



# Agenda item 9

## Appendix 3

2025/0202/PAC – (ECU00004862)

NatureScot comments



Eleanor McKechnie  
Senior Case Officer  
Energy Consents Unit  
Response by email to Econsents\_Admin@gov.scot

Your ref: ECU00004862  
Our ref: CDM181359  
Date: 26<sup>th</sup> January 2026

Dear Eleanor,

**The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 Electricity Act 1989 Section 36 application for Dorenell Extension Wind Farm.**

Thank you for your consultation on the above proposal dated 15<sup>th</sup> August 2025. We provided our response on 14<sup>th</sup> November however we requested additional time to provide our advice on landscape and visual impacts. Thank you for allowing us additional time to respond. Our advice below is given in relation to landscape and visual impacts only.

**Summary**

**The proposal, as currently submitted, would have significant adverse effects on the special qualities of the Cairngorms National Park such that the objectives of the designation and overall integrity would be compromised. Significant effects could be mitigated by incorporating the changes as set out below. We therefore object to this proposal unless it is made subject to these changes.**

**Appraisal of the impacts of the proposal and advice**

Cairngorms National Park (CNP)

The proposed wind farm would be located on the east and north-facing slopes of the Cabrach basin in the Moray Council area. It would comprise 67 wind turbines, 149.9 m to 250 m high to blade tip with a generating capacity of over 50 MW. The closest turbines would be sited around 0.5 km from the CNP boundary.

Our advice on the landscape and visual impacts of this proposal focuses on the potential for significant effects on the Special Landscape Qualities (SLQs) of the CNP. In accordance with our *Agreement on roles in advisory casework between NatureScot and Scottish National Park Authorities*<sup>1</sup>, for proposals outside the Park, we lead the provision of advice on the effects of this proposal on the National Park's SLQs.

1- <https://www.nature.scot/doc/agreement-roles-advisory-casework-between-naturescot-and-scottish-national-park-authorities>.

**The scale, size and location of this proposal would result in significant adverse effects on the Special Landscape Qualities of the Cairngorms National Park. We advise that the proposal may therefore not meet Policy 4c of National Planning Framework 4 (NPF4) due to the extensive nature of effects on the Glenbuchat and the Braes of Glenlivet areas within the Park.**

**We advise that redesigning the proposal following these recommendations would mitigate the effects on the SLQs:**

- **Removal of turbines 35, 51, 55 and 57 to reduce prominence from VP 7 and VP 11**
- **Removal or relocation of turbine 80 so it is not visible from VP 6**
- **Removal, relocation and/or a reduction in size of turbines 23 and 26 to reduce prominence from VP 12**
- **Removal of at least six wind turbines visible above hub height from VP 9 including turbine 48**

We also recommend that the Applicant should consider the use of radar activated lighting to further mitigate visible aviation lighting. However, please note that this is advice only and a condition requiring this is not necessary to remove our objection.

More detailed advice is provided in Annex 1 to this letter.

It is difficult to identify the specific turbines from some viewpoints as the numbers on the wirelines do not appear to line up. We therefore advise that you clarify turbine numbers with the applicant.

The advice in this letter is provided by NatureScot, the operating name of Scottish Natural Heritage.

Please let Gavin Shaw (Gavin.Shaw@nature.scot) know if you or the Applicant require any further information or advice from us in relation to this proposal.

Yours sincerely

Graham Neville

Head of Operations - North

## **Annex 1**

### **Dorenell Extension Wind Farm – Landscape and Visual Appraisal for NatureScot – December 2025**

#### **Introduction**

This appraisal of the proposed Dorenell wind farm extension has been undertaken by Carol Anderson, landscape consultant to NatureScot. It is based on a review of the Environmental Impact Assessment Report (EIA-R) and informed by visits to parts of the Cairngorms National Park (CNP) where visibility of the proposed development is likely to occur. This appraisal principally focuses on the effects of the proposed development on views from within the CNP and on the character and the Special Landscape Qualities (SLQs) of the Park. Additional commentary is provided on the landscape and visual effects of the proposed development on the Cabrach area within Moray which lies outside the CNP.

