

CAIRNGORMS NATIONAL PARK AUTHORITY

Title: CONSULTATION REPORT ON PLANNING APPLICATION TO ABERDEENSHIRE COUNCIL

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DEVELOPMENT PROPOSED: FULL PLANNING PERMISSION FOR CONSTRUCTION OF 7 WIND TURBINES WITH ANCILLARY DEVELOPMENT INCLUDING ACCESS TRACKS, UNDERGROUND CABLES, CRANE HARD STANDING, TEMPORARY CONSTRUCTION COMPOUND, ANEMOMETER MAST, SITE CONTROL BUILDING AND BORROW PIT, WHOLE SITE TO THE SOUTH OF SCARHILL RADIO STATION, PRESSENDYE, CUSHNIE

APPLICANT: CUSHNIE WIND ENERGY LTD. C/O WEST COAST ENERGY, AND C/O ATMOS CONSULTING LTD, INVERNESS BUSINESS CENTRE, STADIUM BUSINESS PARK, 24 LONGMAN DRIVE, INVERNESS

RECOMMENDATION: OBJECTION

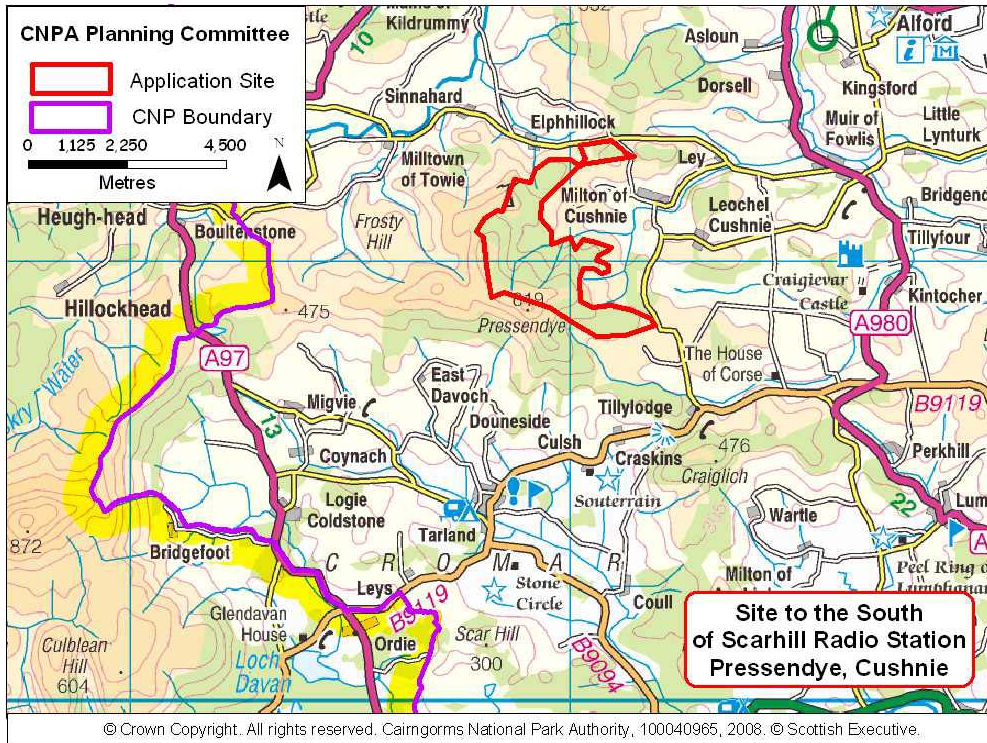


Fig. 1 - Location Plan

SITE DESCRIPTION AND PROPOSAL

1. Aberdeenshire Council have requested a consultation response on a full planning application for a wind farm development of 7 wind turbines on a ridge line running westwards from the hilltop of Pressendye. Pressendye lies approximately 5km north of Tarland and 3kms west of Leochel-Cushnie and as such is outwith the boundaries of the National Park. The site lies approximately 5.5km to the east side of the eastern boundary of the Park at a height of approximately 600m AOD.

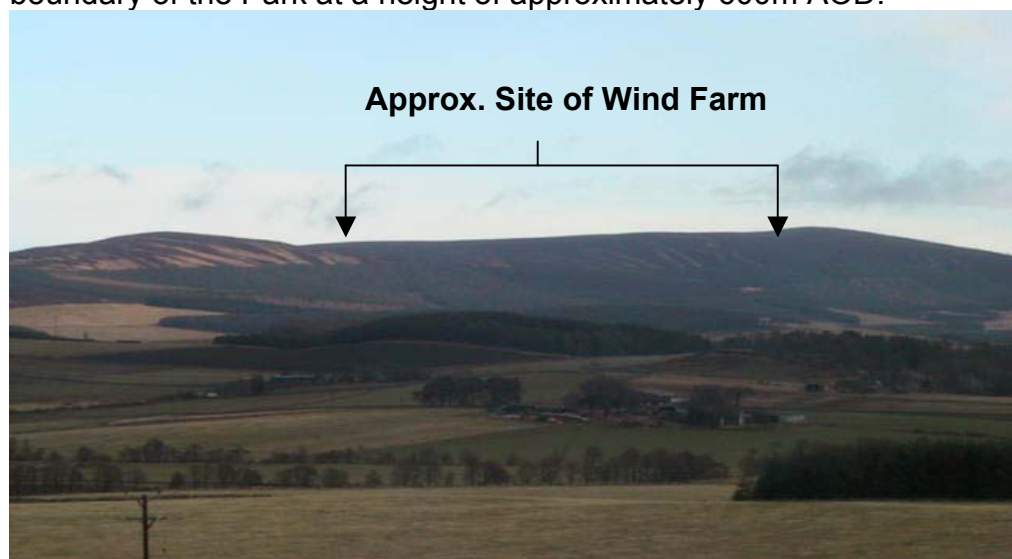


Fig. 2. Ridge Line of Pressendye as viewed from Balhennie on the lower eastern slope of Morven

