

Dorenell Limited

Application in respect of

Dorenell Wind Farm, on land at Glenfiddich Estate, near Dufftown, Moray

**James Welch CMLI
Landscape & Visual Precognition**

1st November 2010

1.0 Introduction

1.1 My name is James Welch. I am a Director of Optimised Environments Limited, 'OPEN', a firm of Landscape Architects and Environmental Planners, based in the Edinburgh office. I am a Chartered Member of the Landscape Institute. Details of my relevant experience and instructions in relation to this Inquiry are set out in Document APP-L1.

1.2 It is not always the case that when I am invited to support a project at Inquiry, such as this one, that I accept the commission. For example, in relation to specific wind farm proposals in Perthshire and Ayrshire, and one other relating to the Loch Lomond & The Trossachs National Park, I have advised my prospective clients that the projects were not defensible in landscape and visual terms and that I was unable to act in support of the respective schemes.

1.3 I am the third chartered landscape architect to review the Dorenell project for Infinergy from a landscape and visual perspective. The LVIA was prepared by Caroline Stanton CMLI and her work was subject to an external review by Pat Alexander CMLI. All three landscape architects independently consider that the methodology used is robust and that the project design has minimised the landscape and visual effects, with particular regard to its scale, design and likely significant effects.

2.0 Approach

2.1 My Precognition is supported by a number of documents that I have produced for the Inquiry, which together forms my evidence, including the following:

CD-H5: Applicant's Environmental Statement: Volume 4

CD-H7 : Applicant's Supplementary Environmental Information (SEI)

APP-L1: Experience & Instructions

APP-L2: Landscape and Visual Report

APP-L3: Illustrations supporting the Landscape and Visual Report

APP-L4: Response to The Moray Council's comments on the SEI

APP-L12: Supplementary Wirelines

Subject to the qualifications noted in APP-L2, I adopt all of the above documents as part of my evidence to the Dorenell Inquiry.

3.0 Landscape and Visual Report

- 3.1 I prepared the Landscape and Visual Report (APP-L2) that is before the Inquiry and I adopt it as the basis of my evidence. APP-L2 is set out in a number of sections which follows the process of evaluation that I undertook and it sets the relevant landscape and visual context for Dorenell Wind Farm. The document establishes the appropriate baseline for the proposed wind farm and determines the likely significant effects of Dorenell. It responds to The Moray Council's stated objection to the proposed development and also addresses the objection from the Cairngorms National Park Authority (CPNA) and those of the Speyside Business Alliance (SBA), the Mountaineering Council of Scotland (MCS); ScotWays and other bodies where relevant. It sets out the justification for the Dorenell Wind Farm, both singly and cumulatively, in landscape and visual terms and explains why the likely effects of the proposed development are considered to be acceptable in my opinion, in landscape and visual terms. The report draws on the various other studies and illustrations outlined above.
- 3.2 My precognition does not repeat the considerable analysis that I have undertaken, as set out in detail in APP-L2, but instead relies on the findings, in terms of the significance of likely effects on the landscape and visual resource and of the key issues that I consider are relevant to this Inquiry. These are discussed in Section 10.0 of APP-L2.
- 3.3 In undertaking the background analysis to my precognition I have carried out an extensive review of the site and its surroundings on the ground, as set out in APP-L2. Of particular relevance to my findings is the fact that I have inspected all of the representative viewpoints on the ground, as well as many other locations. I have walked extensively within the Ladder Hills and Braes of Glenlivet, in order to inform my opinion on the likely effects on the National Park and have also been to the other hilltop viewpoints further away within the Park. This has given me a balanced and informed basis of evidence against which I have been able to form my opinion on the acceptability of the project. Whilst helpful to the site investigations that I have carried out, I do not believe that I could have formed my opinion on the basis of a desk study of the ZTVs, photomontages and wirelines. Only by visiting each location can a full and balanced impression of the scale and characteristics of the landscape be gained and the likely impact of the wind farm determined.
- 3.4 I have also had regard to the various documents that have been lodged by the other parties to the Inquiry and I comment on these in the following section of my precognition.

4.0 Review of other party's evidence/ written submissions

4.1 Following the exchange of documents for the Inquiry I have been able to gain a good impression of the specific issues that are of concern to the main parties. I reserve the right to develop my response to each of the issues that have been raised, but note the following points in respect of each party's documents:

The Moray Council (TMC)

4.2 Notwithstanding its objection to the application, TMC has submitted a Written Submission to the Inquiry in respect of landscape and visual matters. The Council considers that the wind farms at Rothes, Paul's Hill and Berry Burn are consistent with its locational guidance and that they achieve a *'clear pattern, which achieves a sense of order based on landscape and visual sensitivity'*. There is no evidence of a pattern for these wind farms, to which Dorenell might not fit. Additionally, TMC does not record the position that the wind farms at Paul's Hill and Berry Burn (together amounting to 57 turbines and to which it had no objection) are located within the same Landscape Character type as Dorenell, a fact which I consider underpins its capacity to absorb large scale wind farms, in landscape terms.

