

RESIDENTS AGAINST THE CF3 INCINERATOR
A RESPONSE TO
THE MOR HAFREN LANDSCAPE and VISUAL IMPACT ASSESSMENT

INTRODUCTION

This document is a response to the applicant's Landscape and Visual Impact Assessment document, which supports their planning application (DNS/3236340) for an incinerator at Newlands Road, Cardiff.

OVERALL MASSING AND SCALE

The applicant states at paragraph 8.4.4:

"The Energy Recovery Facility will add to the overall physical massing and height of the built environment within the area".

What will the ERF add to the overall physical massing and height of the built environment within the area?

The applicant's assessment provides no illustration or graphic of what the ERF will add. We thought the graphic used in our campaign to raise awareness helpfully illustrates this point, see below.



In terms of the context of the surrounding built area, one of the nearest buildings, located at 1.5km to the proposed development site, is the Aldi warehouse, a regional distribution centre, which was granted planning permission in 2014.

The height of this building is 18m, similar to Eastern High in the graphic above.

In the planning context, concerns were raised during the determination of their planning application, because the proposed Aldi warehouse building was much larger than any of the surrounding buildings on the industrial estate.

Eastern High school is 500m from the development. It is the closest school, with another 4 schools in close proximity.

We observe and comment that the applicant's proposed ERF is of a mass and scale, which is unique to the surrounding industrial areas and protected areas. The topography of the surrounding land is flat, which heightens the significant visual impact and if approved would set a dangerous precedent.

We comment that the applicant's assessment and viewpoints do not take into consideration the impact of the ERF's unique mass and scale on educational facilities in close proximity to the development site.

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OTHER IMPACTS – LIGHTING

The applicant states at paragraph 9.1.7:

*“Lighting will be used only where and when necessary and measures have been taken to ensure that the proposed development will not be lit 24 hours a day **to reduce the impacts of night-time lighting**”.*

We understand that all structures exceeding 45m above the ground must be appropriately marked with aviation warning lights.

The proposed ERF's chimney at 70m height **will require aviation warning lights**.

We have been unable to find any information or details in the applicant's planning application documents on this matter.

This requirement **will not reduce the impact of night-time lighting** so we find the applicant's statement misleading.

We comment that the applicant's LVIA assessment has not given this matter due consideration and calls into question the robustness of this assessment. We request this matter is given due consideration and included in the LVIA assessment prior to the determination of the planning application.

STUDY AREA & VIEWPOINTS

STUDY AREA

The applicant states at paragraph 1.3.2 and 1.3.3:

“The study area comprises an area within a circa 5km radius from the site within which the visibility of the site is assessed. 5km was defined as the outer limit for the assessment even though the development will be seen beyond this limit, it has been assumed that the effects will be not significant beyond this limit, as the development will blend into the background of any view beyond the 5km as this assessment will set out”.

“The study area comprises an area within a 5km radius from the development site and extends:

- *To the north – the village of Cefn Mably*
- *To the east – the village of St Brides Wentlooge*
- *To the south – The River Severn Estuary*
- *To the west – The centre of Cardiff, specifically Cathays ad Roath Park”*

We note that the furthest viewpoint taken into consideration is 3.2Km from the site on Rover Way and there are no viewpoints taken from the points stated above.

We also observe and comment that although the study area is stated as comprising an area of 5km radius, all but 2 of the 19 viewpoints are within a 2km radius. This mismatch is not explained and calls into question the robustness of the applicant's assessment.

