

CAIRNGORMS NATIONAL PARK AUTHORITY

**Title:** CONSULTATION FROM SCOTTISH  
GOVERNMENT ENERGY CONSENTS UNIT

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**DEVELOPMENT PROPOSED:** ERECTION OF 83 WIND  
TURBINES, GARROGIE ESTATE,  
11KM SOUTH EAST OF FORT  
AUGUSTUS

**REFERENCE:** N/A

**APPLICANT:** SSE RENEWABLES

**RECOMMENDATION:** OBJECTION

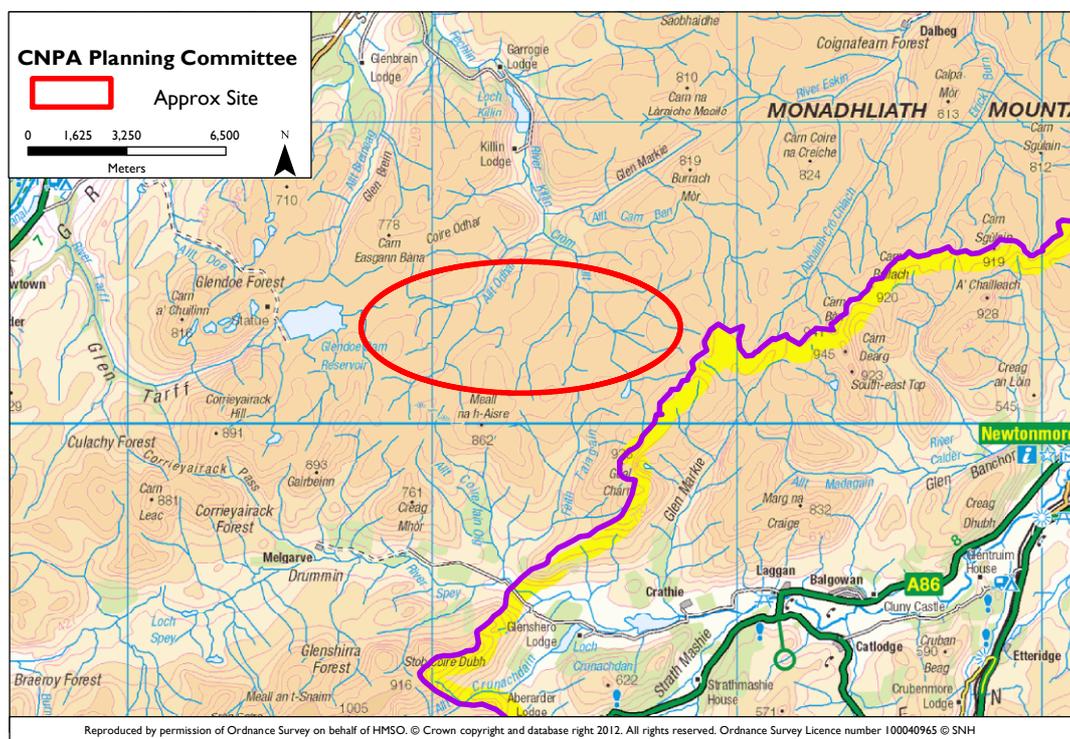


Fig 1. Location Plan

## **PURPOSE OF REPORT**

1. The purpose of this report is to provide a consultation response to the Scottish Government Energy Consents Unit who are dealing with this planning application due to the electricity generating capacity of the scheme being in excess of 50MW. The Cairngorms National Park Authority (CNPA) has been consulted in relation to any impacts upon the Park and 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**

2. The application seeks consent for 83 turbines with a maximum blade tip height of 135m, although 8 turbines would have reduced heights. The site would have a total installed capacity of 300MW. All of the associated infrastructure including approximately 59 km of new access track and 4 met masts is outside of the National Park. The construction would use some of the existing infrastructure of the Glendoe hydro scheme. The nearest turbine to the Park boundary is approx 1.7km away. The Cairngorms National Scenic Area (at its closest point) is approximately 21 km to the east of the site.
3. The application is accompanied by an Environmental Statement (ES) that covers a range of issues including: design evolution, planning policy statement, landscape character, visual amenity, ornithology, ecology, land use, socio economics and tourism.
4. A copy of the ES non- technical summary is attached at the back of this report as Appendix I.

