



South Kyle II Wind Farm

FEI Technical Appendix F: Response to
Ironsides Farrah Report

Vattenfall Wind Power Ltd

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Technical Note:

South Kyle 2:

Response to Ironside Farrah Report

1. Introduction

- 1.1.1 The Ironside Farrar Review (IFR) agrees with the LVIA methodology and almost all of the landscape and visual assessment, with the exception of the EAC Doon Valley Local Landscape Area (LLA). The IFR finds two additional special landscape qualities (SLQ) of this local landscape designation would be significantly affected. There are however a number of errors within the IFR and some inconsistencies that imply a greater level of disagreement with the LVIA than evidenced as follows:
- Methodology: the IFR concludes that the LVIA methodology “*accords with published guidance*” (para. 2.9), yet in para. 4.1 the term “*broadly accords*” is used, implying some difference although no evidence for this is provided.
 - Landscape Character Assessment: the IFR concludes “*we broadly agree*” (para 2.40 and 4.9) although no reasons are provided for the term ‘broadly agree’ as opposed to “*agree*” which is used in section 3.1 and otherwise implies an unexplained difference in opinion. Alternatively, there is confusion about the degree to which the IFR agrees or otherwise.
 - Viewpoint Analysis: Several errors are noted which are described further in Section 1.2 of this report.
 - Visual Assessment: the IFR concludes “*mostly reasonable and agree*” (para 2.60) and “*we mostly agree*” (para 3.1, point 5 and para 4.13) implying some unexplained disagreement with the LVIA. No explanation is provided and the IFR highlights no difference in opinion beyond the previously noted viewpoint analysis.
 - Cumulative Assessment: the IFR concludes “*we agree with the cumulative viewpoint assessment*” (para 2.22) and “*the cumulative assessment provided is reasonably thorough and identifies the most significant effects*” (para 4.14) which further implies an unexplained disagreement with the LVIA. No explanation is provided other than the IFR’s preference for a separate cumulative LVIA, although all cumulative assessment provided in the LVIA is clearly labelled.
- 1.1.2 It is considered that the lack of exactitude or inconsistent use of language and the errors in the viewpoint review have misled or otherwise influenced the alternative assessment provided in the IFR for the Doon Valley Local Landscape Area (LLA).

2. Viewpoint Analysis

2.1.1 The IFR concludes on the viewpoint analysis as follows:

2.1.2 *While we agree with most assessments of significant visual effects, we consider the approach taken to some detailed assessments has reduced the probable level of effect that would be experienced by receptors, some assessments of magnitude of change and effect are too low, for example the assessment of Viewpoint 11¹. We agree with the cumulative viewpoint assessment provided.*

2.1.3 Contrary to the IFR where they claim the LVIA “has reduced the probably level of effect” they provide only one example (Viewpoint 19 which is assessed by both parties as not significant). There is in fact **complete agreement between the IFR and the LVIA on the significance for all 20** of the assessed viewpoints as shown by the IFR, Appendix 1.

2.1.4 It is only to be expected that there is some difference in professional opinion, and in this case the difference is slight. It affects the magnitude of change in relation to four viewpoints, some of which are assessed as higher or lower when compared to the IFR alternative assessment. Further explanation is provided as follows:

- Viewpoint 1: Picnic area off the A713 – The IFR, Appendix 2 assesses the magnitude of change as half a notch higher ‘Medium’ compared to our ‘Medium - Low’ although both assessments judge the level of effect to be the same and significant. It may be noted for context that the picnic area itself is well screened by trees and this view from the carpark entrance is not representative, rather it is a ‘worst case’.
- Viewpoint 4: A713 West of Dalmellington² - The IFR, Appendix 2 assesses the magnitude of change to be ‘Medium’ compared to our *higher assessment* of ‘High - Medium’ although both assessments judge the level of effect to be the same and significant.
- Viewpoint 6: Craigengillan House - The IFR, Appendix 2 assesses the magnitude of change (assuming forestry is felled) as half a notch higher ‘Medium - Low’ compared to our ‘Low’ although both assessments judge the level of effect to be the same and *not significant*. It may be noted that forestry felling would affect potential views of a smaller section of the view whereas the IFR appears to have considered all vegetation within the Garden and Designed Landscape as at risk of felling, which is unlikely.
- Viewpoint 19: Carrick Hills - The IFR, Appendix 2 assesses the magnitude of change as half a notch higher ‘Low’ compared to our ‘Low – Very Low’ resulting in a change to the level of effect from Minor to Moderate / Minor despite the distance being 23.8km. This is the only example resulting in a change to the overall level of effect although both assessments judge the level of effect as not significant.

2.1.5 In the summary of the IFR (para. 3.1, point 3) a different assessment is noted from only Viewpoints 11 and 16. This is a further error in the IFR as there is no difference between the assessment provided in the IFR and the LVIA for these viewpoints.

2.1.6 In summary, there is a slight difference of professional opinion on two significantly affected viewpoints (Viewpoints 1 and 4), neither of which demonstrate an ‘over’ or ‘under’ assessment with Viewpoint 4: A713 West of Dalmellington, assessed as a higher magnitude of change compared to the IFR. Overall, there is complete agreement between

¹ IFR error: It is suspected that this should be ‘Viewpoint 1’ and not 11. No disagreement is recorded in the IFR viewpoint assessment for Viewpoint 11.

² IFR error: Bogton Loch is Viewpoint 5 and not Viewpoint 4. There is no disagreement recorded in the IFR viewpoint assessment for Viewpoint 5: Bogton Loch.

IFR and the LVIA regarding the significance for all 20 of the assessed viewpoints and there is no basis for the IFR to claim that the LVIA has “*reduced the probable level of effect that would be experienced by receptors*”.

