

# **AGENDA ITEM 5**

## **APPENDIX I**

### **REPORT ON CONSULTATION RESPONSE TO SG**

#### **TALLADH-A-BHEITHE WIND FARM**

##### **CONSULTATION RESPONSE LANDSCAPE**

# Talladh A Bheithe Wind Farm: CNPA Landscape Comment Frances Thin 29/7/14

## 1.0 The Development

The Talladh A Bheithe wind farm is a proposal for 24 wind turbines 125m in height. The site is on the Talladh A Bheithe Forest south west of the National Park. The closest of the proposed turbines is approximately 10km from the Park boundary. The effects of the constructed wind farm as described are indirect in nature.

Turbine parts transported by road to Dalwhinnie and by barge along loch Erich would require development within the National Park (NP). Turbine parts would be hoisted over the railway, a process which would require crane pads and laydown areas to be constructed (ref planning statement) and possibly also alterations to existing access for abnormal loads. No detail is given on this aspect of the proposal. Further detail would be required and appropriate compensation sought should this development go ahead.

## 2.0 Environmental Statement Methodology and Visual Material

- The photographic visualisations do not follow current best practice guidance. These are presented as panoramas with no single frame visualisations at 50mm or 70mm.
- The Special landscape Qualities of the CNP are listed at 7.4.7 but no assessment of effects on these qualities is made.
- No specific viewpoint based assessment of landscape character is included.
- CNPA advised at scoping that viewpoint assessments should be undertaken for a number of locations in the part of the Park west of Drumochter. Only one viewpoint was assessed (Beinn Udlamain).

## 3.0 Landscape and Visual Impacts on the Cairngorms National Park

### 3.1 Zone of Theoretical Visibility (ZTV)

The blade tip ZTVs (figures 7.9 and 7.11) demonstrate that the extent of visibility of the proposal from within the CNP will be confined to a limited number of locations;

- on, and immediately inside, the southern boundary of the Park (at distances of approximately 10km Sgairneach Mhor and Beinn Udlamain, at approx 12km on the shoulder of A' Mharconaich. All three of these hills are Munros),
- the slopes of Beinn Dearg and Beinn a Chait at approx. 32km
- and views from the Beinn a Ghlo Munros at > 35km.

### 3.2. Landscape Character Impacts

3.2.1 The application site is largely in the Landscape Character Area (LCA) 'Highland Summits and Plateaux', this LCA extends into the NP. The LCA is extensive and is divided into 12 individual character units. The site is within the Talla Bheith and Craignour Forest character unit (ref figures 7.4 and 7.22) which extends into the NP and is judged to be of medium/high sensitivity (chapter 7-41).

3.2.2 The ES concludes that beyond 4km and up to approximately 8km where turbines would be visible there would be a medium magnitude of change and a moderate significant effect. Beyond this distance there would be no significant effects on the landscape character unit. (7.13.25). This judgement is in part influenced by the view that;

- the wind farm "would not directly affect the landform and topography of the surrounding landscape, nor the perception of the landform." 7.13.23
- there would be no appreciable change to "...pattern in the landscape." 7.13.23
- the turbines being "...relatively slender structures would not obstruct the long distance view when experienced from any direction." 7.13.24
- The turbines would "...become a component of some of these views."

3.2.3 Having considered viewpoint 24 (Beinn Uldamain) my assessment is that in the context of the wider landscape the landform of the Talladh a Bheithe site is relatively flat and the moorland is without any pronounced pattern. 125m turbines in this landscape will be clearly visible well beyond 8km. They will not obstruct/block the view from this distance but they will be a prominent feature, a new shape in the landscape affecting the way we understand and appreciate the landform, and indeed the chain of mountains. There will also be a pattern to the arrangement of turbines and the movement of blades and they will be a scale register in a landscape which is largely devoid of other scale registers.

