Appendix 9.D: Assessment of Effects on Wild Land

1. Introduction

1.1. This Appendix sets out the assessment of the potential effects of the Proposed Development on Wild Land. There are two WLA's within the 40 km Study Area, namely the Cairngorms WLA and Monadhliath WLA, as shown in **Figure 9.3**. These WLAs have been identified by NatureScot (formerly Scottish Natural Heritage (SNH)) and are recognised as a mapped interest.

1.2. The WLAs, shown in conjunction with the ZTV in **Figure 9.9**, illustrate the notable separation distances of approximately 23 km between the Cairngorms WLA and the closest proposed turbine, and approximately 15 km between the Monadhliath WLA and the closest proposed turbine. The figure also illustrates the very limited extent of visibility across the Monadhliath WLA. While visibility is shown to be more continuous along the northern ridgeline of the Cairngorms WLA, the Proposed Development will be seen from distances of beyond 25 km and associated with the existing 13 turbines of the Operational Scheme.

1.3. Through the scoping process, it has been agreed with NatureScot and The Highland Council (THC), that despite the very limited potential for a significant effect to arise, that the Cairngorms WLA should be scoped into the detailed assessment of the LVIA. It has been agreed that the Monadhliath WLA can be scoped out of the LVIA, owing to the limited extent of visibility as shown on the ZTV in **Figure 9.9.**

1.4. The Cairngorms WLA covers an area of 1,572 km^2 that is bounded by the A9 to the south, west and north-west, while the A93 bounds the eastern side and the A939 bounds the north-eastern side. The WLA is contained within the Grampian Mountains and whilst mostly covered by The Highland Council region, also extends into Aberdeenshire in the east and Perth and Kinross in the south.

1.5. The following assessment follows guidance set out in NatureScot's 'Assessing Impacts on Wild Land Technical Guidance' (2020) with reference to SNH's 'Description of Wild Land Areas' (2017).

1.6. The WLA description lists eight key attributes and qualities for WLA 15 (Cairngorms), which have been numbered 1 to 4 for the purpose of this assessment:

1. *"Extensive, open, remote mountain and moorland interior containing few human artefacts or evidence of contemporary land use, and possessing a strong sense of sanctuary and solitude."*

2. *"Massive, rounded hills and plateaux that appear awe-inspiring due to their superlative scale, openness and elevation, and which offer extensive, panoramic views."*

3. *"Long, deep, steep-sided glens that cut into the massive hills and plateaux and possess qualities of remoteness whilst also facilitating access."*

4. *"Corries and gorges carved into the hills and plateaux appear arresting in their vertical form and include features such as cliffs and waterfalls that contribute to perceived naturalness."*

5. *"Dynamic rivers form key visual and physical features, influence access and contribute to the sense of naturalness, whilst watersheds and bealachs form notable crossing points."*

6. *"Simple landforms and landcover that contribute to the awe-inspiring qualities of the area, and exposed rock that influences strongly the sense of naturalness."*

7. *"A variety of recreation activities, including those that are focused, dispersed or occur along through-routes, allowing different wild land attributes and qualities to be experienced."*

8. *"Open native woodlands of diverse spatial and visual characteristics that respond directly to the underlying physical conditions, contributing strongly to the sense of naturalness."*

1.7. These key attributes and qualities (hereafter, referred to as Wild Land Qualities, or WLQs) form the basis of the wild land assessment as they express the distinctive and specific wildness qualities that are found in this WLA. SNH's WLA description provides further information on each of these WLQs as an explanation of how the various aspects of the landscape contribute to the WLQ.

1.8. This appendix is accompanied by a series of figures which are referenced throughout the text.

•**Figure 9.3:** Landscape Designations and Wild Land Areas; and

•**Figure 9.109:** ZTV with Wild Land Areas.

2. 'ASSESSING IMPACTS ON WILD LAND TECHNICAL GUIDANCE' (2020)

2.1. The NatureScot technical guidance (2020) sets out the suggested approach to the assessment of effects on wild land. As noted in paragraph 4 of the guidance, the assessment methodology broadly follows that of GLVIA3, and is based around the following five stages, as described in Table 1 of NatureScot guidance:

Table 9D.1: Approach to assessing impacts on Wild Land Areas (WLAs)

Step	Approach
Step 1 - Define the study area and the scope of the assessment	Identify a study area appropriate to the scale of the proposal and extent of likely significant effects on the WLA. Output: Brief justification and map or description of the area that will be assessed.
Step 2 – Verify the WLA baseline	Confirm the wild land qualities (set out in the WLA description) relevant to the study area, describing any major changes that have occurred since the description was prepared and the nature of their contribution to the WLA. Output: Identification of relevant qualities and explanation of how any changes since preparation of the WLA Description have affected them.

Step 3 – Assess the sensitivity of the qualities	Through detailed field assessment within the study area, assess the sensitivity of the wild land qualities scoped in (including their physical attributes and perceptual responses), to the type and scale of change proposed. Output: A clear and concise narrative explaining the susceptibility of individual qualities and / or combinations of qualities where there is some commonality between their contributing attributes and responses, and their overall sensitivity.
Step 4 – Assess the magnitude of the effects	Assess the effects on individual and / or combinations of qualities, drawing out which physical attributes and perceptual responses will be affected, how and to what degree. This should reflect the size or scale of change, its extent and duration. Output: A clear and concise narrative explaining the effects of the various elements of the proposal on individual qualities and / or combinations of qualities.
Step 5 – Judge the significance of the effects	Conclude on the overall significance (taking into account any mitigation), in terms of the study area and where relevant the wider WLA. Output: A clear narrative explaining the overall significance of residual effects identified on the individual qualities and / or combination of qualities.