#### **The Proposed Development**

The proposed wind farm would be located on the east and north-facing slopes of the Cabrach basin area in Moray Council area. It would comprise 67 wind turbines, 149.9m to 250m high to blade tip, access tracks, substation and energy storage facility, borrow pits and battery storage. Visible aviation lighting would be affixed to 17 of the turbines. Dimming and reductions in vertical directional intensity of lighting would be adopted and the Applicant has additionally stated that they would accept a condition for retrospective installation of a transponder activated lighting system when technically feasible to do so. The Proposed Development lies adjacent to the operational Dorenell wind farm which comprises 59 turbines, 126m high to blade tip.

#### **The Design of the Proposed Development**

The Proposed Development comprises a wind farm with turbines of varied sizes. The majority of the proposed wind turbines would be over 220m high to blade tip (19 wind turbines extend to 250m high) with just two wind turbines below 150m to blade tip. There is no detailed description of the design rationale adopted for the positioning of different sized turbines, but smaller turbines appear to be located closer to the boundary of the CNP in some areas (Figure 3.7 Layout Evolution). Chapter 3 of the EIA describes the design evolution of the proposal and appears to indicate that reduced tip heights of turbines have been used to minimise effects from key viewpoints within the CNP.

The Design Statement includes a series of comparative wirelines showing the differences between key design iterations of the wind farm. It is noted that improvement has occurred to the very congested appearance of the 97-turbine Scoping Stage scheme in views from the CNP with the current application particularly avoiding some of the severe intrusion associated with this earlier scheme in views from lower-lying roads, settlement and visitor destinations within Glenbuchat and Glenlivet. Significant intrusion associated with the proposed large array of very large wind turbines and ancillary infrastructure would however persist from more elevated views located within the north-eastern margins of the CNP.

I consider that the design strategy adopted for the Proposed Development does not go far enough in its objective of restricting visibility of wind turbines from low-lying areas, glens and valleys within the CNP (as stated in EIA-R paragraph 5.8.3). It would also not alleviate severe intrusion from more elevated views from the uplands lying on the north-eastern edges of the CNP.

Biodiversity enhancement measures are proposed as part of the Proposed Development. These include cessation of muirburn on the site, peatland enhancement, management of grazing, enhancement of riparian corridors including creation of broadleaved woodland and establishment of scrub and improvements to inbye-grassland. These measures, and the associated proposed Landscape Mitigation Plan, apply to the proposed development site and the Cabrach area in Moray and not the CNP.

### **The information included in the Landscape and Visual Impact Assessment (LVIA)**

The methodology used for the LVIA accords with best practice set out in the Guidelines for Landscape and Visual Impact Assessment, Third Edition. The Zone of Theoretical Visibility (ZTV) maps provided are clear. The day-time photomontage visualisations accord with best practice guidance and present an accurate representation of the proposed development. Night-time visualisations have been prepared from two viewpoints within the CNP. I consider that the night-time photomontages provide less of an accurate representation of what is likely to be seen in the field and should be treated with caution (as stated in paragraph 81 of NatureScot's Guidance on Aviation Lighting Impact Assessment).

The visualisations and ZTV mapping are clear and well-presented although some of the numbered wind turbine wirelines are difficult to read due to the large number of wind turbines proposed and the diagonal lines used to indicate wind turbine numbers.

### **Visibility of the proposed development from within the CNP**

The Proposed Development would be largely seen across the Glenbuchat and Braes of Glenlivet area and from the hills which contain and divide these two settled glens/basins in the north-eastern part of the CNP. While the Proposed Development would be likely to be visible from more distant hill summits and elevated ground lying closer to the core of the CNP, the effect on these views would not generally be significant due to the distances involved and also because of various other factors, including the presence of other distant wind farm developments in views and the nature of views from some hills, for example Ben Avon (VP 23), where the focus of the viewer would be on the surrounding Cairngorm massif and not on the more subtle and distant north-eastern hills of the CNP.

Visibility of 1-9 wind turbines would occur within Glenbuchat with wind turbine blades and some hubs being seen on the skyline of northerly containing hills from minor roads, settlement, promoted recreational routes and visitor attractions at distances of between 2km and 6km. The operational Dorenell wind farm is already visible in some views from Glenbuchat although the very limited number and the size of these visible existing wind turbines does not result in significant intrusion.