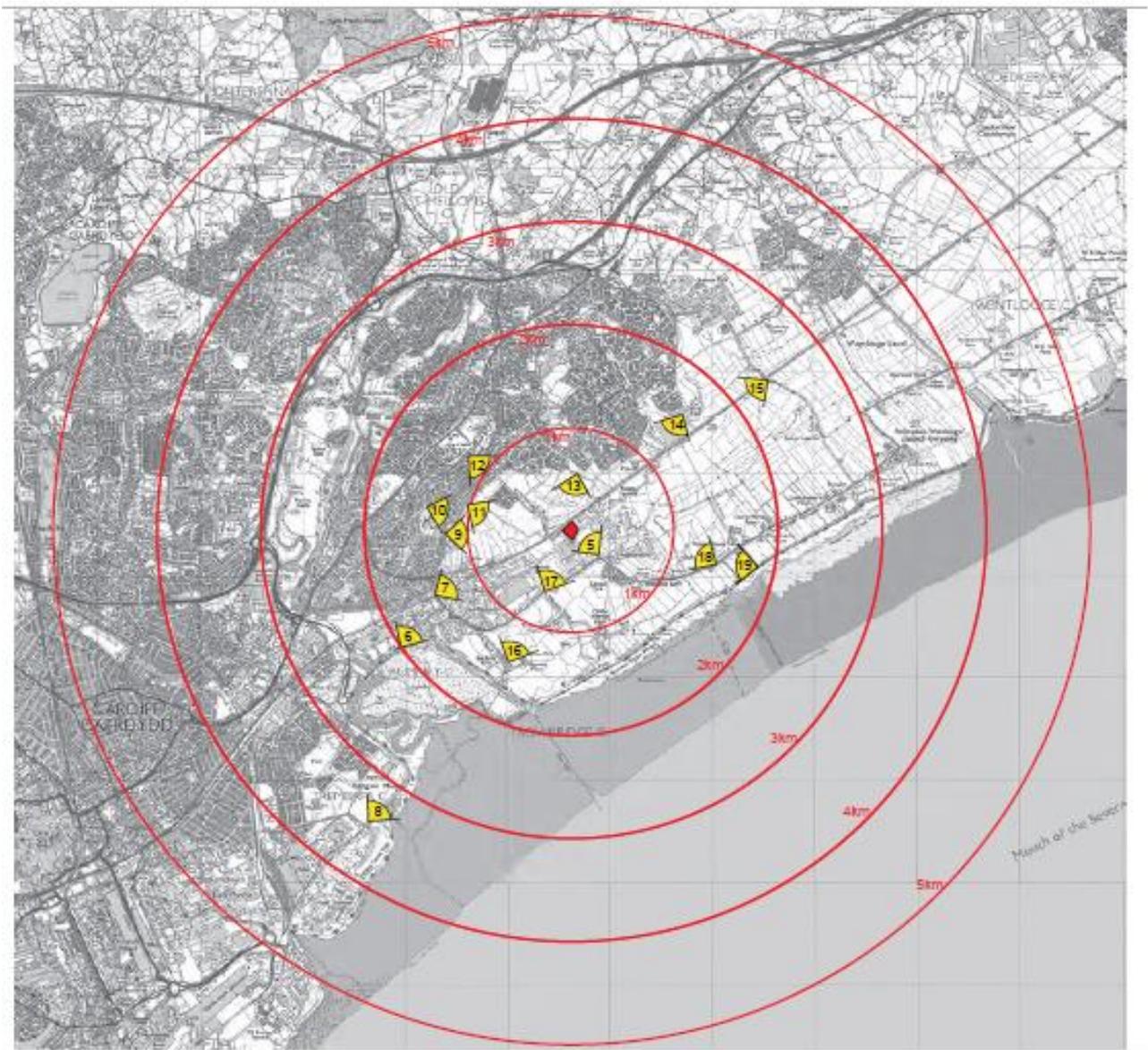
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VIEWPOINTS

The applicant states at paragraph 8.2.1:

*“The assessment of potential visual impacts is, primarily, focused upon the proposed development, placed within its visual context. The general conclusion is that, **in a localised context, potential visual impacts would arise**, however when seen in an increasingly broad context, **these impacts are of moderate / minor significance or not significant**. The extent within which this transition to not significant would occur is considered to be within 3-4km of the application site”.*

The applicant’s LVIA assessment shows the locations of the viewpoints taken into consideration, see below.