2.2. Paragraph 13 of the guidance notes that

"the assessment approach…should be concise and proportionate, focused on likely significant effects on the qualities;"

2.3. While the wild land assessment methodology broadly follows that set out in GLVIA3, there are several points that are beneficially explained prior to the assessment itself, as discussed below.

<u>The Status of WLAs</u>

2.4. The status of WLAs is clearly set out in paragraph 8;

"WLAs have not been identified on scenic grounds and are not a statutory designation."

2.5. There is also an acceptance in paragraph 9 that WLAs are not *"wilderness"* and that human influences can and do form part of the baseline character of WLAs:

"…Whilst the WLA map identifies areas where wildness is most strongly expressed, these are not 'wilderness', empty of any human activities or influence. They reflect Scotland's long history of past occupation and current use and management, albeit that evidence of such is often light and limited in extent."

2.6. An important phrase in this paragraph is *"light and of limited extent"* as this presents a measure with which to assess the existing external influence of development, and operational wind farms in particular, on the WLA, and

indicates to what degree this influence can be accommodated within an area that is considered to be 'wild land'.

The Need for a WLA Assessment

2.7. The need for a WLA assessment is discussed in Paragraphs 5 and 6 of the NatureScot guidance, which note that:

"This guidance should only be applied to proposals whose nature, siting, scale or design are likely to result in a significant effect on the qualities of a WLA. Given this, assessments are more likely for proposals within a WLA, and are less-likely for proposals outwith the WLA.

An assessment will only be required where it has been deemed necessary by the competent authority. You are encouraged to discuss the need for an assessment with the competent authority at an early stage."

2.8. While the Proposed Development lies a minimum of 23 km outwith this WLA, both NatureScot and The Highland Council (THC) have requested that a wild land assessment be carried out.

2.9. It is also important to note that, according to NatureScot guidance, effects on WLAs can only be experienced within WLAs and not on the area surrounding them. Paragraph 3 of the guidance notes that:

"This guidance sets out a methodology and general principles for assessing the impact of development and other proposals on WLAs, as they are experienced from within the WLA, not from outwith it."

Cumulative Effects

2.10. At paragraph 16, NatureScot guidance notes the following in relation to cumulative effects on WLAs:

"The potential for cumulative effects. Other proposals (either of the same or different type) which are likely to contribute to significant cumulative effects should be identified in discussion with the decision maker. The principles within our guidance document Assessing the cumulative impact of onshore wind energy developments specific to onshore wind energy development can be applied to other development and should aid this assessment."

2.11. And at paragraph 33: *"In judging significance, the following factors should be considered - the nature and extent of any likely cumulative effects."*

2.12. Across the 40 km Study Area, the cumulative wind farms are broadly located in a band that follows a south-west to north-east alignment, occupying parts of the upland landscape that extends from the Monadhliath Mountains in the south-west to the Rolling Uplands in the north-east, as shown in **Figure 9.12**.

2.13. The potential for WLA15 to be significantly affected, in conjunction with both the operational and proposed wind farms, will be limited owing principally to the separation distance between WLA15 and the Proposed Development, as well as the existing influence from the Operational Scheme on the adjacent site and the limited geographical extent to which the Proposed Development will be visible from WLA15.

3. Methodology

NatureScot Guidance

3.1. As noted in NatureScot's 2020 Guidance, the wild land assessment methodology broadly follows that of GLVIA3 and is based around the five stages described in Table 1 of the Guidance, replicated as Table 9D.1 in Section 2 above.

- Step 1 - Define the study area and the scope of the assessment
- Step 2 – Verify the WLA baseline
- Step 3 – Assess the sensitivity of the qualities
- Step 4 – Assess the magnitude of the effects
- Step 5 – Judge the significance of the effects

3.2. Steps 1 and 2 do not require detailed explanation of methodology and are carried out subsequently in this Appendix. The methodology for Steps 3, 4 and 5 is described below. These steps are assessed in accordance with GLVIA3 and largely follow OPEN's methodology, which is described in full in **Appendix 9A**.

3.3. In this methodology, WLAs are considered as landscape character receptors rather than visual receptors. This is because the landscape of the WLA is a resource in itself and effects are assessed in terms of the effects on the WLQs of the WLA, in line with NatureScot guidance, and not in terms of the effects on views gained by people who may be within the WLA.

Step 3: Assess the Sensitivity of WLA Qualities

3.4. NatureScot guidance summarises this step as follows: *"Through detailed field assessment within the study area, assess the sensitivity of the wild land qualities scoped in (including their physical attributes and perceptual responses), to the type and scale of change proposed".*

Value of Wild Land Areas

3.5. In applying GLVIA3 to the assessment, and as noted by NatureScot, it is necessary to attribute a value to the receptor – these are classified as high, medium-high, medium, medium-low or low, as described in **Appendix 9A**. The value attributed to nationally important designations, including National Parks (NP) and National Scenic Areas (NSA) is normally found to be at the upper end of the scale and classified as high.

3.6. Wild land is not an environmental designation and is not statutorily protected in the way that NPs and NSAs are for their scenic qualities. It is, however, recognised in SPP and planning policy as a nationally important mapped resource, which should be afforded protection for its wildness qualities.