## **SUMMARY OF FINDINGS OF ES IN RELATION TO LANDSCAPE AND VISUAL IMPACT**

5. The ES covers issues relating to landscape and visual impact that are crucial in assessing the nature of such impacts upon the Park. A summary of the findings can be found in the non-technical summary of the ES attached as appendix I. In relation to the National Park the ES identifies that there would be locally significant impacts on a small area of the CNP. However, due to the limited areas of the CNP affected, it is considered that the overall impacts on this designated area would not be significant. All other designations including National Scenic Areas would not receive significant impacts as a result of the development. Overall, the ES recognises that there would be some localised significant adverse impacts upon a small number of areas within the 15km detailed study area, the impact of the development on the landscape character resource of the wider study area when taken as a whole is not considered to be significant.

6. In terms of visual amenity the assessment has concluded that of the 57 receptors assessed, ten viewpoints and six route/or part route receptors would receive significant operational impacts as a result of the development. The main concentration of significant impacts are from hill tops in close proximity to the development. On cumulative impacts it is recognised that there would be some localised significant adverse impacts upon a number of receptors within the 15 km study area, mostly hill tops and some sections of footpath. Overall in the context of the study area as a whole the effects are not considered to be significant. A map showing areas of visibility and a photomontage from Geal Charn Mor a Munro on the Park boundary can be seen at appendix 2 of this report.

## **POLICY CONTEXT**

7. **Scottish Planning Policy (SPP)** sets a very supportive context for renewables pointing out that planning authorities should support the development of a diverse range of renewable energy technologies and support the development of wind farms in locations where the technology can operate efficiently and environmental and cumulative impacts can be satisfactorily addressed.
8. SPP sets out the policy tests for National Scenic Area (NSA) designations and proposals should not adversely affect the integrity of the area or the qualities for which the NSA has been designated. The SPP sets out the aims of the National Parks. Para 128 of the SPP considers 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.
9. The Scottish Government produced a Routemap for Renewable Energy in 2011 which has recently been updated. The Routemap sets a target that renewable energy should account for equivalent of 50% of Scottish demand by 2012 with the majority of this being met by wind and hydro. The target for 2020 is for 100% of electricity demand to come from renewables.

### **Strategic Policy - Cairngorms National Park Partnership Plan 2012-2017**

10. 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.
11. 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.
12. 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.
  13. 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*.
  14. Long Term Outcome 2 “ A special place for people and nature” with natural and cultural heritage enhanced is of particular relevance to this application. Five year outcome 6 on page 51 of the Plan seeks that the special landscape qualities, including wildness, are conserved and enhanced. The 2017 target for this is that an equivalent or increased area of the Park be characterised as high or medium wildness. Policy 2.3 seeks to conserve and enhance the special landscape qualities with a particular focus on: a) conserving and enhancing wildness qualities.

## CONSULTATION

15. **The CNPA Landscape Officer** comments as follows (full response attached to this report at appendix 3)

### **Zone of Theoretical Visibility (ZTV)**

16. The ZTV demonstrates that the main areas affected are high level summits and ridges along the south western boundary, the southern hills and the central plateau with some limited small areas of visibility at lower elevations.

### **Landscape and Visual Impacts**

17. Sensitivity to the type of change proposed is considered in the ES to be high and magnitude generally low, with a high magnitude along the western boundary. The resultant landscape and visual impact on the CNP is considered to be slight adverse (and not significant) with impacts along the western boundary being locally substantial adverse.
18. I agree that the landscape and visual impacts, and cumulative landscape and visual effects along the south western boundary are substantial and adverse, and that for many other locations in the Park with visibility of the proposed wind farm, the landscape and visual impacts are likely to be slight and adverse (My assessment of effects on different parts of the CNP is explained in more detail below). However, whilst the extent over which an impact can be experienced is a relevant qualification, it is not the case that a widespread lower level of effect can cancel out a concentrated high level of effect and so

arrive at the conclusion of the ES that “the resultant impact on the CNP as a whole ... .. is considered to be slight adverse and therefore not significant.”

19. As a consequence of the size and location of this project, the landscape and visual impacts along the south western edge of the Park would be significant and adverse, and in some locations overwhelming. The Stronelaig wind farm as proposed would adversely affect the landscape setting of the NP and fail to meet Policy 1.3 of the NPPP.

