

**CAIRNGORMS NATIONAL PARK AUTHORITY**

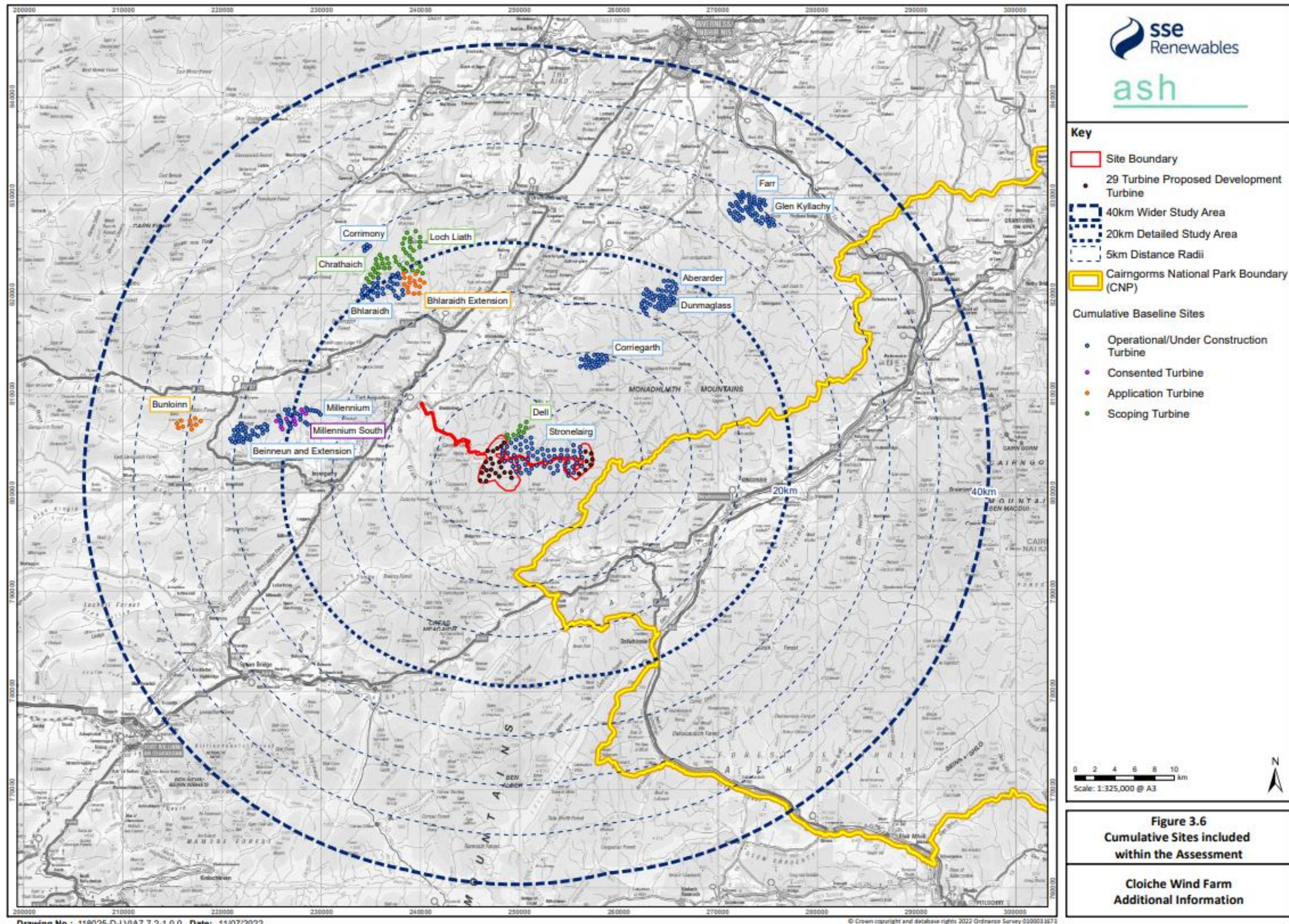
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**DEVELOPMENT PROPOSED: Cloiche wind farm**