3.7. In order to apply objectivity to the attribution of value in wild land areas, it is helpful to have regard to the weighting that SPP gives to it. Whereas in SPP Table 1: Spatial Frameworks, Scottish Ministers place NSAs and NPs in the Group 1 category, Wild Land Areas are identified as a Group 2 consideration, recognising the difference in their respective values. As a matter of national policy, Wild Land is, therefore, less highly valued than NSAs and NPs.

3.8. SNH provides some further guidance on this matter in its publication 'Spatial Planning for Onshore Wind Turbines – Natural Heritage Considerations, Guidance' (June 2015). Annex 1 to this document provides advice on the potential landscape objectives that may be applicable in different landscapes within Scotland in terms of their ability to accommodate wind farms, suggesting that some landscapes should be subject to a higher level of protection than others.

3.9. Annex 1 places WLAs in the middle category, where some landscape 'accommodation' of windfarms may be considered appropriate, noting that:

3.10. *"Within local landscape designations and Wild land Areas, the degree of landscape protection will be less than for National Scenic Areas. In these areas, an appropriate objective may be to accommodate windfarms, rather than seek landscape protection."*

3.11. WLAs are therefore considered to have a lower inherent baseline value, in landscape terms, than nationally designated landscapes. In the terms of GLVIA3 and OPEN's methodology, it is reasonable to attribute a theoretical medium-high value to WLA 15.

3.12. These levels of value are combined with individual assessments of susceptibility, which are described below, to inform the overall assessment of sensitivity within the WLA.

Susceptibility within Wild Land Areas

3.13. Susceptibility relates to the nature of the landscape receptor and how susceptible it is to the potential effects of the Proposed Development, as described in GLVIA3. Susceptibility varies across the WLA depending on the nature and strength of the WLQs, the particular perceptions that are experienced in different areas, and in the context of different external and internal influences.

3.14. OPEN's methodology assesses the susceptibility of landscape character receptors through a series of three criteria, as set out in **Appendix 9A**. Two of these are relevant to the assessment of susceptibility of WLQs:

- The specific nature of the Proposed Development: the susceptibility of landscape receptors is specific to the change arising from the particular development that is proposed, including its individual components and features, and its size, scale, location, context and characteristics.
- Landscape character: the key characteristics of the existing landscape character of the receptor are considered in the evaluation of susceptibility as they determine the degree to which the receptor may accommodate the influence of the Proposed Development (in the wild land assessment this criterion relates to the documented WLQs, physical attributes and perceptual responses of the WLA).

3.15. The third criterion, 'landscape association', is not identified as a separate factor in the judgement of susceptibility within WLAs; this is because the WLQs make specific mention of landscape association where it is a relevant factor, and it is, therefore, not necessary to include it again when considering susceptibility.

Step 4: Assess the Effects

3.16. NatureScot guidance notes this step as follows in Table 1: *"Assess the effects on individual and / or combinations of qualities, drawing out which physical attributes and perceptual responses will be affected, how and to what degree. This should reflect the size or scale of change, its extent and duration."*

3.17. OPEN's methodology for assessing magnitude of change on landscape character receptors is carried out through the application of a set of criteria as set out in **Appendix 9A**.

3.18. Broadly, the magnitude of change that the Proposed Development will have on landscape receptors is assessed in terms of the size or scale of the change, the geographical extent of the area influenced and its duration and reversibility. The key elements of the Proposed Development that will influence the level of change on landscape character are the movement, form, material, colour and scale of the turbines, although infrastructure is also considered.

Step 5: Judgement of the Significance of Effects

3.19. NatureScot guidance summaries this step as follows in Table 1: *"Conclude on the overall significance (taking into account any mitigation), in terms of the study area and where relevant the wider WLA."*

3.20. On the basis that the NatureScot guidance follows the principles of GLVIA3, OPEN's methodology for the assessment of the significance of effects (as described in **Appendix 9A**) has also been used for the assessment of the significance of effects on wild land. OPEN's methodology describes the significance of effects as quoted below.

3.21. *"A significant effect will occur where the combination of the variables results in the Proposed Development having a defining effect on the view or receptor. A not significant effect will occur where the effect of the Proposed Development is not definitive, and the view or receptor continues to be characterised principally by its baseline characteristics. In this instance, a not significant effect would indicate that the Proposed Development may have an influence, but this influence will not be a defining one."*

4. Assessment of Impacts on WLA 15

4.1. The following sections of this report assess the effects of the Proposed Development on WLA 15 Cairngorms following the five steps as described in NatureScot's 2020 Guidance.

Step 1: Define the Study Area and Scope of the Assessment

4.2. NatureScot guidance summarises this step as follows:

"Identify a study area appropriate to the scale of the proposal and extent of likely significant effects on the WLA."

4.3. Paragraph 16 of the guidance notes that:

"The rationale for the selection of the study area and scope of the assessment should be clearly stated and consider the following.

The extent of visibility and recognised routes / movement through the WLA. The scale of the proposal may not equate to the extent of effects (for example, a large proposal where visibility is limited to part of the WLA, a more focused study area may be appropriate).

The wild land qualities likely to be significantly affected. The focus of the assessment should be on the qualities likely to be affected rather than where the proposal is located.

The potential for cumulative effects."

4.4. The Study Area for the wild land assessment is discussed below in relation to these three considerations.

Extent of Visibility

4.5. Prior to carrying out the assessment of effects on the WLA, it is important to establish the theoretical extent that the influence that the Proposed Development will have on the WLA. This is dependent on the extent of visibility; where the Proposed Development is not visible, it will have a limited influence on wild land characteristics. The level of visibility of the Proposed Development from the WLA can be seen in **Figure 9.9**, which shows the ZTV in relation to the WLA.

