
CAIRNGORMS NATIONAL PARK AUTHORITY

Title: CONSULTATION FROM SCOTTISH GOVERNMENT

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**DEVELOPMENT PROPOSED: THE ELECTRICITY WORKS
(ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND)
REGULATIONS 2000 -SECTION 36
APPLICATION FOR THE PROPOSED
CAIRN DUHIE WIND FARM NEAR
FERNES, BETWEEN NAIRN AND
GRANTOWN-ON-SPEY**

**REFERENCE: SCOTTISH GOVERNMENT
CONSULTATION
(HIGHLAND COUNCIL REFERENCE
13/04142/S36)**

APPLICANT: RES UK AND IRELAND LTD

RECOMMENDATION: NO OBJECTION

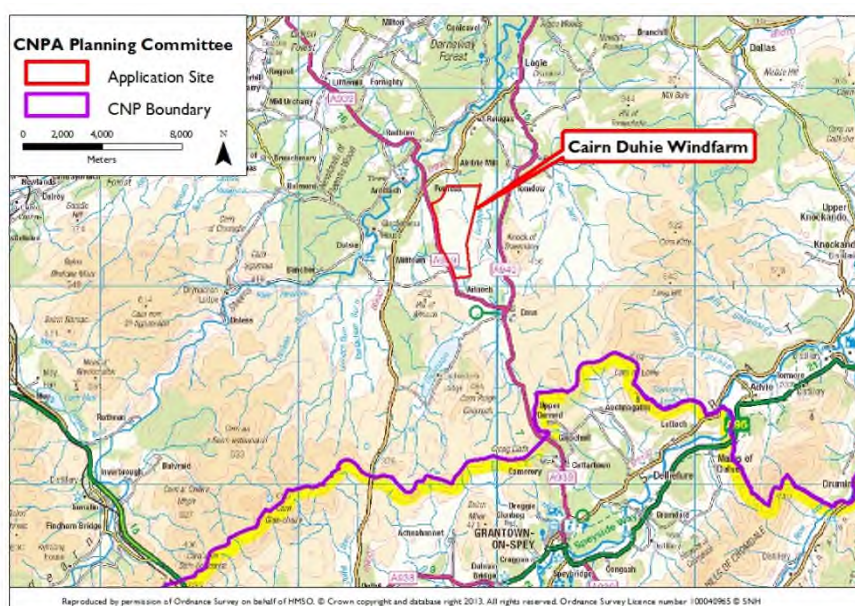


Fig 1.: Location Plan

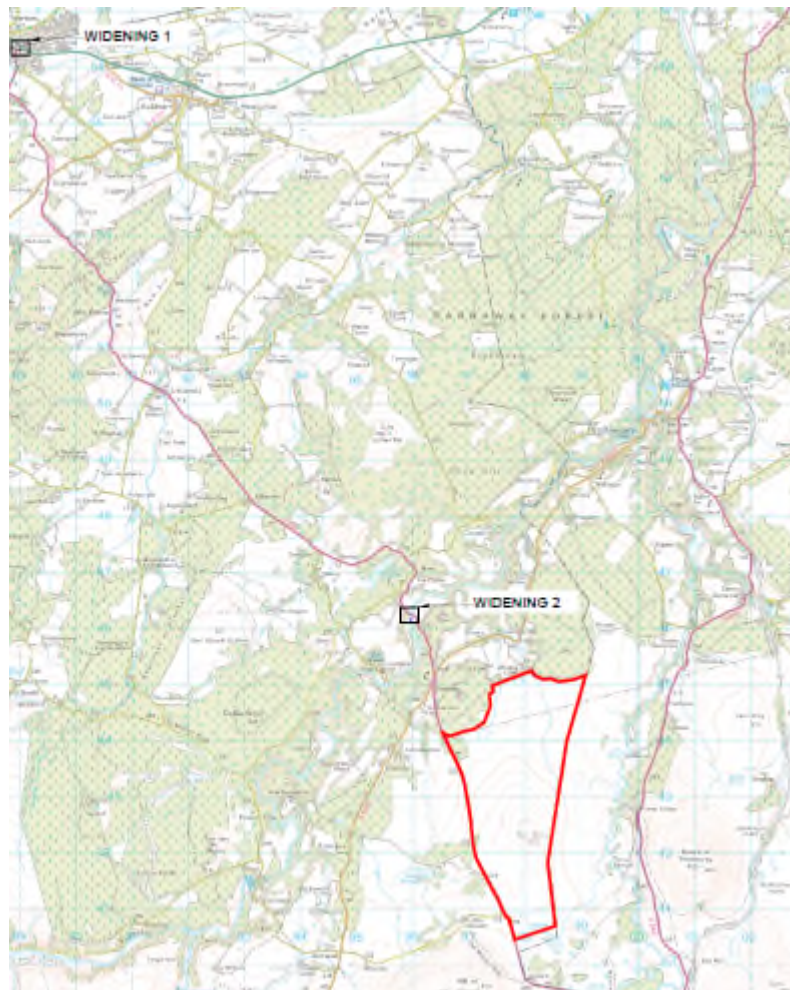
PURPOSE OF REPORT

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 20 wind turbines and associated infrastructure at Cairn Duhie, near Ferness to the north of Grantown on Spey.
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