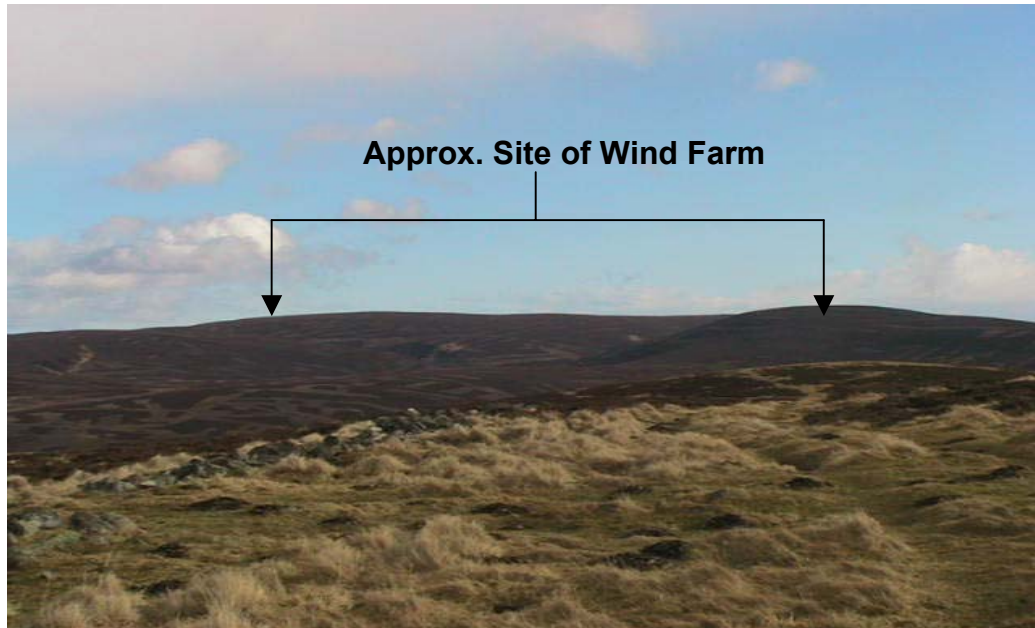


Fig. 3. Site viewed from Gallows Hill area lying to the north-west of the site

2. The main components of the scheme are:-
- 7 wind turbines, each with a maximum power output of 3MW and a maximum height to blade tip of 125m (max. hub height is 80m);
 - Approximately 3.2km of new on-site access tracks;
 - Turning areas to allow for the manoeuvring of delivery vehicles;
 - Crane hardstandings adjacent to each turbine base;
 - Control building;
 - A borrow pit based on an expansion of an existing borrow pit;
 - Connecting underground cabling;
 - One 80m high permanent wind monitoring mast; and
 - A temporary construction compound

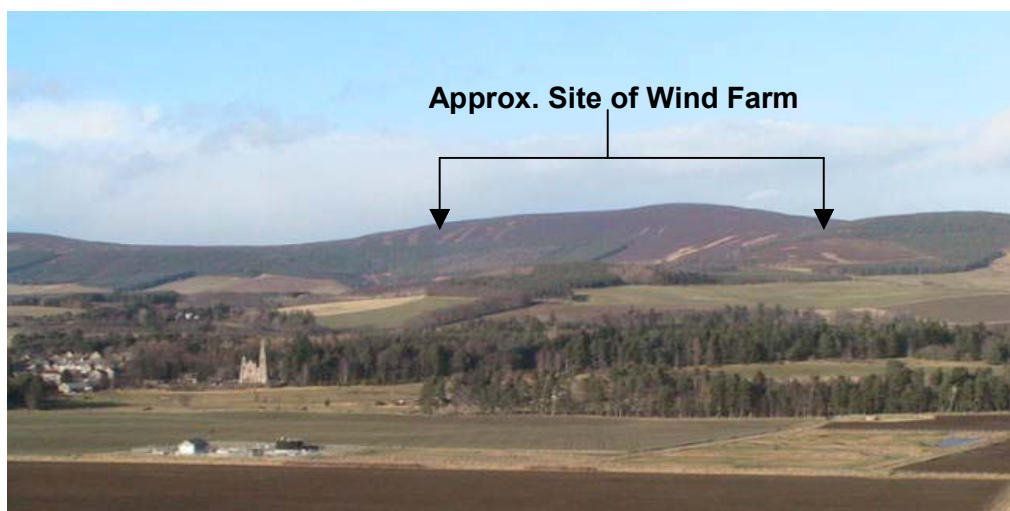


Fig. 4. Pressendye ridge line viewed from Tomnaverie Stone Circle to the south of Tarland

3. A full Environmental Impact Assessment accompanies the application to Aberdeenshire Council and the CNPA have also received a copy as part of the consultation request.
4. The Planning Committee will recall that the CNPA provided a consultation response to Aberdeenshire Council in May 2007, on an associated proposal by the current applicants, for the siting of a 70m high anemometer mast near to the summit of Pressendye. Following the Committee's consideration of a report at their 4 May 2007 meeting, the decision was to respond on this proposal, to Aberdeenshire Council as follows.

"The CNPA considers that the siting of the anemometer mast will have a negative landscape and visual impact on the setting of this side of the National Park and the wider Area of Landscape Significance. However, the CNPA considers that the magnitude of the impact will be generally low and the duration of time relatively short. The CNPA therefore raises no objection, in principle, to the siting of the proposed anemometer mast on a temporary basis.

