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CAIRNGORMS NATIONAL PARK AUTHORITY

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

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**DEVELOPMENT PROPOSED:** ERECTION OF 17 WIND  
TURBINES AT NATHRO HILL,  
ANGUS

**REFERENCE:** Angus Council Reference  
12/00797/S36

**APPLICANT:** NATHRO HILL WIND FARM LTD

**RECOMMENDATION:** NO OBJECTION

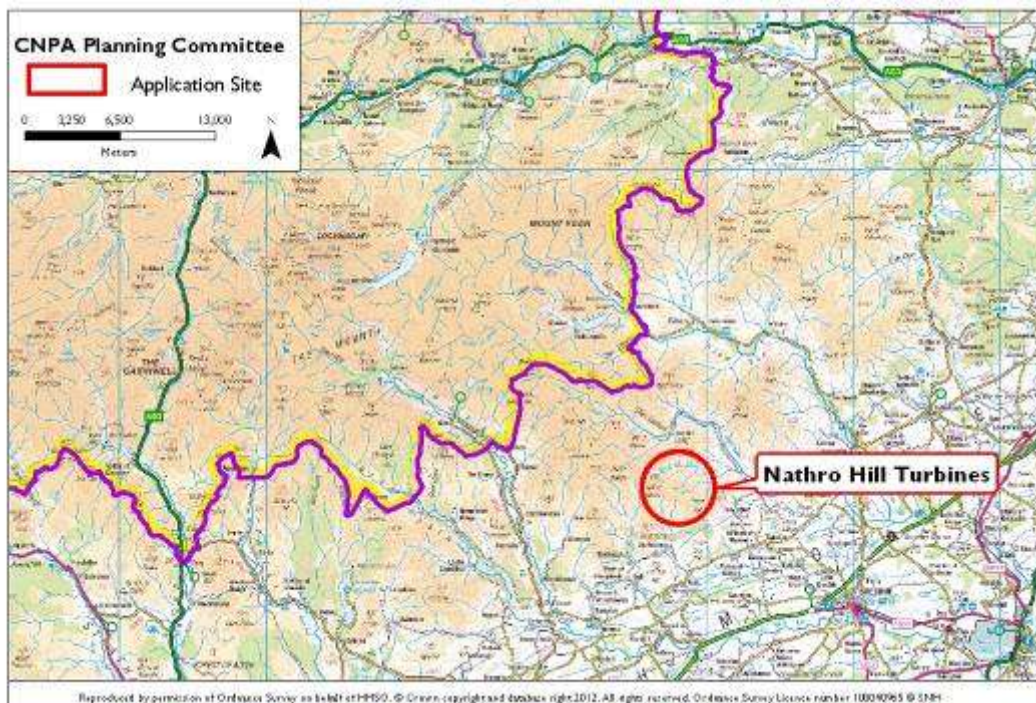


Fig 1. Location Plan

## PURPOSE OF REPORT

1. The purpose of this report is to provide a consultation response to the Scottish Government Energy Consents Unit who are dealing with this planning application due to the level of energy generation proposed, which is up to 61 Megawatts. The site lies some 5.5 km to the south east of the boundary of the National Park at its nearest point within the local authority area of Angus Council.
2. The Cairngorms National Park Authority (CNPA) has been consulted in relation to any impacts upon the 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

3. This proposal is to erect 17 wind turbines of height 134 metres to tip (80 metres to hub) together with associate works including access tracks, borrow pits, and ancillary infrastructure. The output of the proposed wind farm is more than 50 megawatts therefore, under the terms of section 36 of the Electricity Act 1989, this application is being considered by the Scottish Government Energy Consents Division as opposed to the Local Authority which is Angus Council in this case. The CNPA has been consulted as a neighbouring Planning Authority.
4. The site is located, at its nearest point, some 5.5km from the boundary of the National Park as shown on Figure 1 and lies within a sporting estate. The site is located along a ridgeline running from Peat Hill and to the south of Nathro Hill. It is located some 9km north west of Brechin. A single site access will serve the site, taken from Blairno with around 7 km of new tracks proposed and 4 km of upgraded tracks. The site lies between Glen Clova and Glen Esk, immediately to the east of Glen Lethnot.
5. The application is accompanied by an Environmental Assessment (ES) which includes chapters on ecological and landscape impacts, together with visual and landscape assessments. In terms of landscape assessment the study area for considering visual impacts included around 25% of the Park.
6. The ES concluded that there will be relatively little visibility from the main upland areas to the north and west, but that the development would be more widely visible from the Angus plains and the A90. In relation to the Park, the ES concludes that the landscape and visual

impacts are localised, with very localised significant effects on a small section of the Park, (this being the higher ground and peaks within the southern end of the Park). The conclusion is that these effects are so localised that the overall qualities of the nationally important designated area would not be adversely affected.

7. The wildness of the Park has also been considered, with the ES concluding that from the distant hilltops of Lochnagar which have a view down Glen Clova, a number of wind farms are already visible whereby there would be a reduced perception of naturalness and isolation at these locations in any event. It is highlighted that these wild areas are some 15 km away from the application site.
8. The ES concludes overall that at present there is capacity for the development within the landscape taking account of the *current* position with pending and consented proposals
9. Finally, in relation to ecological impacts, no significant impacts upon protected species, birds (including eagles and red kites) or habitats are anticipated by the ES, with the proximity to the Cairngorms Massif Special Protection Area (some 500 metres to the north west of the site and designated for its breeding golden eagle populations) considered. As the site lies outwith the Park, Scottish Natural Heritage will be fully considering the impact upon protected species in this case.