There would be some visibility of 1-9 of the proposed wind turbines from minor roads, settlement and promoted recreational routes within the Braes of Glenlivet basin seen at distances of between 6km and 8km. A greater number of turbines would be seen (theoretically up to 34 indicated on EIA-R Figure 5.2e) from the Glenlivet Estate promoted recreational routes traversing higher ground such as The Bochel Circuit within the Braes of Glenlivet area. Similarly extensive visibility of the Proposed Development would also occur from the hills which contain the southern edge of Glenbuchat with the singular peak of Ben Newe (EIA-R Viewpoint 11) being the most sensitive of these summits because it forms the destination of a promoted walk.

A substantially greater number of the proposed wind turbines would be seen in close proximity from the northerly Ladder Hills lying between the Braes of Glenlivet and Glenbuchat and from the lower hills which form the north-eastern boundary of the CNP. Between 60-67 of the proposed wind turbines would be seen from the highest summits and ridges of these hills. While the operational Dorenell, Clashindarroch and Kildrummy wind farms are already visible from these hills, the Proposed Development would lie much closer and comprise a significantly more extensive array of larger turbines than these existing developments.

### **Effects on landscape character within the CNP**

Three Landscape Character Types (LCTs) lying in the CNP are considered in detail in the LVIA. These are the *Smooth Rounded Hills*, the *Upland Glen: Glenbuchat* and the *Farmed Straths and Glens* which are defined in NatureScot's national landscape character classification. EIA-R Figure 5.4a shows the location of these LCTs. Table 5.19, within the LVIA summary of effects, concludes that no significant effects would occur on any of these three, and other, LCTs lying within the CNP. The detailed commentary in Table 5.11 appears to indicate that significant adverse effects would arise on the *Smooth Rounded Hills* LCT close to the boundary of the Park but then concludes that effects on this LCT would be moderate to minor and not significant.

I consider that the LVIA under-estimates effects on the landscape character of the north-eastern part of the CNP. I disagree that effects on the *Smooth Rounded Hills* LCT would not be significant due to the greatly increased extent and size of turbines within the Proposed Development and their proximity to the higher summits and ridges where visibility would occur. While the magnitude of change would be reduced because of the influence of the nearby operational Dorenell wind farm (and to a lesser extent the operational Kildrummy and Clashindarroch wind farms) on this LCT, I consider that the substantial increase in the extent and size of wind turbines that would be associated with the Proposed Development, and its closer proximity to these uplands, would result in a significant effect on a high sensitivity landscape extending to around 4km. EIA-R Viewpoint 3 from Little Geal Charn in this LCT illustrates the increase in effect that would be likely to occur.

The *Upland Glen* LCT covering Glenbuchat includes the glen sides and the high ridges and hill summits which contain the northern side of the glen (and form the boundary to the CNP). EIA-R Table 5.11 judges this LCT to be of high sensitivity which I agree with (although I disagree with the LVIA that the susceptibility of this smaller scale glen to a development of this nature would only be medium). The LVIA concludes that the magnitude of change to this LCT would be Very Low with the effects on the Proposed Development on this LCT being minor and not significant. The LVIA appears to question the validity of the landscape character classification close to the northern edge of this LCT with it being stated in Table 5.11 that the LCT in this area appears more aligned with the host *Open Uplands with Settled Glens* LCT which lies within Moray. Consequently, it would appear from Table 5.11 that the LVIA judgement considers only the floor and lower slopes of the glen and possibly not the upper slopes and ridges which enclose Glenbuchat and form a distinct boundary to the CNP. This approach results in the effects on the *Upland Glen: Glenbuchat* LCT, as defined in both NatureScot's landscape character classification and described in more detail in the CNP 2009 Landscape Character Assessment, being not properly addressed. Representative Viewpoint 1 at Creag Sgor is not noted in Table 5.11 in relation to this LCT and neither is the likely visibility of the Proposed Development from the ridge which forms the CNP boundary and from the upper glen sides where up to 43 of the proposed wind turbines may be visible (see EIA-R Figure 5.2e). The operational Dorenell wind farm already influences the character of the hills lying on the northern

edge of Glenbuchat but is seen in the context of a generally simpler undulating upland plateau lying north of the CNP boundary. This upland landscape is distinctly different to the *Upland Glen* of Glenbuchat, lacking its diversity of landform and landcover. The Proposed Development would comprise a very extensive array of much larger wind turbines and access tracks lying significantly closer to this LCT, further diminishing the sense of openness and naturalness associated with the less managed ridges and small, craggy and pronounced hills lying on the northern edge of Glenbuchat. It would also introduce a greater number of larger modern infrastructural elements seen from the lower slopes and floor of this small-scale, strongly contained and secluded glen. I consider that significant adverse effects would arise on the character of the *Upland Glen: Glenbuchat* LCT.