The CNPA suggests that, if approval is granted, it should only be for a reduced temporary period from that applied for. The suggestion is for a maximum period of 12 months.

The CNPA recognises that the potential for a wind turbine development in this location, is not a material consideration. However, the CNPA wishes to raise a general concern at this stage, about the potentially significant visual and landscape impact of such a development, on the setting of the National Park. As such, the CNPA would be grateful, if it could be consulted further on any future wind turbine proposals, at the EIA scoping and application stages. In addition, the CNPA would be grateful if it could be consulted on any future application to extend the time period of any temporary permission."

5. Aberdeenshire Council subsequently granted permission for this mast for a period of 1 year dating from 25 June 2007.
6. Also of relevance to this proposal, is two other wind farm proposals in the Aberdeenshire area within reasonable proximity to this proposal and the boundaries of the National Park. An application for 8 no. 93 m high turbines at the Hill of Snowy Slack, Kildrummy, was refused by Aberdeenshire Council on 26 September 2007. This site lies approximately 12km to the north west of Pressendye and within 3km of the National Park boundary. The CNPA raised objections to this proposal. This application is now the subject of an appeal. A Section 36 application, for a large scale wind farm at Clashindarroch, near Huntly was recently refused by the Scottish Government. The original submission was in the very early days of the National Park and the CNPA did not therefore provide any input. A revised application is a

possibility. This site lies approximately 20km to the north of Pressendye and approximately 15km from the boundary of the Park.

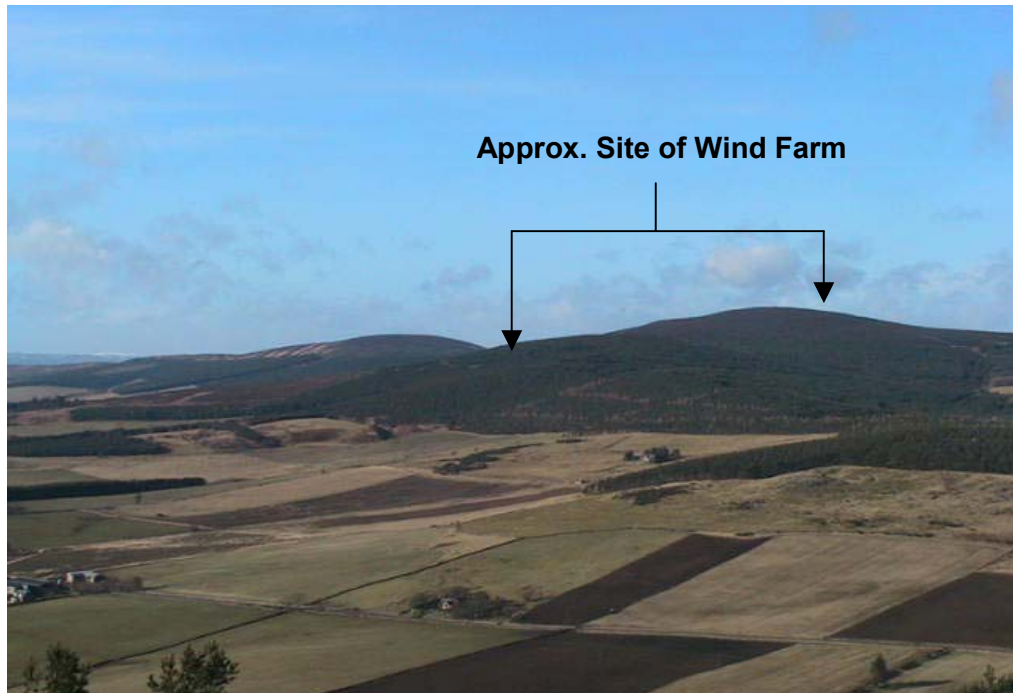


Fig. 5. Pressendye ridge line viewed from western slope access track of Craiglich



Fig. 6. Pressendye ridge line viewed from the A93 looking over Loch Kinord

DEVELOPMENT PLAN CONTEXT

National Planning Guidance

7. **Scottish Planning Policy 6 (SPP6) Renewable Energy (2007)** considers that renewable energy and the need to protect and enhance Scotland's natural and historic environment must be regarded as compatible goals if an effective response is to be made to the challenges of sustainable development and climate change. During the life of the SPP onshore wind power is likely to make the most substantial contribution towards meeting renewable targets. Scotland has considerable potential to accommodate this technology in the landscape although, increasingly, careful consideration must be given to the need to address cumulative impacts.
8. Para 54 considers that the significance of any adverse impacts of renewable energy should have regard to the projected benefits of the proposal in terms of the scale of its contribution to the Scottish Executive's targets. **In all instances, the integrity of national and international designations should not be compromised.**
9. The guidance notes that tourism is an important element in the economic, social, environmental and cultural well-being of Scotland. The beauty of Scotland's landscape attracts many visitors and sustainable tourism supports many small businesses and remote rural and island communities.
10. **National Planning Policy Guidance 14 (NPPG14) Natural Heritage** states the Government's commitment to the protection and enhancement of the landscapes of Scotland as reflected in a wide range of policies and initiatives. For example, its support for National Parks in part reflects a commitment to safeguarding landscapes of international importance. It also recognises that the most sensitive landscapes may have little or no capacity to accept new development and that a key role of the planning system is to ensure that society's land requirements in terms of housing, economic activity, transport infrastructure and recreation are met in ways which do not erode environmental capital. The protection of natural heritage may sometimes impose constraints on development. However, conservation and development can often be fully compatible and, with careful planning, the potential for conflict can be minimised.
11. 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:**
 1. **The objectives of the designation and the overall integrity of the area will not be compromised; or**

