
CAIRNGORMS NATIONAL PARK AUTHORITY

Title: CONSULTATION FROM SCOTTISH GOVERNMENT

**Prepared by: KATHERINE DONNACHIE,
PLANNING OFFICER
(DEVELOPMENT MANAGEMENT)**

**DEVELOPMENT PROPOSED: THE ELECTRICITY WORKS
(ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND)
REGULATIONS 2000 -SECTION 36
APPLICATION FOR THE PROPOSED
HILL OF TOWIE II WIND FARM,
DRUMMUIR, MORAY**

**REFERENCE: SCOTTISH GOVERNMENT
CONSULTATION
(MORAY COUNCIL REFERENCE
I3/02057/S36)**

APPLICANT: RES UK AND IRELAND LTD

RECOMMENDATION: NO OBJECTION

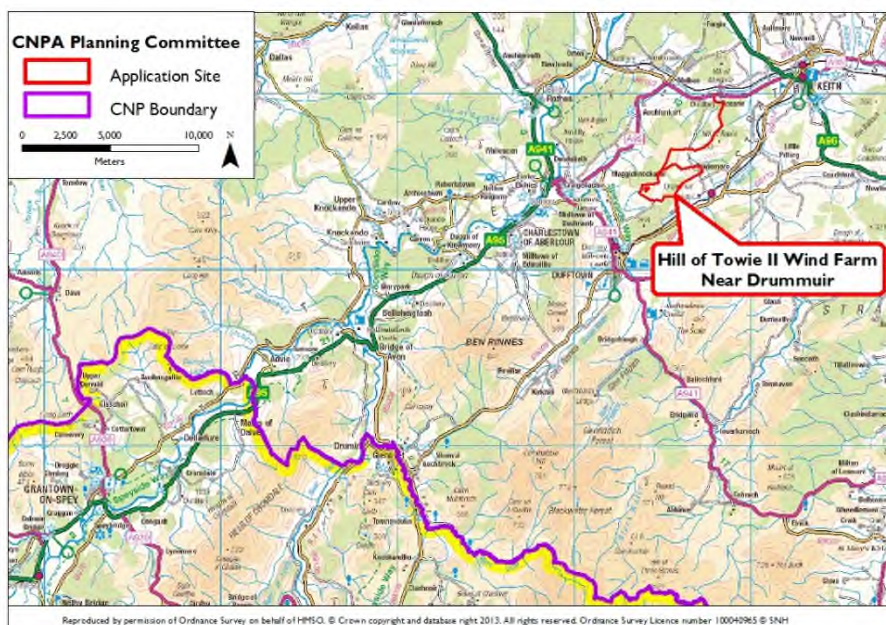


Fig 1.: Location Plan

PURPOSE OF REPORT

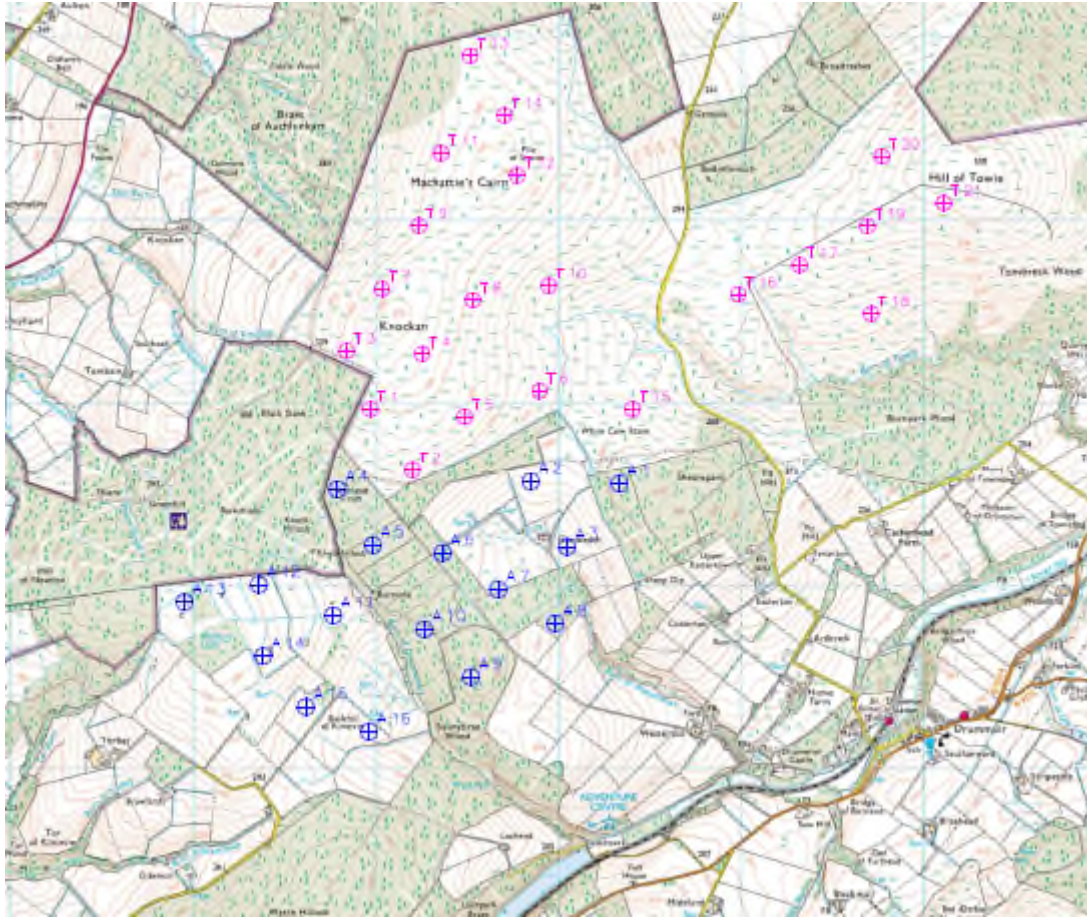
1. The purpose of this report is to provide a consultation response to the Scottish Government (who is the determining Authority for this application as the output is more than 50 MW) to erect 16 wind turbines and associated infrastructure at Hill of Towie, near Drummuir to the west of Keith.
2. The Cairngorms National Park Authority (CNPA) has been consulted in relation to any impacts upon the National Park as the application is accompanied by an Environmental Statement under the terms of the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2011. The planning issues being considered in relation to this consultation are whether there are any impacts upon the qualities of the Park.

