

AGENDA ITEM 6

APPENDIX 3

2015/0027/PAC

CNPA LANDSCAPE COMMENT

Macritch Wind Farm: CNPA Landscape Comment

1.0 The Development

The Macritch wind farm is a proposal for 18 wind turbines of up to 125m in height. This is a Scottish water proposal and is wholly located on the SW land holding. The site is located between glen Prosen and Glen Isla. It extends from the Backwater reservoir at approx. 8km from the CNP boundary to 1km south of the CNP boundary. The turbines are arranged in 2 distinct groups. The group closest to the Backwater reservoir consists of 11 turbines and the group closer to the Park on the ridge of Cairn Daunie of 7 turbines. The closest of the proposed turbines is approximately 1.5 km from the Park boundary. As no part of the development as proposed would be constructed within the National Park all effects as described are indirect in nature.

Pre-Application and Scoping

CNPA staff have had detailed ongoing discussions with the applicants landscape consultants from an early stage. We have on a number of occasions expressed concern about the vicinity of the northern group turbines to the Park and the potential impacts on sensitive receptors.

2.0 Environmental Statement Methodology and Visual Material

The analysis and assessment of L&V effects is consistent with LVIA 3, the impacts on the Special Landscape Qualities of the Park relevant to the potential area of effect are considered.

Although this application was registered before the revised guidance on the preparation of visualisations came into force, the photographic visualisations and wirelines are of a high quality and single frame images at 50mm have been produced.

CNPA requested in scoping response that all maps include the CNP boundary. Disappointingly the submitted ZTV maps do not include the CNP boundary and the location maps for the viewpoints include the pre 2010 boundary!

3.0 The Cairngorms National Park

3.1 Zone of Theoretical Visibility (ZTV)

The hub and blade tip ZTVs (figures -6.5a to 6.5e and 6.6a to 6.6e) demonstrate that visibility of the proposal from within the CNP will extend to the following areas; (...km) =approx. distance to nearest turbine.

- the slopes and summits of Caenlochan Forest including Glas Maol (12.7km) and Creag Leacach (12.1km).
- Hills and ridges along the CNP boundary including Midhill (5km), Bawhelps (6km) Craigie Thieves (3.5km) , the High tree (2.5km) and Bad Buidhie (1km)

- The tops and higher south west-facing slopes between Glen Prosen and Glen Clova including the hills of Driesh (7.7km) and Mayar (7.4km)
- the high ground to the east of glen Clova including areas around Loch Brandy and Loch whirral, and the Corbett Ben Tirran at approx. 13km
- The munro summits of Beinn a Ghlo at approx. 28km.

3.2. Landscape Character

I concur with the ES assessment that there are significant effects on the Landscape Character Area Highland Summits and Plateaux (6.7.3) by dint of the turbines themselves (size, colour, form, and movement), the infrastructure and the likely viewing position. I do not however concur with the ES conclusion that the effects on the Angus Glens Uplands (6.7) are not significant. This character area (and the overlapping Glen Prosen character area) extends to within 1km of the northern cluster with direct views on to the turbines and associated infrastructure.

The assessment of magnitude of effects on the Angus Glen Uplands in the ES determines that the turbines would intrude upon views from the summits and ridges at the southern edge of the character area (which is within the NP), and they would bring large scale development closer to the character area. However, an argument is then pursued that such an obvious difference occurs between the Angus Glens Uplands character area and the Highland Summits and Plateaux, that there would be limited change in the character experienced. I profoundly disagree with this assessment. Looking south from elevated locations within the Angus Glens Uplands, the landscape is characterised by overlapping, yet clearly defined and distinct individual hills. Across these hills the land cover is broadly consistent. Grouse moor management is the dominant land use along with areas of plantation forest which gradually increase in scale further down the glens. Within this landscape the transition between the character areas 'Angus Glens Uplands' and 'Highland Summits and Plateaux' is not recognisable with no difference in character from one side to the other, which is not surprising as the line is simply an 'accident' of the assessment process (2 different character assessments following an administrative boundary), and not a pronounced /real character difference.

