
CAIRNGORMS NATIONAL PARK AUTHORITY

**Title: CONSULTATION RESPONSE TO
PLANNING APPLICATION TO HIGHLAND
COUNCIL ON SITE OUTSIDE OF PARK
BOUNDARY**

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(DEVELOPMENT MANAGEMENT)**

**DEVELOPMENT PROPOSED: FORMATION OF WINDFARM
COMPRISING 17 TURBINES AT TOM
NAN CLACH, NORTH EAST OF
TOMATIN, INVERNESS-SHIRE**

APPLICANT: INFENERGY

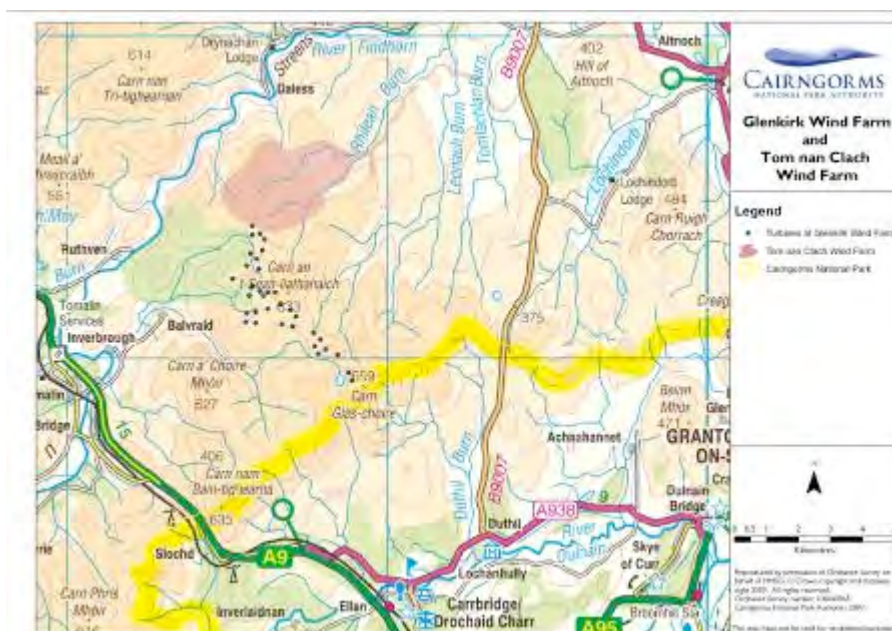


Fig. 1- Location Plan showing site in red with adjacent wind farm turbines at Glenkirk shown as dots

SITE DESCRIPTION AND PROPOSAL/BACKGROUND

1. This site is located approximately 5 kilometres from the park boundary where it runs along a hill ridge to the north of Carrbridge (see fig 1). The windfarm site is located on the Cawdor Estate on undulating moorland to the south of the River Findhorn.
2. The proposal involves the siting of seventeen turbines at a maximum height of 110 metres when the blade is in the vertical position. Associated infrastructure would include a wind monitoring mast. Access would be taken from the B9007 via a new road junction resulting in the need to construct approximately 11.5 kilometres of 5 metre wide track across moorland to the site. The windfarm would have a maximum generating capacity of 39.1MW
3. The Planning Committee will be aware of a proposal for a windfarm at Glenkirk (Section 36 proposal being dealt with by the Scottish Government) which the planning committee had previously raised objection to in 2006. The nearest turbine on this 31 turbine scheme was located 1.45 kilometres from the Park boundary where it runs along a hill ridge to the north of Carrbridge. The CNPA objected on the grounds of visual, landscape impact and raised consequent concerns about potential impacts on the tourism economy.