4.6. WLA15 is extensive and it is only the northern part that is covered by the southern part of the 40 km radius Study Area, with the remainder lying beyond the southern boundary. The areas outwith the 40 km Study Area can be discounted from the assessment, as significant effects will not arise from these distant ranges. Furthermore, visibility beyond the 40 km Study Area will be very limited in extent owing to the screening effect of the intervening high tops of the Cairngorm range.

4.7. The ZTV in **Figure 9.9** shows that visibility will generally occur as patches across the northern extent of the WLA. The limit to the visibility is broadly marked by the south-west to north-east ridgeline formed by the high tops, including Braeriach (1,235 m AOD), Cairn Gorm (1,245 m AOD) and Cairn Lochan (1,215 m AOD). The ZTV shows that visibility north of this ridgeline will reduce with elevation, with the proposed turbines becoming increasingly or completely screened by the intervening landform.

4.8. The northern slopes of Cairn Gorm are largely excluded from WLA 15 owing to the influence of the human artefacts which form part of the Cairngorm Mountain Resort, including ski lifts and access roads. This forms a notable indent in the northern boundary, although it then extends to the north-east to include the lower hills on the western edge of Abernethy. From the high point of Bynack More (1,090 m), the hills to the east of Strath Nethy occur between 600 and 800 m and visibility occurs across their north and north-west facing slopes from ranges of approximately 25 to 33 km.

4.9. While all seven turbines will be visible from the upper slopes and summits, these will be seen from distances between 27 and 36 km. The cumulative ZTV in **Figure 9. 13** shows that these seven turbines will be seen mostly in conjunction with the operational turbines, while the cumulative ZTVs in **Figures 9.14 to 9.18** show that a number of other operational wind farms are also already visible from this ridgeline.

4.10. The ZTV shows that visibility north of this ridgeline will reduce with elevation, with the proposed turbines becoming increasingly or completely screened by

the intervening landform. There are also areas of theoretical visibility shown across northern parts of the WLA where no visibility will occur owing to the enclosure of large-scale forestry plantations.

4.11. It can be concluded that the extent to which the Proposed Development will be visible, will be limited, with most of WLA 15 unaffected by visibility with the exception of the northern parts. While the ZTV shows that higher levels of visibility will occur across the upper slopes and high tops of the northern parts of WLA 15, the distant range of visibility, beyond 27 km, combined with the existing influence from other visible operational wind farms will mean that the Proposed Development will have a limited influence on WLA 15. The Study Area should only include the northern part of WLA 15.

Recognised Routes and Movement

4.12. In respect of recognised routes and movement, the WLA 15 description states *"This WLA is very popular for outdoor recreation such as hillwalking, shooting, fishing, climbing, wildlife-watching, skiing and mountain-biking. These activities are facilitated by a range of different access points and tracks or paths that enter the area from its edges. Many hillwalkers target the Munros and Corbetts as well as a number of through-paths that are also popular with mountain bikers. These routes tend to follow rivers and traverse hill passes, for example through the Lairig Ghru between Rothiemurchus and Linn of Dee, or between the latter and Blair Atholl, offering the experience of a variety of different wildness attributes and qualities along the way."*

4.13. Access tracks and paths that are relevant to this assessment occur on the northern side of WLA 15, where access is drawn from the roads and settlements of Speyside to the north and north-west. Tracks and paths into WLA 15 typically follow the north to south routes of the glens, for example the northern section of Lairig Ghru, while the internal paths traverse the higher slopes to access the summits and connecting ridgelines. Apart from where forest cover occurs across the northern edge of WLA 15, views are typically open and these paths in the northern part of WLA 15 will be susceptible to visibility of the Proposed Development.

4.14. It can be concluded that the effects of the Proposed Development on recognised routes and movement will be limited owing to the limited extent of theoretical visibility shown on the ZTV, to be concentrated in the northern part of WLA 15. The consideration of recognised routes and movement will, therefore, lead to the northern part of WLA 15 being considered as the Study Area.

Wild Land Qualities

4.15. In respect of WLQs, NatureScot guidance states "*rationale for the selection of the study area and scope of the assessment*" includes consideration of the *"wild land qualities likely to be significantly affected".*

4.16. WLA 15 has eight WLQs. These are set out in Table 9D.2 below, along with a judgement as to whether or not there is potential for them to be significantly affected by the Proposed Development.

Table 9D.2 Wild Land Qualities with Potential to be Affected

Wild Land Quality (defined in SNH's	Potential to be affected by the Proposed Development