**In my view the magnitude of change to the character of the Talladh A Bheithe landscape from viewpoint 24 and other viewpoints nearby within the NP, would be high and the impact on landscape character significant.**

### 3.3 Visual Impacts

#### 3.3.1 From the south western edge of the Park (Dalnaspidal Forest)

Viewpoint 24 on Beinn Uldamain is 10.1km from the nearest turbine. Substantial parts (hubs and towers) of 14 turbines are visible and a further 4 blade tips (figure 7.48). Similar views are likely to be experienced from Sgairneach Mhor. Both of these hills are Munros and so well-visited.

From this viewpoint, and I judge also Sgairneach Mhor, the wind farm will appear to sit on the moorland (ref appendix 7.3 table 7.13 for assessment).

From these elevated viewpoints one is looking along the Grampian Highlands, a continuous mountainous landscape where the peaks and ridges form natural focal points. At this

distance the turbines will be clearly visible and the wind farm will sit on an area of moorland within this landscape, creating a new and prominent focal feature here. As stated in appendix 7.3 p 33 the proposed turbines would not break the skyline, but far from being a mitigating effect, research shows that back-clothed turbines can be as prominent or more prominent than those which skyline. Due to the prominence of colour, texture and pattern contrast it is my view that the magnitude of visual change would be high and not 'medium' as stated in the ES, leading to a substantial level of effect. Research reference [The Backclothing of Wind Turbines in the Scottish Landscape: A report to CNPA Caroline Stanton](#)

Though the ES assessment deems the effect to be significant, the statement of significance text qualifies this with a statement that "... the viewpoint is not located along any recognised route..." Contrary to this view, the 3 Munros in the National Park with visibility of the wind farm are regularly visited and are on a recognised route that is promoted in Munro texts and on several websites.

**The visual impact on receptors in this location would be significant.**

### **3.3.2 From the Hills east of the A9 (Beinn Dearg and Beinn a Ghlos)**

Viewpoint 15 is at 31.8km on Meall Reamhar a 565m top north of Blair Atholl. A single blade tip is visible. I concur with the ES assessment of viewpoint 15 as being not significant. However No viewpoints are analysed for the Beinn A Ghlo hills but it is clear from the ZTV that there will be visibility of up to 18 turbines though this is at a distance of 38km plus.

### **3.4 Cumulative Landscape and Visual Effects**

The assessment of cumulative effect of the proposed wind farm development on landscape is based on an assessment from three of the higher viewpoints, Ben Alder, Schhallion and Ben Lawers. None of these viewpoints are in the National Park.

At 7.20.10 the ES concludes that the nearest other wind farm lies over 35km from the proposed development and an assessment of cumulative effects concludes 'no significant cumulative effects on landscape character or visual amenity'. Given that the assessment of cumulative landscape and visual impact is about the 'additional impact' of a proposed wind farm to existing wind farm development, this conclusion is valid. However, this point aptly illustrates that this is an area currently without windfarms.

See also discussion below on Setting of the National Park.

## **4.0 The Planning Context for a wind farm outside the Park**

The relevant planning context for the NP is the National Park Partnership Plan policy priorities 1.3 (with regards to effects on the landscape setting of the Park and Special qualities), and SPP Guidance in respect of the Wild land and the NP designation (SPP paras 200, 212 and 215).

The key landscape issue in respect of these planning tests is that of the contribution that areas outside the Park make to the special landscape qualities experienced in the Park.

## **5.0 National Park Setting and Special landscape Qualities**

The landscapes around the National Park contribute in greater or lesser part to the experiences that people have within the Park. The Special landscape Qualities (SLQ) of the CNP are recorded and described in SNH commissioned report No. 375. Some of these landscape qualities are strongly influenced by landscape characteristics that may be found both within **and** outside the boundary of the Park.

This visual relationship between the landscape of some areas outside the Park and the experience of the SLQs within the Park is what underpins ‘the landscape setting’ of the National Park. The mountainous and wild character of the area to the south west of the Park, the Grampian Highlands, contributes substantially to the experience of SLQs in the Park. I conclude that the area within which the wind farm would be sited is part of the landscape setting for the Cairngorms National Park.