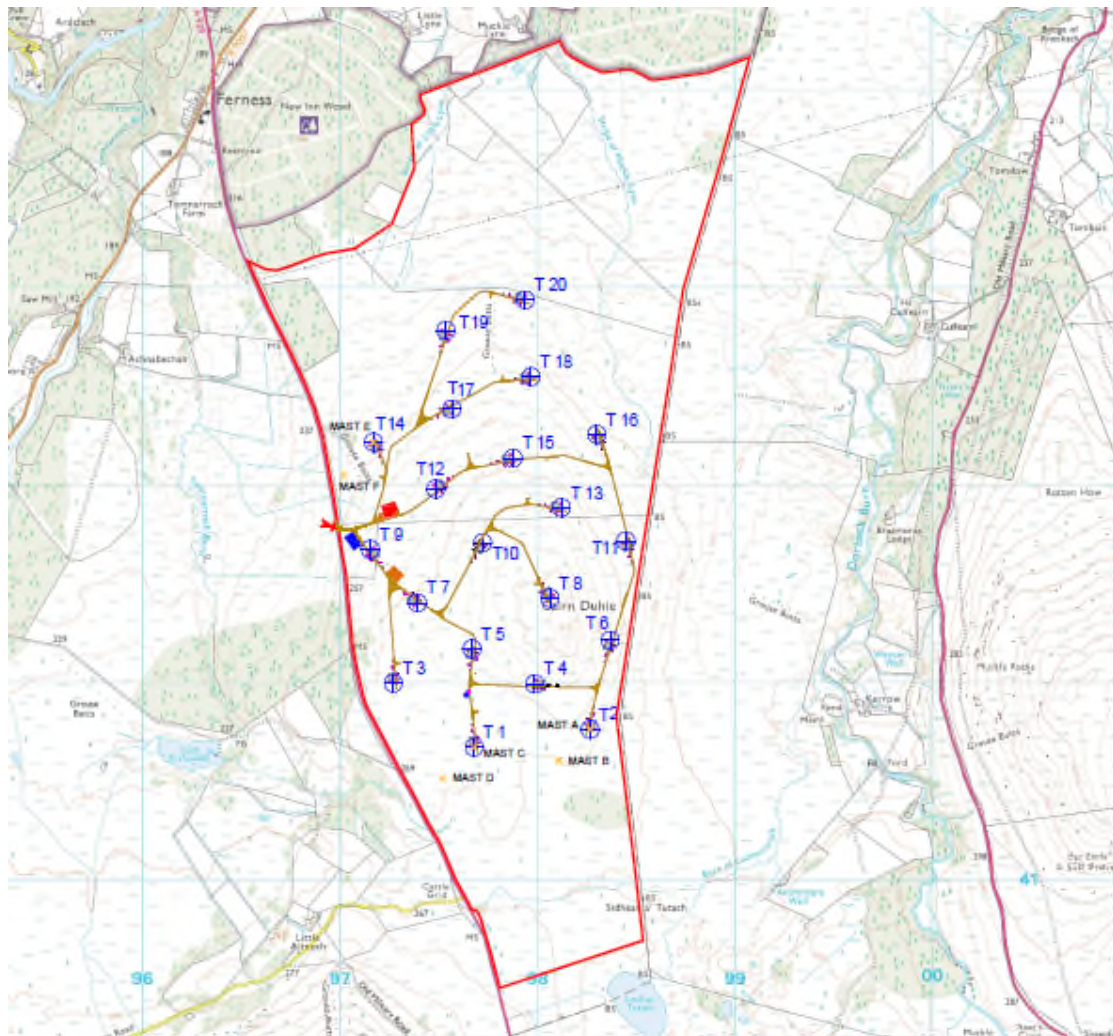
The Proposals and Site

3. This proposal is to erect 20 wind turbines of height up to 110 metres to blade tip, together with associated infrastructure including access tracks, control building, monitoring and communications masts, hard standing areas, construction compounds and off site road widening proposals. The applicants expect that the maximum installed capacity of the site would be 60 megawatts.
4. The application site is located just south of Ferness, to the west of the A939 Grantown to Nairn road. It lies some 15 km south east of Nairn and around 13.5 km north /north west of Grantown on Spey, and just under 8 km north of the Cairngorms National Park. It is close to the boundary with Moray Council's administrative area, but lies wholly within the administrative boundaries of Highland Council.



5. The site itself is largely upland moorland edged by trees. To the north of the site lies a largely wooded landscape of Darnaway Forest and there is further woodland to the west. To the south is the Dava Moor. The site, as described in the applicants' Environmental Statement (ES) is relatively flat and open, but is visually enclosed by the large scale topography of the Hill of Aitnoch to the south and the Knock of Braemoray to the east, with the sense of enclosure increased by the coniferous plantations to the north. This is described as a transitional landscape between the higher land of the Cairngorms and the lower coastal lands to the north.
6. A copy of the proposed site layout is illustrated in **Figure 2** below and in their design statement the applicants outline that they sought, as a design principle, to avoid siting turbines on the southernmost parts of the site in order to try and minimise impacts upon the National Park.

Figure 2 Proposed Site Layout



7. The application is accompanied by an Environmental Assessment 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 visibility from the National Park will be from the higher summits and that additional wind farm visibility as a result of the Cairn Duhie proposal will be limited.

8. A number of photomontages and wireframe drawings have been provided from viewpoints within and around the National Park, key ones being as follows:
- A939 Grantown to Nairn Road and Dava Way. The viewpoint demonstrates the view exiting from the Park, and is taken at a location some 2.3 km north of where the A939 leaves the Park (viewpoint 10 – wireframe and photomontage) and some 7.8 km from nearest turbine. It helps to illustrate the visual impact upon the Dava Moor
 - Summit of Carn Allt Laoigh to the south west of the site close to the boundary of the National Park (viewpoint 13 –wireframe and photomontage) This viewpoint is located to the west of the Duthil to Ferness road, some 11 km from the nearest turbine and shows the position of the wind farm relative to the setting of the National Park.
 - Summit of Creagan a Chaise , the highest of the Cromdale hills located to the south east of the site and within the National Park (Viewpoint 17 – wireframe) some 21 km from the nearest turbine.
 - Viewpoints W8 , W9 and W10 – are wireframes to illustrate views from summits further into the National Park at Meal A Bhuachaille, Geal Charn and the Ptarmigan Restaurant, Cairn Gorm.
9. The Environmental Statement (ES) concludes that although the wind farm would be visible from limited upland summits within the National Park, the presence of an additional group of turbines in views from the Park would not introduce visibility of wind farm development from substantial new areas of the Park. The ES considers that the development would appear in the context of the existing pattern of wind farm development to the north outwith the National Park, and it is judged that it would not significantly affect the special qualities of the National Park.

Planning History

10. The CNPA were consulted at the pre application (scoping stage) in May 2013 and provided information on key issues to be considered.
11. 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. In relation to the current application site, the most recent consultation close by was for 12 wind turbines at Hill of Glaschyle at the Committee meeting of March 2013 when it was agreed to raise no objections. That application has since been refused by Moray Council and an appeal has been lodged against this decision (reference 13/00053/EIA).

DEVELOPMENT PLAN CONTEXT

Strategic Policy - Cairngorms National Park Partnership Plan 2012-2017

12. 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.
13. 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