WLA 15 Description)	
WLQ1 *"Extensive, open, remote mountain and moorland interior containing few human artefacts or evidence of contemporary land use and possessing a strong sense of sanctuary and solitude."*	There will be no direct effect on the mountain and moorland interior as the Proposed Development will be located a minimum distance of approximately 23 km outwith WLA 15. Indirect effects will not be significant owing to the notable separation distance between WLA 15 and the Proposed Development, the existing influence from the Operational Scheme on the adjacent site and the limited extent to which the Proposed Development will be visible across the mountain and moorland interior.
WLQ2 *"Massive, rounded hills and plateaux that appear awe-inspiring due to their superlative scale, openness and elevation, and which offer extensive, panoramic views."*	There will be no direct effect on the rounded hills and plateaux as the Proposed Development will be located a minimum distance of approximately 23 km outwith WLA 15. Indirect effects may occur owing to visibility of the Proposed Development which will occur in some of the extensive panoramic views from the WLA, albeit with a notable separation distance between WLA 15 and the Proposed Development, an existing influence from the Operational Scheme on the adjacent site and the limited geographical extent over which the Proposed Development will be visible.
WLQ3 *"Long, deep, steep-sided glens that cut into the massive hills and plateaux and possess qualities of remoteness whilst also facilitating access."*	There will be no direct effect on the mountain glens as the Proposed Development will be located a minimum distance of approximately 23 km outwith WLA 15. Indirect effects will not be significant owing to the notable separation distance between WLA 15 and the Proposed Development, the existing influence from the Operational Scheme on the adjacent site and the very limited extent to which the Proposed Development will be visible within the mountain glens.
WLQ4 *"Corries and gorges carved into the hills and plateaux appear arresting in their vertical form and include features such as cliffs and waterfalls that contribute to perceived naturalness."*	There will be no direct effect on the corries, gorges and upland plateaux as the Proposed Development will be located a minimum distance of approximately 23 km outwith WLA 15. Indirect effects will not be significant owing to the notable separation distance between WLA 15 and the Proposed Development, the existing influence from the Operational Scheme on the adjacent site, and the limited extent to which the Proposed Development will be visible from the corries, gorges and upland plateaux.
WLQ5 *"Dynamic rivers form key visual and physical features, influence access and contribute to the sense of naturalness, whilst watersheds and bealachs form notable*	There will be no direct effect on the rivers as the Proposed Development will be located a minimum distance of approximately 23 km outwith WLA 15. Indirect effects will not be significant owing to the notable separation distance between WLA 15 and the Proposed Development, the existing influence from the Operational Scheme on the adjacent site, and the limited extent to which the Proposed

crossing points."	Development will be visible from the rivers.
WLQ6 "*Simple landforms and landcover that contribute to the awe-inspiring qualities of the area, and exposed rock that influences strongly the sense of naturalness."*	There will be no direct effect on the landform and landcover as the Proposed Development will be located a minimum distance of approximately 23 km outwith WLA 15. Indirect effects will not be significant owing to the notable separation distance between WLA 15 and the Proposed Development, the existing influence from the Operational Scheme on the adjacent site, and the limited extent to which the Proposed Development will be visible from the simple landform.
WLQ7 "*A variety of recreation activities, including those that are focused, dispersed or occur along through-routes, allowing different wild land attributes and qualities to be experienced."*	There will be no direct effect on the recreational activities in WLA 15 as the Proposed Development will be located a minimum distance of approximately 23 km outwith WLA 15. Indirect effects will not be significant owing to the notable separation distance between WLA 15 and the Proposed Development, the existing influence from the Operational Scheme on the adjacent site, and the limited extent to which the Proposed Development will be visible from the corries, gorges and upland plateaux.
WLQ8 "*Open native woodlands of diverse spatial and visual characteristics that respond directly to the underlying physical conditions, contributing strongly to the sense of naturalness."*	There will be no direct effect on the native woodlands as the Proposed Development will be located a minimum distance of approximately 23 km outwith WLA 15. Indirect effects will not be significant owing to the notable separation distance between WLA 15 and the Proposed Development, the existing influence from the Operational Scheme on the adjacent site, and the very limited extent to which the Proposed Development will be visible from the native woodlands.

4.17. It can be concluded that only one of the eight WLQs has some degree of susceptibility to indirect effects of the Proposed Development. Despite the limited potential for a significant effect to arise, the effects on this WLQ have been considered in the detailed assessment.

4.18. The consideration of WLQs suggests that only the northern part of WLA15 should form the Study Area, as this is the only part where the panoramic views referenced as part of WLQ2 have the potential to be significantly affected.

Potential for Cumulative Effects

4.19. The third point noted in NatureScot guidance as being relevant in the "*rationale for the selection of the study area and scope of the assessment"* is consideration of the "*The potential for cumulative effects".*

4.20. The relevant projects that the Proposed Development may interact with cumulatively, and that have the potential to give rise to significant cumulative effects on wildness qualities, include the following developments:

- Operational Tom nan Clach Wind Farm;
- Operational Moy Wind Farm;
- Operational Farr Wind Farm;

•Operational Glen Kyllachy;

•Operational Berry Burn / application stage Berry Burn II; and

•Operational Paul's Hill / consented Paul's Hill II.

4.21. The cumulative ZTVs in **Figures 9.14 to 9.23** show that there is already an existing baseline influence from operational wind farms on WLA 15, which covers similar extents to theoretical visibility of the Proposed Development. Furthermore, the seven additional turbines will be visible at distances beyond 23 km and seen located immediately adjacent to the 13 operational turbines of the Operational Scheme. The Proposed Development will, therefore, be seen as relatively small scale and distant structures, located adjacent to similar small scale and distant structures and in a sector of the view where there is a wider influence from groups of also similar small scale and distant structures. It is in respect of this context that significant cumulative effects will not arise and, therefore, the consideration of cumulative effects will have no bearing on the defined extent of the Study Area.

Identification of the Study Area

4.22. In considering the extent of theoretical visibility, the potential effect on routes and movement through WLA 15, the potential for the WLQs to be affected and the potential for cumulative effects to arise, it is evident that the majority of WLA 15 and the majority of the eight WLQs will not be affected.

