
CAIRNGORMS NATIONAL PARK AUTHORITY

Title: CONSULTATION FROM HIGHLAND COUNCIL
RE: SCOTTISH EXECUTIVE CONSULTATION
ON APPLICATION UNDER SECTION 36 OF
ELECTRICITY ACT 1989

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(DEVELOPMENT CONTROL)

DEVELOPMENT PROPOSED: CONSTRUCTION OF 31 TURBINE WIND
FARM AT GLENKIRK, TOMATIN
INVERNESS-SHIRE (Amended Proposal)

APPLICANT: EURUS ENERGY LIMITED

RECOMMENDATION: OBJECTION

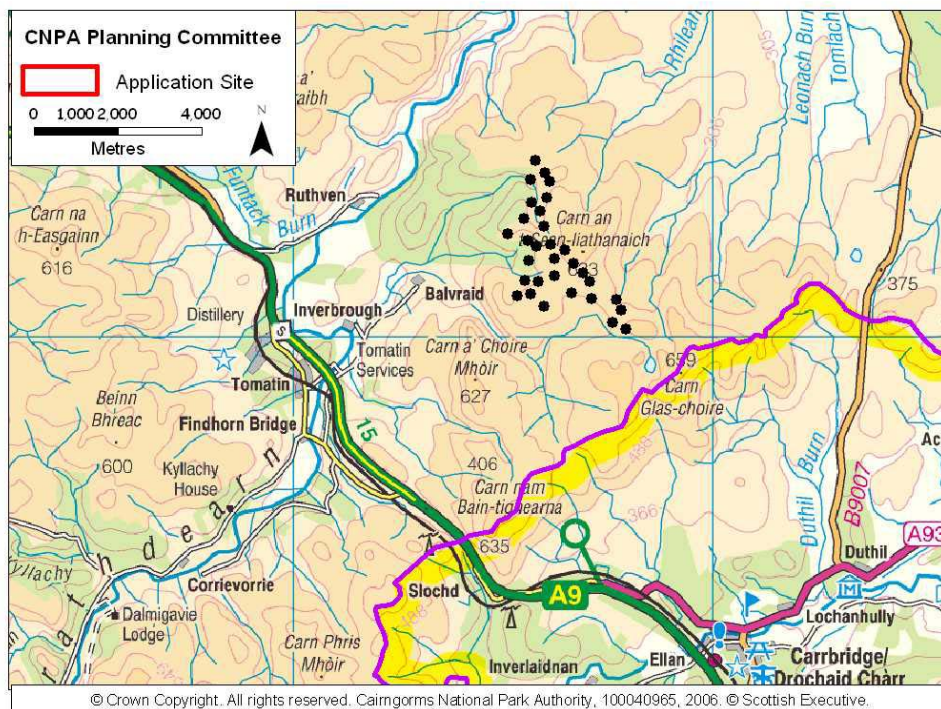


Fig. 1 - Location Plan

SITE DESCRIPTION AND PROPOSAL

1. This report has been drafted at short notice due to tight consultation deadlines on what is an amended proposal. This application is to the Scottish Executive and the Park has been consulted by Highland Council on the proposal for a 31 x 3 MW turbine windfarm development at Glenkirk approximately 6 kilometres to the north of Carrbridge. Members will recall this application being reported last year. This is essentially a revised application where the development has been reduced by 3 turbines and 7 others have been relocated. The area for the windfarm is located in a triangle of land between the B9007 Forres Road, the Findhorn Gorge and the A9. The nearest turbine on the original scheme was approximately 380 metres from the Park boundary where it runs along the 659 metre summit of Carn Glas chorie (classified as a 'Graham' Scottish Hill between 2,000 and 2,500ft). Now the nearest turbine is around 1.45 km from the Park boundary, the 3 nearest turbines having been deleted from the scheme. All service requirements including tracks to the development will be formed from Tomatin into Gleann Seileach through Forestry Commission land where three borrow pits will be reopened to provide stone and aggregates. The site of the farm is basically an undulating plateau area; the higher points of this plateau correspond with the boundary of the National Park along the summits. The ridge undulates between the 500 and 650 metre contour. The turbines are located in a shallow upper glen on the hillslope that slopes away gently to the north west.



**Fig 2. View Towards Site (centre of photograph-hill ridge on horizon)
from slopes of Meall a' Bhuachaille**

2. As mentioned the National Park boundary runs along the ridge immediately south east of the site. From this ridge the ground slopes down more steeply so the site is at a prominent height above the northern margins of the Park. The CNPA was consulted at the scoping stage and raised concern regarding potential landscape impact. A number of viewpoints for the landscape assessment were suggested by ourselves and SNH. Given the location of the site particular concern was raised regarding views from the northern corries of the Cairngorms and the Craiggowrie to Meall a' Bhuachaille hill ridge above Glenmore.

3. In terms of technical details the turbines are 67 metres in height to the top of the pole (hub), the maximum height of the structure overall when one blade is in the vertical position is 110 metres. The turbine bases are approximately 18 by 18 metres with foundation depths of more than 3 metres. The highest turbine (No7) in the vicinity of the Park boundary is now located on the 560 metre contour. The very highest turbine (No 14) set further back is on the 620 metres contour (see fig 4). The highest point of the ridge in this area is the adjacent 659 metre summit of Carn Glas chorie which is now approximately 1.45km from the nearest turbine. The turbine site is designed in a generally NNW to SSE orientation. Two 69 metre high anemometer masts were originally proposed, this amended scheme has just one.