Consultation from Scottish Government Energy Consents & Deployment Unit

**REFERENCE:** 2020/0121/PAC (ECU00002054)  
**APPLICANT:** SSE Generation, Cloiche wind farm  
**DATE CONSULTED:** 26 September 2022  
**RECOMMENDATION:** Objection  
**CASE OFFICER:** Emma Bryce, Planning Manager (Development Management)

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## **PURPOSE OF REPORT**

1. The purpose of this report is to inform the committee decision and subsequent consultation response to the Scottish Government Energy Consents & Deployment Unit (ECDU) on additional information (AI) which has been submitted to accompany an application submitted under Section 36 of the Electricity Act 1989 for a proposed wind farm located to the south west of the Cairngorms National Park. The Scottish Government are the determining Authority for this application as the output is more than 50 MW. The original application, submitted in April 2020 was for a windfarm comprising of 36 turbines and was accompanied by an Environmental Report (ER), which presents the findings of the applicant's Environmental Impact Assessment (EIA). The AI now proposes a reduction in the number of turbines to 29.
2. The planning issues to be considered are confined to the effects of the proposed wind farm on the landscape character and Special Landscape Qualities (SLQs) of the National Park. All other matters, such as ecology, noise, general amenity, etc, are assessed by the decision maker (Scottish Ministers) with advice from statutory consultees.
3. Under the current working agreement on roles in landscape casework between NatureScot (formerly Scottish Natural Heritage, SNH) and the Park Authority, NatureScot lead on the provision of advice on the effects on the SLQs caused by proposals outwith the Cairngorms National Park. Their advice has been used to inform this report.

## **SITE DESCRIPTION AND PROPOSED DEVELOPMENT**

4. The proposed wind farm is split into two clusters of turbines, adjoining the west and eastern ends of the existing Stronelairg wind farm in the Monadhliath mountains, as shown in the applicant's ER Figure 3.6 on page 2 of this report. As also shown in the figure are numerous operational/under construction, consented, at application stage or at scoping stage wind farms within the surrounding area.
5. The proposed development now comprises 29 turbines (in place of 36 proposed with the original submission back in 2020). The turbines will have a maximum height of 149.9m to the tip of the blade in an upright position (with 7 turbines in the eastern cluster and 22 in the western cluster), approximately 29km of upgraded existing track plus 26km of new track, as well as other infrastructure and works (such as substation, underground cabling, borrow pits, etc). It is expected that the wind farm would have an estimated total installed capacity of around 150MW, dependent on the turbine specification used.
6. The nearest turbine of the eastern cluster would be around 1.4 km to the north of the closest part of the boundary of the Cairngorms National Park, with the western cluster, tracks and associated infrastructure located further from the Park boundary.
7. Theoretical visibility of the proposed wind farm from within the Park would largely be focussed between 5 and 25 km from the wind farm around the south western corner of the Park, with some visibility at greater distances further into the Park, as shown by the coloured areas in Figure 3.5a of the applicant's ER (Appendix 1).

8. When considering the cumulative visual effects with the baseline of existing and consented wind farms in the surrounding area, the proposed wind farm adds to effects caused by the baseline developments by intensifying the baseline level of development experienced, as well as creating new visibility of a wind farm in areas that do not or would not already see existing and consented wind farms. The new visibility is largely focussed around the south western corner of the Park, as shown by the blue areas in figure 3.7.3. of the applicant's ER (Appendix 1).
9. Visualisations from a number of viewpoints (VPs) have been provided in the applicant's ER that demonstrate the level of visibility that would be had (figure 3.5a Appendix 2), including from within and close to the Park boundary. These include those listed in the table below, which can be found (along with other ER material) on the ECDU website via <https://www.energyconsents.scot/ApplicationDetails.aspx?cr=ECU00002054> and looking under the 'application documents' for documents with a description starting 'Volume 3A – Figure 7.XXX' where XXX is the visualisation title (eg 'Volume 3A - 7.9.9.1 - Viewpoint from Geal Carn (Monadhliath)'). It is recommended that Committee members familiarise themselves with the visualisations online before the planning committee meeting.