#### **Wildness and other Special Qualities**

20. The special landscape qualities of this part of the National Park arise from the simple character of this landscape and its relative featureless-ness. The vast open spaces of the high moorland and extensive tracts of semi-natural vegetation create subtle patterns, broken occasionally by rocky feature and incised rivers and burns. The extensive and rugged nature of the terrain, the difficulties of access and the lack of human artefacts mean that this area, both that within the Park and beyond, has high, and sought-after, qualities of wildness. The introduction of the Stronelaig wind farm, a varying arrangement of large, vertical industrial scale, moving structures and a network of tracks, would be in direct contrast to, and have a significant impact on, the key characteristics of this landscape and specifically on those that are valued as special qualities. The ES indeed concludes that the impacts on landscape character in these areas would be significant and adverse. However, the ES also concludes that the overall impacts on the Monadhliath Search Area for Wild Land (which includes this part of the Park) would be slight adverse and not significant. I strongly contend that the impacts of this development on the sense of wildness within the National Park in the vicinity of the proposed windfarm (see para 3.1.4 above) would not be slight and adverse but rather significant and adverse. The net result would be a loss in the quality and extent of wildness that can be experienced in the National Park and a failure to meet Policy 2.3 of the NPPP.

#### **Cumulative Effects on the CNP**

21. The landscape and visual effects of Stronelaig on the Monadhliaths are assessed as significant. This level of significance is both in addition to those windfarms already in the landscape now, and those consented and proposed. These landscape and visual effects will have a consequent effect on the experience and perception of the special qualities of this part of the Park and particularly on wildness.
22. This windfarm will extend the L&V effects of windfarms on the Park landscapes penetrating areas hitherto little or unaffected, the Southern Monadhliath, Ardverikie, Drumochter Hills, Giack, Dalnamein and Atholl forest with predicted visibility on Beinn a Ghlo. (fig 9.6)
23. This proposal would contribute further to the now marked encircling effect of wind farms around the NP, extending the effect into the south western extremities of the Park.

### **National Park Designation and the National Interest**

24. There are 3 Long Term Outcomes identified in the NPPP designed to deliver the 4 aims of the National Park. The outcome 'A special place for people and nature with natural and cultural heritage enhanced', identifies conserving and enhancing the distinct landscape character of the Park's landscapes, and the sense of wildness in particular, as being key to success. The NPPP in its 5 year outcomes and targets recognises that the special landscape qualities are integral to the delivery of economic and social outcomes as well as landscape conservation and enhancement.
25. The wind farm sits west of the ridge that forms the boundary to the National Park and this limits the extent of visibility throughout the Park. There is a low level of landscape and visual impact, and effects on special qualities, on the central massif and associated ridges. However, in the south west of the Park the majority of the hills and ridges that form the boundary to the National Park are affected, with significant adverse landscape and visual impacts occurring from Stob Coire Dubh to Meall na Creughaich. The intensity of landscape and visual impact is very high, and where this would be experienced, coincides with an area that contains a number of Munros and Corbetts, and is within an area of Band A wildness.
26. This wind farm as proposed would have a significant adverse impact on the special landscape qualities along the south western edge of the National Park, and would result in a loss in the quality and extent of wildness that can be experienced in the National Park. In so doing it would undermine the objective (NPPP outcome 2) to conserve and enhance the distinct landscape character of the Park's landscapes, and the sense of wildness in particular.

## **APPRAISAL**

### **Introduction**

27. The key issues in the consideration of this application are potential landscape and visual impact including potential impacts on wild land. There are likely to be a range of ecological issues but these will be dealt with by Scottish Natural Heritage (SNH) and Highland Council. The protocol between SNH and the CNPA is about to be reviewed. However, one recent change with regard to applications outside of the Park means that SNH will also advise the Scottish Government about the impacts of the development upon the Park.
28. While within the setting the site is located outside of the CNP area and consequently the CNP Local Plan does not apply to the development. However, the aims of the Park and the CNP Partnership Plan are material considerations and decision makers must have regard to them when making decisions that may affect the CNP.

