Alvah and Forglen Community Council, Banff

Secretary email: secretary.alvahforglencc@gmail.com

Alvah and Forglen Community Council has the following comments, observations, and requests on planning application APP/2024/1812 | Onshore Transmission Infrastructure for Caledonia Offshore Wind Farm. Please note the possible conditional objection on page 5.

Overall, Alvah and Forglen Community Council believes that Ocean Winds are to be congratulated on finding an affordable underground route for the entire length of the cable run rather than use overhead power lines. This is a major achievement which mostly respects the designated Special Landscape Area status of the Deveron Valley and hopefully will minimize impact on residents of , and visitors to, the Alvah area. However, it has major concerns on the following:

1A. Effects on trees located within the proposed cable route - Alvah

From the current available route plan, the cable route would go through a line of trees to the west of Greenlaw Farm. The trees are located within the Deveron Valley Special Landscape Area and form part of Deveron Valley skyline visible from both within the west side of the Deveron Valley SLA as well as from over 5km of the east side of the Deveron SLA along National Cycle Route 1 (NCR1) as well as from other nearby roads.

Looking west from the eastern side of the Deveron Valley (north to the right of image)



The SLA designation notes that such wooded framing to the Deveron Valley forms part of the structure of the area deemed worthy of protection. and is of significance in their contribution to the special qualities of the area.

1B. Effects on trees located within the proposed cable route - King Edward

From the current available route plan, the cable route would go through a line of mature Beech trees extending from Hill of Scatterty to Holm Wood in King Edward on the east side of the Deveron Valley. The trees are located within the Deveron Valley Special Landscape Area (SLA) and form part of Deveron Valley ridgeline visible to road users over a length of around 2km, both from low in the valley to higher up on the valley slopes They are a component of some of the most scenic views of the River Deveron and its valley in Alvah

Looking east from the west side of the Deveron Valley (north to the left of the image)



Alvah and Forglen Community Council disagrees with the applicant on the visual impact of the proposed removal of trees from this linear wood. It notes and agrees with the comments in the submission by Carol Anderson, landscape consultant to Aberdeenshire Council

"***The removal of locally prominent beech woodland*** *between Hill of Scatterty and Holm Wood on the upper eastern slopes of the Deveron valley* ***is*** *however* ***concerning and it is unclear why the adverse effects of this removal would constitute a temporary effect*** *as stated in paragraph 4.7.1.98 of the LVIA*."

Apart from their contribution to views in the Deveron Valley SLA these trees are also of benefit to many species of insect and animals. According to Forest and Land Scotland their life span is 350 years and they can support 98 insect species. *Whilst its native status is still open to question, Forestry and Land Scotland is keen to use this species where it will meet our objectives such as creating beautiful landscapes*

Volume 5 Chapter 4 Landscape and Visual Section 4.7.1.96 claims ***The OnTI RLB avoids trees and woodland wherever possible*** but also ***An approximately 50m long section of trees will be removed from an approximately 815m long linear woodland between Hill of Scatterty and Holm Wood.***

In 4.7.1.94 the applicant claims ***Woodland within this section will undergo a low magnitude of change as the alteration to the landscape element will be barely discernible.***

but then in 4.7.1.96 contradicts by stating
4.7.1.96 ***The removal of this section will be notable from the surrounding landscape*** and in
4.7.1.97 notes ***Removal of a short section of the row of beech trees between Hill of Scatterty and Holm Wood will be notable because of the prominence of these trees on the skyline.***

This line of Beech trees is the **only** linear woodland feature visible in this part of the Deveron Valley SLA to form a contiguous bounding to the valley on its eastern side where, because of the clear visibility of individual tree trunks, the removal of 50m or more of these trees would have a noticeable visual effect akin to seeing a catwalk model with missing front teeth. This would be a permanent change to this prominent ridgeline woodland feature as the applicant notes no compensatory tree planting in situ over the buried cables is possible.



The Deveron Valley SLA designation notes:
Proposals within the river valley or on the rolling wooded hills and ridges should be carefully assessed to ensure development will not negatively impact on the landscape or sense of place felt within this area.

As such the community council request that the planning department look carefully at, and reassess using all possible sources of information, the magnitude of change advanced by the applicant for their proposed tree removal taking into account the concerns of the Aberdeenshire Council landscape consultant report and those of Alvah and Forglen Community Council.

Aberdeenshire Council Policy E3: Forestry and Woodland aims to protect and, where appropriate, enhance Aberdeenshire's forests and native and semi-natural woodland to ensure the environment, habitats, species and local culture are safeguarded, whilst also benefiting and supporting the local and national economy**. The policy states a presumption against the removal of safe and healthy trees, non-commercial woodlands and hedgerows**.