<b>VP number and location</b>	<b>Within the Park?</b>	<b>Closest visible turbine to VP</b>	<b>ER visualisation titles</b>
VP9, Geal Charn (Monadhliath)	on boundary	2.7 km	3.8.9.1. (1 – 2) Viewpoint from Geal Carn (Monadhliath)
VP8, Carn Dearg (Monadhliath)	yes	6.2 km	3.8.8.1. (1 – 3) Viewpoint from Carn Dearg (Monadhliath)
VP18, Loch na Lairige	yes	11.1 km	3.8.18.1. Viewpoint from VP18 Loch na Lairige
VP12, Glen Shirra	yes	11.2 km	3.8.12.1. Viewpoint from VP12 Glen Shirra
VP19, Carn na Caim	yes	22.7 km	3.8.19.1. and 3.8.19.2. Viewpoint from VP19 Carn na Caim
VP10, Braeriach	yes	38.1 km	3.8.10.1. (1 – 2) Viewpoint from VP10 Braeriach
VP11, Carn Liath	approximately 2.5 km outwith	10.3 km	3.8.11.1 (1 – 2) and 3.8.11.2. Viewpoint from VP11 Carn Liath
VP6, Glen Markie	approximately 6 km outwith	7.4 km	3.8.6.1. Viewpoint from Glen Markie
VP5, Carn Dubh	approximately 10 km outwith	5.5 km	3.8.5.1. (1 – 4) Viewpoint from Carn Dubh

## RELEVANT PLANNING HISTORY

10. **PRE/2019/0019** CNPA responded to a scoping consultation from ECDU for a different number and size of turbines in the same location (up to 40 wind turbines of height 175 metres to tip) on 25 October 2018. This deferred to the advice of NatureScot but highlighted the sensitivity of the location and the need for careful consideration of cumulative effects.
11. CNPA attended a pre-application meeting with Highland Council, the applicant and statutory consultees on 27 November 2019, where verbal advice was given to the applicant. Written advice was produced by Highland Council in December 2019 after the meeting.
12. 2020/0121/PAC (ECU00002054) – May 2020 - CNPA objected to a consultation on the development of 36 turbines at this location due to significant adverse effects on some of the Special Landscape Qualities and landscape character of the Park causing it to fail to meet the requirements of Policy 3.3 (and so policy 1.3) of the Cairngorms National Park Partnership Plan 2017 – 2022.

## PLANNING POLICY CONTEXT

13. The development proposal is located wholly outwith the National Park, therefore the Cairngorms National Park Local Development Plan (2021) policies do not apply. However, an assessment of the proposal must have regard to Scottish Planning Policy (SPP) and the National Park Partnership Plan (NPPP).

### National Policy

14. **Scottish Planning Policy** (revised December 2020) sets out national planning policies that reflect Scottish Ministers priorities for the development and use of land, as well as for operation of the planning system. The content of SPP is a material consideration in planning decisions that carries significant weight.
15. Policy relating specifically to National Parks and development management can be found in paragraphs 84 and 85 of SPP. These re-state the four aims of the National Parks as set out in the National Parks (Scotland) Act 2000, as well as the need to pursue these collectively. SPP highlights that if there is a conflict between the first aim (conserving and enhancing the natural and cultural heritage of the area) and any of the others, then greater weight must be given to the first aim. Planning decisions are expected to reflect this weighting and be consistent with the four aims.
16. Paragraph 85 of SPP also clarifies that the aims and requirements of paragraphs 84 and 85 apply to development outwith a National Park that affects the Park.
17. Paragraph 212 of SPP states that “where development affects a National Park... it should only be permitted where:
  - a) the objectives of the designation and the overall integrity of the area will not be compromised; or

- b) any significant adverse impacts on the qualities for which the area has been designated are clearly outweighed by social, environmental or economic benefits of national importance”.