2.1.7 It is considered that these errors will have affected the alternative assessment conclusions provided in the IFR in relation to the Doon Valley LLA.

3. Doon Valley LLA

3.1.1 The LVIA includes five pages of assessment of the Doon Valley LLA, based on the analysis of three EAC reports documenting the Doon Valley LLA, including a designation review and extensive site survey.

3.1.2 In summary, the LVIA assessment of the Doon Valley LLA correctly notes that the “*Proposed Development is not located within the Doon Valley LLA and there would be no direct effects. Although the Site boundary does extend into the Doon Valley LLA no part of the development is located within this western, forested area that overlaps with the LLA.*”

3.1.3 Notably the Proposed Development would have no significant effects on the overarching summary of the character and qualities of the Doon Valley LLA as follows:

3.1.4 “*A grand and dramatic landscape of mountains and large water bodies, large-scale, and a sparsely settled landscape with a lack of woodland gives a strong sense of wildness and naturalness. This area is also important as it encompasses part of the Dark Sky Park and the UNESCO Galloway and Southern Ayrshire Biosphere. The LLA boundary is distinct and does not bound either of the other two Local Landscape Areas.*”

3.1.5 The LVIA finds there would be no significant effects on the factors that relate to the four Design Principles which seek to guide the management of the LLA. The LVIA continues: “*Of the eleven criteria evaluated as part of the designation review in 2021 and the nine landscape character observations noted in the background report from 2015, the Proposed Development would significantly affect two of these:*

- *Setting / backdrop of views towards Dalmellington – viewing from the north and west the Proposed Development would increase the prominence of wind farm development in the ‘setting’ or views of these settlements (including Bellsbank) to a significant degree as indicated by the viewpoint assessment.” ...*
- *“Effects on views - although the reports do not refer to any specific locations, Craigen Gillan GDL is noted and there would be significant visual effects on viewpoints from within the wider estate including Viewpoint 5: Bogton Loch (Figure 5.18), Viewpoint 7: Site of former Observatory (Figure 5.20), Viewpoint 8: Berbeth (Figure 5.21), and Viewpoint 10: Auchenroy Hill (Figure 5.23).”*

3.1.6 The LVIA concludes: “*the overarching summary of the character and qualities of the Doon Valley LLA denotes the main reasons and SLQs of this LLA. Considering that the Proposed Development would not significantly affect the overarching summary, or the majority of the assumed SLQ’s set out in the reports, and noting the significant effects on particular views, it is considered that the Proposed Development would not significantly affect the integrity of the Doon Valley LLA and the designation would remain viable as a local designation.*”

3.1.7 The LVIA does however note a significant cumulative effect as a result of all visible existing, consented and proposed wind farm applications and notes that “*wind farm*

development is not incompatible with LLAs and the Uplands and Moorlands LLA near New Cumnock contains the Hare Hill and part of the Afton wind farms within its boundary.”

3.1.8 The IFR finds two additional special landscape qualities (SLQ) of the local designation would be significantly affected, although other than the flawed viewpoint review, no further reasoning or explanation for this alternative judgement is provided. The additional SLQs are discussed further as follows:

- Intactness and Condition:

“The landscape and combinations of elements are generally in a good state of repair. Some damage to verges around Loch Doon, by cars, due to insufficient parking space / passing places. Some encroachment of wind turbines within some views detracts slightly from the natural landscape around Loch Doon. Changes will occur as part of forestry felling and restocking (over time) but the requirement to include greater mix of native, deciduous species will be beneficial. Currently, no wind farms or other infrastructure projects within the planning system.”³

The first part of the above text relates to the condition of the landscape and the Proposed Development would have no effect on this. Some encroachment in views is noted as detracting from the natural landscape around Loch Doon, but again the Proposed Development would not significantly affect these views. Where visible (from the area around Dalmellington) the Proposed Development would appear in the context of a more developed or contemporary and rural, river valley where wind farm development is already part of the views. Clearly this SLQ relates to Loch Doon and the more natural landscapes further to the south. The views from these areas would not be significantly affected by the Proposed Development. The LVIA finds no significant effects on this SLQ and the IFR judgement appears to be based on visibility alone, rather than a more thorough analysis of the SLQ.

- Scenic Qualities:

“The rich combination of hills (forested, open moorland), lochs, streams, wild land areas with extensive views is very scenic and attractive to visitors who come to enjoy nature. Some encroachment of wind turbines within some views detracts slightly from the natural landscape.”⁴

This SLQ again, relates to the ‘natural landscape’ and read in the context of the other SLQs and the overarching statement, this also relates to the Loch Doon area (with other SLQs relating more specifically to the Doon Valley). The LVIA finds no significant effects on this SLQ or the Loch Doon area as noted above. Considering views from the Dalmellington area, whilst these may also be described as scenic, they are scenic for different reasons and relate to a more developed or contemporary and rural, river valley (Doon Valley) where there is evidence of a long cultural history of mining and where wind farm development is already part of the views. Although the Proposed Development would be visible and therefore ‘encroaching’ its addition to this visual context is not unreasonable and does not render the area as ‘un-scenic’ or otherwise significantly affect this SLQ.

3.1.9 To conclude, the overall integrity of the Doon Valley LLA would not be significantly affected despite the visibility of the Proposed Development in some views in the Dalmellington area.

³ Sourced from EAC Local Landscape Areas Supplementary Guidance 2024 and the East Ayrshire Local Landscape Area Boundary Review, June 2021.

⁴ Sourced from EAC Local Landscape Areas Supplementary Guidance 2024 and the East Ayrshire Local Landscape Area Boundary Review, June 2021.

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