## Landscape and Visual Issues

29. The ES considers that there would not be overall significant effects upon the CNP despite there being some localised substantial and adverse landscape and visual impacts upon the south western boundary of the Park. The ES seeks to balance the substantial local impacts on the south western boundary against with the windfarm not being visible from many parts of the Park and in those wider areas where it is visible the distances are considered to result in impacts that would be negligible or slight adverse. This is the case for the Cairngorms Massif where the viewpoint assessed is from Braeriach at a distance of some 39km from the site. The CNPA Landscape Officer's assessment is that the proposal would result in a slight adverse impact and this is the case for the parts of the massif covered by the Cairngorm Mountains National Scenic Area (NSA)
30. The site is located within a Search Area for Wild Land (SAWL). While not including an assessment of the proposal upon all the special qualities of the area within the CNP affected the ES does undertake an assessment of the proposal upon the Monadhliath SAWL. The conclusions of this assessment are that the overall impacts on the SAWL (from this wind farm alone and cumulatively) would be slight adverse. The CNPA Landscape Officer disagrees with this conclusion as far as it relates to the part of the SAWL that is located within the CNP boundary, where very little of the area is influenced by the presence of development. The Landscape Officer is of the opinion that the impacts upon the special quality of wildness in this area would be substantial adverse.
31. From the assessment made by the ES and the assessment made by the CNPA Landscape Officer there are large areas of the Park that would have no visibility of this proposal and from the Cairngorms Massif the visibility is at such a distance that it would have only slight adverse effects. However, the impacts upon the Monadhliath including from a number of Munros would be significant with the nature of that impact being very intensive and in some parts overwhelming along the boundary of the CNP where it runs along the ridge of the Monadhliath.
32. In this case the ES takes the view that this intense impact along the south western boundary is balanced out by the widespread lower level of effect from areas of the Park that would have no visibility or visibility at a distance that would result in only slight or negligible effects. This balance results in a conclusion that the impacts upon the CNP as a whole are not significant. While accepting that the extent of an area impacted is a relevant issue there is a danger in using it to balance a substantial impact on a small area. This line of argument can be used by a number of different proposals the sum of which could result in serious cumulative impacts on the Park. In cumulative terms is clear that this proposal would add to the now marked encircling effect around the Park which could lead to an undermining of the integrity of the Park designation.

## Policy Assessment

33. The site being outside of the Park, the main policy considerations are the effects upon the aims of the Park and how the application accords with the more detailed policies of the Cairngorms National Park Partnership Plan.
34. It must be recognised that this proposal could contribute a very significant amount of energy to meet Scottish Government targets for renewables. This is something that the decision maker will have to weigh against any concerns raised by consultees about the detailed impacts of the proposal. From the CNPA's perspective the task is to assess the proposal against the policies of the CNP Partnership Plan and the aims of the Park.
35. The CNP Partnership Plan contains long term outcome 2 'A special place for people and nature with natural and cultural heritage enhanced'. One of the five year outcomes to achieve the long term outcome is that the special landscape qualities, including wildness, are conserved and enhanced. Policy 2.3 of the Plan seeks to conserve and enhance the special landscape qualities with a particular focus on conserving and enhancing wildness qualities. Given the intensive nature of the impacts on the south western boundary which exhibits wildness qualities the proposal cannot be considered to comply with this policy or long term outcome 2.
36. The CNPA seeks to accommodate renewable energy proposals where they are of a scale and nature that is compatible with the special qualities of the National Park. Policy 1.3 of the NPPP supports the development of a low carbon economy with a particular focus on increasing renewable energy generation that is compatible with conserving and enhancing the special qualities of the National Park. The policy goes onto consider that large scale commercial wind turbines are not compatible with the special qualities of the Park within the Park or where they affect its setting. This policy is set out under Long Term Outcome 1 'A sustainable economy supporting thriving businesses and communities'. In essence, the policy supports the development where it is compatible with the special qualities and is effectively recognising that the economy of the Park rests upon conserving the special qualities. The proposal would not be compatible with the special qualities exhibited along the south west boundary of the Park.
37. The aims of the Park must be collectively achieved in a co-ordinated way. As identified in the previous section of the report the proposal would have adverse landscape and visual effects and the proposal would result in a loss in the quality of wildness that can be experienced in the National Park. It is accepted that the proposal would contribute significantly to renewable energy targets and would result in a significant investment in the economy. However, in the context of collectively achieving the Park's aims it is difficult to see how the predicted economic benefits would promote the economy of the Park given that the site access and infrastructure is gained from the A82/Loch Ness corridor. The proposal may prejudice some visitor's enjoyment of the Monadhliath; however, it would be difficult to quantify this

to an extent that would justify the Park objecting on the basis of impact upon visitors. In simple terms, while the proposal is considered to offend the first aim it makes little contribution in achieving the remainder of the Park aims.

## Conclusion

38. A balance must be struck between the renewable energy and economic benefits of the proposal and the adverse landscape and visual impacts identified. However, assessing this balance is a role for the decision maker, in this case, the Scottish Government. While accepting that the application will make a very significant step towards renewable energy targets this consultation shows that the proposal results in significant adverse impact upon the special landscape qualities of the Park along the south western boundary. Consequently, the proposal fails to accord with the first aim of the Park.

## RECOMMENDATION

39. That the Committee support a recommendation to **OBJECT** to the application for the erection of 83 wind turbines, Garrogie Estate, 11 km south of Fort Augustus, Highland for the reasons set out in this report.

## NOTE

A copy of this report will be sent to Highland Council.

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29 November 2012

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.