## Strategic Policy

18. The **Cairngorms National Park Partnership Plan (NPPP) 2022 – 2027** is required under section 11 of the National Parks (Scotland) Act 2000. It is the management plan for the Cairngorms National Park approved by Scottish Ministers. The NPPP sets out how all those with a responsibility for the Park will coordinate their work to tackle the most important issues. There is a duty for decision makers to have regard to the NPPP, a requirement set out in Section 14 of the Act. As such, the NPPP is a material consideration in planning decisions.
19. The NPPP identifies that the landscapes of the National Park are valued by many and underpin the area’s economy. It contains policies to safeguard landscape interests. Of relevance to wind farm development proposals are policies A4 AND C2.a.
20. Policy A4 seeks to conserve and enhance the SLQs. Policy C2.a. seeks to support development of a low carbon economy and increase renewable energy generation where this is compatible with conserving the SLQs. In relation to wind farm development, the policy states that “large scale wind turbines are not compatible with the landscape character or special qualities of the National Park. They are inappropriate within the National Park, or in areas outside the National Park where they adversely affect its landscape character or special landscape qualities”.

## CONSULTATIONS

### NatureScot advice

21. NatureScot previously provided CNPA with advice in relation to the effects on a range of landscape interests, including the Park, of the previously proposed 36 turbine wind farm both alone and cumulatively with other existing and consented wind farms in the surrounding area. They have now provided further comments on the proposed 29 turbine scheme.

### ***Effects on the SLQs***

22. NatureScot focused their original analysis of the 36 turbine windfarm on the SLQs that they consider the proposed development is likely to have significant adverse effects. Some of the SLQs were grouped where they share many of the same underpinning landscape characteristics. The groupings of SLQs (in *italics*) are those that NatureScot considered are most relevant and sensitive to likely significant effects from the proposal.
23. *Strong juxtaposition of contrasting landscapes & Grand panoramas and framed views* - There is a strong juxtaposition between the settled and managed landscapes along the lower glens of Glen Shirra, Glen Mashie and the Upper Spey, and the higher ground uplands of the South Monadhliaths where natural processes dominate in this relatively small intimate part of the Park. The upland hills create a simple backcloth that emphasises

the landscape pattern within the straths as well as their spatial containment and sense of place, seeming high, massive and extensive in scale.

24. The AI for the introduction of 29 wind turbines did not identify any change in magnitude effect (remaining as negligible) on *Strong juxtaposition of contrasting landscapes* SLQ and a reduction (from low to negligible) in *Grand panoramas and framed views* SLQ. NatureScot consider that the change following the removal of turbines from within the Spey Headwaters – Upper Glen of the Spey LCA is notable (see Viewpoint 11 Loch na Lairg) and as a result would have a reduction in the overall encroachment into the glen landscapes. There would, however, remain an effect on the currently simple and untouched horizon where the turbines would present human-made vertical structures both in front of and over the horizon, albeit to a lesser degree than the previous proposal for 36 turbines. The proposal for 29 turbines will still have **some significant effects** on these SLQs in addition to the effects of the existing Stronelairg wind farm, which forms part of the baseline conditions, because it would typically appear much more prominent and imposing upon the surrounding straths.
25. *Landscape of layers & Layers of receding ridge lines & Vastness of space, scale and height.* NatureScot concluded that the effects of the proposed 36 turbine scheme are **not considered to be significant** due to the existing prominence of the Stronelairg turbines and the effects on these qualities. Effects on distant view and vastness of space and scale were considered to **unlikely be significant**, principally due to the distance of the proposal and effects of existing wind farms, including Stronelairg, Millennium, Corriegarth, and Dunmaglass. The reduced number of turbines does not alter this conclusion.
26. *Dominance of natural landforms & Wildness.* NatureScot concluded that the 36 turbine scheme would have significant adverse effects on these SLQs in addition to the existing Stronelairg windfarm. The proposed scheme of 29 turbines identifies no change in magnitude of effect (low-medium) in *Wilderness* SLQ and a reduction in *Dominance of natural landforms* SLQ. The effect on these qualities, however, would not be substantially reduced (see viewpoint 9 Geal Charn) as Cloiche would appear to ‘spill over’ into the wider, wilder landscape. As with the original proposal, this current proposal of 29 turbines increases the prominence, extent and influence of human structures when seen with Stronelairg, whilst simultaneously diminishing the dominance of natural forms and perceived wildness. From more distant locations into the Park (see viewpoint 19 Carn na Caim) the turbines would continue to compete with the dominance of natural landforms. The proposal for 29 turbines will still have **some significant effects** on these SLQs.