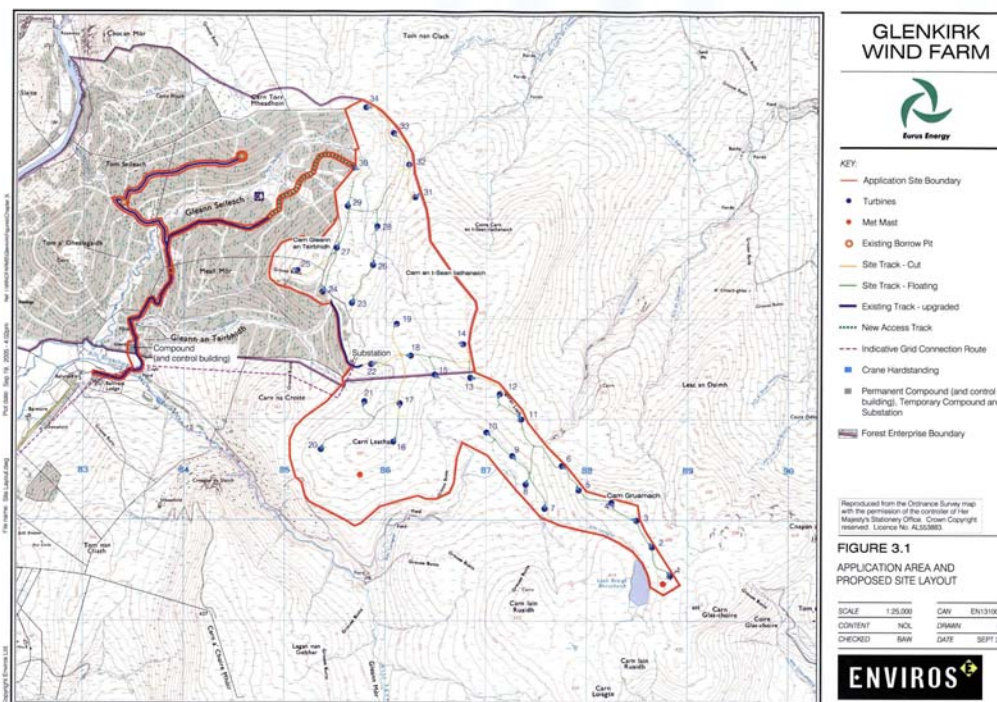


Fig 3. Layout for Original 34 Turbine Scheme

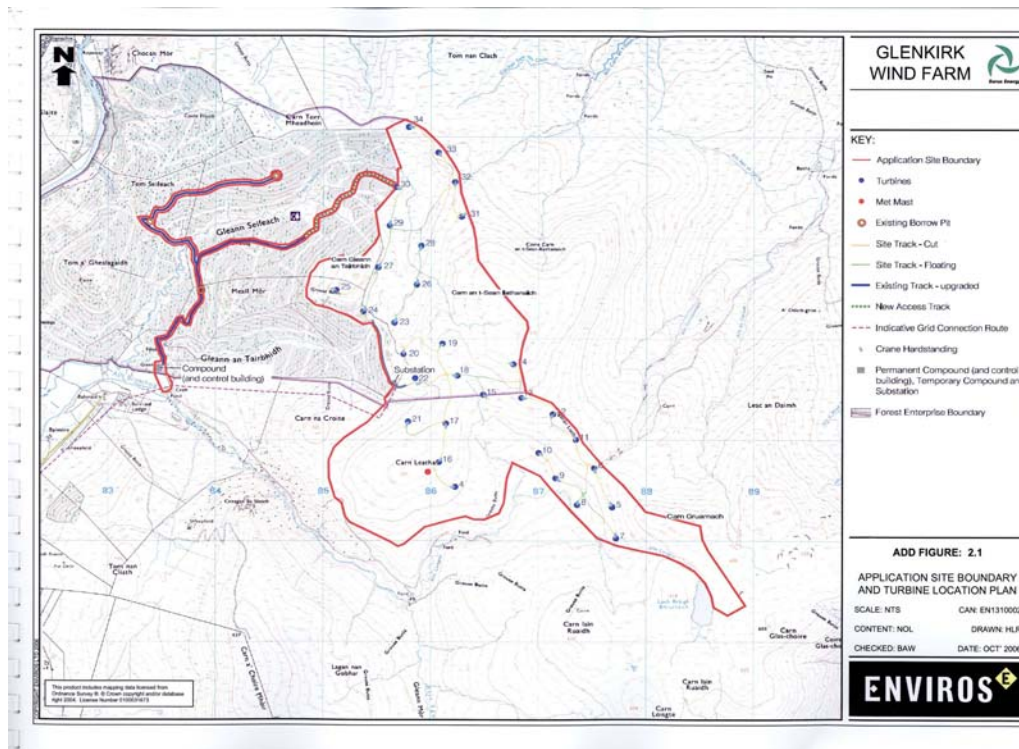


Fig 4. Amended Layout for 31 Turbines

4. This latest scheme is submitted with an Environmental Statement (ES) addendum which covers a range of issues addressing concerns raised by SNH and the RSPB and a meeting was held between these two bodies and the applicant. The CNPA had no input to this meeting. Of key importance here is the addendum to the landscape assessment which includes a range of viewpoints from within the park from the Northern Corries and Meall a Bhuchaille. While these are key viewpoints, the potential visibility of the farm from the glens, especially the A9, but also from Abernethy, the Cromdale Hills and higher ground to the NE of Grantown must be considered.
5. The CNPA raised objection to the scheme for 34 turbines on the following grounds.
 - a) The outstanding and unique characteristics of the landscape extend beyond the administrative boundaries of the Cairngorms National Park. The proposal would lead to an unacceptable degree of adverse visual impact upon the character of the Cairngorms National Park from the Glenkirk proposal itself and cumulatively with other built/consented/proposed windfarms.
 - b) Tourism is central to the economy of the Cairngorms National Park with visitors coming to the area to enjoy the unique character of the environment, especially its internationally recognised landscape as well as modern and traditional sporting activities. Whether visitors are experiencing the view from the Ptarmigan, more isolated points in the northern corries or from Meall a Bhuachaille. Parts of the wind farm would also be visible from

large areas within Abernethy and Strathspey as a whole. The statement provides inconclusive evidence of the economic impacts of the proposal. In the absence of a comprehensive economic assessment that demonstrates to the contrary, it is considered that the precautionary principle should apply and a development that could, with others, have an adverse effect on the local economy should not be permitted.

- c) The proposal has the potential to set a dangerous precedent for further windfarms to be located in such proximity to the boundaries of a nationally and internationally recognised landscape.
6. In addition to the above concerns were also raised in relation to the quality of some of the material presented in the landscape/visual assessment. Concern was also raised regarding potential impacts upon bird species. The Energy Consent Unit's attention was also drawn to potential for regional energy targets in the context of the future production of SPP6.
 7. It is important to note that on a site immediately to the east of this application site another potential windfarm proposal is being considered (no formal application yet). The number of turbines is not set but it is thought that the site may have a theoretical capacity for up to 50 turbines with a hub height of 80 metres and a rotor diameter of 90 metres.

NATIONAL GUIDANCE AND DEVELOPMENT PLAN CONTEXT

Scottish Executive Policy

NPPG 6 Renewable Energy Developments

8. Planning policy is based on the principle that renewable energy developments should be accommodated throughout Scotland where the technology can operate efficiently and environmental impacts can be addressed satisfactorily.
 - Where a priority habitat or species would be affected, prior consultation with the European Commission is required unless the development is required for public health or safety reasons.
 - In relation to national designations (National Scenic Areas,...National Parks), renewable energy projects should only be permitted where it can be demonstrated that the objectives of designation and the overall integrity of the area will not be compromised or any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by the social and economic benefits of national importance....

