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To whom it may concern:

Proposed Development ECU00000676 by Glendye Wind Farm Limited.

Glendye Wind Farm Limited (GWFL), on the 3rd October 2018, submitted the subject Planning Development under Section 36 to the Energy Consents Unit of the Scottish Government Energy Consents Unit for the construction of a major Wind Farm at a site located on the Fasque and Glendye Estates, approximately 2km from Fettercairn and 12km from Strachan within the boundaries of Aberdeenshire. This Planning Development follows on from the Scoping Report Report reference ECU00005272 with a submission date of 26 January 2016.

This letter forms our Representation against the Glendye Windfarm Proposed Development ECU00000676.

1. **The site selected is unsuitable for development of a windfarm for several reasons:**
 - a) **The Proposed Development contravenes many aspects of Scottish Planning Policy.** The Scottish Governments National Planning Framework 3 June 2014 states: **“We will respect, enhance and make responsible use of our natural and cultural assets.”** and **“4.4 Scotland’s landscapes are spectacular, contributing to our quality of life, our national identity and the visitor economy. Landscape quality is found across Scotland and all landscapes support place-making..... Closer to settlements landscapes have an important role to play in sustaining local distinctiveness and cultural identity, and in supporting health and well-being”.**

2. **The Proposed Development contravenes many elements of the adopted Aberdeenshire Local Development Plan 2017(ALDP 2017) namely:**
 - a) Supplementary Guidance, Section 9c, Special Landscape Areas, Clachnaben and Forest of Birse
Pages 70-72 and maps pages 73-77 extensively stress the importance of this Special Landscape Area and Management Recommendations specific to the area include:
 - i. **The Clachnaben and Forest of Birse SLA is classed as an upland landscape type. As such emphasis should be on retaining their largely undeveloped and remote character. This means ensuring that any developments are located and designed to limit their wider visibility and protect open skylines and rugged summits.**
 - ii. **Development must respect the strong, rolling relief and sense of wildness of the upland landscape.**
 - iii. **Development involving hill tracks should be undertaken in line with best practice guidance and should take account of landscape character and qualifying features of the SLA.**
 - iv. **Avoidance of development which erodes or interrupts the seamless relationship of this area to the Cairngorms.**
 - v. **Avoidance of development which impacts upon the appreciations of Clachnaben and Mount Battock and their settings.**
3. Section 10, Shaping Marr, Page 25: **“There is no real opportunity for wind turbines within Marr”** and the supporting map Page 26 showing the development site has **no “Strategic Capacity for Small, Medium & Large wind turbines “** This conclusion is probably based on a study by Aberdeenshire Council and published by SNH entitled “Strategic Capacity Landscape Assessment for Wind Energy in Aberdeenshire” (March 2014) which shows clearly that geographic area 22 (ii) The Mounth keyed as an area of **“no underlying capacity”**. Furthermore, the map shows area 22 (ii) is just across the B974 road from the operational Mill Hill windfarm as an **“area that has exceeded underlying capacity”**.
4. Section 15, Natural Heritage and Landscape, Page 54, Policy E2 Landscape: **“We will refuse development that causes unacceptable effects through its scale, location or design on key natural landscape elements, historic features or the composition or quality of the landscape character.”**
 - a) Section 18, Climate Change, Page 72, Policy C2: **All windfarms must be appropriately sited and designed and avoid unacceptable environmental effects taking into account the cumulative effects of existing and consented wind turbines.Unacceptable significant adverse effects on the amenity of dwelling houses or tourism and recreation interests including core paths and other established routes used for public walking, riding or cycling should also be avoided.**

5. Supplementary Guidance Section 5, Local Nature Conservation Sites, subsection 5d Landward Sites, Site 42 Feughside: **“Extensive area of geomorphological interest representing the best part of a more extensive fluvio-glacial complex. Clachnaben is a good example of a granitic tor. Locally rare plants in pine woodland and mire.** This LNCS covers an area from Feughside south to include the summit of Clachnaben southward towards the Water of Dye (Maps 46A-D). The southern boundary merely 3km from the proposed development. The ALDP policy for LNCS is given in Section 15 Natural Heritage and Landscape, page 53 Nature conservation sites: **We will not allow new development where it may have an adverse effect on a nature conservation site designated for its biodiversity or geodiversity importance, except where the following circumstances apply the proposal’s public benefits must clearly outweigh the nature conservation value of the site.**

6. **The Proposed Development is almost entirely on peatland.** ECU00000676 Vol 1 Figure 7.4 Superficial Geology maps the extent of peat with Chapter 7 paragraph 7.18 stating **“Approximately 84% of the Site is shown to be within Class 1 based on the mapxxi. This comprises nationally important carbon-rich soils, deep peat and priority peatland habitat (land covered by peat forming vegetation or vegetation associated with peat formation) and areas likely to be of high conservation value.”** (xxi SNHH The Carbon and Peatland Map 2016). We believe that “high conservation value” (SNH) excludes disturbance resulting from the construction and operation of 26 turbines, 31 km of track and ancillary works and that this concentration of disturbance will result in hydrological disconnection of the remaining dissected areas of peat and blanket bog that can not be mitigated by the intentions of the Peat and Habitat Management Plan Appendix 4.3.

7. **The Proposed Development creates an unacceptable level of “significant effects” of a detrimental nature on local and distant landscapes and wild lands.** (Chapter 15 Summary of Significant Effects, Table 15.1). These landscapes are not only the site itself but to 2 recognised Landscape Character Types, including The Mounth, 2 Strategic Landscape Areas, Clachnaben/Forest of Birse and the Breas of the Mearns and one Wild Land area, Lochnagar – Mount Keen. The referenced Table also indicates that the mitigation efforts result in no change, the “Residual Effect” after mitigation remains “significant”.

8. **The Proposed Development creates an unacceptable level of “significant effects” of a detrimental nature on neighbouring viewpoints.** Excellent, realistic images from 22 viewpoints are provided (Vol 3 Fig 6.12 to 6.32) of both the existing and the future vista with the Proposed Development turbines in place. The turbines have a significant effect on 8 of the 22 viewpoints including iconic summits of Clachnaben, Mount Battock, Cairn o’ Mount, Hill of Whirran and Hill of Rowan. The same viewpoint image is provided from the summit of Lochnagar. From this lofty, distant summit the tops of the Glendye turbines are visible, in an otherwise natural eastward landscape. Many would deem this as a “significant effect” of a detrimental nature.

9. **The Proposed Development does not state the solution to the significant effect of a detrimental nature on both the NATS Perwinnes Radar and the RRH Buchan (military) radar.** Detrimental effects on these two independent radar systems could have serious implications for the effective control of aircraft and thus safety of the population both in the air and on the ground.

In conclusion, on the basis of the reasons stated above I believe that this development should be refused.

Yours Sincerely,