### **Cumulative effects**

27. NatureScot has provided advice in relation to the effects of Cloiche in combination with existing and consented wind farms. Their advice is that existing and consented wind farms across the Monadhliaths have significantly affected nationally important landscapes including the Park, intensifying the existing developed character of this part of the Rolling Uplands of the Monadhliaths. In relation to the National Park, Cloiche would significantly add to these effects for the reasons described above. It is on this basis that the appraisal and recommendation in this report is made.

### **NatureScot Conclusion**

28. Whilst there would be some significant effects where Cloiche would add to the effects of Stronelairig, the effects on the character and SLQs of the Park would be slightly reduced as a result of the revised proposal.

### **APPRAISAL**

29. The policies of the NPPP and SPP set out how proposals outwith the boundaries of the National Park should be considered in terms of effects on the Park.
30. Policy C2.a. of the NPPP sets out a test for considering effects on the Park, in that large scale wind turbines are inappropriate outside the Park where they ‘significantly adversely affect its landscape character or special landscape qualities’. If a proposal fails policy C2.a. it would also be in conflict with policy A4 which seeks to conserve and enhance the SLQs.
31. Paragraph 212 of SPP sets out that “development that affects a National Park... should only be permitted where:
  - a) the objectives of designation and the overall integrity of the area will not be compromised; or
  - b) any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by social, environmental or economic benefits of national importance.”
32. In the policy context of the NPPP and SPP, consideration is required of the effects of the proposed development, on landscape character and the SLQs, both alone and cumulatively with other wind farms in the surrounding area.
33. There are a number of existing and consented wind farms in the area surrounding the proposed wind farm, as shown on page 2 of this report.
34. In relation to effects on the SLQs of the Park, NatureScot conclude that the proposed Cloiche wind farm would encroach significantly on some of the landscape character, SLQs and people’s experience of these, principally due to its siting and extent that would breach the shallow bowl that contains much of the Stronelairig development, undoing the mitigation that was put in place as part of the Stronelairig application to secure this containment. It would diminish existing qualities of: *Strong juxtaposition of contrasting landscapes, Grand panoramas and framed views, landscape of layers, Dominance of natural landforms & Wildness*. The proposal would have significant adverse effects in addition to the existing Stronelairig wind farm that forms part of the baseline conditions, particularly because it would appear from many sensitive areas to significantly add to the extent and proximity of the Stronelairig wind farm and perceived encroachment.
35. When considered against the baseline of existing and consented wind farms, the addition of Cloiche would have significant adverse effects on the several SLQs and



landscape character of the Park, adding to the existing level of effects in some areas and introducing new effects in others.

36. The extent and level of significant adverse effects caused by the addition of Cloiche to the baseline of existing and consented wind farms is therefore considered to fail to meet the requirements of NPPP policy C2. A. (and so policy A4). As a result, CNPA should **object** to the proposed Cloiche wind farm in combination with existing and consented wind farms.

## **RECOMMENDATION**

**That Members of the Committee confirm:**

- **That CNPA OBJECTS to the proposed Cloiche wind farm in combination with consented and existing wind farms, due to significant adverse effects on some of the Special Landscape Qualities and landscape character of the Park causing it to fail to meet the requirements of Policy C2.a. (and so policy A4) of the Cairngorms National Park Partnership Plan 2022 – 2027.**