SITE DESCRIPTION AND PROPOSAL

The Proposals and Site

3. This proposal is to erect 16 wind turbines of height up to 125 metres to blade tip, together with associated infrastructure including tracks, control building, sub station and meteorological mast immediately beside the existing wind farm at Hill of Towie (21 wind turbines.) The main existing access route to Hill of Towie will be used and the applicants expect that the maximum capacity of each turbine would be around 1.8 megawatts. As the site is adjacent to the existing Hill of Towie wind farm, which has a capacity of 48.3 Megawatts, the total capacity at Hill of Towie if extended would therefore be in excess of 50 megawatts.
4. The application site is located just some 8 km west of Keith , close to the village of Drummuir and some 4 km from Dufftown, to the north west of the Keith to Dufftown road. It lies around 22 km to the west of the boundary of the Cairngorms National Park and within the administrative boundary of Moray Council.
5. The site comprises a mixture of grazing land and forestry and is located adjacent to, and to the south of, the installed Hill of Towie Wind Farm as shown in **Figure 2** below. This is an area of upland agricultural character and broad forested hills, which is separated from the Cairngorms National Park by a number of different landscape character areas.

Figure 2 Proposed Site Layout



6. The application is accompanied by an Environmental Statement (ES) as noted earlier, and this includes assessment of ecological and landscape impacts. It includes information on zones of theoretical visibility (ZTV) information, wireline drawings and photomontages together with assessment of cumulative effects with other wind turbines in the area. The ZTV information is provided for both the impacts of the proposed wind farm and also its cumulative impacts with other consented and proposed wind farms in the area. These illustrate that there will be limited visibility from the National Park.
7. A number of photomontages and wireframe drawings have been provided from various viewpoints including one within the National Park at Carn Mor in Glenlivet to the south east of Scalan. (Viewpoint 20) This illustrates that visibility of the wind farm will be at a distance and that views of the consented wind farms at Dorenell and Kildrummy will be much more significant.
8. The Environmental Statement (ES) concludes that significant effects from the proposed wind farm will be limited to areas within 10 km of the site with limited inter visibility from the National Park.

Planning History

9. The CNPA were consulted at the pre-application (scoping stage) in March 2013 and provided information on key issues to be considered.
10. As members are aware there has been considerable pressure for new wind farms around the edge of the National Park, with various consultation requests from the determining authorities on proposed wind farms having been considered by the Committee in recent years for example Dorenell to the south of the application site, in closer proximity to the National Park.

DEVELOPMENT PLAN CONTEXT

Strategic Policy - Cairngorms National Park Partnership Plan 2012-2017

11. The Cairngorms National Park Plan sets out the vision and overarching strategy for managing the Park and provides focus and priorities at a time of limited financial resources. The Plan also provides a strategic context for the Local Development Plan and shows how the four aims of the National Park can be achieved together. It sets out the strategic direction and priorities for the Park.
12. Three long term outcomes for the Park are set out as follows:
 - A sustainable economy supporting thriving businesses and communities;
 - A special place for people and nature with natural and cultural heritage enhanced; and
 - People enjoying the park through outstanding visitor and learning experiences.