2. **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.**
12. 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.
13. **Planning Advice Note 45 Renewable Energy Technologies (2002)** provides more detailed advice on assessing applications for wind farms and provides particular advice in terms of assessing landscape impact. The document notes that Scotland has a range of landscapes some of which will more easily accommodate wind farms than others. **The guidance notes that a cautious approach is necessary in relation to particular landscapes such as National Scenic Areas and Proposed National Parks and their wider settings. Here it may be difficult to accommodate wind turbines without detriment to natural heritage interests.**

North East Structure Plan (NEST) 2001-2016

14. **NEST Policy 5 Renewable Energy** supports new renewable energy facilities when compatible with ecological, transportation, landscape and amenity considerations. NEST directs that further detailed assessment be provided within local plans and that wind farm proposals shall be based on a sequential exploration of tiered planning designations as outlined in NEST Policy 26, Table 5.
15. **NEST Policy 19 Wildlife, Landscapes and Land Resources** states that development will only be permitted where it can be demonstrated that any damaging impacts are considered acceptable overall, or that there is a public interest that outweighs the conservation interest.
16. **NEST Policy 26 Four Tier Policy Areas for Minerals, Landfill, Land Raise and Wind Farm Proposals** provides a **four tier policy guide on the location of wind farm development within tiers of preference related to areas where there is no International, National, Local or other designations. The policy requires a sequential approach to site selection with presumption in favour of Tier 4 sites.**

Aberdeenshire Local Plan 2006

17. The site is located immediately on the boundary of an **Area of Landscape Significance**. In fact it could be argued that the line of the proposed turbines runs along the boundary of this designation which extends to the east, the south and to the west towards and into the National Park. **Policy Env\5B Areas of Landscape Significance**

notes that development within **or adjacent** to an Area of Landscape Significance will not be permitted where its scale, location or design will detract from the quality or character of the landscape. Where acceptable in principle, development must conform to Appendix 1 and Appendix 5. In all cases the highest standards of design, in terms of location, scale, siting, aesthetics and landscaping will be required within Areas of Landscape Significance. **Within the Cairngorms National Park greater weight will be given to the conservation and enhancement of the natural and cultural heritage of the area if the Park's aims are in conflict.**

18. **Policy ENV/21 Vehicle Hill Tracks** notes that development involving vehicle hill tracks, insofar as it is not Permitted Development, will be refused unless it can be integrated satisfactorily into the landscape and minimise detrimental impact, such as soil erosion, on the environment including habitats and watercourses.
19. **Policy Inf7 Renewable Energy Facilities-Wind Energy** considers that wind energy developments will be approved in principle, if located, sited, and designed in accordance with a range of criteria including; d) the proposal has an impact (visual and other) which is assessed and is acceptable on sites of importance to natural heritage, international, national and local landscape designations and areas of local ecological importance, in accordance with policies Env 1 to Env 7; e) the proposal would not have an adverse effect on any existing or proposed public access; f) the proposal is appropriate in terms of the scale and nature of the setting of listed buildings, conservation areas, archaeological sites, and historic gardens and designed landscapes; h) the proposal is unlikely to result in a material loss of amenity to other sensitive receptors, such as those involved in leisure or recreation on land or water; and i) the proposal takes into consideration the cumulative impacts of neighbouring wind turbines or wind farm developments.

Cairngorms National Park Plan 2007

20. **Strategic objectives for Landscape, Built and Historic Environment** include, amongst others; maintaining and enhancing the distinctive landscapes across the Park; conserving and enhancing the sense of wildness in the montane area and other parts of the Park; and ensuring development complements and enhances the landscape character of the Park. This section also emphasises the importance of assessing the potential impacts of public and private roads, masts, utilities, renewable energy developments (in and where relevant beyond the Park), to ensure that designs and locations do not detract from the landscape character.
21. **Strategic objectives for Energy** include; contributing to national targets for greater renewable production through increasing community, business and domestic-scale renewable energy schemes. However, large scale windfarms are not considered to be appropriate in

the National Park due to landscape and natural heritage impacts, but the development of domestic, and community-scale facilities in a full range of energy options should be pursued in appropriate locations.

CONSULTATIONS

22. **The CNPA's Visitor Services and Recreation Group** has advised that Dinnet is the eastern gateway to the National Park. The A93 is the third most used vehicle entry into the Park (after the A9 north and south bound) comprising about 15% of the traffic into the Park. Survey work commissioned in 2003/04 found that 46% of visitors to the Park liked the Cairngorms area because of the beautiful views and scenery; 27% because of the hills, wide spaces and rugged mountains; 25% because of the peacefulness and easy going pace of life; and 13% because of the trees and colours of the landscape. The same survey identified the top two activities for visitors as general sightseeing and walking. These figures clearly indicate that one of the key reasons for visitors coming to the National Park is to experience the natural landscape with the most common ways of engaging with these landscapes being by simply enjoying the views or by going for a walk, and enjoying the views.
23. The Cairngorms National Park Plan contains the following outcomes for raising understanding and awareness of the National Park; everyone will know when they have arrived in the National Park and have a positive feeling about arriving in a special place; and more people who have visited the Park will have high quality experiences and will tell positive stories about the area. The Plan also recognises the importance of National Nature Reserves in allowing people to enjoy and learn about the special qualities of the National Park with an action being to promote and interpret the suite of National Nature Reserves as being best suited for the experience of special natural qualities in the Park. The National Nature Reserve at Muir of Dinnet is one of eight within the Park and a key site for interpreting the natural and cultural heritage of the Park. The NNR has a well-promoted path network and the route around Loch Kinord and the link from Dinnet are designate core paths.
24. At this time, evidence on the impact of wind turbines, on all visitors is inconclusive. However, Visit Scotland has looked at visitors with a specific interest in the countryside:-

"We then took the proportion of these holidaymakers whose activity was 'walking two miles or more,' i.e. tourists involved in specifically rural activities as opposed to those merely visiting attractions located in the countryside.

