon the protected dark sky environment and determine whether the conclusions regarding the significance of effects remain appropriate.

12.Cumulative Effects

12.1. This review identifies a recurring inconsistency in the application of the cumulative assessment methodology, despite the methodology itself being appropriately set out within the applicant's LVIA[26]. The assessment repeatedly appears to conflate the extent of cumulative interaction with the magnitude of change attributable to the Proposed Development. Where consented schemes are considered to exert little cumulative influence, the assessment frequently reduces the magnitude of change to Negligible and the resulting effects to Minor, rather than recognising that the effects of the Proposed Development would remain as per those identified in the main assessment. The limited influence of other schemes does not in itself, justify a reduction in the magnitude of change attributable to the Proposed Development. This inconsistency occurs across both landscape character and visual receptor assessments and represents a material methodological weakness, undermining confidence in the cumulative conclusions and creating the potential for a systematic understatement of adverse effects.

12.2. Best practice guidance states that "*The aim of the cumulative assessment is to identify the magnitude of additional cumulative change which would be brought about by the proposed development when considered in conjunction with other wind farms*"[27]. The principal assessment should establish the additional change attributable to Banc Du against each cumulative baseline. Therefore, what is the level of change when assessing against the cumulative baseline scenario. It is commonly found that where the Proposed Development is the dominant feature within the landscape setting or view, the introduction of the development into any future cumulative baseline would be of the same magnitude as the existing baseline. This may change where another development is very proximate, as the setting would be more heavily developed and levels of change may be reduced due to insertion into a more developed setting. However, if another development is sited at a similar distance, or appears at the same scale, it may result in an expansion of overall lateral extent, and increase levels of effects.

[26] Banc Du Energy Park Environmental Statement, Volume II, Chapter 6 LVIA - Appendix 6.1 – Methodology.
[27] NatureScot (2021), Assessing the Cumulative Landscape and Visual Impact of Onshore Wind Energy Developments, sections 'Assessing cumulative impacts' and 'Assessing cumulative landscape and visual impacts'.

12.3. The approach is neatly summarised within Landscape Institute Technical Guidance Notes, which detail the difference between additional and combined effects. It is assumed that the Applicant seeks to identify additional effects, as this would usually form the primary cumulative assessment. With regard to additional effects the guidance states that: "*This is typically assessed as the effect arising from the proposed development when considered against a baseline containing the other developments in the scenario being considered (i.e. what the effect of adding the project under consideration would be if Development X were already built).*"[28]

12.4. Furthermore, it would be appropriate to include an assessment of combined effects within the cumulative application scenario, to establish the full extent and significance of the cumulative impacts arising from both the proposed Banc Du and Rhiwlas schemes. An additional effects assessment does not reveal the overall combined impacts of the developments, but instead identifies the individual contribution of each scheme when introduced into an increasingly developed baseline. This can result in a reduction in the assessed magnitude of change and significance of effects, as the growing influence of existing or proposed wind energy development progressively alters landscape character and reduces susceptibility to further change. By contrast, a combined effects assessment considers the introduction of both schemes into the existing baseline, providing a clearer understanding of their collective influence upon landscape character and visual amenity, and the full extent and severity of the resulting cumulative effects. The Landscape Institute details that "*Typically a combined' cumulative assessment is only relevant where a decision-maker is likely to need to consider proposed developments together – for instance a conjoined appeal, or applications likely to be decided at the same planning committee session. In other situations, the 'additional' cumulative effects assessment will provide the information needed to understand the effects if another application has been recently consented".*

[28]Landscape Institute (2024), Notes and Clarifications on Aspects of Guidelines for Landscape and Visual Impact Assessment, Third E dition (GLVIA3), Technical Guidance Note LITGN-2024-01, Section 7(3): 'Additional or combined effects?', p. 19