### **5.1 Special Landscape Quality ‘Wild land and Wildness’**

The mountain core of the CNP is one of the wildest places in Britain. Beyond the mountain core there are also many places characterised by their remoteness and ruggedness, where the vegetation is near natural and there is little evidence of human structures. It is in these places that people get the opportunity to experience the special quality of wildness. The locations where these characteristics occur out with the Park contribute to the experience of wildness within the Park, and can be identified as those areas of Wild Land that cross the boundary. The proposed wind farm is within Wild Land Area I4 Rannoch, Nevis, Mamores and Alder ( [Wild Land Areas 2014](#)) This Wild Land Area extends well into the National Park and includes the munros from where there is visibility of the wind farm.

Looking out from the National Park the Grampian Highlands offer an arc of wind farm-free panoramic views as far south as Ben Nevis. Of all the views out from the National Park it is the one to the south west that allows the viewer to appreciate the CNP as part of the Grampians; one of the three major mountain ranges in Scotland, one that includes, Ben Nevis and Ben Macdui, the highest mountains in the British Isles. This is a Wild Land Area that would be very sensitive to any form of intrusive human activity.

Given the visual effects of this wind farm (para 3.3.1 this report) it is highly likely to affect the experience of wildness in this area, particularly as it would be seen in the context of a mountainous landscape where the peaks and ridges form natural focal points.

### **5.2 Special landscape Quality ‘layers of receding ridgelines’**

This is a visual quality that occurs where undulating and ascending ridgelines appear to form a series of interlocking layers, giving great depth to the landscape. The locations where areas outside the Park contribute to the experience of this special quality within the Park are

limited to the north west, west, south west and south and in these situations are best appreciated from an elevated location. The proposed wind farm would introduce a new and distracting feature into the mountainous landscape of the Grampian Highlands

### **5.3 Special Landscape Quality ‘Grand panoramas (and framed views)’**

Vast and panoramic views are frequent throughout the Park and from the higher tops many of these extend way beyond the boundary. These are generally uninterrupted views across an often rocky and sparsely vegetated foreground, a mid-ground of moorland, glens, straths and lesser hills to a horizon of rugged peaks (south through to north west) or distant farmland (south through to south east through to north). The proposed wind farm would introduce a new and distracting feature into the mountainous landscape of the Grampian Highlands.

## **6.0 Conclusions**

### **6.1 Setting**

The proposal would have a significant effect on a number of landscape characteristics (this report 3.2.3) and adversely affect the landscape setting of the Park. The proposal would fail to meet policy 1.3 of the Cairngorms National Park Partnership Plan.

### **6.2 Wildness and Wild Land**

The people who visit this part of the National Park, do so for their enjoyment. It is highly likely that the landscape and visual effects of the proposal would adversely affect their experience of the special landscape qualities of this part of the Park, and of wildness in particular. In my view the adverse effect that this proposal would have on people’s experience of the Wild Land Area that stretches from the Cairngorms National Park in the north to Ben Nevis and the Mamores in the south, cannot be overcome by siting, design or other mitigation. The proposal would fail to meet the guidance in SPP (para 215)

### **6.3 Integrity of the Designation and the Qualities for which it was designated**

The proposed Talladh A Bheithe wind farm would not significantly affect the integrity of the National Park, it would however affect the special qualities for which it was designated in a number of areas in the south west of the Park. The proposal would fail to meet the national designation test in the SPP (para 212).

## **7.0 Recommendation**

**In total extent, the area of the Cairngorms National Park that would be affected should this development go ahead, is small. However, the significance of what would be lost, the opportunity to experience vast panoramic views across an intact and possibly unique windfarm-free, mountainous landscape, would be great. I would recommend that our advice to the Scottish Government should be to refuse this application.**