Fifteen per cent of those surveyed by VISITSCOTLAND answered categorically that they would steer clear of an area with a wind development.

A further ten per cent said they would be 'less likely' to return to the Scottish countryside if the number of wind-power sites increased."

Source: Wind Turbines and Rural Tourism, VisitScotland.

25. If such comments are supported by visitor behaviour they would have a negative impact on tourism in the area. The proposed wind farm at Cushnie will be highly visible from the Muir of Dinnet NNR. It will affect the beautiful view, the wide spaces; it will impact on the features that people most like about the area. The findings of the VisitScotland survey suggests that this development will have a negative effect on a key segment of visitors to the National Park with associated negative impacts on tourism businesses. While the proposed development is outwith the National Park this would only be apparent to a visitor with a detailed map and regardless of whether 'in or out' of the National Park the turbines will have an impact on the visitor's experience. It seems likely that this impact will be associated with the landscape of the National Park. In considering the application **VS&RG** recommend that consideration is made of the potential negative impacts on visitors experiences and that the development may directly conflict with two outcomes in the National Park Plan: that visitors will not have a positive feeling about arriving in a special place and they will not have high quality experiences and not tell positive stories about the area.
26. **The CNPA's Economic and Social Development Group** have stated that a new government report "Economic Impacts of Wind Farms on Scottish Tourism" has just been published and that the summary document finds that overall, nationally, the impact of windfarms on tourism is generally low. However, there are a couple of recommendations that are of particular relevance to the National Park. At a national level, it stresses the need to retain areas where turbine development is limited to supplying local needs in small remote communities. This would allow the 25% (approx.) of tourists who view wind farms negatively to "substitute" a visit to an area with turbines to one without. National Parks and National Scenic Areas are particularly mentioned in this context. It also suggests that developers should be asked for a Tourist Impact Statement as part of the EIA.
27. **The CNPA's Land Management and Heritage Group (Landscape Officer)** has provided a detailed assessment of the findings of the EIA and the proposal in general, in relation to visual and landscape impacts.

Methodology

28. Generally the outline methodology used reflects the standard guidelines reasonably well, with one or two exceptions. The references cited are what would be expected but do not list the Landscape

Character Assessment (LCA) for the Cairngorms (SNH 1996) though they have clearly made use of this later in the study.

29. However there is disagreement with the application and the interpretation of the methodology. One of the most important principles is that the process by which decisions are made should be clear and transparent. It is found that there are points in this study which are less than this. For example, table 7.3 of the EIA (Definition of Magnitude of Change) defines magnitude of change but there are no quantitative or qualitative measures to help define the limits of each category. High magnitude of change is simply described as “fundamental change”. By contrast the SNH guidance “A handbook on EIA” suggests that it might be either a “noticeable change in characteristics or features over an extensive area, ranging to intensive change to a more limited area”. This, whilst not detailed, at least provides some measure of the limits. The lack of this more precise definition does not make it possible to see how judgements are derived.

Landscape impact

30. In the description of landscape character types (table 7.6 of the EIA) it is invariably stated that “there is no specific guidance provided on sensitivity to windfarms” from the SNH 1996 LCA study (Cairngorms). Whilst this may be factually correct, this might give the impression that this means it is not considered important. However when this was written 12 years ago, windfarms were not as frequent as they are now and it was quite unlikely to have been considered a possibility. It is interesting to note that in the ‘North-Eastern hills’ description of the SNH LCA study, pylons were specifically mentioned as being as detractors, though this has not been mentioned in this applicants study.
31. On the issue of pylons, it is also worth pointing out that the pylon line from the Lecht is mentioned in several descriptions as being large vertical man made features. However it is not mentioned that their removal is part of the Beaully Denny power line application mitigation considerations. The CNPA may pursue this course of action even if the Beaully Denny power line development is approved. Without these pylons there would be few, if any, large vertical structures in this area and this would make the turbines even more obvious. However no distinction is made between the size of the pylons and the proposed turbines, which is quite considerable.
32. Table 7.9 of the EIA (Impacts on Landscape Character Types) - here there are several incidents where landscape types and areas have been listed with variable sensitivity rating. This makes interpretation of the impact assessment difficult. For example the Cromar Farmlands, which lies in part within the National Park, is given a medium or high sensitivity rating but only a single moderate adverse impact. This combining or splitting of ratings may diminish the actual impact and might provide the reader with a false impression.

33. Table 7.10 of the EIA (Impacts upon the Cairngorms National Park) lists the overall impact at only medium despite there being many parts of the Park rated a significant adverse effect, mainly in the north eastern hills LCA. This grading is challenged for the following reasons:-
- The lack of a comprehensive wildland assessment has diminished the real effect of the proposal upon this characteristic and special quality of the Park.
 - 19.1% (almost 1/5th) of the Park within the study area, has a view to the proposal. This represents a very substantial portion in itself, but it is not clearly explained that much of this is concentrated on upland areas close to the Park boundary. Consequently the turbines have proportionally greater impact because of the landscape characteristics and their proximity. This specific area (north eastern hills) should be given a higher rating.
 - The use of the LCAs has disguised the fact that there is a strong link between the moorland of the eastern part of the Park and the Pressendye ridgeline. This is because the boundaries of the separate LCAs fall across this area. There is clearly a continuity of character across the Park boundary due to elevation, landform and land cover. This continuity is clearly apparent from many areas that have a view to both the Park and the proposal. This is an important component of the setting of the Park and in particular plays an important part in the definition of the Cromar bowl, a feature that straddles the Park boundary.
34. It is considered that it is not enough to imply that screening vegetation may block theoretical views. The nature of this woodland cover should be considered, i.e. is it evergreen or deciduous, is it forestry and therefore likely to be felled, etc.