12.5. Within the LVIA and Banc Du cumulative assessment, the general trend is for cumulative effects to be assessed as lower than the main assessment, which is highly unusual. Effects tend to be as per the main assessment, with a small number of effects increasing and decreasing. For example, within the assessment of LCA 23 Llyn Clywedog (the host landscape), the main assessment determines Moderate-Major and significant effects to 3.6km. Within the consented cumulative scenario it is detailed that "*these consented schemes will have little cumulative influence on the baseline…"*[29] and a determination of Negligible magnitude and Minor levels of effects is reached. This is incorrect and it appears to show that the applicant is assessing magnitude of cumulative interaction, which is neither an additional effects or a combined cumulative effects assessment. Within this scenario, if there is little influence from other schemes, the baseline will be much as per the existing baseline, therefore a Moderate-Major effect is expected, as per the main assessment.

12.6. Within the application scenario for LCA 23 the applicant identifies the introduction of the Rhiwlas scheme, but states that "*overall cumulative interaction is therefore intensified by the introduction of the Proposed Development*"[30]. This again appears to be an assessment of the degree of cumulative interaction, rather than the magnitude of change when introducing the Proposed Banc Du scheme into this scenario. The Applicant determined a medium-low magnitude, when it would remain as per the main assessment (High) within the local area, due to the stronger influence of the Banc Du scheme. If there is limited change to the baseline, or the Proposed Development remains an overwhelmingly dominant element, the levels of effect would again be as per the main assessment, at Moderate-Major.

12.7. When revieing the cumulative effects of the Banc Du scheme, this review determined that due to the isolation of the Banc Du scheme from consented schemes, there was little change to the baseline within a cumulative consented scenario. Within all assessment for landscape effects in this scenario, the limited changes in baseline resulted in levels if effects being the same as the main assessment.

[29] *Banc Du Energy Park ES*, Vol. II, Chapter 6: Landscape and Visual, para. 6.9.22, p. 59.
[30] *Banc Du Energy Park ES*, Vol. II, Chapter 6: Landscape and Visual, para. 6.9.23, p.60.

12.8. The application cumulative scenario would result in a broadly similar pattern of significant landscape and visual effects to those identified under the operational and under construction scenario, although with some notable increases in the level and geographical extent of effects. For landscape character, significant effects would extend further within LCA 24, from approximately 5 km to 12 km, due to the proposed Banc DU and Rhiwlas scheme being viewed as one larger development, intruding strongly onto the open uplands to the east of Pumlumon. Effects within LCA 34 would increase from Moderate to Moderate-Major and significant, due to perception of encirclement and a continuum of development along adjoining skylines. Conversely, effects within LCA 37 would reduce to Minor and non-significant levels, due to the dominant presence of the Proposed Rhiwlas scheme within the local landscape.

12.9. For visual receptors, increased effects are identified from several elevated recreational locations, most notably Viewpoint 12 at the summit of Pumlumon Fawr, where effects would increase from Moderate-Minor and non-significant to Moderate-Major and significant. This is similarly produced by the perception of the scheme of Banc Du and Rhiwlas as one larger development, asserting strongly within the upland landscape. Effects would also increase at Viewpoint 3 along the Wye Valley Walk, due to the expansion of development to both sides of the route, with a resulting sense of encroachment. However, reductions in the level of effect are identified at several other viewpoints, including Viewpoints 9, 10, 13, 14 and 18, while some locations would experience no additional cumulative interaction under the application scenario.

12.10. Overall, the application cumulative scenario would not result in a uniform increase in cumulative landscape and visual effects. Rather, the findings indicate a redistribution of effects, with greater influence across parts of the surrounding upland landscape and from prominent elevated viewpoints, while some locations closer to the Proposed Development would experience reduced additional cumulative effects, where the siting of the Proposed Rhiwlas scheme exerts a stronger visual influence.