Volume 5 Chapter 4 Landscape and Visual Section 4.7.1.96 states horizontal drilling will be used for native woodland near the Deveron while the Onshore Planning Statement Section 5.5.1.9 in describing how the construction will comply with Policy E3 notes "***There are small areas of fragmented woodlands located within the OnTI RLB however through .....the use of embedded mitigations such as HDD, it is anticipated that there will be no significant adverse impact on woodlands.***

It is unclear then why the applicant proposes to remove this portion of this wood. rather than use HDD which is noted within in the previous paragraph as being an available mitigation. The non commercial woodland in question is located at the top of a ridge with the ground sloping away on both sides. This would seem to be conducive to use of HDD under the trees. The applicant should provide information as to the amount of any extra costs involved to drill under, rather than remove, the 50m section of these trees that it proposes to remove..

It is the view of Alvah and Forglen Community Council that removal in whole or in part of these identified lines of trees on the Deveron Valley ridgeline will negatively impact on the visual quality of the Deveron Valley SLA landscape as seen by residents and visitors to the area. This will be a permanent removal of trees with a lifespan of up to 350 years and as noted previously "***will be notable because of the prominence of these trees on the skyline".***

When the previous Moray East wind farm underground cable was constructed through the Alvah area within the Deveron Valley SLA there was the loss of numerous mature Beech trees. Accordingly, the community council does not wish to see a repeat of that situation again within the wider Deveron Valley SLA areas of Alvah and King Edward.

First Request
Alvah and Forglen Community Council requests full details of the number and location of trees to be removed in the Deveron Valley SLA area once the final route is available and that provision is made to reduce to an absolute minimum any effects on the landscape character within the Alvah area of the SLA from the cabling works.

- that existing gaps in the tree line behind Greenlaw Farm in Alvah be used to keep the number of trees there to be removed to an absolute minimum
- that visualisations be prepared of before/after views showing the proposed tree removal in King Edward between Hill of Scatterty and Holm Wood to assist Aberdeenshire Council in deciding what mitigation is needed and warranted for the applicant's proposal to remove these prominently visible trees from within the SLA.
- that the applicant should provide information to Aberdeenshire Council as to any extra costs involved to drill under, rather than remove, the trees in question.
- that Aberdeenshire Council stipulate that drilling be used under the King Edward Beech trees instead of their removal.
- or a slight route adjustment be made to bypass these Beech trees to the south.

2. Effects on Local Roads and Residents

The cable route through Alvah crosses the A97, B9121 and two unclassified roads: the C41L and U12L. One of them, the U12L Kemplemire and Newton Road between the C41L at Bagrae farm and Kirkton of Alvah, is a narrow single track road. with few passing places.

The community council has concerns as to increased traffic on these roads especially given the nature and number of local residents complaints made over the previous Moray East underground cable route through Alvah involving the same two unclassified roads. Some examples:

- heavy traffic damaging road surfaces.
- increased noise and disturbance to residents from the higher traffic levels.
- delays and blocking of access to properties.
- contractors travelling at inappropriate speeds for the narrow roads and in one instance a claim that directly caused the death of a family pet.

Second Request
Alvah and Forglen Community Council requests sufficient measures are taken to reduce impact on Alvah residents from the construction work. Some suggestions:

- Impose a 40mph speed limit for construction traffic and contractors on the U12L and C41L in Alvah
- keep the community fully informed on road closures and work in a timely manner, perhaps by a real time web interface, text messages, emails etc.
- All necessary repairs to the roads requested by the community council and residents to be carried out before construction of the cable route starts.
- Roads damage 'hotline' for necessary repairs to roads during the construction period.

3. Noise and disturbance mitigation for nearby homes which may suffer loss of amenity.

At a meeting with Ocean Winds on 30th July 2024 Alvah and Forglen CC noted that three homes would be within 150m of the cable route boundary with one being within 60m. Addresses of the properties were subsequently provided to the Ocean Winds project team

The area where these houses lie has low background noise levels and low existing traffic flow. The community council is concerned that, given the stated multi year long timescale for the cabling works, these homes will possibly suffer considerable loss of amenity from noise disturbance.

Third Request
Alvah and Forglen Community Council requests sufficient measures are implemented to reduce disturbance from construction noise to the absolute minimum possible for households in Alvah and are fully detailed in the CEMP and associated documents. Also

- that steps are put in place for prompt action to be taken in the event of noise complaints once work is underway.
- that no evening or night working is to be allowed in the vicinity of homes.

Conclusion

If our three requests noted previously cannot be granted by way of conditions attached to the consent, or statements of compliance by the applicant , or similar, then please consider this representation as an objection.
For reasons of
1. Protection of the Deveron Valley SLA
2. Road Safety
3. Protection of residents amenity.

Doug Hill
Chair
Alvah and Forglen Community Council

Appendix 1 Views of the King Edward beech trees from Alvah

All photos taken with Canon EOS full frame camera and Canon 50mm lens. All images are of the full frame photo width cropped down to 1098 pixels width from a 8192 pixel width original. Please refer to image on page 2 for viewing locations.