4.23. NatureScot's Guidance requires the establishment of a Study Area at the outset of the assessment, that is *"appropriate to the scale of the proposal and extent of likely significant effects on the WLA".* If this guidance is followed, the Study Area would cover only the northern part of WLA 15 where the ZTVs show theoretical visibility to occur. The Study Area, therefore, focuses on the northern part of WLA 15 where there is some potential that one of the WLQs may be affected by the Proposed Development.

Step 2: Establish the Baseline

4.24. NatureScot guidance summarises this step as follows in Table 1: *"Confirm the wild land qualities (set out in the WLA description) relevant to the study area, describing any major changes that have occurred since the description was prepared and the nature of their contribution to the WLA."*

4.25. The baseline study is informed by SNH's description of the WLA, the mapping of the eight classes of wildness (SNH, 2014), OPEN's site visits, and assessment of viewpoints in WLA 15, which illustrate the outlook across the WLA. It is important to note that while these viewpoints provide a useful illustration of the views that can be gained from within the Study Area, the assessment of effects on viewpoints and on WLAs is carried out separately and according to specific methodologies that vary in some respects. Viewpoint 3: Ptarmigan and Viewpoint 9 Meall a Bhuachaillie have, therefore, been referenced simply to provide an illustration of views within the Study Area.

Baseline Description

4.26. In order to understand the key characteristics and special qualities that have led to the WLA classification, this section presents a brief description of the landscapes and wildness qualities of WLA 15. The description focuses on the

experiential qualities of the landscapes included in the WLA, as well as their relationship with those landscapes which form the wider setting.

4.27. WLA 15 covers an area of 1,572 km^2, spanning parts of Highland, Aberdeenshire, and Perth and Kinross, and making it one of the largest WLAs in Scotland. It also includes some of the largest hills, with peaks ranging between 600 m and 1,300 m. The Cairngorm Massif forms the highest tops and most dramatic skylines, set in the northern part of WLA 15 and with the high plateaux and tors of Ben Avon to the east. Other medium to large interlocking hills and ridges, create an extensive landscape setting to the south.

4.28. The boundaries of WLA 15 are defined by the surrounding lower-lying glens and passes, which are typically used as main road corridors. The A9 wraps around WLA 15 from Blair Atholl in the south, through Dalwhinnie in the west and Kingussie and Aviemore in the north-west and north. In the east, WLA 15 is bounded by the A93 near Braemar, with an indent created where the Dee Valley occurs. The interior is extensive and remote, with very little habitation other than occasional bothies and estate buildings.

4.29. The awe-inspiring qualities of WLA 15 relate to the horizontal and vertical scale of the landscape, both in relation to the elevated mountains as well as the sunken glens. There are also extensive glacial features evident, with arêtes, corries, gorges, truncated spurs and u-shaped valleys. The openness and elevation of the landscape ensures that views are often expansive, and the extent of the undeveloped landscape engenders a sense of remoteness and isolation. While large tracts of WLA 15 are managed by the estates, there is a strong sense of naturalness relating to the simplicity of the heather moorland.

Physical Attributes and Perceptual Responses

4.30. Establishing the baseline involves a review of the strength of attributes and responses and their contribution to the identified WLQs of WLA 15. These are verified against NatureScot's WLA Description, noting that the strength to which the WLQS are expressed will vary in different parts of the WLA.

4.31. OPEN's baseline is also informed by its fieldwork within WLA 15, without which it could not have undertaken this assessment. OPEN considers that wild land qualities in WLA 15 are derived from a combination of the following physical attributes and perceptual responses, shown in Table 9D.2 below, all of which are displayed to differing degrees across the northern part of WLA 15.

Table 9D.2 – Physical Attributes and Perceptual Responses of WLA 15

Physical Attribute	Perceptual Response
A high degree of perceived naturalness derived from the extensive and remote mountain and moorland interior; rounded hills and plateaux; long, deep and steep sided glens; corries and gorges; and dynamic rivers. WLA 15 presents a variety of scenic landscapes, making up a remarkably open and expansive landscape with extensive	The naturalness of this landscape gives rise to a number of strong perceptual responses including a sense of solitude, sanctuary and remoteness that strengthens towards the core of WLA 15. A sense of risk is derived from the openness and vast scale of the landscape, which is considered to be arresting and awe inspiring.

visibility beyond the boundaries of the WLA.	
A lack of modern human artefacts and structures within the WLA contribute to a largely undeveloped landscape with very little evidence of human occupation. There are, however, some human influences to the north of WLA 15 including Cairngorm ski centre / Ptarmigan Restaurant in the close range; roads, rail line and settlements through the Spey Valley; and wind farms on the hills to the north, north-west and north-east.	An awe-inspiring scale and vastness of landscape that extends to the south and east of the northern part of WLA 15, as well as beyond the boundaries of the WLA to include other more distant WLAs. The modern human artefacts, including the ski centre and wind farms to the north, diminish the sense of remoteness experienced in the northern part of WLA 15.
Little evidence of contemporary land uses occur within the WLA, with the vast majority of the area comprising open moorland. There are, however, management practices and estate activities within the WLA, evident as tracks, fences, muirburn and grazing. There are also contemporary land uses around parts of the perimeter, including forestry plantations and farmland which have led to the modification of the natural landscape.	A strong sense of remoteness, solitude and sanctuary that strengthens towards the core of the WLA, but which is diminished in some areas of WLA 15 by proximity and visibility of some contemporary land uses. The forestry plantations diminish some of the area's awe-inspiring qualities of openness, as well as its perceived naturalness. The management and activities associated with the estates in WLA 15 also detract from the sense of naturalness and remoteness.
Landform which is rugged, or otherwise physically challenging occurs especially across the Cairn Gorm mountain massif in the north of the WLA, owing to the elevation and steepness of the slopes and craggy outcrops.	Perceptions that the landscape has inspiring qualities, that strengthen towards the core of the WLA, and which appear to extend well beyond its boundaries, especially to the south and west. The vastness and scale of the landscape also make navigation difficult, adding to the sense of risk.
Remoteness and / or inaccessibility occurs more towards the core of WLA15. This area is popular for recreation and as such there is a large number of paths and tracks that enter WLA 15 from the edges. While many of these routes follow rivers and mountain passes, many also connect the high tops in this northern part of WLA 15.	The vastness and scale of this landscape means that there are many parts that are remote and difficult to access, adding to the sense of risk and physical challenge. There are also large numbers of paths and tracks allowing access and reducing the sense of risk or remoteness.