13.Summary and Conclusions

13.1. This review identifies areas of agreement with the Applicant's Landscape and Visual Impact Assessment (LVIA), but concludes that the **extent and severity of adverse landscape and visual effects arising from the Proposed Banc Du Energy Park have been underestimated.** The principal concerns relate to the scale and siting of the proposed turbines within a sensitive transitional upland landscape, their relationship with the surrounding settled valleys, the extensive effects upon recreational receptors and residential visual amenity, and substantive methodological shortcomings within the cumulative assessment. Collectively, these findings raise significant concerns regarding the landscape and visual acceptability of the Proposed Development.

13.2. The **Proposed Development** would introduce five turbines of up to 200 m and one of 180 m in height into a relatively constrained upland landscape, bordered by smaller-scale pastoral valleys and visually connected to the surrounding Cambrian Mountains. The review considers that the **site selection and design process has not adequately reconciled the scale of the proposed turbines with the character and sensitivities of this landscape**. In particular, their prominent positioning along the Banc Du skyline, close proximity to settlement and substantial contrast in scale with the existing Bryn Blaen turbines would result in a dominant and, in places, discordant developed presence. These effects call into question the extent to which the final layout has successfully responded to established principles of sensitive wind farm siting and design.

13.3. The Applicant's LVIA identifies **significant adverse landscape character effects**, but this review determines that these would be more geographically extensive, affecting a greater number of landscape character areas. Additional significant effects are identified within LCAs 24, 31, 34 and 37, together with an extended geographical influence within LCAs 23 and 30. Significant effects would extend approximately 7 km into the elevated landscape of LCA 31 and approximately 6 km northwards within LCA 23. Of particular concern is the influence of the Proposed Development upon the visual and perceptual relationship between the surrounding uplands and the Upper Wye and Severn Valleys, where the turbines would appear disproportionately large against the smaller-scale

pastoral landscapes and enclosing skylines. These findings indicate that the landscape effects cannot reasonably be characterised as confined principally to the immediate site and adjoining uplands.

13.4. This review agrees with the Applicant's conclusion that significant adverse effects would not arise upon **SLA 12: Northern Uplands** as a designated landscape receptor. Nevertheless, significant visual effects would be experienced from prominent elevated locations within the wider uplands, including Pumlumon Fawr, particularly under the application cumulative scenario. These effects would diminish the experience of expansive views, remoteness and tranquillity from affected locations, even where the overall qualities underpinning the SLA designation would remain legible.

13.5. The **visual assessment** identifies a widespread pattern of significant adverse effects affecting residential communities, recreational routes and elevated viewpoints. The review determines additional significant effects at Viewpoint 2 in Llangurig, with higher levels of effect also identified at several other viewpoints. The scale and prominence of the turbines would be particularly apparent within the Nant Bronfelan and upper Severn Valleys, where they would occupy the enclosing skyline and contrast strongly with the smaller-scale field pattern, woodland and dispersed settlement. These effects would substantially alter the rural outlook experienced by residents and visitors across a wider area than that identified by the Applicant.

13.6. **Recreational receptors** would be particularly affected. Significant adverse effects are identified along approximately 19 km of National Cycle Route 8, together with the substantial effects acknowledged along the Wye Valley Walk. The elevated alignment and generally slower pace of travel along the Wye Valley Walk would provide sustained opportunities to experience the Proposed Development as a prominent and intrusive feature within views across the valley and adjoining uplands. The review also identifies a significant omission in the assessment of the Prince Llewelyn Ride, a promoted long-distance equestrian route which passes directly through the Proposed Site, within approximately 80 m of the nearest turbine. Major adverse visual effects are determined along approximately 4 km of this route, with significant effects extending across approximately 14.5 km. The proposed upgrading of part of the route as a development

access track would further alter its character and recreational experience. The failure to assess this receptor adequately represents a substantive deficiency in the Applicant's LVIA.