I am of the view that the turbines, particularly of the northern cluster, would contrast with the underlying land form, by virtue of their form, colour and the movement of blades and would be very obvious in a landscape defined largely by the landform of distinct hills and valleys. The effect in a landscape with a high level of sensitivity would be significant. In addition the magnitude of effect would be higher within parts of the character area 'Glen Prosen' where there would be direct and close range views of the infrastructure as well as the turbines.

3.3 Visual Impacts

8 viewpoints have been assessed within the National Park. All viewpoints are elevated and are representative of the views likely to be gained by walkers and skiers etc. All are assessed as having a high sensitivity to change.

- Viewpoint 1 The Snub (13.km)
- Viewpoint 2 Shank of Catstae (13.7km)
- Viewpoint 3 Dreish (7.7km)
- Viewpoint 4 Glas Maol (12.7km)
- Viewpoint 5 Creag Leacach (12.1km)
- Viewpoint 19 Mid Hill Grouse Butts (5km)
- Viewpoint 20 Mayar (7.4km)
- Viewpoint 25 Beinn a Ghlo (28km)

The visual effects from Dreish, Mayar and Mid Hill Grouse Butts are assessed as significant and adverse, and I concur with this. In addition the separation of the two groups of turbines, poor relationship to landform, and design inconsistencies in the relationship with landform and the backclothing (where there is both a positive colour contrast and a pattern contrast with the backcloth, as is the situation here, wind farms are typically more visible rather than less and this can exacerbate adverse landscape and visual effects)¹ is such that the magnitude of the assessed impacts from viewpoints 4 Glas Maol , 5 Creag Leacach, and 2 Catstae are medium rather than small.

Much is made of the limited extent of visibility i.e. of visibility being limited to the ridge top north of Glen Prosen and the fact that north of here there is minimal visibility (ES 6.8.15, 6.8.19 and 6.8.22). This discussion fails to register that the visibility within the park overlaps with areas that are hugely popular walking areas and that those walking between the highest points will be experiencing views of these turbines at 5km to 13km. For example the walk between Mayar and Dreish and the walk between Glas Maol and Creag Leacach. Less well walked is the ridge south west of Glen Prosen (Craigie Thieves and the High Tree) that forms the boundary of the National park. There are no viewpoints taken from here but the impact of both turbines and track infrastructure on these close range views will doubtless be significant.

3.4 Cumulative Effects

The ES concludes that there will be little or no cumulative visual effects as a consequence of the addition of this proposal to those existing consented (and proposed). (ES Appendix 6.11). However, I would contend that in views from the hills of Dreish and Mayar and the other tops in their vicinity and the hills of Craigie Thieves and High Tree there will be in combination impacts with Drumderg which will be significant. Additionally and possibly more importantly in many of the views from the National Park the separation between the

¹ Ref Caroline Stanton Report

northern and southern groups is such that they appear as two separate smaller developments and in these situations the intra-cumulative effects are significant. The adverse effects would be augmented by the linearity/lining up of the turbines in the northern group and the inconsistent relationship to landform and visibility of the access tracks in the southern group.

3.5 National Park Setting (NPPP policy priority 1.3)

Contiguity and consistency of landscape character across the park boundary are parameters which contribute to the Park's landscape 'setting'. In my view there is both contiguity and consistency of character across the Park boundary as described in 3.2 above.

South from high upland plateau that includes Dreish, Mayar, Finalty hill and others the upland character of rounded summits and heather-clad slopes remains consistent as it crosses the Park boundary at Craigie Thieves and The High Tree and extends on to Cairn Daunie . Towards the Backwater reservoir the amount of plantation forestry in the landscape increases with woodland extending on to and over the landform, but none the less the shape of the landform is the most dominant characteristic.

The northern part of the Macritch windfarm sits on the Cairn Daunie ridge, this part of the wind farm will have a significant adverse effect on, the immediate landscape setting of the Park, and will fail to meet policy 1.3 of the NPP.

3.6 Integrity of the Designation and the Qualities for which it was designated (SPP)

Whilst the Macritch wind farm would be experienced from and adversely impact upon a number of locations in the southern part of the Park, it could not be said to significantly affect the integrity of the National park.

Table 6.6 at pages 6-51 to 6-52 the ES contains an assessment of the impacts of the proposed development on the SLQs of the NP. No attempt has been made to identify which of the Special landscape qualities can be experienced in this part of the Park.