Review of NatureScot's WLA Description

4.32. This step of the assessment carries out a review of the baseline physical attributes and perceptual responses of WLA 15 and their contribution to the identified WLQs of the area, as identified in NatureScot's WLA description.

OPEN agree that the eight WLQs set out in the WLA Description are representative of WLA 15, to varying degrees, and does not dispute the factual accuracy of the information that is contained within the WLA Description.

4.33. Site assessment for NatureScot's WLA Description was carried out in April, August and September 2016. The cumulative ZTVs in **Figures 9.14 to 9.23** show that operational wind farms are also visible from WLA 15. A number of these become operational prior to NatureScot's site assessment in 2016, including Paul's Hill Wind Farm in 2006, Berry Burn Wind Farm in 2014, Farr Wind Farm 2005 and Moy Wind Farm in 2015.

4.34. There is no reference in the WLA Description to any influence from operational wind farms despite these developments being present across the hills to the north-east and north-west during NatureScot's site assessment. It, therefore, has to be assumed that the influence from these operational turbines was considered sufficiently light not to warrant a reference. This would perhaps be owing to their distant locations well beyond the northern boundary of the WLA at ranges beyond approximately 20 to 30 km. Since the time of writing, external influences have increased with the construction of Tom nan Clach and Dunmaglass Estate, as well as more distant wind farms.

4.35. In respect of other modern artefacts and contemporary land uses, the WLA Description presents the following statement.

4.36. *"The A9 main road corridor forms a hard edge to the western side of the WLA and includes vehicle activity and noise as well as high voltage powerlines and coniferous plantations that have cumulative effects. In addition, the Cairngorm ski centre forms an elevated edge on the north side (although its visibility is limited from within the WLA as it is located on slopes that face mainly outwards). In contrast, the other boundaries mark a more gradual transition of increasing amounts of managed forest (such as around Glenmore and Atholl) and human elements and activity (such as within Glens Tromie, Dee and Tilt)."*

4.37. On the basis of OPEN's fieldwork in the northern part, the WLA Description has been found to not fully capture the influence from human activity that exists in this area nor how this diminishes the perceptual qualities of wildness in this area. No reference is made to the series of settlements that occur along the Spey Valley, including Newtonmore, Kingussie, Aviemore and Nethy Bridge, nor of the influence from the A9(T) or train line that connects these settlements Again, it is perhaps the separation distance between the WLA boundary and these developments that prevents them from being considered to have a notable influence.

Step 3: Assess the Sensitivity of the Wild Land Qualities

4.38. The sensitivity of WLA 15 is assessed by combining the value of the WLA and its susceptibility to the Proposed Development. NatureScot guidance summarises this step as follows in Table 1:

4.39. *"Through detailed field assessment within the study area, assess the sensitivity of the wild land qualities scoped in (including their physical attributes and perceptual responses), to the type and scale of change proposed".*

4.40. The value of the WLA has been established previously at paragraphs 3.5 to 3.12 as medium-high.

4.41. NatureScot's 2020 Guidance requires the assessor to establish which WLQs, including the physical attributes and perceptual responses that contribute to those qualities, are most sensitive to the type and scale of change proposed.

4.42. The WLQs vary across WLA 15, in terms of their strength and/ or the intensity to which they can be perceived. This means that the sensitivity that is attached to them must also vary across WLA 15. Across the northern part of WLA 15 the WLQs are experienced as being relatively strong and intact, although the sensitivity is affected to some degree by the perception of human influences which are seen from, but which lie outside the WLA 15 boundary, including commercial forestry plantations, the Cairngorm ski centre, Berry Burn, Paul's Hill, Tom nan Clach, Moy, Farr and Glen Kyllachy wind farms, and the settlements, road and rail through the Spey Valley.

4.43. The presence of these influences in the baseline moderates the susceptibility of this northern part of the WLA to medium, and this, in the terms of GLVIA 3, reduces the overall sensitivity of the northern part of WLA 15. The combination of a medium-high value with a medium susceptibility, produces a **medium-high** sensitivity for the eight WLQs.

4.44. In Table 9E.5, WLQ2 was highlighted as the only WLQ with potential to be significantly affected by the Proposed Development. As this WLQ relates to the massive rounded hills and plateaux, that are evident in the northern part of WLA 15, this WLQ is expressed to a strong degree.