Wildland

35. It is surprising that the EIA does not make a fuller analysis on this subject. It has limited its approach to pointing out the search area for wildland as per the SNH guidelines. However they do not mention that the map referred to, is an addendum to this statement and is not intended to be used in the way that it appears to have been here, i.e. to imply that anywhere else does not have any wildland or wildness features.
36. The CNPA's own work on this wildland issue will show that the eastern part of the park has significant wildness attribute levels and that these would be adversely affected by this proposal. It is certainly fair to say that the applicant does not yet have access to this work but the

principles of wildness should be well known to them and these should be applied to areas outwith the 'search' area in the SNH guidelines.

Visual impact

37. It is not found necessary to go into the details of the various viewpoints shown in the EIA, though there are some reservations about the analysis from some of these. However in Table 7.13 of the EIA (Visual Impacts on Landscape Designations and Non Designated Sites) the section dealing with the National Park rates the assessment of impact as only moderate. The reasons for this seem to largely be because, of the 1280km² of the National Park within the study area, the EIA states that only 245 km² has a view to the proposed windfarm. However this is concentrated at the periphery of the Park and so within this part of the Park, the percentage will be higher.
38. Overall the percentage of the National Park within the study area with a view to the windfarm would be just under 20%. It is considered that this is actually quite a significant proportion and this alone should rate a more severe impact rating. This is bearing in mind that many of the significant mountain tops will be included in this. These are the very areas where hill walkers and wildness seekers will aim to go. These are the highest sensitivity visual receptors and so the effect will be disproportionately adverse upon this group.
39. The EIA analysis also considers the whole of the National Park area together. This encourages an averaging effect that has resulted in this moderate impact rating. The study does recognise that the 'areas of intervisibility' are largely closer to the boundary (and on mountain tops). These are obviously also closer and so the effect is higher. For much of the 245 km² therefore the magnitude of change is likely to be high and so the impact will be substantial. Having such an impact upon the National Park is considered to be unacceptable.
40. The importance of the impacted area as the setting and a major entrance to the park has not been discussed in the EIA. It is felt that this is a significant omission in that such locations play an important part in setting visitor expectations of the Park and making their first experiences as positive as possible. It is felt that this raises the sensitivity of these locations and that this has not been adequately considered.

Sequential impacts

41. On the whole the sequential assessment (views from roads and railways) in the EIA is simply a factual assessment of the routes but there are a few points that make the apparent situation seem rather better than perhaps it is. Each one on its own may have a small effect but combined they could very well make a significant difference to the resultant impact.

- The travel speed along these roads is constantly assessed at 100kmph. This equates to 62.5miles per hour. Apart from being over the speed limit, it is also an impossible speed for many of the roads, especially ones near the Park. This gives a distorted picture of observation times and does not reflect the way these roads are really being used.
 - The length of each road, in some instances, is divided into quite long sections. This makes the percentage of time visibility smaller than it might otherwise be. Again this process of generalisation, whilst being factually correct, can give a misleading impression on the summary table 7.15 in the EIA (Summary of Sequential Assessment). This shows no sections of road as being more than moderately adversely impacted upon. The A97 is perhaps the best example of this. If the analysis was broken into discrete sections such as from Heugh-head (where the A97 joins the A944) to Dinnet, the picture would be significantly different and the overall impact is likely to be much greater.
 - Only A Class roads have been chosen, clearly other roads in the area are used as well and so it only gives a partial picture.
42. Finally there is no evaluation of any road in terms of its users and significance for the Park in terms of visitor numbers and entrance point value.

Cumulative impacts

43. This is again a factual piece of the EIA study and there is little analysis. It is clear however that there are several other windfarm sites or proposed sites that would have, along with Cushnie, a cumulative effect. The level of this has not been described but for several of the Park's viewpoints, where the impact of Cushnie Windfarm has already been rated as moderate or substantial, it would clearly make the rating more severe.

Conclusions

44. In conclusion, **the CNPA's Landscape Officer** advises that the impact of the proposal upon significant parts of the National Park will be high and adverse. It would appear that the generalising within the EIA report has underplayed the level of the impact upon important parts of the Park and that the role of the setting of the Park has been diminished. In particular the specific relationship to the Park from the Cromar bowl and the Pressendye ridge has been largely discounted. It seems quite clear that this proposal, in no way, either conserves or enhances the natural or cultural heritage of the Park and accordingly the **CNPA's Landscape Officer** objects to it upon landscape grounds.

REPRESENTATIONS

45. Although the CNPA are not the determining Planning Authority, some letters of representation have been received (two of which are copies of representations sent to Aberdeenshire Council). These are attached to this report for information. In general, the matters raised include, concerns about the impacts on the landscape and species of the National Park. Also of concern is the impact the proposals will have on recreational activities in the National Park.

APPRAISAL

46. The application raises a significant number of detailed issues. However, with the site lying outwith the boundaries of the National Park, these are matters for Aberdeenshire Council. The CNPA's role in this instance is therefore as a consultee. As such, the CNPA's response should be based on the effect the proposal will have upon the aims of the National Park and the implications for the objectives of the National Park Plan.