4.3 TMC considers (page 7) that the *'impact of the proposal has been underestimated and not adequately represented'*. I do not agree with this assertion and consider that the LVIA has been undertaken accurately and professionally. Furthermore, TMC (with CNPA and SNH) was consulted on the viewpoint selection and approach to the LVIA. I note that SNH's final consultation response of 18th June 2009 is not critical of any aspect of the LVIA, which I regard to be particularly relevant. Indeed, SNH states at 3.4 that *'it remains of the opinion that this is a suitable location for a wind farm of this scale.'*

4.4 Table 1 on page 9 of TMC's submission erroneously claims to show the cumulative wind farm applications *'within a 35km radius of Dorenell'*. This table is incorrect as a number of relevant wind farms are missing from the list, including Kildrummy, Cairnsmore and Berry Burn, for instance. Bearing in mind the criticism of the SEI by TMC it is surprising that the Council is not aware of all of the cumulative wind farms around Dorenell. I do not accept the assertion on page 9 that the SEI submission contains 'fundamental flaws' or as asserted on page 10 that it reflected a piecemeal approach with incomplete or misleading wirelines. The SEI omitted two distant wind farms, the inclusion of which in

APP-L4 has had no bearing whatsoever on the updated cumulative assessment.

4.5 I do not accept TMC's assertion on page 9 that the wind farm would have '*a visual impact far beyond the Moray boundary*'. The degree of visual influence from Dorenell, outwith a part of Moray, is very limited in my view, as evidenced by the ZTVs in APP-L3.

4.6 In my view the Council's written submission adds nothing new to the position of significance that is established through the LVIA and SEI and I do not accept that the effects of the development have been underestimated or misrepresented in any way.

The Speyside Business Alliance

4.7 I have read the evidence of Mark Steele (SBA/1/1) and have found that it is purely a critique of the methodology used within the LVIA. I consider that the LVIA methodology, and how it has been applied, is entirely consistent with good practice and that it demonstrates a good degree of understanding and judgement from the professionals that were involved.

Cairngorms National Park Authority

4.8 I have read David Tyldesley's evidence in respect of landscape and visual matters and I do not agree with his conclusions as to the extent of likely significant effects on the National Park. I do not accept that there would be significant effects on any of the seven areas of the Park he has identified at paragraph 3.1 in CNPA 3, other than from within the Ladder Hills. I consider that he has overstated the likely effects of the development on the National Park, a point which the CNPA has been criticised for previously at the Kildrummy Inquiry (APP-L2 para. 5.4.12).

Aberdeenshire Council's Consultation Response

4.9 Peter Fraser's response to the Energy Consents unit (CNPA 8) is limited to an appraisal of the development from four elevated viewpoints within the study area, (The Buck; Tap O'Noth, Clashmach Hill and Ben Rinnes) and has no regard to the overwhelming evidence in the ZTV, that the county would experience very limited visibility as result of the Development. I do not accept Mr Fraser's conclusion that Dorenell would drastically alter the landscape character '*at a wider level*'. Indeed, I do not accept that there would be a significant effect on the character of Aberdeenshire as a consequence of the proposal and I find his comments to be overstated as a result, particularly given the limited appraisal that he has undertaken. It is also the case that his advice has taken no

account of the SEI, due to pre-dating it.

ScotWays

- 4.10 I have also read the evidence submitted by John MacKay from ScotWays and nothing contained therein serves to change my opinion as to the acceptability of Dorenell, in landscape or visual terms. It is clear to me that there will be some significant visual effects on the paths, including core paths that pass close to the wind farm, but that these effects are of no greater consequence than is found elsewhere in Scotland in relation to wind farm development and open air recreation. This is the case with a number of important long distance paths including the Southern Upland Way at Black Hill wind farm; the Kintyre Way at Deucheran Hill wind farm or the Rob Roy Way at Calliachar wind farm.
- 4.11 While I can appreciate the concerns of other parties to this Inquiry, having undertaken a comprehensive review of the likely effects of the development on the ground, I have found nothing within their objections that indicates to me that the proposed Dorenell wind farm is unacceptable in landscape and visual terms.

5.0 Conclusions

- 5.1 I rely on the conclusions that I set out in section 11.0 of APP-L2. I have carried out a detailed review of the evidence that is before this Inquiry and have concluded that there are no landscape or visual effects that are of such significance that they render Dorenell unacceptable in landscape and visual terms. The choice of site is an appropriate one and it is located within a character type that has an appropriate carrying capacity to accommodate a wind farm of the size proposed. With the exception of a small number of elevated hilltops, the influence and perception of the wind farm within the landscape will diminish within a relatively short distance from the site (5km). I regard SNH's position on L&V matters to be of particular importance in this regard.
- 5.2 I do not accept, therefore, that the reasons for objection put forward by TMC or the concerns of the other parties at the Inquiry, including the CNPA; SBA and ScotWays, are well founded in landscape and visual terms.