13.7. With regard to **residential visual amenity**, this review broadly agrees with the Applicant's assessment findings but identifies one property, Beili, where the effects are considered capable of reaching the Residential Visual Amenity Threshold. The property's close proximity to the Proposed Development, its principal outlook towards the turbines and the perceived continuity of the landscape across the Nant Bronfelan Valley would create an experience of development that is potentially inescapably dominant and unpleasantly encroaching. More widely, the concentration of residential receptors experiencing high levels of adverse visual effect within the Nant Bronfelan and upper Severn Valleys adds considerable weight to the concerns regarding the suitability of the site and turbine arrangement.

13.8. The **cumulative assessment** contains a recurring methodological weakness whereby the limited visual interaction between the Proposed Development and other wind energy schemes appears to have been used to justify reductions in the magnitude and significance of effects attributable to Banc Du. This approach does not adequately distinguish the additional effects of introducing the Proposed Development into a cumulative baseline from the degree of visual interaction between schemes. In particular, where other developments exert limited influence upon the baseline, the effects attributable to Banc Du would generally be expected to remain comparable to those identified in the main assessment. The review therefore considers that the Applicant's cumulative assessment systematically understates effects for a number of landscape and visual receptors and does not provide a sufficiently reliable account of the additional cumulative change.

13.9. The **relationship between Banc Du and the proposed Rhiwlas Energy Park** is of particular concern. Under the **application cumulative scenario**, the two developments would frequently be perceived as a larger and more extensive concentration of wind energy development, increasing the developed character of adjoining skylines and the sense of encroachment upon surrounding upland landscapes. The review identifies an

increased geographical extent of significant effects within LCA 24, extending to approximately 12 km, and an increase to Moderate-Major significant effects within LCA 34. For visual receptors, increased effects are identified at the summit of Pumlumon Fawr and along parts of the Wye Valley Walk. Although the additional effects attributable to Banc Du would reduce at certain receptors where Rhiwlas would exert a stronger influence upon the cumulative baseline, this should not be interpreted as a reduction in the overall combined landscape and visual effects of both developments. A clearer assessment of their combined influence would assist the decision-maker in understanding the full extent and character of cumulative development within this landscape.

13.10. Taken together, the findings demonstrate that the landscape and visual impacts arising from the Proposed Development would be **substantial and geographically extensive**. The adverse effects would not be limited to isolated viewpoints or the immediate host landscape but would affect the character and experience of interconnected upland and valley landscapes, settled communities and an extensive network of recreational routes. Of particular importance is the concentration of significant effects arising from the juxtaposition of large-scale turbines with smaller-scale pastoral landscapes, their prominence upon enclosing skylines and their close relationship with residential and recreational receptors. These effects are inherent to the scale and siting of the Proposed Development and would not be readily addressed through minor amendments to layout, or small adjustments to turbine scale.

13.11. Whilst the **determination of planning acceptability** requires consideration of the wider policy context and the benefits of renewable energy generation, the scale, severity and geographical extent of the landscape and visual effects identified within this review should carry substantial weight in that balance. The findings raise serious questions as to whether the Proposed Development has achieved an appropriate response to its landscape setting and whether the resulting adverse effects upon landscape character, visual amenity and nearby communities can be considered acceptable. The cumulative relationship with Rhiwlas further reinforces these concerns, particularly regarding the progressive introduction of large-scale wind energy development across adjoining upland skylines.

13.12. **Overall,** this review concludes that the Proposed Banc Du Energy Park would give rise to a materially greater extent of significant adverse landscape and visual effects than reported in the Applicant's LVIA. The identified underassessment of receptors, omission of the Prince Llewelyn Ride, potential breach of the Residential Visual Amenity Threshold at Beili and substantive deficiencies within the cumulative assessment undermine confidence in the Applicant's conclusions. Beyond these assessment shortcomings, the review identifies fundamental concerns regarding the ability of the landscape to accommodate the proposed turbine scale and arrangement without unacceptable adverse consequences for its character and the visual amenity of surrounding communities and recreational users. Accordingly, the landscape and visual acceptability of the Proposed Development has not been adequately demonstrated, and these matters should be afforded substantial weight in determining whether consent should be granted.

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