Conserve and Enhance the Natural and Cultural Heritage of the Area

47. Given that the site lies approximately 5.5km outside the eastern boundary of the Park, the key issue in relation to this aim, is the effect the proposed turbines will have on the landscape and visual character and setting of the National Park, both in themselves and cumulatively with other existing or proposed/potential wind farms. This takes account of the sensitivity of the landscape affected and of potential receptors, and views into and out of the Park. In addition, there are some issues in relation to species which may cross the National Park boundaries.
48. The EIA submitted provides landscape and visual impact assessments. The analysis, of the quality of the findings in the EIA, is covered in great detail in the CNPA's Land Management and Heritage Group's response above. Without repeating the detail of these findings, the conclusion is that there have been some generalisations made which lead to an underestimation of the level of visual and landscape impact on important parts of the Park. Several viewpoint visualisations from parts of the National Park have been included in the EIA study. These are Morven, the B976 South Deeside Road (Glascorrie), Pannanich Hill, Gallows Hill, Dun Muir (Ladder Hills) and Mount Keen. There are also some viewpoints towards the Park. The most prominent being Craiglich Hill, and Queens View on the B9119. However, it is considered that there are some omissions, such as Lochnagar, the A93 North Deeside Road/Loch Kinord, and the higher parts surrounding the Burn O Vat. It is also considered that some the viewpoints chosen eg. Glascorrie on the B976 South Deeside Road may not be the most appropriate or obvious locations for viewing the site, in the area.

49. The EIA concludes that the overall impact on the National Park is moderately adverse. However, it is considered that this underplays the significance. The areas where the turbine proposal will be seen are generally sensitive. In this respect they include well-used higher mountain top areas and footpath routes in close proximity (Morven), tourist routes (A93, B9119, and the B976), National Park gateway entrance areas (A93, Loch Kinord, Queens View, Craiglich Hill), popular visitor attraction areas (Burn O Vat, Muir of Dinnet NNR) and wildland areas (Ladder Hills, Lochnagar, Pannanich Hills areas). The Howe of Cromar is a "landscape bowl" which forms part of the wider Area of Landscape Significance (ARLS) defined in the Aberdeenshire Local Plan. While it may be argued that the line of turbines may be physically sited outside the "ARLS line drawn on the map", in reality, it is so close, that it will be seen as indistinguishable, in landscape terms, from the ARLS. The ARLS extends into the Park. The Pressendye Ridge forms an integral part of the Cromar Bowl which also extends into the Park towards Morven. It therefore provides an important and iconic landscape setting for the Park at this location. It is considered that this will be significantly disrupted by the windfarm proposal and views into and out of the Park will be significantly and adversely affected.
50. In terms of cumulative impact of the proposal, with other proposed or potential windfarms in the vicinity, the EIA does cover this in its written and visual assessments. Of most relevance are perhaps the Kildrummy and Clashindarroch proposals. Clashindarroch does not though seem to get acknowledged in the EIA. It is accepted that at present, both these proposals are not approved (one is the subject of an appeal, the other has been refused and may be submitted in a revised form). However, in relation to Kildrummy, if approved, the EIA finds that there will be a greater cumulative effect on various areas, including, from the National Park, with the addition of Cushnie. Taking into account that it is considered that the impact of the Cushnie windfarm, on the setting of the National Park, is currently underplayed in the EIA, it follows that the cumulative impact of Cushnie and least Kildrummy would be higher.
51. In relation to the impact on species that may traverse the boundaries of the Park, the EIA provides surveys and assessments. Of particular relevance to the Park is ornithology and the possibility of bird collisions. The CNPA is aware of a response from the RSPB on the proposal. This makes mention of the area being subject to frequent goose movements between feeding sites or moving to roosts at, amongst others, the Dinnet Lochs (within the National Park). It is accepted that numbers of geese roosting at Dinnet have declined over the last few years. However, this is not due to any known change in the suitability of the Dinnet Lochs as a roosting site. It is therefore possible that use of the Lochs may yet increase again. They remain Special Protection Areas because of the geese. With any windfarm at Pressendye

potentially having a lifespan of 25 years or more, it is suggested that increased usage of the Lochs is a real possibility. The EIA does not necessarily take account of this possibility, and it is suggested by the RSPB that further potential goose movement modelling scenarios be requested, in order to further assess the potential impact on the Dinnet Lochs SPA currently and in future years.

52. In relation to birds of prey, this is examined at length within the EIA. The RSPB generally accepts the findings that the impacts of the windfarm on raptors, is likely to be adverse, but low. There is the possibility of bird collisions for Golden Eagle, Hen Harriers and Peregrine deriving from the National Park and elsewhere, but the level of occurrence of these birds is reduced by the fact that there are no known nests within 10km of the site. This would take in parts of the Park.
53. The RSPB do not raise a formal objection on ornithological grounds, but requests some additional appropriate modelling in relation to alternative potential goose movement scenarios. The CNPA's Ecologist has confirmed that he concurs with the findings of the RSPB.
54. To conclude, it is considered that in relation to the first aim of the National Park, the proposal is not considered to have a significant adverse impact on species that may traverse the boundaries of the Park but further work needs to be undertaken. However, it is considered that the landscape and visual impact of the proposal on significant parts of the National Park and its landscape setting will be high and adverse. In this respect, it is considered that the proposal does not conserve or enhance the natural and cultural heritage of the Park.

Promote Sustainable Use of Natural Resources

55. Scottish Government Guidance recognises that more electricity generation from renewable resources is an important element of both UK and Scottish Climate Change Programmes and that it contributes towards the UK's legally binding targets on reducing emissions from a range of greenhouse gases.
56. While there are a range of arguments relating to the detailed technical efficiency of wind farm projects over time, the principle of such developments has been accepted and is supported by government as contributing towards reducing the use of fossil fuel generated energy. Given this, the view is that the proposal may well contribute positively towards this particular aim in the widest national sense.

Promote Understanding and Enjoyment

57. It is widely accepted that tourism is an important element in the economic, social, environmental and cultural well-being of Scotland.