14. 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

15. **The CNPA's Landscape Advisor** has assessed this application. A copy of the response is attached as **Appendix I** and key points are summarised below.
16. The officer concludes that theoretical visibility of the proposed wind farm will be confined to a limited number of locations; on, or immediately inside the northern boundary of the Park (at distances of around 11 to 12 km); views from the Cromdales (at around 19 to 21 km away); from peaks further away (distances from 28 to 35 km); with the ridge along the northern edge of the Park effectively screening visibility from the lower lying parts.
17. The landscape character area that extends along and around the northern boundary of the Park is called the Strathdearn hills character area. Beyond this is a landscape character area called the Uplands. The proposed wind farm is located within, and visually associated with the Uplands character area, a transitional landscape between the Strathdearn Hills and the wooded hills and farmland to the north. The scale of change to the Strathdearn Hills landscape is judged to be small.
18. The visual impact from the northern edge of the Park is illustrated in a typical view (viewpoint 13 – Cairn Allt Laoigh) and it is considered that this shows the turbines will sit on the moorland edge that slopes away from the Park, behind the Hill of Aitnoch and generally against a varied backdrop of lower wooded hills and distant farmland, which will serve to reduce the visual prominence.
19. From the Cromdales (viewpoint 17) the development would be seen on the moorland to the north west of the Paul's Hill and Berry Burn wind farms with a minor scale of change arising from the current proposal.
20. Finally, viewpoint 10 illustrates views from along the Dava Way and the A939 Grantown to Ferness road. At present there are no wind farms visible from these views and the proposal would appear as a compact visual grouping across the horizon with visual impact here considered in the Environmental Statement to be major – the Officer concurs with this assessment. When crossing the boundary of the National Park on the A939 there would be no visibility of the development, but there could be visibility just north of this crossing point, and as one moves northwards from the boundary there will be an increasing visual impact.
21. However it is considered this significant impact will relate to the experience of the Dava Moor rather than an impact upon the experience of the landscape of the National Park. When heading south from the site it is several

kilometres before the National Park begins to dominate views, so the experience of the National Park is judged to be largely unaffected.

22. In terms of cumulative landscape impacts, it is considered that the development will be seen as part of a pattern of wind farm development within the upland and moorland landscapes that run east-west between the National Park and the Moray Firth and will not create a further significant cumulative impact on the landscape character.
23. This is also the case in relation to cumulative visual impact, other than a moderate and significant visual impact in a small number of relatively little visited locations along the northern boundary of the Park. At these locations the extent over which a significant impact would be experienced is very limited and this is not considered to be unacceptable.
24. Wildness has also been considered and it is concluded that there will be no significant loss in the quality and extent of wildness that can be experienced in the Park with the development lying some 35 km from areas of high wildness. It is also considered that there will not be significant effects on the other special landscape qualities experienced along the northern edge of the Park, these being the medium sense of wildness, open moorlands and views of cultural and natural landscapes.
25. The final matters which were assessed by the CNPA Landscape Advisor are that of impacts on the setting of the National Park and the integrity of the designation and special qualities for which the Park was designated. It is concluded that the juxtaposition of viewer locations, turbine positions and landscape character here means that the wind farm will not be associated with the immediate landscape setting of the Park either looking out from the Park or when approaching. Consequently there is not considered to be a significant adverse effect upon the landscape setting of the National Park.
26. It is also concluded that the proposal will not significantly affect the integrity of the National Park. Although it will add to the pattern of wind farms around the Park the effect of which may be minor in EIA terms, this type of incremental landscape change and the assessment of each new proposal against a constantly changing baseline is a concern.

APPRAISAL

27. The proposed wind farm is located on a site which lies just under 8 km away from the northern boundary 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.
28. As noted earlier, the ES suggests that the proposed development would not significantly affect the special qualities of the National Park, with viewpoints from a number of points in and around the Park provided which seek to substantiate this view. The CNPA Landscape Officer, whilst having some concern about the incremental landscape change of wind turbine

developments around the National Park, concurs with this conclusion as summarised in the foregoing paragraphs and as detailed in **Appendix I**.

29. The proposed site is located to the north of the National Park, beyond the Dava Moor and within a transitional landscape leading north to the wooded landscapes and distant farmland leading to the Moray Firth. This landscape is not considered to contribute in any substantial way to the setting of the National Park, and whilst it is agreed that the development will have a significant effect on the Dava Moor this does not mean it will have a similar effect on the National Park which sits beyond the Dava.
30. As outlined in our Landscape Advisor's assessment this means that the overall impact upon the landscape setting of the Park is not considered significant. Due to the overall landscape characteristics here, relationship to the National Park (in terms of both topography and distances) it is not considered that there will be any significant impacts upon the National Park in terms of either wildness or distinct landscape quality.
31. Consequently, in this case, given the visual relationship to the Park boundary, local topography, 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 wind farm. Localised issues in terms of impacts upon the Dava Moor may be more properly commented on by the relevant Local Authorities and are not a matter for the Cairngorms National Park Authority.
32. 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

33. **That Members of the Committee support a recommendation of no objection to the construction of a wind farm at Cairn Duhie near Ferness, between Nairn and Grantown-on-Spey**

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14 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.