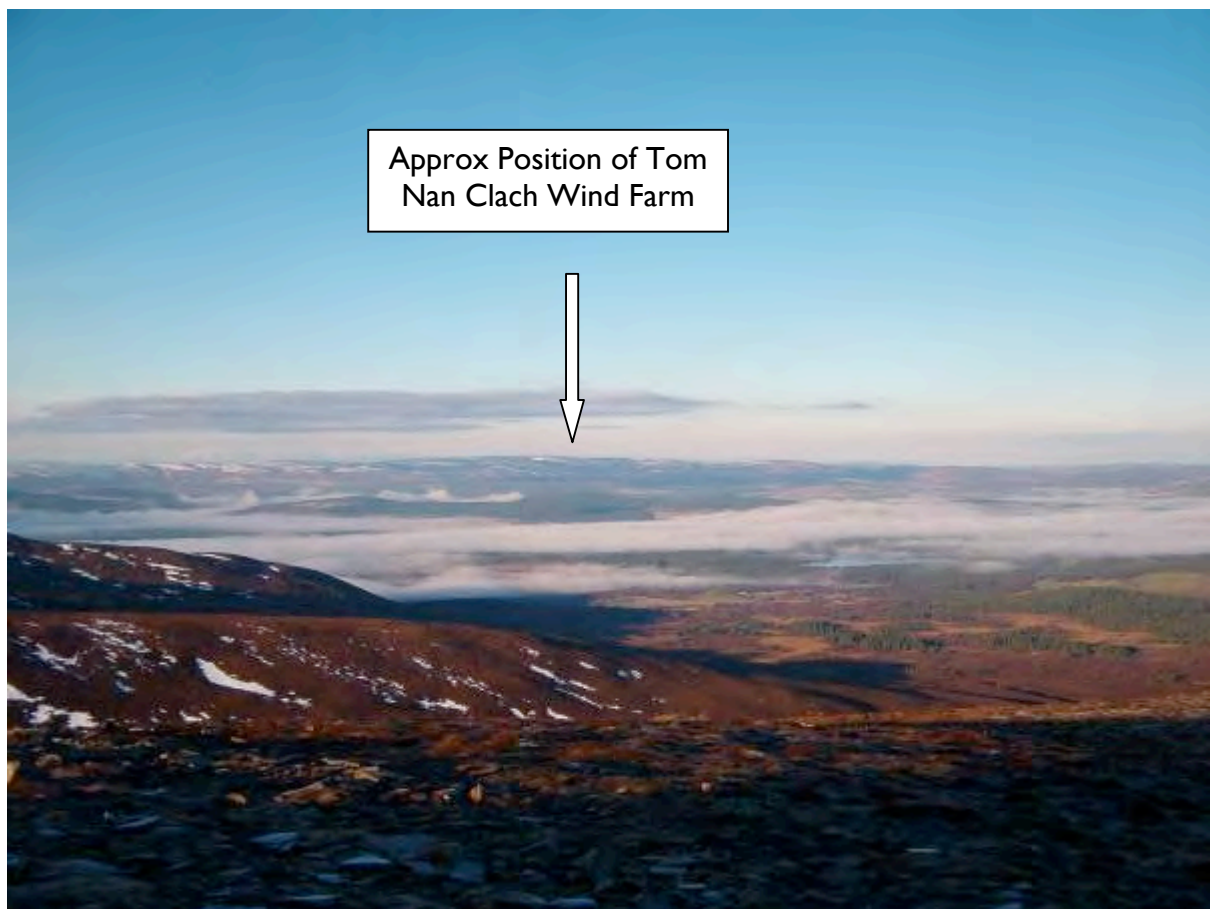


Fig 2 View towards site from Meall a' Bhuachaille (Glenmore)

DEVELOPMENT PLAN CONTEXT

4. **Scottish Planning Policy 6 (SPP6)** sets out Scottish Ministers Targets for generating 50% of Scotland's electricity from renewable resources by 2020. The Scottish Ministers will continue to support the full range of renewable generation technologies.
5. Spatial policies should not be used to restrict development on sites where the technology can operate efficiently and environmental and other impacts can be addressed. Plans should use spatial policies to afford significant protection to areas designated for their national or international natural heritage value.
6. Support for renewable energy developments and the need to protect and enhance Scotland's natural and historical environment must be regarded as compatible goals if an effective response is to be made to the challenges of sustainable development and climate change. The guidance points out that the UK Government has signed and ratified the European Landscape Convention the purpose of which is to promote landscape protection, management and planning.
7. It is further noted that during the lifetime of the guidance onshore wind power is likely to make the most substantial contribution towards meeting renewable targets. Scotland has considerable potential to accommodate this technology in the landscape although; increasingly careful consideration must be given to the need to address cumulative impacts.
8. Consideration of any adverse impacts of a renewable generation proposal should have regard to the projected benefits of the proposal in terms of the scale of its contribution to the Scottish Executive's targets for renewable energy Projects making a small contribution to renewables targets should not be dismissed as of little benefit, as they may have the potential to make a significant contribution cumulatively. In all instances, the integrity of national and international designations should not be compromised.
9. **National Planning Policy Guidance Note 14 Natural Heritage**, recognises that the most sensitive landscapes may have little or no capacity to accept new development. Some of Scotland's remoter mountain and coastal areas possess an elemental quality from which people derive psychological and spiritual benefits. Such areas are sensitive to any form of intrusive human activity and planning authorities should take great care to safeguard their wild land character. This care should extend to the assessment of proposals for development outwith these sensitive areas which might adversely affect their wild land character.
10. The presence of a protected species or habitat is a material consideration in the assessment of development proposals. Planning authorities should take particular care to avoid harm to species or habitats protected under the 1981 Wildlife and Countryside Act or European Directives, or identified as priorities in the UK Biodiversity Action Plan.