9. In many areas of Scotland, tourism and recreation support local economies and to varying degrees such activities depend on the quality of the environment, particularly the landscape. This does not mean that renewable energy developments are incompatible with tourism and recreation interests. Sensitive siting can successfully minimise adverse impacts, particularly visual impacts, but it is unrealistic to expect such developments to have no effect at all. Opinions are divided as to whether some renewable energy developments, such as wind farms or hydro schemes, may themselves be of interest to tourists and the extent to which their existence can be compatible with recreational pursuits such as hill walking.
10. The characteristics associated with wind farms raise a number of issues that require to be considered, and where appropriate addressed. These relate to:
- **Visual impact** – the size and scale of development and its relationship to the characteristics of the locality and land form in which it is to be built will be a relevant consideration. The visibility of a wind farm may in some circumstances raise concerns, although distance as well as landscape and topography will affect its prominence. Additionally the cumulative impact of neighbouring wind developments may in some circumstances be relevant.
 - **Landscape** – the character of the landscape and its ability to accept this type of development, including associated infrastructure, will be an important consideration....A cautious approach should be adopted in relation to landscapes that are valued, such as National Scenic Areas or National Parks...
 - **Birds and habitats** – the importance of complying with international and national conservation obligations must be recognised...
11. **Scottish Planning Policy 6 (SPP6) Renewable Energy Consultation Draft** notes that Scottish Ministers are fully committed to increasing the amount of electricity generated from renewable energy resources. The guidance notes that planning authorities should use the development plan process to consider an area's potential for accommodating all forms of renewable energy technologies. Reference is made that the suitability of local landscapes will be dependent on the scale and type of project proposed.
12. The guidance considers that a primary role of the planning system is to guide development to appropriate locations. Areas designated for their international and national natural heritage value are identified in Annex A (includes national parks). Planning authorities should not impose additional zones of protection around areas designated for their landscape value. However, the potential impact of proposals on such areas may be a material consideration to be taken into account. Reference is made to the effect of cumulative impact of proposals on species and landscape. Cumulative effects may arise where two or

more developments are visible from the same point, or are visibly shortly after each other along the same journey.

13. The guidance notes that tourism is an important element in the economic, social, environmental and cultural well being of Scotland. Sustainable tourism supports many small businesses and it is the beauty of the landscape which draws many of our visitors. There is as yet no conclusive evidence about the impact of windfarm development on tourism-while some people express concerns about the effects of windfarms on landscape others see them as attractive additions to the landscape that provide visible evidence of our commitment to sustainable development.

NPPG 14 Natural Heritage

14. The most sensitive landscapes may have little or no capacity to accept new development. Some of Scotland's remoter mountain and coastal areas possess an elemental quality from which people derive psychological and spiritual benefits. Such areas are sensitive to any form of intrusive human activity and planning authorities should take great care to safeguard their wild land character. This care should extend to the assessment of proposals for development outwith these areas which might adversely affect their wild land character.
15. The presence of a protected species or habitat is a material consideration in the assessment of development proposals. Planning authorities should take particular care to avoid harm to species or habitats protected under the 1981 Act or European Directives, or identified as priorities in the UK Biodiversity Action Plan.
16. The presence of a national heritage designation is an important material consideration. This does not mean that development is precluded by the presence of such a designation. Proposals require to be assessed for their effects on the interests which the designation is designed to protect.

Development which would affect a designated area of national importance should only be permitted where:

- **The objectives of the designation and the overall integrity of the area will not be compromised; or**
 - **Any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by social or economic benefits of national importance.**
17. Planning authorities should take particular care to ensure that new development in or adjacent to a National Scenic Area does not detract from the quality or character of the landscape.....

18. While conservation of the natural heritage will be a key objective in any National Park, the Government considers that due weight must also be given to the social and economic interests of local communities. Planning authorities should take particular care to safeguard the landscape, flora and fauna of Loch Lomond and the Trossachs and the Cairngorms.

PAN 45 Renewable Energy Technologies

19. Scotland has a variety of landscapes. Some will be able to accommodate wind farms more easily than others, on account of their landform and ability to limit visibility. Some are highly valued for their quality. There are no landscapes in which a wind farm will not introduce a new and distinctive feature. Given the Scottish Ministers' commitment to addressing the important issue of climate change and the contribution expected from renewable energy developments, particularly wind farms, it is important for society at large to accept them as a feature of many areas of Scotland for the foreseeable future.
20. This is not to suggest that areas valued for their international or national landscape and nature conservation interest will have to be sacrificed. Nor that elsewhere, attempts to lessen the impacts by integrating the development into the surrounding landscape would not be worthwhile. On the contrary, it emphasises the need to be taken of regional and local landscape considerations. Development that has been carefully sited and tied into the surrounding landscape will still be visible, but the impact will be less than had this effort not been made and the development left less well related to its surroundings.

Highland Structure Plan Policies

Policy E1 Distributed renewable energy developments

21. The Council supports the utilisation of the region's distributed renewable energy resource, including hydro, wind, wave and tidal stream powers. Proposals will be assessed against the provisions of the General Strategic Policy.

Approvals for renewable energy developments will normally be for a temporary period only (tied to the life time of a project), with provision where appropriate for the removal and reinstatement of affected areas. Earlier action for removal and reinstatement will be required in the event of premature permanent cessation of energy production.

Policy E2 Wind energy developments

22. Wind energy proposals will be supported provided that impacts are not shown to be significantly detrimental. In addition to the General Strategic Policies, wind energy proposals will be assessed in respect of the following:
- visual impact;
 - noise;
 - electro-magnetic interference;
 - roads, bridges and traffic;
 - aircraft flight paths / MOD operations; and
 - cumulative effects.

Policy E3 Wind farm safeguarding

23. The Council will seek to safeguard the operational efficiency of approved and constructed wind farms in the consideration of adjacent proposed developments or other land use changes.

Policy G1 Conformity with strategy

24. The Council will support developments, having regard to the Plan's sustainable objectives, which promote and enhance the social, economic and environmental wellbeing of the people of Highland.

Policy G2 Design for sustainability

25. Proposed developments will be assessed on the extent to which they:
- are compatible with service provision...;
 - maximise energy efficiency in terms of location, layout and design, including the utilisation of renewable sources of energy;
 - are affected by significant risk from natural hazards, ...;
 - are affected by safeguard zones where there is a significant risk of disturbance and hazard from industrial installations, ...;
 - impact on individual and community residential amenity;
 - impact on non-renewable resources such as mineral deposits of potential commercial value, prime quality or locally imported agricultural land, or approved routes for road and rail links;
 - impact on the following resources, including pollution and discharges, particularly within designated areas: habitats, species, landscape, scenery, freshwater systems, marine systems, cultural heritage, air quality;
 - demonstrate sensitive siting and high quality design in keeping with local character and historic and natural environment and in making use of appropriate materials;
 - contribute to the economic and social development of the community.

Developments which are judged to be significantly detrimental in terms of the above criteria shall not accord with the Structure Plan.

Policy G3 Impact assessments

26. Where environmental and/or socio-economic impacts of a proposed development are likely to be significant by virtue of nature, size or location, the Council will require the preparation by developers of appropriate impact assessments. Developments that will have significant adverse effects will only be approved if no reasonable alternatives exist, if there is demonstrable over-riding strategic benefit or if satisfactory overall mitigating measures are incorporated.

Policy G4 Community benefit and commitment

27. The Council will expect developments to benefit the local community and contribute to the wellbeing of the Highlands, whilst recognising wider national interests.
The Council will seek to enter into agreements with developers as appropriate...

Policy G6 Conservation and promotion of the Highland heritage

28. The Council will seek to conserve and promote all sites and areas of Highland identified as being of a high quality in terms of nature conservation, landscape, archaeological or built environment.

