AGENDA ITEM 10

APPENDIX 3

2018/0378/PAC

SNH ADVISORS COMMENTS

Annexe 3 – Effects on the Cairngorms National Park (CNP) and Wild Land Area 16 - Lochnagar and Mount Keen (WLA16)

A3.1 As presented on EIA R Figure 6.7, the majority of the WLA 16 is contained within the boundary of the CNP and therefore contributes substantially to the Special Landscape Qualities (SLQs) of the National Park, in particular qualities of wildness, remoteness and naturalness. In this context, for the most part advice on the impacts of the development on wild land will be considered under the wider consideration of impacts on this SLQ of the National Park.

A3.2 The extent of the WLA extends eastwards and southwards beyond the Park boundary corresponding to high massif of the Hill of Saughs (east of Mount Keen) and White Hill/Hill of Glansie enclosing Glen Clova to the east. Impacts upon these two areas, for which there is predicted visibility from the upper slopes and summits, is considered in paras. 3.20 – A3.22 below.

A3.3 The site boundary (and nearest turbine) is located 10km from the CNP. However most areas of visibility to the development are displayed on the west facing slopes of the immediate and wider hills surrounding Loch Lee, including but not limited to Mount Keen (Scotland's most easterly Munro), Easter Balloch, Muckle Cairn and Ben Tirran (which coincide broadly with wild land Areas D and E[8]). As previously mentioned, Lochnagar and the immediate mountainous massif also display visibility which is restricted to upper slopes and summits (corresponding to Area A of the WLA assessment).

A3.4 The following viewpoints assessed within the EIA Report are of relevance (distance to the development noted):

- Shank of Inchgrundle (18.5km)
- Mt Keen (17km)
- shores of Loch Lee (15.4 km)
- Ben Tirran (21.9km)
- Cairn o Mount (outside the NP at 3.6km but views westwards to the CNP and WLA) and
- Lochnagar (35km).

Assessment Methodology to consider impacts on the CNPA SLQs

A3.5 Apart from the Cairn O Mount viewpoint where the visual effects are judged to be major significant, and the Loch Lee viewpoint where the visual effect is stated as negligible (not significant) the effect of the Glendye Wind Farm on the other viewpoints is judged within the EIA Report as minor and not significant.

A3.6 The viewpoint assessments and the landscape assessments are a reasonable interpretation of the level of effects given the established GLVIA methodology.

A3.7 However the SLQ assessment contained within the EIA Report focusses strongly on the findings of the main LVIA, in particular LCA boundaries and the viewpoints, as opposed to assessment in relation to the 'perceptual' aspects inherent in SLQs.

A3.8 The study areas selected for the SLQ assessment reflect the LCA boundaries. The SLQ assessment concludes that the area where the experience of SLQs may be affected is limited to the west of Glen Esk, encompassing parts of the Upper Glen Esk LCA and the Angus Glens LCA. The assessment predicts that these LCAs will not experience significant effects on their SLQs. **However SLQs are perceptual qualities which are experienced**

[8] Two of the five Study Areas identified to assess the impacts of the development on WLA 16 – contained within EIA Report Appendix 6.3 Wild Land Assessment.

by people and not by the landscape. To inform this aspect it would have been helpful if the effects on SLQs had also been assessed on-site at the viewpoints.

A3.9 It is therefore considered that the SLQ assessment does not fully inform the likely extent and nature of effects arising from the proposed wind farm, and could therefore underestimate the assessment of effect.

Mitigation

A3.10 As detailed in para.7.3 above, we recognise the mitigation embedded within the design of the development to reduce the visibility of the development (turbine numbers and extent) from locations within the CNP (and in turn WLA).

A3.11 However in opting to locate the turbines in a natural bowl-like landform, the instances of where the turbines will be visible, backclothed by a contrasting darker background (in particular from the higher massif to the west) will be increased. As discussed above, the contrast of the tall light vertical structures with rotating components, are considered to increase the prominence and perceived vertical height of the wind turbines when seen from within the Park and WLA. As such this design approach to siting increases rather than mitigates effects on the Park and WLA.

Effects on the CNP and underpinning Wild Land attributes

A3.12 Mt Keen and Ben Tirran and the Shank of Inchgrundle. Though the character of the landscape that extends across the Park boundary from these high points is broadly similar, the turbines which will be clearly visible (at distances of 17km to 22km) are seen to be associated with the lower hills and more managed landscapes that descend away from the Park (largely beyond the actual Park boundary) towards the coast. The experience of the following SLQs are likely to be affected; the layers of receding ridge lines, grand panoramas, the surrounding hills and extensive moorlands, sense of wildness and a landscape of layers from inhabited strath to uninhabited upland. At present existing wind energy development is experienced on the fringes of the views namely Midhill, Tullos and Drumderg.