11. The presence of a national heritage designation is an important material consideration. This does not mean that development is precluded by the presence of such a designation. Proposals require to be assessed for their effects on the interests which the designation is designed to protect.
Development which would affect a designated area of national importance should only be permitted where:
 - The objectives of the designation and the overall integrity of the area will not be compromised; or
 - Any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by social or economic benefits of national importance.

12. **Planning Advice Note 45 Renewable Energy Technologies (2002)** provides more detailed advice on assessing applications for wind farms and provides particular advice in terms of assessing landscape impact. The document notes that Scotland has a range of landscapes some of which will more easily accommodate wind farms than others. The guidance notes that a cautious approach is necessary in relation to particular landscapes such as National Scenic Areas and Proposed National Parks and their wider settings. Here it may be difficult to accommodate wind turbines without detriment to natural heritage interests.

13. **Policy E1 Distributed Renewable Energy Developments** The Council supports the utilisation of the region's distributed renewable energy resource, including hydro, wind, wave and tidal stream powers. Proposals will be assessed against the provisions of the general policies of the Plan. Approvals for renewable energy developments will normally be for a temporary period only (tied to the life time of a project), with provision where appropriate for the removal and reinstatement of affected areas. Earlier action for removal and reinstatement will be required in the event of premature permanent cessation of energy production.

14. **Policy E2 Wind Energy Developments** Wind energy proposals will be supported provided that impacts are not shown to be significantly detrimental. In addition to the General Strategic Policies, wind energy proposals will be assessed in respect of the following:
 - visual impact;
 - noise;
 - electro-magnetic interference;
 - roads, bridges and traffic;
 - aircraft flight paths / MOD operations; and
 - cumulative effects.

15. **Policy E3 Wind Farm Safeguarding** The Council will seek to safeguard the operational efficiency of approved and constructed wind farms in the consideration of adjacent proposed developments or other land use changes.

16. **Policy G1 Conformity with Strategy** The Council will support developments, having regard to the Plan's sustainable objectives, which promote

and enhance the social, economic and environmental wellbeing of the people of Highland.

17. **Policy G2 Design for Sustainability** Proposed developments will be assessed on the extent to which they:

- are compatible with service provision...;
- maximise energy efficiency in terms of location, layout and design, including the utilisation of renewable sources of energy;
- are affected by significant risk from natural hazards, ...;
- are affected by safeguard zones where there is a significant risk of disturbance and hazard from industrial installations, ...;
- impact on individual and community residential amenity;
- impact on non-renewable resources such as mineral deposits of potential commercial value, prime quality or locally imported agricultural land, or approved routes for road and rail links;
- impact on the following resources, including pollution and discharges, particularly within designated areas: habitats, species, landscape, scenery, freshwater systems, marine systems, cultural heritage, air quality;
- demonstrate sensitive siting and high quality design in keeping with local character and historic and natural environment and in making use of appropriate materials;
- contribute to the economic and social development of the community.

Developments which are judged to be significantly detrimental in terms of the above criteria shall not accord with the Structure Plan.

18. **Policy G3 Impact Assessments** Where environmental and/or socio-economic impacts of a proposed development are likely to be significant by virtue of nature, size or location, the Council will require the preparation by developers of appropriate impact assessments. Developments that will have significant adverse effects will only be approved if no reasonable alternatives exist, if there is demonstrable over-riding strategic benefit or if satisfactory overall mitigating measures are incorporated.

19. **Policy G4 Community Benefit and Commitment** The Council will expect developments to benefit the local community and contribute to the wellbeing of the Highlands, whilst recognising wider national interests. The Council will seek to enter into agreements with developers as appropriate...

20. **Policy G6 Conservation and Promotion of the Highland Heritage** The Council will seek to conserve and promote all sites and areas of Highland identified as being of a high quality in terms of nature conservation, landscape, archaeological or built environment.

21. **Policy G8 Precautionary Principle** In the relatively rare situation of assessing development proposals where the potential impacts are uncertain, but where there are scientific grounds for believing that severe damage could occur either to the environment or the wellbeing of communities, the Council will apply the precautionary principle.