These outcomes address the interaction of the three main characteristics of the National Park these being that the Park is an internationally important area for nature conservation; a fragile rural economy, and an internationally known tourism destination. Recognising the relationship of these outcomes is at the heart of the National Park. A series of work programmes to help deliver the outcomes is set out in the Plan.

Policy 1.3 of this Plan states that large scale commercial wind turbines (defined as more than 1 turbine, and more than 30m in height) are not compatible with the special qualities of the National Park and are not considered to be appropriate within the National Park or “*where outside the Park they affect its landscape setting.*” Also relevant is Policy 2.3 which seeks to conserve and enhance the special landscape qualities, with a particular focus on conserving and enhancing wildness qualities

National Policy and Guidance

13. Scottish Planning Policy (SPP) sets out Scottish Government's policy on nationally important land use planning matters, and it sets out the Scottish Government's commitment to increasing the amount of electricity generated from renewable sources, identifying hydro and wind energy as the main sources of supply. Policy stresses the importance of carefully considering siting to ensure landscape and visual impact is minimised, and sets out the range of issues to be considered. This is reinforced in Planning Advice for onshore wind turbines. Also Scottish Natural Heritage guidance on wind energy, which all provide guidance on assessment of wind energy proposals. The importance of particular landscapes such as National Parks is highlighted with the aims of the National Parks set out in paragraph 128 which explains that the most sensitive landscapes may have little or no capacity to accept new development, noting that areas of wild land character in some of Scotland's remoter upland, mountain and coastal areas are very sensitive to any form of development.

CONSULTATIONS

14. **The CNPA's Landscape Advisor** has assessed this application and a copy of the response is attached as **Appendix I**. Key points are summarised below.
15. The ZTV information illustrates that there will be very little visibility from the National Park, with small areas of visibility being at long distances. The magnitude of change to landscape character will therefore be negligible.
16. The proposed wind farm will be viewed in close association with the existing Hill of Towie wind farm. It is considered there will be negligible impact on the landscape character areas that encompass the northern fringe of the National Park, and a negligible visual impact in the small number of locations within the National Park from which the wind farm would be visible. In terms of cumulative impact the additional impacts of Hill of Towie II are also considered to be negligible.
17. In terms of wildness, visibility from an area of high wildness at the Ladder Hills will be some 27 km from the site whereby any additional impacts will again be negligible given the limited visibility and distances involved.
18. Finally in relation to landscape setting the proposed site is separated from the National Park by a number of different landscape character areas and in terms of both distance and landscape character is considered to sit outwith the landscape setting of the National Park.

APPRAISAL

19. The proposed wind farm is located on a site which lies around 22 km to the west of the National Park. The key planning issue for consideration is that of the visual and landscape impact upon the setting of the National Park.
20. As noted earlier, the ES concludes that the proposed development would not adversely affect the special qualities of the National Park, with information in the form of ZTV and photomontages/wirelines (including a viewpoint within the National Park) seeking to substantiate this conclusion.
21. The CNPA Landscape Officer concurs with the conclusion all as summarised in the foregoing paragraphs and as detailed in **Appendix I**.
22. As noted earlier the proposed site is located at some distance to the east of the National Park, separated from the Park by a number of different landscape character areas and outwith the landscape setting of the Park. It is not inter visible with the National Park and there will be very limited visibility of the proposed wind farm from the National Park as evidenced in the ZTV information. This is as a result of the topography and the distances involved.
23. As outlined in our Landscape Advisor's assessment this means that the overall impact upon the setting of the Park is not significant, neither will there be any significant impacts upon the National Park in terms of wildness or landscape quality.
24. Consequently, in this case, given the visual relationship to the Park boundary, local topography, distances involved, and the existing landscape characteristics of the area, it is not considered that there would be any significant adverse impact upon the special qualities or setting of the National Park arising from this proposed wind farm.
25. The proposal has been carefully considered with respect to the statutory aims of the National Park and is not considered to conflict with these objectives. Accordingly it is recommended that the CNPA raise no objection to the proposal.

RECOMMENDATION

26. **That Members of the Committee support a recommendation of NO OBJECTION to the PROPOSED HILL OF TOWIE II WIND FARM , DRUMMUIR, MORAY**

Katherine Donnachie

planning@cairngorms.co.uk

21 January 2014

The map on the first page of this report has been produced to aid in the statutory process of dealing with planning applications. The map is to help identify the site and its surroundings and to aid Planning Officers, Committee Members and the Public in the determination of the proposal. Maps shown in the Planning Committee Report can only be used for the purposes of the Planning Committee. Any other use risks infringing Crown Copyright and may lead to prosecution or civil proceedings. Maps produced within this Planning Committee Report can only be reproduced with the express permission of the Cairngorms National Park Authority and other Copyright holders. This permission must be granted in advance.