Policy G8 Precautionary principle

29. In the relatively rare situation of assessing development proposals where the potential impacts are uncertain, but where there are scientific grounds for believing that severe damage could occur either to the environment or the wellbeing of communities, the Council will apply the precautionary principle.

Policy T6 Scenic views

30. The Council will protect important scenic views enjoyed from tourist routes and viewpoints, particularly those specifically identified in Local Plans. There will be a presumption against development in narrow areas of land between roads and railways and open water.

Policy N1 Nature conservation

31. New developments should seek to minimise their impact on the nature conservation resource and enhance it wherever possible. The Council will seek to conserve and promote all sites according to the following hierarchy:

- **sites and species of international importance** – Developments which would have an adverse effect on the conservation interests for which a site has been designated will only be permitted where there is no alternative solution and there are imperative reasons of over-riding public interest, including those of a social and economic nature. Where a priority habitat or species (as defined in Article 1 of the Habitats Directive) would be affected, prior consultation with the European Commission is required unless the development is necessary for public health or safety reasons.

- **sites of national importance** – Developments will only be permitted where the objectives of designation and the overall integrity of the area will not be compromised or any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by social and economic benefits of national importance.
- **sites of local importance** – Developments will be assessed for their effects on the interests of sites of local conservation importance and will be resisted where these are judged to be unreasonably detrimental.

Policy L4 Landscape Character

32. The Council will have regard to the desirability of maintaining and enhancing the present landscape character of development proposals, including offshore developments.

Highland Council Renewable Energy Strategy and Planning Guidelines

33. In May 2006 Highland Council adopted their **Highland Renewable Energy Strategy and Planning Guidelines**. The strategy includes a map showing preferred development areas for windfarms, possible development areas and areas where there is a presumption against.
34. **Policy E5** in the strategy relates to **preferred areas** that have been established for major and national scale onshore wind developments. There are 3 designated areas which contain optimal conditions in terms of planning constraints, energy production, technical feasibility and proximity to grid. The detailed suitability of all prospective sites still needs to be confirmed through the normal planning process. There will, however, be a strong presumption in favour of projects proposed for these designated areas, and developers will be encouraged to come forward with proposals there subject to appropriate community and environmental safeguards.
35. **Policy E6** of the document identified **possible development areas** that have been identified in places where although constraints are relatively light, their limited extent makes them less optimal than preferred development areas for national scale schemes. **In these locations developments will be judged on their merits and will need to show that there is no scope for alternative development within preferred development areas.**

36. **Policy E7** of the Strategy considers that elsewhere in Highland there will be a **presumption against** export wind development. Any proposals for national or major projects will have to overcome a precautionary approach to planning approval. Any development would also need to show that there is no scope for alternative development within other preferred and possible development areas.
37. **The site is located in a small block area considered under the strategy as a possible development area; the area is otherwise surrounded by presumption against development areas. This small block area may have been drawn up simply because of the existence of the proposal prior to the guidelines being published.**

**Badenoch & Strathspey Local Plan
Policy 1.4.3**

38. The Council will encourage the sustainable use of the area's resources and a wide distribution of employment opportunities by promoting:-
- Extension of established resource based activities;
 - Opportunities in the natural environment.
- Subject to suitable amenity safeguards and adequate servicing arrangements.

Policy 1.4.4

39. The Council will encourage integrated use and management of resources in the landward area, and will continue to seek a balance between development and the conservation of features which represent the area's outstanding natural and cultural heritage.

**Cairngorms National Park Authority Interim Policy
No.1: Renewable Energy Finalised Draft January 2005**

40. Windfarm proposals which are outwith the CNP boundary may still be visible from within the Park, and may indeed have an adverse impact on the character and quality of landscapes which cross the Park boundary. Such proposals should be assessed for their impact upon the Park, as careful layout-design and siting can potentially reduce these impacts. Pre-application meetings with the CNPA will be sought in these cases and the CNPA should always be consulted as an interested party by the relevant Planning Authority or Scottish Executive. The issue of cumulative development from a number of wind farms around the Park will also create serious issues of visual impact.

Recommendation RE4: Wind Farm Developments Outwith the Park

41. Windfarm proposals beyond the boundary of the Park will be carefully assessed for their visual impact on the landscape and setting of the Park and their natural heritage impacts. The 4 aims of the Park should not be considered as stopping dead at the boundary either, but ideally their objectives should extend beyond the invisible line. Viewpoints should be taken from within the Park, at the earliest stages of a proposal, to assess and mitigate against visual impacts. Natural heritage issues will also stretch across the boundary, such as bird foraging areas and river catchments and hydrology.
42. The cumulative impacts of wind farms outwith the Park should also be carefully considered and minimized.

Cairngorms National Park Local Plan (Consultation Draft) for information

43. The site is located within 400 metres of the Park boundary. The area of the park adjacent to the site is a **General Policy 2** area under the terms of the Plan because of its height above sea level (over 400 metres). **General Policy 2** notes that development will only be permitted where it is demonstrated that there is no alternative and; the aims of the National Park or objectives of designation and the overall integrity of the areas, features or interests will not be compromised; or any significant adverse effects on the special qualities of the National Park or qualities for which the area, feature or interest has been designated or identified, or amenity or public health are clearly outweighed by social or economic benefits of national importance and are mitigated to provide features or interests of equal importance to those that are lost.
44. **Policy 21 of the Plan Energy from Renewables** considers that a) There will be a presumption against the development of new commercial windfarms or hydro electric schemes within the Park. b) This Local Plan will strongly support the development of community or domestic small scale/micro renewable energy projects. c) Commercial projects such as biomass or biofuel developments will be considered subject to a full assessment of their impacts.
45. **Policy 4 Landscape** considers that development that is likely to have an adverse impact on the special landscape qualities of the National Park including landscape character; scenic qualities; natural beauty; amenity; historic landscape elements; cultural components; or wild land character of parts of the National Park will not be permitted.
46. The planning authority will use conditions and agreements to ensure that all consented development in the National Park will be sited, laid out, designed and constructed of materials so as to make a positive contribution to the special landscape qualities of the National Park.