The *Farmed Straths and Glens* LCT covers the Braes of Glenlivet basin and the adjoining small hills lying to the south-west of the River Livet within the CNP where the Proposed Development would be visible. The Braes of Glenlivet area is specifically defined and described in detail in the 2009 CNP Landscape Character Assessment. Some of the operational Dorenell wind turbines are already visible from this landscape although the Proposed Development would lie closer and would also comprise substantially larger structures (up to 220m proposed turbines located within 0.5km of the CNP boundary as opposed to 126m high existing turbines lying 3.5km distance from the boundary). Viewpoint 12 from the Braes of Glenlivet basin illustrates the greater influence of the Proposed Development on lower parts of this LCT. Much of the large array of wind turbines within the Proposed Development would be visible from higher ground within this LCT. The LVIA judges effects on this LCT to be not significant principally due to the presence of the existing Dorenell wind turbines in views. I disagree with this finding and consider that significant adverse effects would occur on part of this LCT due to the greater influence of much closer and larger wind turbines on this landscape, their increased detractive effect on the well-defined hills which form a strong and scenic backdrop to the Braes of Glenlivet and a diminishment in the pronounced sense of seclusion associated with this landscape.

Further detailed assessment on landscape character is set out below in relation to the effects of the Proposed Development on the SLQs of the CNP.

#### **Effects on views from within the CNP**

The LVIA concludes that significant adverse effects would occur on representative Viewpoints 1, 3, 7, 10 and 11 which lie in the CNP. I agree that significant adverse effects would occur from these viewpoints. The LVIA acknowledges that major/substantial effects that would occur on views from promoted recreational routes within part of the Ladder Hills and the lower hills on the northern edge of Glenbuchat. A circular traverse of Creag an Sgor within Glenbuchat is promoted on the Walk Highlands website but is not listed in the Walking Routes and Summits in EIA-R Table 5.7 or in Technical Appendix 5.2 in relation to the description for Viewpoint 1. Receptors using this route within the CNP would be particularly overwhelmed by the closeness of very large wind turbines, some of these extending to 220m to blade tip, sited around 1km from the route.

I consider that the LVIA under-estimates the magnitude of effect likely to occur on lower elevation views from roads, promoted and informal walking routes and residential properties in Glenbuchat and from parts of the Braes of Glenlivet. An example of this is the assessment for Viewpoint 9 at Glenbuchat Castle in Table 5.18 and the more detailed assessment in Technical Appendix (TA) 5.2. This viewpoint provides a vantage point, and often a first impression for visitors, of the simple but scenic character of Glenbuchat where softly rolling walled fields are backed by heather-clad hills. 18 turbine blades/tips and 7 hubs (but

with towers largely screened by landform) would be visible on the skyline of these hills at around 6km distance, forming a focus in long channelled views down the glen. TA 5.2 notes the harmonious scenic views over the glen from this viewpoint yet concludes that the magnitude of change would be low, commenting that the wind farm would be a feature that would be noticeable yet ....'could be missed by some visitors'. I disagree with this judgement and consider that the magnitude of change would be at least moderate on a high sensitivity viewpoint resulting in a significant adverse effect on this view. Although this viewpoint is unlikely to be seen by many receptors at night, one turbine light would be visible prolonging significant effects from this location.

Further detailed assessment on views and visibility is set out below in relation to the effects of the Proposed Development on the SLQs of the CNP.

### **Effects on the SLQs of the CNP**

The LVIA includes an assessment of the effects of the Proposed Development on the SLQs of the CNP. NatureScot are reported as having advised on which SLQs should be considered in the LVIA (EIA-R paragraph 5.10.71). I have reviewed the LVIA's assessment of effects on SLQs set out in Table 5.13 of the EIA-R and, **using the reference numbers listed in this table**, I indicate my agreement or disagreement with the judgements made as follows:

- **1. General Qualities:** Agree that no adverse effects would arise on SLQs 1a and 1e. Disagree that no adverse effects would arise on SLQs 1b, 1c, 1d and 1f.
- **2. The Mountains and Plateaux:** Agree that no adverse effects would arise on SLQs 2c but disagree that SLQ 2d would not be significantly affected.
- **3. Moorlands:** There is an overlap between SLQ 3a and SLQ 1b in respect of the reference to 'expansive, open moors' in the former and the sense of space and openness associated with the 'open rolling heather moorland' identified in the latter. I have therefore addressed all these qualities in relation to SLQ 1b in my detailed appraisal of significant effects below. I agree with the LVIA that there would be no physical effect on the extent of moorland and heather in the CNP in relation to SLQ 3a.
- **4. Glens and Straths:** This SLQ can be interpreted in a variety of ways. The LVIA assessment set out in Table 5.13 focuses on the glens and straths specifically noted in the SLQ description although these can also be read as being examples of the more well-known glens and straths and not a comprehensive description of all that is important within the CNP. I disagree that there would not be a significant adverse effect on SLQs 4a and 4b, particularly as NatureScot's Special Landscape Qualities – Guidance on assessing effects stresses the need to consider key landscape characteristics informed by published sources and detailed field study to supplement the more generic information set out in the SLQ description.
- **5. Trees, Woods and Forests:** Agree that no adverse effects would occur on SLQs 5a-c
- **6. Wildlife and Nature:** Agree that no adverse effects would occur on SLQs 6a and 6b but disagree that effects on SLQ 6e (*wildness*) would not be significant.
- **7. Visual and Sensory Qualities:** Agree that no effects would arise on SLQs 7a but the description of SLQs 7b, 7d and 7e note scenic characteristics which can be applied to the north-eastern part of the CNP which would be most affected by the Proposed Development. I therefore disagree

that there would be no effect on SLQs 7b, 7d and 7e although I acknowledge that there is an element of overlap with some of the characteristics set out in SLQ 4 in relation to glens and straths.

- **8. Culture and History:** While I agree that there would be no adverse effects on SLQs 8c-e in relation to the key generic qualities described by NatureScot, I consider that cultural and perceptual qualities associated with Glenbuchat and the Braes of Glenlivet areas would be significantly affected and I have therefore addressed these effects below in relation to SLQ 1f (*Landscapes both cultural and natural*).

I provide further detail on the SLQs that I consider would be adversely affected by the Proposed Development below. The SLQs provide an overview of character and qualities within the Park; they provide a starting point for considering effects on the CNP as noted in NatureScot's Special Landscape Qualities - Guidance on assessing effects. My appraisal is additionally informed by the more detailed 2009 Cairngorms National Park Landscape Character Assessment and my own field observations. SLQs are grouped together where they are related to specific landscape features found in the north-eastern part of the CNP where the greatest landscape and visual effects of the Proposed Development will occur.

- **SLQ 1b Vastness of space, scale and height, SLQ 2d The Surrounding Hills, SLQ 6e Wildness.**

These SLQs relate to the character and qualities of the extensive open and rolling moorland-covered hills in the north-eastern part of the CNP that lie in close proximity to the Proposed Development. Upland landscapes extend northwards into Moray beyond the boundary of the CNP. While there are some similarities in landform, landcover and scale in the uplands lying either side of the Park boundary, differences include the generally more subtle plateau-like landform and the presence of operational wind farm development in the Cabrach area of Moray north of the CNP boundary. These developments include the operational Dorenell, Kildrummy and Clashindarroch wind farms which diminish to some degree the openness and expansiveness of these uplands lying outside the CNP and give them a more developed character than the adjacent uplands lying within the Park. While a sense of remoteness is experienced when walking on the northern margins of the CNP, the perception of naturalness is reduced looking north. The Proposed Development would introduce an extensive array of substantially larger wind turbines lying much closer to the CNP boundary. It would significantly and adversely affect the character and setting of *The Surrounding Hills* including a diminishment of the sense of *wildness* and *wide open space* experienced from these uplands on the north-eastern boundary of the Park.

Paragraph 5.10.39 of the LVIA concludes that in views from the summit of Creag an Sgor, the '*sense of space or openness would be preserved, separating the Project from the Cairngorms National Park*'. The assessment set out in Table 5.13 against SLQ 1b confusingly conflates sensitivity and the magnitude of change in stating that ....'*the proposed turbines have a large spacing and semi-permeable nature that allows a limited sense of space to persist*'. While there would be some screening of the full extent of the Proposed Development in lower elevation views from within the nearby glens of the CNP, this is not the case from the upper slopes, higher ridges and summits close to the northern boundary of the Park where the very close proximity of very large wind turbines would be overwhelming and would not in my opinion preserve a sense of space and openness or be perceived as being set back from the Park's boundaries. Promoted

walking routes are present on these hills and although they are likely to be less well used than routes in other parts of the CNP, their presence increases visual sensitivity.