The assessment appears to conclude that there will be no significant detrimental effect to any of these Special Qualities. In my view there would be adverse effects on the following SQs

SLQ	Landscape Characteristics that underpin the SLQs	Effect of wind farm
vastness of space, scale and height and surrounding hills and extensive moorland	The sense of expanse experienced from the undulating plateau is reinforced by the openness of the rounded summits and the smoothness of the moorland that extends out to the south across the	The wind farm will introduce large scale structures into a landscape currently without scale reference, and it will appear to 'shrink' the expansive nature

	boundary of the NP which is not visible. There are conifer woodland within this landscape but their scale is generally not discernible and the landform reads through	
Dominance of natural landforms Wildness	From the scraped rounded summits of the plateau, the rocky tops and corries of Caenlochan, the overlapping distinct hills between the Angus glens and the distant lower hills and ridges that dip towards Strath More, there is a dominance of natural landform in the view. Distances from the public roads and settlements in Glen Clova are short and it is the ruggedness at the head of the glens, the sudden sense of exposure and the dominance of natural landform that underpins the sense of wildness as one emerges/crosses/walks on to the plateau. This experience is a key characteristic of the Angus glens.	Drumderg is clearly visible in many of the views on this side of the Park, but at some distance. The proposed wind farm will compete with those natural landforms, (the shapes and lines of the hills, crags and gully's) through their stature, movement and the access tracks. The introduction of 125m wind turbines into this landscape at distances of 1.1km to 13km (Glas Maol) will impact that sense of wildness severely
Grand panoramas and framed views	As one emerges onto the plateau from the main access footpaths from Gen Doll the view south is framed between the shoulders of Mayar and Little Dreish. elsewhere,(including from the hills and slopes east of Glen Clova) the views from the hill tops focus down the Angus glens as well as to the higher hills to the north	The proposed turbines will be backclothed in the majority of views, appearing prominent against the darker background. The effect will be intrusive and significant

The proposed development will have a significant adverse effect on the experience and appreciation of these special qualities in key parts of the NP where people go specifically to enjoy those special qualities, and will fail to meet the requirements of SPP para 212.

3.7 Wild Land Areas (SPP) and Wildness (NPPP policy priority 2.3)

All of the assessment viewpoints used within the NP are also within Areas of Wild Land (WLA 16).

With respect to the Lochnagar Mount Keen WLA the ES (appendix 6.8) concludes that "...the change would not be significant with the majority of the WLA wholly unaffected, and only small scale change occurring in those areas where the turbines would be visible."

The turbines would be visible from key locations, from hill summits ridges and key routes where people go to experience wild land qualities, Dreish, Mayar, Lochs Whirral and Brandy and Mid Hill, and along the ridges and slopes between (be it walking, skiing or sport shooting). From breasting the col between Little Dreish and Mayar and completing the ascent of both Dreish and Mayar the wind farm will be in almost constant view.

These locations are at the edge of the WLA, but rather than them being insignificant to the whole, it makes them more vulnerable, particularly as the areas concerned are encompassed within narrow protrusions of the WLA. The magnitude of change experienced from these locations due to the addition of industrial scale artefacts at 3.5 to 13km distance would be major to medium. The construction of access roads 5 or 6km beyond the end of the public road will affect remoteness and accessibility (this is used in the ES as an argument to increase recreational access into the southern part of the NP page 6-52). The visual intrusion will affect the sense of solitude and sanctuary and it will affect the arresting and inspiring qualities.

For these reasons I conclude that the Macritch wind farm would have an adverse impact upon the WLA, so much so that it may warrant a change to the WLA boundary.

3.8 Conclusion

The proposed Macritch Wind Farm would result in significant landscape and visual impacts and significant intra-development cumulative effects being experienced within the National Park.

The northern part of the Macritch windfarm will have a significant adverse effect on, the immediate landscape setting of the Park, and will fail to meet policy 1.3 of the NPP.

The proposed wind farm will not affect the integrity of the National Park but it will have an adverse effect on a number of the special landscape qualities in parts of the NP where people go specifically to enjoy those special qualities, and will fail to meet the requirements of SPP para 212.

The Macritch wind farm would have an adverse impact upon the Lochnagar Mount Keen WLA, so much so that it may warrant a change to the WLA boundary.