CONSULTATIONS

47. The **Natural Heritage Group** has provided comments with particular regard to landscape issues. Previously the Park had raised concern regarding potential impact upon bird species such as raven. The area was also considered a suitable habitat for Golden Eagles. Incidentally, a pair of eagles were noted at the site by our landscape officer recently.
48. With regard to landscape issues the CNPA landscape officer raises concern that the addendum to the environmental statement revolves around the visibility or otherwise of the proposal rather than the direct impact of how it will change the characteristics of the site and the area. Considering the sheer size of the turbines and their elevated position the effected area is quite considerable and includes the National Park. Attention is paid to the size of the development within any particular view but not to the nature of the development and consequently, nature of its impact.
49. With regard to the changes proposed the 3 nearest turbines have been deleted from the proposal. The nearest turbine would now be 1.45 km away from the Park boundary and 6 of the 7 relocated turbines are sited further downslope than their original position.
50. The main effect from these changes on the “Zone of Theoretical Visibility” would be that the turbines would appear to be no longer visible from Carrbridge and the central Strathspey areas. The total area of the park that will have a view of the turbines is reduced but only in the order of 30-40%. The upland areas will still have clear views of the proposal, including from the Meall a’ Bhuachaille-Craiggowrie hill ridge and the Cromdale Hills. Further north and west views are still to be had from Beinn Mhor and Gorton Hill at the back of Grantown.
51. The selected views produced are considered somewhat limited, emphasising the more distant and elevated viewpoints rather than closer hills such as Gorton Hill, or the ridge of Carn Glas-chorie itself where much simpler landscapes will be more affected by the degree of change. Views will still also be had from parts of Boat of Garten including Loch Pityoulish, the area north of Loch Vaa. Views will also still be available from Glen More, Rothiemurchus and the upper parts of Strath Nethy.
52. In terms of cumulative effects it is clear that from the main viewpoints used in the assessment that the proposal will be seen together with Farr and Paul’s Hill windfarms. From these viewpoints it is clear that the cumulative effects are significant and begin to establish a skyline that is contrary to the special qualities of the Park.

53. The landscape assessment provided is considered to significantly underestimate significantly the impact upon the park in several ways particularly because it focuses on the visual envelope rather than the nature of the impact on the landscape character.
54. The change in moving the nearest turbine from 350 to 1450 m away from the boundary is relatively insignificant in terms of the impact of the proposal as a whole. Clearly it limits the area from which the farm would be visible and this is beneficial but the extent of residual visibility is underestimated. *“more commonly the, wind farm will be only viewed from distant elevated vantage points such as ptarmigan lodge, and be observed from these locations as a minor element within an expansive and diverse view with limited effect on the setting of the national park”*. This view is demonstrably wrong as the visibility is much wider. Also, only the view from Ptarmigan Lodge could be described as diverse, from other locations it is much simpler and therefore the sensitivity to additional and discordant features is greater.
55. Clearly the sensitivity of the park and the NSA as a landscape receptor is of the highest category and even with magnitude of change that is medium the significance must be substantial/high. From Gorton Hill where the cumulative impact is even greater due to proximity; the magnitude would be high too. The magnitude of change from Ptarmigan Lodge is perhaps the most arguable. From here the turbines are furthest away; in addition the view is moderately complicated because of the addition of the structures associated with the ski activity and the presence of Aviemore. Consequently the magnitude of impact might be rated as low or medium. However; even at low the significance of the impact is still medium due to the sensitivity of the receptor. The same cannot be said for the view from Meall a Bhuachaille which is significantly closer (22km to the nearest turbine rather than 30 from Ptarmigan) and also the view is far less disturbed by developments; the principle elements being forestry, farmland and moor covered mountains. The view is far simpler and so more prone to disruption. From here the magnitude must be rated as at least medium, especially as the view to Farr is within 26°.

Significance to the National Park

56. The park designation is due to the outstanding and national value of the special qualities within its boundaries. However these qualities are influenced heavily by the setting of the National Park and as a consequence the special qualities would be diminished by inappropriate development outwith.
57. The special qualities of wildness and naturalness are particularly important to the National Park and by their nature are especially sensitive to changes by modern developments. There are few developments more visually intrusive than 110m high wind turbines. This proposal because of its proximity to the National Park, its physical characteristics and the cumulative effect with existing wind farms

further away would certainly negatively affect the character of the National Park and this is clearly contrary to the first aim.

Conclusion

58. The ES/Addendum clearly sets out the overall visibility of the proposal within the National Park and there are certainly improvements over the original scheme. However it is deficient in that it does not clearly demonstrate a sufficient understanding of the nature of the Cairngorms National Park as a landscape receptor or its highest sensitivity rating. From this the magnitude of effects are not adequately discussed and I feel this has led to an underestimation of the significance of the impacts of the proposed development on the landscape resource of the National Park. The significance of impact will be moderate in many areas and high in others. Moderately or highly significant impacts upon the landscape of the National Park are clearly unacceptable and consequently the authority should put forward a request to reject this application on these grounds.
59. **CNPA Economic and Social Development Group** commented originally that the windfarm is likely to be visible from an important entry point to the Park along the B9007 and is also in an area popular with walkers. Carn Glas-chorie is a Graham and attracts regular walkers for whom a windfarm would be detrimental to their visitor enjoyment and therefore make future visits less likely. The site is likely to have a substantial effect on views from within the Park. Windfarms can have the same effects as industrial sites (lorry movements, concreting of substantial areas, visual impact which would not seem to fit with the character and nature of the area).
60. There will be short term benefits to the economy, but these are unknown as the work will be tendered out and it is not known if local firms will benefit. Maintenance and long term job effects are very small compared to possible effects on local tourism business. The British Wind Energy Association (BWEA) research on economic conclusions for windfarms in Bute should be taken with caution. The CNPA area is substantially different.

REPRESENTATIONS

61. No written representations have been received but one individual has telephoned raising concern that because of the proximity to Inverness Airport the turbines may have to have lights on top. **(On checking the GIS System the site is located within the Inverness Airport Wind Turbine Safeguarding Zone).**

APPRAISAL

62. There is a range of detailed issues relating to this proposal which will be determined by the Scottish Executive. Highland Council and the Scottish Executive have formally sought CNPA's views on the proposal with any representations to be made to the Scottish Executive. This appraisal is written with particular reference to the proposal's effect upon the aims of the Park and the CNPA's own Interim Planning Policy No.1: Renewable Energy Finalised Draft January 2005.
63. One key issue that has arisen since the original proposal was assessed is the publication of Highlands Renewable Energy Strategy which sets out 3 areas, one being preferred areas for large scale windfarms, another being possible areas and the third being areas where there is a presumption against major windfarm development. On the maps that accompany the policy the site is located within a possible development area. The relevant policy considers that in such areas evidence should be provided as to why the windfarm should be located here as opposed to a preferred area. No justification has been provided in the ES addendum, so the proposal as it stands does not accord with that policy. This is fed into the recommendations at the end of the report.
64. The environmental statement accompanying the application covers a range of potential impacts of the proposal, but the ones most relevant to the National Park are considered to be the impact of the proposal on the landscape and peoples enjoyment of it, the impacts upon species that may be using the site from the park and the socio economic impacts.
65. As with other consultation documents of this type the proposal will be assessed against the aims of the Park in turn.

Conserve and Enhance the Natural and Cultural Heritage of the Area

66. This is the key area against which the proposal will be assessed. There is no doubt that wind farms can have a positive impact in making some level of contribution in reducing green house gas emissions, although detailed site factors must also be taken into account such as the carbon storage that some upland bog habitats provide and which can be displaced by construction activity. However, the key natural heritage aspects from a Park point of view relate to two areas, the first being the effect of the windfarm on the ecology of the Park with reference to bird species that may use both the windfarm area and sites within the park. The second key area for assessment is the potential impact of the development upon the landscape and visual amenity of the national park. Following on from this the report will attempt to make an assessment of what implications any negative landscape impact would have for the other two aims of the park

(although it has to be recognised that such areas have been the subject of only very limited research).