A3.13 Glendye wind farm would introduce a prominent new feature into the panoramic views which will draw attention away from other focal points including neighbouring Mount Battock, Mount Keen, and Lochnagar, will interrupt the receding ridgelines and layers of the landscape experienced, and introduce the experience of development onto an uninhabited upland.

A3.14 The effects on the experience of these SLQs will be adverse and the magnitude of change likely to be introduced higher than predicted in the EIA Report. However for the majority of SLQs the effects are considered to be moderate and not significant owing to the distance to the development and the wider context within which they would be experienced i.e. with 360 views including those towards the interior of the Park. Moderate significant effects are considered to result from the development, on the SLQs of wildness which take cognisance of the predicted moderate significant effects on WLAs D and E.

A3.15 Loch Lee - From a few places along the track that follows the northern shore of Loch Lee, 3 part- blades will be visible. The Loch Lee view point has been used in the optioneering process and it is recognised that the number and spread of turbine blades visible has been reduced through the design process. However, it remains that visibility of these blades is penetrating into the lower parts of the National Park. Fortunately existing and soon-to-be planted woodland will help to screen bits of the blades, but Loch Lee is a much-visited location within the National Park and sky-lining and moving turbine blades where none previously existed will intrude into people's experience of the SLQs. The SLQs likely to be affected here would be; landscapes both cultural and natural, the surrounding hills, extensive moorland, beautiful lochs, grand panoramas and framed views, attractive and contrasting textures. It is considered that the effects on the experience of these SLQs will be adverse, slight but not significant from Loch Lee.

A3.16 From the Cairn O Mount viewpoint - SLQs typically associated with the Cairngorm massif; the unifying presence of the central mountains and an imposing massif of strong dramatic character will be experienced, in particular encompassed in views to Lochnagar and Mount

Keen on clear days. These SLQs will contribute to the more immediate experience of the viewpoint and how it is experienced in terms, in particular as part of the sequential journey crossing the uplands between the Howe of Mearns to Deeside.

A3.17 In the view from Cairn o Mount the turbines will be introduced onto the plateau that provides the foreground to more distant views to the CNP, which contribute to the interest and drama of this location. At 3.5kms both turbines and track infrastructure will be clearly visible and dominant in the view. Whilst the bulk of the turbines will be backclothed by the immediate moorland, on a clear day the dramatic upland views to distant Munro summits and the Cairngorm massif will be significantly intruded upon by the vertical turbine towers and rotating blades. Introduced in close proximity in the foreground, the turbines will significantly diminish the scale of these mountains and their contribution to the backdrop of the Eastern Mounth.

A3.18 Due to distance and scale it is unlikely that the effect on those SLQs of the Park will be significantly affected. However the wind farm will introduce a new uncharacteristic focus, the prominence of which will detract from the appreciation of the western extent of the Park, in particular its summits, and its contribution to the scale of the wider Eastern Mouth landscape.

A3.19 In summary moderate significant effects have been identified on the wildness SLQs of the Park (and underpinning WLA). However it is considered that the majority of these effects are more relevant to the consideration of how the wind farm is perceived in relation to and impacts on, the intervening Eastern Mounth landscape (which contributes to the wider SLQs of the Park and experience of wild land) than on the Park and Wild Land Area alone. In this context it is considered that the impacts identified on the protected landscapes assessed do not raise issues of National Interest for SNH.

Extent of WLA 16 beyond the CNP boundary and SNH Relative Wildness mapping

A3.20 SNH Relative Wildness mapping illustrates that the two areas of WLA16 not included within the Park, reflect areas of upland which extend in two spurs out beyond the Park as detailed in para. 3.2, above.

A3.21 Of relevance, in particular with regard to the landscape character of the site and wider Eastern Mounth, the high relative wildness scores captured within the Mount Keen 'spur' of WLA16, continue across the upland of the Eastern Mounth running across Mount Battock to Clachnaben and south to Sturdy Hill. The relative wildness scores are underpinned in particular by the *Rugged and Challenging Terrain* and *Lack of Built Artefacts* attributes modelling. The development and viewing context to the development, all sit within this area of high relative wildness and contribute to the significance of effects assessed. More recent man-made influences, for example the multiple access tracks running up from Glen Esk, will erode the '*Lack of Built Artefact*' qualities when experienced on site. However these tracks are considered to have a relatively 'light' imprint on the landscape (owing to their narrow alignment following hill spurs or glen) in contrast to the much wider access tracks in a dense network with greater areas of disturbance, that are required for the construction and operation of a wind energy development.

A3.22 Key landscape characteristics of the Eastern Mounth landscape and the Clachnaben and Forest of Birse SLA reflect these high relative wildness scores.