The existing wind farms which are clearly seen in views north of the CNP from the *Surrounding Hills* reduce the magnitude of change that would occur on these SLQs to some degree. However, the proximity and scale of development proposed would result in a significant exacerbation of existing negative effects on these SLQs in relation to the character and perceptual qualities associated with part of the *Surrounding Hills* lying on the northern eastern edge of the CNP. Redesign of the Proposed Development could alleviate but not fully mitigate effects on the SLQs within these adjacent uplands.

- ***SLQ 1c Strong juxtaposition of contrasting landscapes, SLQ 1d A Landscape of layers from inhabited strath to remote uninhabited upland, SLQ 1f Landscapes both cultural and natural***

These SLQs principally relate to the settled glens of Glenbuchat and the Braes of Glenlivet where the Proposed Development would be seen on the skyline of containing hills at distances of around 2km to 8km. Other SLQs that have some relevance to this part of the CNP include SLQ 7b which notes the '*aesthetically pleasing assemblage of landscape features*'...and the '*inviting arrangement of hill slopes and glens*', SLQ 7d in relation to *dark skies* and SLQ 7e *attractive and contrasting textures*. SLQs 8d (in relation to *the ruins of past settlement*) and 8e (*cultural landmarks*) also have some relevance to these settled glens.

Glenbuchat and the Braes of Glenlivet area are strongly contained by the *surrounding hills*. They lie on the north-eastern edge of the Park and both these landscapes have a secluded and tranquil character being relatively little frequented due to the absence of through roads (in this respect similar to the Angus Glens but quite unlike the broad straths of the CNP which contain considerably more settlement and major communications). The pastoral landscapes on the settled floor and lower slopes of these glens are scenically complemented by the open moorland-clad slopes of the smoothly rolling hills which contain them and form the northern edge of the CNP. Both areas are sparsely settled with mainly small 19<sup>th</sup> century farmsteads, residential dwellings and historic landmark buildings instilling a sense of timelessness. Little large-scale infrastructure is seen from within the settled floor and lower slopes of the glen/basin (a small number of the operational Dorenell wind turbines are evident in views from parts of these landscapes but do not strongly influence character). The 'tucked away' and secluded character of Glenbuchat and the Braes of Glenlivet is described in the 2009 Cairngorms National Park Landscape Character Assessment.

The Proposed Development would significantly affect the cultural and perceptual qualities associated with these secretive hidden glens. Large scale infrastructure would be seen in relative proximity (<8km) on the skyline of the containing uplands. The magnitude of change associated with the Proposed Development would greatly exceed the effect of existing visibility of the very few operational Dorenell wind turbines seen in some parts of these landscapes. These effects are illustrated the visualisation from Viewpoint 12 in the Braes of Glenlivet where the smooth rolling hills would be interrupted by moving turbines, albeit seen on less visually prominent dips in the upland skyline, but nonetheless still intrusive and introducing modern large-scale infrastructure into the scene. Viewpoints 6, 7 and 9 within Glenbuchat illustrate similar, and generally more

widespread intrusion, across this glen. The SLQs associated with these glens are most commonly experienced from roads, settlement and walking routes within the floor and lower slopes of these strongly contained glen/basin landscapes where small scale buildings, enclosed fields and the scenic contrast between farmland and the open upland backdrop is most strongly felt. More elevated views from nearby hills and ridges span across these quiet, little developed glen/basins but also tend to focus on wider views within which the distant Cairngorms massif is a particular attraction.

The aesthetic qualities of SLQs 1c and 1d (*strong juxtaposition of contrasting landscapes* and the *landscape of layers*) would be diminished by the presence of much more visible wind turbines (both closer and larger), detracting from the simplicity of the skyline of smooth, rolling hills and the contrasting backdrop it provides to small scale fields and settlement. The contrasts between the inhabited lower slopes and glen/basin floors and the remote undeveloped surrounding hills in terms of the SLQ 1d would also be adversely affected. The hidden secretive character and distinctive cultural associations of these landscapes would be significantly diminished by the introduction of prominent wind turbines seen on the skyline of hills which presently provide strong visual containment to development outside the Park.