67. With regard to the general ecology of the site this will be dealt with by Scottish Natural Heritage and Highland Council given that the site lies outwith the Park. However, as with previous proposals the impact upon populations of specific birds, particularly golden eagles that may use the area and also frequent the Park is important. The ES contains an entire chapter on ornithology and this had been assessed by our Natural Heritage Team. It is noted that the RSPB and SNH raised concern about the original proposal with regard to collision risks for birds. However, it is apparent from the statement that golden eagles within the Park could be using the site. In addition if a pair become established and attempt to breed the risk of collisions with the turbines could increase and prevent any pair from successful establishment. In line with the RSPB and SNH views it was considered that the evidence available was not robust enough to support a formal objection. However, concerns were raised and the subsequent amendments made to the proposal have been based upon consultation between the developer, RSPB and SNH. While visiting the site the CNPA Landscape Officer noted a pair of Golden eagles. This again raises the possibility that birds within the Park may use the site. In addition, should the scheme ultimately receive permission from the Scottish Executive it may be some time before construction starts and the situation regarding bird species at the site may well have changed between permission being granted and construction being started on the site. In my view this should be raised as a direct concern.

Landscape and Applicant's Environmental Statement (ES) and Addendum

68. The original statement identified a number of key viewpoints within the Park and rated in terms of their sensitivity as receptors and the magnitude of change from those receptors. The statement uses a range of words such as negligible/slight/moderate/substantial to describe magnitude of landscape change and words such as moderate/minor/major to describe visual effect. The words significant and not significant are used to summarise the significance of the changes. A landscape consultant provided the Park with advice on the landscape section of the ES. Our own Landscape Officer has made an assessment of the scheme based upon the addendum to the environmental statement.
69. As noted by our Landscape Officer, the deletion of 3 turbines and the relocation of others results in little change in terms of impact from distant receptors such as the northern corries. The impact results from the 'clutch' of turbines as viewed from the northern corries as opposed to their exact siting or number so the analysis from this viewpoint remains largely the same as before.

70. In landscape terms the Ptarmigan Lodge on Cairngorm is considered by the ES as a high sensitivity receptor. However, the statement considers the magnitude of change to be negligible and the visual effect moderate/minor therefore not leading to a significant effect. However, it should be noted that while some 30 kilometres to the south east of the site (measured from site centre and not nearest turbine), the height at which the turbines would be viewed from would be aerial in nature and because of this their white colour stands out against the dull background of the Cawdor Hills. A darker colour for the turbines would help to reduce visual impact from this point but would increase the prominence from many other views, particularly from lower ground. It is important to note that given the altitude a view of all 31 turbines and the anemometer mast would be available. In terms of cumulative impact windfarms/consents/proposals at Farr 36km, Dumnaglass 40km and Paul's Hill 39 kilometres would also be visible from the Ptarmigan.
71. The viewpoint at the Ptarmigan is considered as sensitive, but it must also be recognised that the windfarm would be highly visible from all of the northern corries, which are considered to be high sensitivity receptors (hillwalkers and climbers who may be seeking a remote or 'wild' experience in the hills). The applicant's landscape assessment considers that the magnitude of change is likely to be negligible. However, this opinion is partly based upon the complex intervening elements between the viewpoint at Ptarmigan and the site itself. Many of these intervening elements would relate to the clutter associated with the ski area, these elements would not be seen from the remaining areas of the northern corries so the choice of Ptarmigan is not typical of the views to be gained from the whole of the northern corries and as receptors the northern corrie area away from the ski centre must be considered to be of a higher sensitivity because of their higher sensitivity to discordant features than Ptarmigan itself. It is recognised that a range of other landscape elements including some built elements such as Aviemore itself can be seen. However, what is clear from the applicant's own photomontage is that on clear days the windfarm would still be by far the single most prominent built element in the landscape when viewed from Ptarmigan and the northern corries. Of particular note with this section of the statement is that the radius for the study is set at 30 kilometres from the centre of the windfarm site when some windfarm landscape assessments have used a 35 kilometre figure. This precludes the upper parts northern corries from the landscape assessment, even though it is obvious that on clear days the windfarm would be visible from Sgoran Dubh Mor and Braeriach eastwards all the way along the tops of the northern corries. The motion of the turbines is an issue not addressed by the statement but the motion of the blades increases visibility by drawing the eye towards them, so that their visual intrusion is greater than that for static structures.

72. Another key viewpoint in the analysis of the scheme is from Meall a Bhuchaille directly above Glenmore. Again the summit of the hill is considered a sensitive receptor (rated high) for hillwalkers and also those involved in more traditional sporting activities in the wider area. However, the magnitude of change is considered slight with a moderate visual effect. This leads the assessor to the view that the impact is not significant. This viewpoint is 21 kilometres to the south east of the wind farm site and is considered to be a crucial viewpoint on what is a popular recreational hill above Glenmore. This was considered by our landscape consultant to be poorly depicted in both the photomontage and wireframe, the quality of the material was questioned but the amended scheme utilises the same photograph. The photomontage is taken on a cloudy day that would lend just about total invisibility to the windfarm which does not allow a realistic basis for assessment. The applicants ZTV (zone of theoretical visibility) shows that practically all of the turbines would be visible, although they would now be seen in a tighter, more compact form. However, as with the Ptarmigan viewpoint the deletion of 3 turbines is considered to result in a negligible difference between the original 34 turbine proposal and the 31 proposed this time around. Indeed, the landscape assessor's own opinion is that the perceived effect on visual amenity at this location is considered to remain as moderate.
73. The relative isolation of this hill provides a magnificent viewpoint of Strathspey and looks down on Loch Garten. The ES again considers that the magnitude of change to be slight but recognises that the effect on visual amenity would be moderate. Again, attention is drawn to the fact that a range of other elements are visible in the Strath including settlement, forests, and pasture. This high diversity of visual elements is considered to soften the impact of the proposal. However as noted by our landscape response the view from the Bhuachaille is much less disturbed by intervening elements than that from Ptarmigan which includes a view of Aviemore and elements of the ski centre in the foreground. Again, as with the Ptarmigan viewpoint the windfarm would be by far the most prominent built structure/s in view. In terms of cumulative impact other windfarms/consents at Cairn Kitty, Farr and Paul's Hill also raise concern to our Landscape Officer in relation to cumulative impacts. The ES recognises the visual effect as moderate from Meall a Bhuchaille but comes to the conclusion that this is not significant. The value of the hill as a highly sensitive viewpoint taken together with moderate visual effect should in my view lead to a different conclusion in terms of its significance and it is clear from our landscape consultation that the cumulative effects are significant and begin to establish a skyline that is contrary to the special qualities of the Park.