We assume viewpoints 1, 2, 3, and 4, between 20m and 130m from the site, are not shown as the scale of the graphic is too small.

We do not understand the applicant’s claim that, *“however when seen in an increasingly broad context, **these impacts are of moderate / minor significance or not significant**”.*

The LVIA assessment rates each viewpoint by Sensitivity and Significance as per the table, see below, which we have created from the applicant’s LVIA assessment below.

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| Viewpoint | Sensitivity | Significance | Distance |
|-----------|-------------|----------------|----------|
| 9 | High | Major/Moderate | 1120m |
| 11 | High | Major/Moderate | 950m |
| 12 | High | Major/Moderate | 1155m |
| 13 | High | Major/Moderate | 480m |
| 14 | High | Major/Moderate | 1495m |
| 19 | High | Major/Moderate | 1785m |
| 3 | Moderate | Moderate | 127m |
| 4 | Moderate | Moderate | 22m |
| 10 | Moderate | Moderate | 1330m |
| 15 | Moderate | Moderate | 2370m |
| 16 | Moderate | Moderate | 1315m |
| 18 | Moderate | Moderate | 1400m |
| 6 | Moderate | Moderate/Minor | 1926m |
| 7 | Moderate | Moderate/Minor | 1370m |
| 8 | Moderate | Moderate/Minor | 3220m |
| 1 | Low | Moderate/Minor | 43m |
| 2 | Low | Moderate/Minor | 25m |
| 5 | Low | Moderate/Minor | 220m |
| 17 | Low | Moderate/Minor | 465m |

The Significance criteria are defined as:

MAJOR: Very large or large change in environmental or socio-economic conditions. Effects, both adverse and beneficial, which are likely to be important considerations at a regional or district level because they contribute to achieving national, regional or local objectives, or, could result in exceeding of statutory objectives and/or breaches of legislation.

MODERATE: Intermediate change in environmental or socio-economic conditions. Effects that are likely to be important considerations at a local level.

We observe and comment that there are 6 viewpoints rated as High Sensitivity and Major/Moderate Significance between 500m and 1.8 km from the site.

These are, in the main, viewpoints that the residential areas of Rumney, St Mellons and Trowbridge and schools in close proximity, e.g. Eastern High, will have of the proposed ERF's mass and scale.

Based on the Significance criteria definitions and the viewpoint assessments we do not agree with the applicant's general conclusion that **"these impacts are of moderate/minor significance or not significant"** for these communities or schools.

63% of the viewpoint assessments are either Major/Moderate or Moderate, which means they could result in exceeding of statutory objectives and/or breaches of legislation or are likely to be important considerations at a local level.

We also do not understand how the conclusion of "a transition to not significant at a distance of 3 to 4 km's" will occur when there is only 1 viewpoint taken into consideration at this distance.

Additionally, we note that the applicant's LVIA assessment has not given due consideration to the Travellers site, close to the site, or the residential population of St Mellons.

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CONCLUSION

The applicant states at paragraph 9.1.8:

“Where the visual impacts of the proposed development have been assessed to be the highest the impacts are considered to be sufficiently localised and contained that the impacts are acceptable”.

We comment that we consider that the following points have not been given due consideration:

- The overall scale and massing of the proposed ERF building is unique within the localised industrial area.
- The impact on the surrounding residential areas and schools is not robust enough as certain viewpoints from these areas have not been assessed within the 5km study area.
- Aviation warning Lighting of the chimney stack has not been taken into consideration.
- The assessment’s conclusions lack a balance of the impact on the localised industrial area with the residential areas and schools in close proximity to the site.

We therefore request that the applicant addresses these concerns and presents a Landscape and Visual Impact Assessment, which is truly representative, robust, and identifies all the impacts of the proposed ERF, prior to determination of the application.