The quality of Scottish landscapes attracts many visitors. The response from the CNPA's Visitor Services and Recreation Group (VS&RG), which provides the results of some visitor survey work, emphasises, that this is certainly the case within the National Park.

58. Some people may argue that a windfarm could become a visitor attraction in its own right. Indeed the EIA, in its section on Effects on Tourism mentions some examples in England where this has happened. However, no tourism related proposals are included with the Cushnie development at present. Being outwith the Park though, this is not of any particular concern. Nevertheless, what is of concern is the potential impact of the turbines on visitors to the Park and their enjoyment of the Park's special qualities. This is directly linked to the impact the turbines will have on the landscape, and the setting of the National Park, from views from, and towards, the Park. This assessment can be based on the type of visitor attractions in, the type of recreational activities carried out, and the general sensitivity and importance of, the areas affected.
59. In this instance, as concluded in the section on the first aim above, it is considered that the impacts on the landscape setting of the National Park will be significantly adverse. It is considered that the areas affected by the proposal are important for visitor and recreational pursuits, most of which are linked to the "understanding and enjoyment" of the special qualities of the area. There are promoted walks around Loch Kinord and at Gallows Hill, (both within the Park) and on Pressendye itself, where views towards the Park are significant. Within the Park, the Burn O Vat and the Muir of Dinnet NNR are popular visitor locations. Morven, is a well known and well used "Corbett" and its eastern slopes, from where Pressendye is prominently viewed, is one of the main routes to the summit. Other popular hills and mountains where the turbines will be seen (albeit from different distances) include iconic tops such as Lochnagar, Mount Keen, and Pannanich Hill. It is suggested that users of these more remote mountain locations will be highly sensitive to the change in character of the landscape that the turbines will introduce. Outwith the Park, Craiglich Hill on the west side of the "Cromar Bowl" offers informal recreational opportunities. Views towards the Park across the Howe of Cromar, from the access track ascending the western slope, are expansive. The Queens View on the B9119, is a visual gateway towards the Park, again across the Howe of Cromar.
60. To conclude, while it is difficult to quantify in specific terms, it is considered that the proposed windfarm, by having a potentially negative effect on a key element of the visitors to this part of the National Park, will not help promote the understanding and enjoyment of the special qualities of the area.

Promote Sustainable Economic and Social Development

61. This issue is essentially related to the above section on impacts on tourism, visitor attractions and recreational pursuits in the area. As stated by the CNPA's Economic and Social Development Group, a recently published Government Report titled "Economic Impacts of Wind Farms on Scottish Tourism", finds that, at a national level, the impacts are generally small and that any reduction in employment in tourism will be less than the numbers currently directly employed in the wind power industry. However, it also suggests that Planning Authorities may wish to consider some factors to ensure that any adverse local impacts on tourism are minimised. These include; the number of tourists travelling past en route to elsewhere; the views from accommodation in the area; the relative scale of tourism impact ie. local or national; the potential positives associated with the development; and the views of tourist organisations ie. local tourist businesses or VisitScotland.
62. While it is accepted that this is just one piece of research, it is the most recent. As such, it is considered that some of the factors mentioned above, in relation to numbers of tourists in the area, and the potential impact on tourism on what is a national asset, are relevant to this case. This said, it is not possible to be specific, nor to make clear justified assumptions in either a positive or negative way. However, given that the most attractive qualities for visitors and service economies of the Park rely upon the quality of the environment, it is considered that the proposal would not be seen as promoting the economic and social development of this part of the National Park.

RECOMMENDATION

63. **That, taking account of all the above factors and assessments, it is recommended that the Committee agree to forward an OBJECTION to this windfarm proposal, to Aberdeenshire Council, on the following grounds:**
- a. **Due to its prominence, location and landscape relationship with the National Park, it is considered that the proposal will have negative implications for the landscape setting of the National Park. This could be exacerbated by the potential cumulative effect of other windfarm proposals, in the general area, outwith the Park, but in proximity to the Park boundary. This has negative implications for the first aim of the National Park which is to conserve and enhance the natural and cultural heritage of the area. In this respect, it is also considered to be contrary to the Strategic Objectives (a, b, & c) for Landscape, Built and Historic Environment of the Approved Cairngorms National Park Plan 2007. In addition, because of the negative implications for the first aim of the National Park, it is suggested that the proposal is**

contrary to National Planning Policy and Guidance, and Structure Plan and Local Plan Policy, as contained in NPPG14 (Natural Heritage), SPP6 (Renewable Energy), and PAN45 (Renewable Energy Technologies), NEST Policies 5 (Renewable Energy Facilities), 19 (Wildlife, Landscape and Land Resources) and 26 (Four Tier Policy Areas for Minerals, Landfill, Land Raise and Wind Farm Proposals) and ALP Policies ENV\5B (Areas of Landscape Significance) and INF\7 (Renewable Energy Facilities – Wind Energy).

- b. In light of the concerns raised in a. above, it is considered that, due to the sensitivity and importance to tourism and recreation of the area of the National Park affected by the proposed windfarm, the proposal does not promote the public's understanding and enjoyment of the special qualities of this area of the National Park.
- c. In light of the concerns raised in a. and b. above, it is considered that the proposal does not promote the economic and social development of the area's communities within this part of the National Park.

OTHER RESPONSES

1. The CNPA supports the suggestion from the RSPB that further work is undertaken by the applicant to assess the potential current and future impact of the proposal on alternative goose movements in the area. This is in relation to the Dinnet Lochs SPA which lies within the National Park.
2. The CNPA suggests that Aberdeenshire Council consider the findings of the recently published Government Report "Economic Impacts of Wind Farms on Scottish Tourism" as part of their assessment of the impacts on tourism of this proposal. National Parks and Protection of Wilderness Areas are given specific mention.

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