74. The ES contains a section on cumulative impact from the National Park. The statement recognises that the Glenkirk windfarm would be likely to be viewed in conjunction with other built/consented windfarms, particularly from the Hills of Cromdale and parts of Abernethy Forest. In consideration of the distances over which the windfarms will be viewed, the diversity of elements within the landscape within between the National Park and the wind farm which will be viewed simultaneously with others, the magnitude of change is considered by the ES to be locally slight but generally negligible or none. As such the cumulative effect and contribution of Glenkirk on the character and qualities of the National Park is considered by the ES to be locally moderate but generally minor/none which in the context of their assessment does not constitute a significant effect. The Cairngorm Mountains NSA designation is also considered but the conclusions on cumulative impacts are similar to those for the National Park. However, it again must be pointed out that the line drawn for the ZTV excludes the upper parts of the Northern Corries, therefore cumulative impacts from here are not addressed by the statement.
75. The ES looked at the proposal from a range of viewpoints both inside and outside of the Park. However, our landscape consultant drew particular attention to the fact that parts of this particular windfarm will be visible from swathes of Abernethy, Strathspey and areas around the Cromdale Hills and north east of Grantown. The statement relied heavily on the fact that many of these lower areas are forested which would help to screen the turbines on their distant hill ridge. This is one area where the amended scheme does result in some definite improvement. Because with the original proposal some turbines were sited close to the hill ridge this meant that varying numbers of turbines would have been visible from wide swathes of lower ground within the Park as well as from the main street in Carrbridge. One viewpoint used in the original assessment from the A9 south of Carrbridge now experiences no views of the turbines. This is a significant improvement but it is still the case that some turbines will be visible from lower and intermediate ground. Our landscape officer estimates that the reduction of visibility from the Park is something in the region of 30-40% with some turbines still being visible from Boat of Garten, Rothiemurchus
76. The windfarm would still also be visible from the A939 in the vicinity of Dirdhu where at least the blade tips of a large number of turbines would be visible. Practically all of the turbines would be visible from the central ridge of the Cromdale Hills This is an important area as it forms a gateway into Strathspey from the Moray area and driving north along the A939 one is currently greeted by the vast open sweep of Abernethy Forest and the wider Strath which reaches across to Craigellachie in the west and the hill ridge that is the subject of this application in the north west. The entire central ridge and north west slopes of the Cromdale Hills would see the majority of turbines.

77. Overall, it must be recognised that because this windfarm is sited on the first high hill ridge north west of Strathspey it will be visible from a range of lower and higher ground viewpoints in Strathspey and Abernethy, and because of its location and proximity to the Park boundary would be the **most** visible proposed windfarm from the National Park, in my view this statement is a fact (notwithstanding local landcover and topography) and is evidenced by the material provided in the ES and addendum. Therefore, the key to assessing the proposal relies on the significance of this visibility.
78. The very designation of the Cairngorms as a National Park recognises its special qualities and policy recognises that the objectives or overall integrity of the area (including landscape) should not be compromised unless these are outweighed by social or economic benefits of national importance. While wind power per se may be of national importance in my view this one site cannot be considered in those terms, so the question becomes the significance of the effects of the proposal. In my view and that of our landscape officer the ES has underestimated the importance of this particular proposal on the integrity of the park in landscape terms given the wide areas that at least parts of it can be viewed from. A key point made by the Park's Interim Policy on Renewable Energy is that the boundaries of the Park are in reality fluid with its interests sometimes going beyond the administrative boundary set down on a map. Because of this, the Park has objected to previous windfarm proposals at Dumnaglass and Hill of Snowy Slack in Aberdeenshire. This farm is close to the Park boundary, and parts of it would be visible across large swathes of Abernethy and Strathspey as a whole. SNH did object to the scheme on landscape grounds. However, the amendments put forward are understood to be partly in response to landscape concerns raised by SNH.
79. The process of landscape assessment uses an objective methodology. However, ultimately, the information used in the process is based upon a more subjective professional judgement. In this case that judgement is the value and sensitivity attributed to the special qualities of the National Park. In my view, the assessment to some extent underplays the significance of the effect upon both the landscape and visual amenity of users within the National Park and officers would place a greater weight upon the significance of the National Park as a material consideration. This is particularly relevant when considering our landscape officers response where it is considered that the assessment concentrates on the visibility, or otherwise of the turbines and little reference is made on the nature of the impact (industrial?) and how it will change the physical attributes of the site and subsequently the characteristics of the area. This is set out strongly in the advice provided by NPPG 14 on Natural Heritage with regard to the care that must be taken of the Scottish National Parks. Based upon this and the assessment in this section of the report I am of the clear view that while recognising that the proposal reduces the visual impact from low ground the proposal would still fail, overall, to conserve and

enhance the natural and cultural heritage of the area. In relation to the question of views into the Park from the main approaches this has not been addressed and many of the turbines would be visible from the A9 travelling south towards the Park. Views would also be had of the turbines from the quieter approach along the B9007 from Forres.

Promote Sustainable Use of Natural Resources

80. At a fundamental level the use of wind power is contributing to a reduction in green house gas emissions and can be described as a sustainable use of natural resources. It could be argued that it would be more sustainable if facilities of this scale are sited closer to the large centres of population where most of the power generated will be consumed. In tandem with this the view could be taken that smaller developments servicing local communities would be the most sustainable.
81. Given Government policy on the issue of wind farms it is, however, concluded that the proposal contributes towards this aim in the widest national sense. However, it is important to note that in carrying out its duties in relation to this aim the National Park Authority is seeking to promote a more sustainable use of natural resources through all the policy and individual planning application decisions that it makes.

Promote Understanding and Enjoyment of the Area

82. NPPG 6 on Renewable Energy states that renewable energy developments are not necessarily incompatible with tourism and recreation interests whilst stressing that it is unrealistic to expect such developments to have no effect at all. The Scottish Planning Policy 6 Renewable Energy: Consultation Draft considers that there is as yet no conclusive evidence about the impact of windfarm development on tourism-while some people express concerns about the impact of windfarms on landscape, others see them as attractive additions to the landscape providing visible evidence of a commitment to renewable energy.
83. The changes to the proposal while being an improvement from some low ground viewpoints result in little change from higher and key recreational areas. Visitors passing through the Park by car or rail might not have their enjoyment marred by passing glimpses of wind farms and the turbines would now not be seen from the south along the A9, it is considered that the same will not hold true for those walking on the Northern Corries, Meall a Bhuchallie or the many quieter hills which the windfarm could be viewed from. Visitor Services and Recreation Group have previously identified the qualities that bring visitors to the Park and the impact that the introduction of industrial elements in the landscape might have upon their experience. This aspect again highlights that a line on a map cannot be taken as the boundary of influence with regard to enjoyment. The park designation is in a large

part a landscape designation and one of the key aspects that attracts visitors to the park is its scenic vistas and semi-natural landscapes as well as the activity based attractions that are provided by the local community and often based upon the natural and cultural heritage attractions of the Park. It is most unlikely that the proposal would contribute towards the enjoyment of these attractions.

84. While all of the aims of the Park are linked, in the discussion of this proposal promoting understanding and enjoyment is intrinsically linked to the tourist economy which is more fully discussed below.