Step 4: Assess the Magnitude of Change

4.45. A key component in assessing the significance of effects is to attribute the likely magnitude of change that may arise across the northern part of WLA 15. The assessment presented in Section 4, and more specifically Table 9D.2, identifies those WLQs with potential to be affected by the Proposed Development. This has highlighted that only one of the eights WLQs has potential to be significantly affected and this is assessed in more detail in Table 9E.5 below.

Table 9E.5 – Magnitude of Change in the northern part of WLA 15

Wildness Quality	Magnitude of change to baseline Wildness Quality
WLQ 2: *"Massive, rounded hills and plateaux that appear awe-inspiring due to their superlative scale, openness and elevation, and which offer extensive, panoramic views."* *"This WLA comprises an extensive range of rounded hills and*	The Proposed Development will not have a direct effect on the 'massive rounded hills and plateaux' as it will be located beyond 23 km from the northern boundary of WLA 15. It will, however, have an effect on the extensive, panoramic views from WLA 15, as it will form a feature in the hills seen to the north. The effect will be moderated by the combination of the following factors. Firstly, there is the separation distance of more than approximately 23 km which will ensure that the seven proposed turbines will be seen as small-scale elements, even taking into account their longer blades and blade tip height of 149.9 m. Secondly, the proposed turbines will be seen set to the immediate fore of the operational

plateaux whose immense scale, simplicity of landform, similar altitude and openness appears awe-inspiring. From the tops, these hills and plateaux appear to form a collective platform of interlocking ridges, with lower areas screened due to the convexity of slopes. This means that views tend to pass over a succession of sweeping, landform horizons upon the tops, uninterrupted by human artefacts and leading into the distance and the sky. This contributes to an exhilarating experience of seeming 'on top of the world'."	turbines, such that they will appear as an extension and will not introduce a new feature. Thirdly, the Proposed Development will be associated with the lower Open Rolling Uplands LCT to the north, which form one of the less remarkable sectors in the wider surrounding views. Taking all these factors into account the magnitude of change on this WLQ will be **low** and the effect will be **not significant**. The Proposed Development will have a limited influence on the panoramic views experienced from this northern part of WLA 15 and will, therefore, have a limited influence on the exhilarating experience of these views.

Cumulative effects

4.46. The assessment indicated in Table 9E.5 above reflects the cumulative effect that the Proposed Development will give rise to, in addition to the other operational wind farms, which collectively form the baseline context.

4.47. It is important also to consider the cumulative effect of the Proposed Development in conjunction with all relevant consented and application stage wind farms, to ensure that future scenarios are covered in the assessment. The relevant consented wind farms include Paul's Hill II, Cairn Duhie and Aberarder wind farms. Paul's Hill II is located a minimum of approximately 23 km from the closest WLA 15 boundary, while Cairn Duhie is located a minimum of approximately 25 km. Both consented wind farms form part of the cluster with operational Berry Burn and Paul's Hill to the north-east of WLA 15. Aberarder lies a minimum of approximately 28 km to the west of WLA 15 and forms part of the cluster with Dunmaglass Estate. The notable separation distance of these wind farms from WLA 15 combined with their close association with operational wind farms limits the additional influence they will have on the cumulative situation. The addition of the Proposed Development to a cumulative context including the relevant consented wind farms will, therefore, not alter the assessment made in respect of the baseline context.

4.48. The relevant application stage wind farms include Berry Burn II and Clash Gour wind farms, joining the cluster to the north-east of WLA 15, while application stage Corriegarth Wind Farm will join the cluster to the west. At minimum distances of approximately 24 km and 28 km respectively, Berry Burn II and Clash Gour will form distant features from WLA 15 and be seen to the rear of the other operational wind farms in this sector. Similarly, Corriegarth will be seen at a range of 28 km and will form a distant feature, associated with operational Dunmaglass Estate. The application stage wind farms will have a weak influence on the overall cumulative context owing to

their notable separation distances and the existing influence on WLA 15 from the operational wind farms. The addition of the Proposed Development to a cumulative context including the relevant consented and application stage wind farms will, therefore, not alter the assessment made in respect of the baseline context.

4.49. It can, therefore, be concluded that the addition of the Proposed Development will not give rise to any significant cumulative effects in respect of cumulative contexts including both consented wind farms and application stage wind farms.

Step 5: Judge the Significance of Effects

4.50. The Proposed Development would not give rise to any significant effects, either singly or cumulatively, on the WLQs of WLA 15. This assessment has been carried out in respect of the northern part of WLA15 which is closest to the Proposed Development and from which there is the highest occurrence of theoretical visibility, as shown on the ZTV in **Figure 9.9**.

4.51. The wildness qualities in the northern part of WLA 15 are displayed to different strengths, with a relatively strong expression across most of the area owing to the impressive scale and extent of the Cairn Gorm mountain massif. There is, however, some weakening within WLA 15 owing to estate management and activities which means tracks, fences, muirburn, grazing and shooting, detract from the sense of remoteness, solitude, sanctuary and naturalness. There is also some weakening of wildness qualities along the northern aspect of WLA 15 where external influences, such as the Cairngorm ski centre, commercial forestry, settlement, roads, the rail line and more distant wind farms also detract from the perceptual responses associated with WLA 15. These influences reduce further south through WLA 15 as they become progressively screened by the ridgeline which extends through Cairn Gorm and the adjacent high tops.

4.52. Within the northern part of WLA 15, the Proposed Development would not give rise to any significant effects on the perception of wildness qualities. This assessment has been made in respect of both the baseline context and the cumulative contexts, considering consented and application stage wind farms.