From V1



From V2



From V3

Appendix 1 Views of the King Edward beech trees from Alvah (part 2)

All photos taken with Canon EOS full frame camera and Canon 50mm lens. All images are of the full frame photo width cropped down to 1098 pixels width from a 8192 pixel width original. Please refer to image on page 2 for viewing locations.



From V4



From V5



From V6

Appendix 2 Deveron Valley Special Landscape Area.

Designation of the Deveron Valley acknowledges the high scenic quality resulting from its meandering ***river bounded by rolling wooded hills****, which forms an important setting to settlements along the valley floor and sides, and backdrop to castles and estates. The interplay and harmonious balance between the features of this SLA means that* ***no one feature particularly dominates the landscape over another but that they are all of equal significance in terms of their contribution to the special qualities of the area.*** *The importance of the area for connectivity, in terms of transport corridors, water catchments and woodland networks is also recognised*

The Deveron Valley has a strong woodland structure comprising deciduous woodland associated with traditional estates, as well as forested hills, riverside trees and beech hedging. Woodland on the steep sided valleys are important for nature conservation and also contributes to the quality, richness and diversity of the SLA, as well as providing a mature and managed character.

The following aspects and features of this landscape are considered worthy of recognition through SLA designation:

- *Meandering river* ***framed by rolling wooded hills and ridges****, providing views into the valley. These views are typically directed and focussed along the river and to the side slops and immediate skylines.*
- ***Strong network of woodland throughout the valley provides landscape structure and wildlife habitat****. A variety of woodland types include coniferous plantations, deciduous hilltop copses, shelter belts and a wealth of roadside trees including beech and ash.*

Management Recommendations

- *The Deveron Valley SLA is classed as a valley landscape type. As such emphasis should be on maintaining the current patterns of land use and settlement, with development focused within existing towns and villages. Elsewhere, development should be located on lower slopes or floor of the valley and carefully sited, designed and landscaped to integrate within the wider valley landscape.* ***Development proposed in surrounding upland areas should be assessed to minimise the visual impact on the SLA, including views and vistas along the valley.***
- ***Proposals within the river valley or on the rolling wooded hills and ridges should be carefully assessed to ensure development will not negatively impact on the landscape or sense of place felt within this area.***
- *There is* ***strong network of woodland throughout the valley which provides landscape structure.*** *Woodland management and further creation of coniferous plantations, deciduous hilltop copses and shelter belts is encouraged in this area.*
- *This SLA should remain as a continuous valley landscape, from the hills to the sea. Development which is likely to break up or negatively impact on the continuity associated with this landscape should not be supported.*

Appendix 3 - APP/2024/1812 documents referred to

Application Document 3 Onshore Planning Statement

5.5.1.9 Policy E3: Forestry and Woodland aims to protect and, where appropriate, enhance Aberdeenshire's forests and native and semi-natural woodland to ensure the environment, habitats, species and local culture are safeguarded, whilst also benefiting and supporting the local and national economy**. The policy states a presumption against the removal of safe and healthy trees, non-commercial woodlands and hedgerows**.

Through realignment of the OnTI RLB during the optioneering stages, large, forested areas of plantation woodland were avoided. **There are small areas of fragmented woodlands located within the OnTI RLB however through** detailed optioneering of the cable route post consent and **the use of embedded mitigations such as HDD, it is anticipated that there will be no significant adverse impact on woodlands.**

Trees and hedgerows within the OnTI RLB will be removed to facilitate the construction of the Proposed Development (Onshore) however, replacement planting within the OnTI RLB, where possible, will be implemented during or at the end of the construction period.

Volume 5 Chapter 4 Landscape and Visual

4.7.1.94 **Woodland within this section will undergo a low magnitude of change** as the alteration to the landscape element **will be barely discernible.**

4.7.1.95 Volume 7E, Appendix 4-2, Figure 4-4c shows the woodland within this section.

4.7.1.96 The OnTI RLB avoids trees and woodland wherever possible. **HDD will be used to avoid removing larger woodlands along the River Deveron that includes native woodland.** Construction works will avoid a linear woodland south of the dwelling at Scatterty, along its access. **An approximately 50m long section of trees will be removed from an approximately 815m long linear woodland between Hill of Scatterty and Holm Wood.** This linear woodland comprises a row of beech trees running along the ridgeline of a low hill and piercing the skyline**. The removal of this section will be notable from the surrounding landscape.** Tree protection zones will be established to minimise soil compaction and impacts on all trees not being removed. **Tree removals to enable construction of the OnTI will be mitigated in agreement with Aberdeenshire Council.**

4.7.1.97 A very small proportion of the woodland within this short section of the OnTi RLB will be removed. **Removal of a short section of the row of beech trees between Hill of Scatterty and Holm Wood will be notable because of the prominence of these trees on the skyline**. However, the level of woodland within the Deveron Valley is sufficient that the overall level of tree cover will appear unaffected. The pattern and level of surrounding tree cover is such that the contribution of woodland to the landscape character along the valley will largely remain as at baseline.