I consider that effects on these SLQs exhibited within Glenbuchat and the Braes of Glenlivet would be significant and adverse. Redesign of the Proposed Development could mitigate these effects.

### **Significant effects on landscapes lying outside the CNP**

There would be widespread visibility of the proposed development across the Cabrach basin in Moray. The Cabrach basin is already influenced by operational wind farm development with the Dorenell and Clashindarroch wind farms visible. The Proposed Development would however significantly exacerbate effects on the dramatic scenic qualities of this landscape. It would comprise an extensive array of much larger turbines fundamentally diminishing the perceived containment of the basin and the sense of openness and huge space which can be experienced. Major adverse and significant effects would occur on the dramatic views over the Cabrach basin from the A941 which are suddenly revealed when travelling westwards from Aberdeenshire past The Buck hill on this route.

As well as significantly affecting promoted hill routes in the CNP, the proposed development would also result in a particularly severe effect on views from The Buck, a distinctive isolated hill where the proposed development would lie within 2.7km west of its summit. The path to The Buck from the B9002 is not shown on Figure 5.8 Local Tourist Facilities despite it being promoted in published walking guides and websites although it is listed in LVIA Table 5.7. The proposed wind turbines would interrupt long views to the Cairngorms plateau over currently expansive open moorland-covered hills from the summit of this hill (intervening glens are not readily seen). The photomontage from Viewpoint 2 from The Buck does not illustrate the network of access tracks which would contribute to the major intrusion that would occur from the summit of this hill. Views from hill tracks to and from the Cabrach, Glenbuchat and Glenfiddich areas (some of these comprising Core Paths and Heritage Paths) would also be significantly affected, particularly where they are aligned close to and within the proposed wind farm site.

Visible aviation lighting would extend the duration of significant adverse effects, principally in the Cabrach area and surrounding uplands. The wind farm site and its immediate surrounds are sparsely

settled with low levels of night-time lighting and the effect of introducing lighting in a context where dark skies are present is a concern.

## **Conclusions**

### Summary of landscape and visual effects on the CNP

Significant adverse effects on landscape character and on views would occur from the northerly Ladder Hills and the lower hills which contain Glenbuchat and form the northern boundary of the CNP. There would be a significant adverse effect on some of the SLQs associated with these hills including the sense of wildness and openness experienced from promoted walking routes. These hills are already influenced to some degree by the operational Dorenell and Kildrummy wind farms and while the proposed development would substantially increase and significantly exacerbate existing adverse effects on landscape character and views, I consider these effects would not be of a level of severity that would lead to a loss of integrity to the designated area in terms of effects on SLQs.

I consider that the magnitude of significant adverse effects on SLQs will be greater across Glenbuchat and the Braes of Glenlivet. These include significant adverse effects on the cultural and perceptual qualities associated with these hidden, tranquil and seemingly timeless settled glens and the diminishment of the scenic juxtaposition of smooth rolling hills with settled farmland which is principally experienced from within the floor and lower slopes of these landscapes. I consider that the degree of intrusion of the Proposed Development would lead to a loss of integrity of the designated area because of the magnitude of change that would occur to the SLQs exhibited in these parts of the CNP.

The scale of this Proposed Development and its proximity to the CNP boundary would result in significant adverse landscape and visual effects on the Park and on some of the SLQs evident in this north-eastern part of the designated area. I consider that redesign of the Proposed Development could mitigate effects from the Glenbuchat and Braes of Glenlivet area. Although redesign of the Proposed Development could alleviate significant adverse effects from nearby hills these would be unlikely to be reduced to a non-significant effect.

### Landscape and Visual effects on Moray

The Proposed Development would result in a profound change to the character of the Cabrach Basin in Moray as its remote, open and expansive character would be displaced by an industrial development of huge scale. Visible aviation lighting would extend the duration of significant adverse effects on the perception of isolation and naturalness associated with the dark skies of this area. Major adverse effects would occur on presently dramatic views from the A941, from recreational routes, settlement and minor roads close to the Cabrach area and from nearby popular hill summits including The Buck which lies on the border between Moray and Aberdeenshire.