Promote Sustainable Economic and Social Development of the Area

85. The original ES included a section on the social and economic benefits of the proposal. This section of the report is basically as before, the deletion of 3 turbines and the amendments to the layout are considered to make little difference to the principle issues discussed in this section.
86. The ES noted that the proposal has a potential to have a beneficial impact upon the local economy such as in the provision of jobs for local people. The proposal is also considered to have the potential to stimulate the tourist market. The proposal could create between 50 and 70 jobs for a 23 month period in the construction sector and this could be a spin-off for local accommodation businesses. In the long term the number of jobs that the windfarm would be likely to create in the direct management of the site may be 2-3 persons.
87. In terms of direct short term jobs it is clear that the proposal would provide some level of benefit to the economy, although it is impossible to pin point to what extent this would benefit local residents, if workers from other areas are brought in this may benefit the local economy in terms of accommodation. However, I would also point out that the topography and construction of the site means that all materials and staff would be brought into the site from a northerly direction so Carrbridge and environs may not be the best placed settlement to benefit from such potential.
88. In terms of the effect of the proposal on tourism this is difficult to quantify as only a few studies have been carried out the positive aspects of windfarms are stressed in terms of them being tourist resource and 43% of tourists in one study (British Wind Energy Study Argyll) thought that windfarms had a positive effect upon the landscape. A study by Visit Scotland considers that scenery is a key influence on decisions to visit a particular area, in this study 29% of visitors thought that wind farms detracted from their experience while 18% thought they enhanced their experience. The applicant's statement considers that in practice the effect of a wind farm on tourism is likely to be determined by local factors, in particular the value of the landscape as a tourist resource. In my view, reliance on the few previous surveys carried out is a poor justification for more recent

windfarm proposals. Their benefits as tourist attractions would presumably decline as more are built and it is important to recognise that the very limited research carried out has related to windfarms that have been built and operating for a few years now. The Economic and Social Development Group also point out the different circumstances between the Argyll study and what is proposed by this scheme. When the Argyll study was carried out three small sites were in existence, there are now 24 proposed and constructed within the Argyll and Bute area. Since this time windfarms have tended to be larger in number of turbines and in terms of the size of the turbines used. In addition to this it takes no account of the combined impact of large windfarms in a particular area. Because of this, my view is that the research that this scheme is predicated upon is likely to be unreliable in relation to the more recent schemes being put forward. Indeed the latest overview of research by the Scottish Wind Assessment Project (April 2005) regards both the Argyll and Visit Scotland studies to be obsolete.

89. Because the landscape assessment section of the ES considers that there would be unlikely to be significant effects upon the landscape of the Cairngorms National Park the ES considers this an indication that the Glenkirk windfarm would be unlikely to form a significant element within tourists experiences of the Highlands and therefore unlikely to provide a major factor in tourists decision making. However, given this planning reports conclusions on the landscape issues involved and that the changes are significant because of the value that is placed upon this landscape of recognised national importance the precautionary approach should be adopted.

CONCLUSION

90. The amended proposal for this windfarm has been assessed against the aims of the Park and it is recognised that the deletion of 3 turbines and changes made to the layout make a contribution to reducing landscape and visual impacts from lower ground in Strathspey. However, these changes are negligible in terms of the effects of the proposal on many of the higher areas. It is recognised in the widest sense that the scheme contributes towards promoting sustainable use of natural resources, so consequently makes some level of contribution to this aim of the Park. Although, it must be recognised that this is to the benefit of the National Grid and not specific to the local communities within the Cairngorms area. The potential for this proposal to result in negative landscape and in particular visual amenity impacts has been discussed above as has the lack of clear evidence as to how the windfarm would impact upon the local economy. It is again important to stress that as evidenced by certain material within the ES that this wind farm would still be visible across large parts of the Highland area of the Park from the tops of the Northern Cairngorm Mountains and the Cromdale Hills and certain lower areas in Strathspey

91. The stance of the National Park has always been clear and that it that there would be a presumption against commercial wind farm projects within the Park, the nearest turbine is still well within 1.5 kilometres metres of the Park boundary which clearly blurs the distinction between what happens inside and outside of the Park. In my view the scheme is still so close that the presumption against large scale windfarms within the Park should also hold sway here. Cumulative impact has also been considered by the applicant's statement but I would also raise concern regarding the precedent that acceptance of this application may set this is in relation of the proximity of the windfarm to the boundary of the Park and the fact that another scheme for a windfarm with a theoretical potential for 50 larger turbines immediately to the east of this site is still waiting in the wings. It is clear in my mind that the acceptance of this proposal would set a precedent for further proposals within close proximity to the park boundary and lead to a significant deterioration of the setting of the Park both when viewed from inside and when approaching the Park.

RECOMMENDATION

92. Overall, based upon the information contained within the original Environmental Statement, and addendum it is recommended that the CNPA recognise that some improvements have been made in terms of a reduction in the visibility of the proposal from low ground. However, Cairngorms National Park Authority considers the proposed development to be contrary to National, Highland and CNPA planning policy as well as three aims of the National Park and consequently continue to object to the proposed development of a wind farm at Glenkirk for the following reasons:
- a) Since the original proposal for 34 turbines Highland Council's Renewable Energy Strategy has been published. This is an important new material consideration. The windfarm is identified as being in a 'possible' development area for windfarms. This policy area includes a requirement to show why the windfarm cannot be located in one of the 'preferred' areas. No justification has been made with regard to this principle policy issue.
 - b) The outstanding and unique characteristics of the landscape extend beyond the administrative boundaries of the Cairngorms National Park. The proposal would lead to an unacceptable degree of adverse visual impact upon the character of the Cairngorms National Park from the Glenkirk proposal itself and cumulatively with other built/consented/proposed windfarms. The CNPA considers that the visual assessment of the scheme places insufficient weight on the Park's sensitivity as a visual receptor for the scheme which effectively downplays the resulting impacts predicted by the ES. In addition little regard is

given to the nature of the development in that in visual terms the prominence of what is proposed is assessed by a given methodology which places an emphasis upon visual prominence as opposed to the introduction of large elements of an industrial character to the setting of an internationally recognised landscape.

- c) Tourism is central to the economy of the Cairngorms National Park with visitors coming to the area to enjoy the unique character of the environment, especially its internationally recognised landscape as well as modern and traditional sporting activities. Whether visitors are experiencing the view from the Ptarmigan, more isolated points in the northern corries or from Meall a Bhuchaille. Parts of the wind farm would also be visible from large areas within Abernethy and Strathspey as a whole. The statement provides inconclusive evidence of the economic impacts of the proposal. In the absence of a comprehensive economic assessment that demonstrates to the contrary, it is considered that the precautionary principle should apply and a development that could, with others, have an adverse effect on the local economy should not be permitted.
- d) The proposal has the potential to set a dangerous precedent for further windfarms to be located in such proximity to the boundaries of a nationally and internationally recognised landscape.

NOTE

In addition to the letter of formal objection reference shall be made to concerns highlighted by the Natural Heritage Group relating to golden eagles and ravens. References made earlier to regional targets for renewable energy production in the terms of the Draft SPP6 will also be reiterated. The additional concern that any lighting for the turbines should only be visible from above will also be mentioned.

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