## **DEVELOPMENT PLAN CONTEXT**

### **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*.

## CONSULTATIONS

14. **The CNPA Senior Heritage Manager** advises that this proposal will have some visual impact upon the National Park, derived from a combination of the height of the turbines and the overall size of the windfarm. In addition the location of the windfarm is approximately 7km from the boundary of the park and its layout is along a ridgeline that runs parallel to the closest part of the Park. It will therefore occupy a relatively wide angle of view from certain viewpoints. However it is not considered that there will be direct landscape effects, because of the distance from the Park boundary.
15. Whilst the magnitude to the impact will be significant from the closest part of the Park this is mitigated by fact that the site is located on the very edge of what is considered to be the setting of the Park at this point. This is important in this case because there is a clear distinction between the landscape of the National Park, its landscape setting, and the landscape beyond its setting. It will be apparent from viewpoints within the Park that the wind farm itself is not within the Park.
16. The extent of the visual impact is clearly limited to a small number of discrete locations, especially on and around the boundary of the Park. There are clear views from well visited high points such as Mount Keen and Lochnagar, although this is at least 20km away and, on its own, the windfarm will not be significant.
17. Given these circumstances it is concluded that whilst there are visual impacts of significant magnitude their extent is limited to the point where an objection to the proposed development could not be sustained.
18. The Heritage Manager further commented that the biggest cumulative concern from the development is “envelopment “of the Park by a ring of windfarms. Whilst this is of importance to the National Park, there

is no specific guidance on this kind of cumulative effect and the weight to be attached to this. More specifically there are no major developments within 20km on either side of the development, or where they do occur within this arc of view they are smaller, further away and in the more settled landscape. (The Heritage Manager notes that Tullymurdoch and Bamff have not been included in the applicants plan so have presumably not been assessed)

19. The Heritage Manager has further noted that if this development was any nearer to the Park then an objection would be appropriate because of the greater magnitude of visual impact and the stronger apparent connection to the landscape of the National Park. It would clearly be within the setting of the park and therefore impacts would be more significant.
20. Finally the Heritage Manager advises that the layout of the windfarm plays a significant part in the level of impact. It has a linear pattern, running along a ridge for approximately 6km. The line is 'side on' to the Park at its nearest point and as such the visual impact is maximised. A more compact pattern at any point of the ridge is likely to have a significantly smaller impact upon the Park, and indeed from the other side. If possible it is recommended that a redesign should be undertaken.

## APPRAISAL

21. The proposed wind farm is located on a site which lies approximately 5.5 km away from the southern boundary of the National Park. Based upon the conclusions of the Environmental Statement and the location of the site relative to the Park, there are unlikely to be any significant ecological issues in this case, with issues relating to raptors and geese dealt with by SNH given that the site lies outwith the Park boundaries.
22. Consequently, the key planning issue for consideration is that of the visual and landscape impact on the setting of the National Park, and views into and out of this part of the Park.
23. The ES suggests that any landscape and visual effects upon the overall National Park will be limited to localised, significant impacts upon the southern part of the Park whereby the overall qualities of the Park will not be adversely affected. The CNPA Heritage Manager generally agrees with this conclusion
24. This is effectively a borderline case in terms of the scale of the impacts upon the Park. There is no doubt that any impacts will indeed be localised to the southern part of the Park, where the peaks are considerably higher than the proposed application site and of a different, and distinct, scale and character. It is therefore considered

that views looking towards the Park and its setting from the south will not be unduly affected. It is however the views *from* this southern part of the Park which will be impacted upon. Walkers in this popular area will be able to clearly see the turbines due to their scale and also their ridgeline location. (This effect is highlighted in viewpoints provided by the applicants from Mount Keen and Ben Tirran). This will impact upon their enjoyment of this wild place and change its character to a

degree. The question is whether the degree of change is detrimental to the Park and its setting.

25. Having given due consideration to this matter, the Heritage Manager has concluded that the effect is not sufficient as to warrant objection to a proposal which lies at a distance from the Park where the site which does not form part of the setting of the Park, but rather is part the outer setting of the Park which leads to the more settled landscape beyond.
26. It is however important to highlight that this view is based on the specifics of this case, which relates to a development which is not considered to form part of the setting of the Park. Any further, closer development in this area would, as noted by the Heritage Manager, begin to erode the setting and quality of the Park and it is therefore important to highlight this at this stage for future reference and to guide developers.
27. Whilst it is considered that an objection to this proposal could not be justified in terms of the impact upon the overall qualities and character of the Park, it is considered that there is potential to amend the layout of the development to further reduce any impacts upon the Park, as noted by the Heritage Manager. For example by considering a reduction in the number of turbines or re-evaluating the layout to avoid creating a continuous ridge line of development here. It is recommended that these comments are passed onto the determining authority for consideration.
28. In these overall circumstances, while the development would be clearly visible from some high points in the Park, the impact upon the overall setting and qualities of the Park is not considered to be such as to warrant objection.
29. The proposal has been 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

30. That Members of the Committee support a recommendation of **NO OBJECTION** to the construction of 17 wind turbines of height 134 metres to tip at Nathro Hill, Angus. It is further recommended that the following comment is passed onto the determining Authority

- It is considered that there is potential to amend the layout of the development to further reduce any impacts upon the Park and immediate area - for example by re-evaluating the layout to avoid creating a continuous ridge line of development here and considering a reduction in the number of turbines.

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25 September 2012

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