### Recommendation

In terms of NPF4 Policy 4c which addresses development affecting National Parks, I consider that this development would have a significant adverse effect on views from the CNP, on its character and on some of the SLQs of the Park. I consider that the significant adverse effects on SLQs relating to the cultural and landscape qualities of Glenbuchat and the Braes of Glenlivet would be sufficiently severe to affect the integrity of the CNP.

***It is recommended that the Applicant redesigns the scheme to minimise effects on the character and SLQs of the CNP principally in relation to Glenbuchat and the Braes of Glenlivet as follows:***

## Glenbuchat

- VP 6 from the minor road at Badeyon at the head of Glenbuchat: removal/relocation of T80 so it is not visible. This wind turbine is particularly intrusive as its hub is visible and it is seen in close proximity to the boulders and crags on the summit of Creag Sgor and nearby hill slopes which contribute scenic interest to views from within this part of the glen.
- VP 7 from the minor road crossing the south-western shoulder of Glenbuchat near Kirkton of Glenbuchat: Recently restocked woodland is likely to screen views from this elevated road below Ben Newe in time but similar views are likely to occur from nearby residential settlements and roads on north-west facing slopes. Turbines 51, 55, 35 and 57 appear to be most prominent from this area and should be removed<sup>1</sup>
- VP 11 from Ben Newe: The proposed development presents an extremely congested and substantially extended array of wind turbines in this view. The operational Dorenell wind turbines are smaller, more distant and partially contained by landform in the current view to the north-west from this hill. Views towards the central Cairngorm massif from the summit of Ben Newe would not be affected. There would be similar views from other nearby hills lying on the south-western hills which contain Glenbuchat although Ben Newe forms the destination of a promoted walk. A great many turbines would need to be removed from the Proposed Development to provide meaningful mitigation on views across Glenbuchat from this hill but T51, 55 and 57 appear to be especially intrusive due to their more prominent positioning and should be removed.
- VP 9 from the front of Glenbuchat Castle which lies on a small hill at the entrance to the glen. Around 6 turbines would be particularly prominent on the skyline of the hills which contain the glen (seen at distances of 6km from the viewpoint). The little developed pastoral charms of the glen are appreciated in this view. An information panel in the car park for the castle describes the cultural heritage of Glenbuchat. The introduction of modern large-scale infrastructure clearly seen on the skyline overlooking the glen from this important viewpoint would conflict with the distinct feeling of timelessness associated with this secluded and minimally developed glen. It is not possible to identify the specific turbines that are most intrusive in this view as the numbers on the wirelines do not appear to line up although T48 (one of only two turbines at 149.9m height to blade tip) would seem to be particularly prominent. It is recommended that all wind turbines visible above hub height should at least be removed from this view.
- Elsewhere in Glenbuchat, there would be visibility of the Proposed Development from the minor road and nearby residential properties between Smithyford and Easterbuchat and from the tracks which provide access to Creag Sgor (a promoted walk) from the Whitehillock area. The ZTV in EIA-R Figure 5.2e indicates that between 1-9 turbines would be visible from these lower elevation views. As no visualisations have been produced from this area it is not possible to ascertain which turbines would be seen/be most prominent. It is recommended that the Applicant produce wirelines from this area as part of any redesign process.

## Braes of Glenlivet

- Viewpoint 12 Glenlivet Community Hall: T23 and T26 are particularly prominent in views from this area and are seen on the skyline of the pronounced rolling hills which backdrop the broad basin of the Braes of Glenlivet. It is possible that more turbines located on the south-western

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<sup>1</sup> *The turbine numbers are difficult to read on the wirelines and the most intrusive turbines noted may not be correct.*

edge of the Proposed Development may be visible from nearby locations in this part of Glenlivet with a larger array theoretically visible from the small hill, The Bochel, which forms part of a promoted walk. Removal/repositioning and/or a reduction in size of these turbines should be undertaken by the Applicant to minimise intrusion on the skyline of these hills seen from lower elevations within the more settled part of the basin.

The following conditions should also be recommended to the Energy Consents Unit:

- The Applicant should actively consider further mitigation of visible aviation lighting, taking advantage of any progression in current negotiations with the CAA undertaken by other wind farm developers on radar activated lighting which would significantly reduce the duration of lighting. The consented Garbet wind farm in Moray would feature visible aviation lighting and a condition has been placed on this development to review the lighting strategy as technical solutions to radar activated lighting become available. The applicant for this proposal has noted willingness to adopt a similar condition.