22. **Policy T6 Scenic Views** The Council will protect important scenic views enjoyed from tourist routes and viewpoints, particularly those specifically identified in Local Plans. There will be a presumption against development in narrow areas of land between roads and railways and open water.
23. **Policy NI Nature Conservation** New developments should seek to minimise their impact on the nature conservation resource and enhance it wherever possible. The Council will seek to conserve and promote all sites according to the following hierarchy:
- **sites and species of international importance** – Developments which would have an adverse effect on the conservation interests for which a site has been designated will only be permitted where there is no alternative solution and there are imperative reasons of over-riding public interest, including those of a social and economic nature. Where a priority habitat or species (as defined in Article 1 of the Habitats Directive) would be affected, prior consultation with the European Commission is required unless the development is necessary for public health or safety reasons.
 - **sites of national importance** – Developments will only be permitted where the objectives of designation and the overall integrity of the area will not be compromised or any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by social and economic benefits of national importance.
 - **sites of local importance** – Developments will be assessed for their effects on the interests of sites of local conservation importance and will be resisted where these are judged to be unreasonably detrimental.
24. **Policy L4 Landscape Character** The Council will have regard to the desirability of maintaining and enhancing the present landscape character of development proposals, including offshore developments.

Highland Council Renewable Energy Strategy and Planning Guidelines

25. In May 2006 Highland Council adopted their **Highland Renewable Energy Strategy and Planning Guidelines**. The strategy includes a map showing preferred development areas for wind farms, possible development areas and areas where there is a presumption against.
26. **Policy E5** in the strategy relates to **preferred areas** that have been established for major and national scale onshore wind developments. There are 3 designated areas which contain optimal conditions in terms of planning constraints, energy production, technical feasibility and proximity to grid. The detailed suitability of all prospective sites still needs to be confirmed through the normal planning

process. There will, however, be a strong presumption in favour of projects proposed for these designated areas, and developers will be encouraged to come forward with proposals there subject to appropriate community and environmental safeguards.

27. **Policy E6** of the document identified **possible development areas** that have been identified in places where although constraints are relatively light, their limited extent makes them less optimal than preferred development areas for national scale schemes. In these locations developments will be judged on their merits and will need to show that there is no scope for alternative development within preferred development areas.
28. **Policy E7** of the Strategy considers that elsewhere in Highland there will be a **presumption against** export wind development. Any proposals for national or major projects will have to overcome a precautionary approach to planning approval. Any development would also need to show that there is no scope for alternative development within other preferred and possible development areas.
29. **With regard to this strategy it is important to note that Highland Council issued a position statement on 4 March 2009 in response to an appeal case. The statement confirmed that the strategy does not fully comply with the more recent policy expression of SPP6 in that it did not reflect a 'presumption in favour' of wind energy. While the strategy is still a material consideration it should carry limited weight.**

Badenoch & Strathspey Local Plan

30. **Policy I.4.3** The Council will encourage the sustainable use of the area's resources and a wide distribution of employment opportunities by promoting:-
 - a. Extension of established resource based activities;
 - b. Opportunities in the natural environment.
 - c. Subject to suitable amenity safeguards
31. **Policy I.4.4** The Council will encourage integrated use and management of resources in the landward area, and will continue to seek a balance between development and the conservation of features which represent the area's outstanding natural and cultural heritage.

Cairngorms National Park Plan 2007

32. **Strategic objectives for Landscape, Built and Historic Environment** include, amongst others; maintaining and enhancing the distinctive landscapes

across the Park; conserving and enhancing the sense of wildness in the montane area and other parts of the Park; and ensuring development complements and enhances the landscape character of the Park. This section also emphasises the importance of assessing the potential impacts of public and private roads, masts, utilities, renewable energy developments (in and where relevant beyond the Park), to ensure that designs and locations do not detract from the landscape character.

33. **Strategic Objectives for Energy** include; contributing to national targets for greater renewable production through increasing community, business and domestic-scale renewable energy schemes. However, large scale windfarms are not considered to be appropriate in the National Park due to landscape and natural heritage impacts, but the development of domestic, and community-scale facilities in a full range of energy options should be pursued in appropriate locations.

CONSULTATIONS

34. **CNPA Heritage and Land Management (Landscape)** has considered the proposal and comments are summarised as follows: The Environmental Statement (ES) considers 5 representative viewpoints from within the Park. The significance rating is moderate for 3 viewpoints Carn Glas Choire. Ptarmigan and Gorton Hill above Grantown. The effects are considered slight for the Cromdale Hills and Meall a Bhuachaille. In general terms the CNPA Landscape Officer agrees with the assessment of the ES. The significance of impact is viewed as moderate from the majority representative viewpoints, the assessment from Meall a Bhuchaille is considered as slight by the ES when the Landscape Officer considers this as moderate given that it is 5km closer to the wind farm site than Ptarmigan and while not attracting the numbers of people that Ptarmigan does it is still a very popular hill.
35. The viewpoints chosen are only representative and there are other parts of the CNP that will be affected, but those areas tend to be limited to the higher points. This is because the park boundary closest to the proposal is a ridge line that creates an extensive view shadow. The visibility to areas less than 10 kilometres from the proposal is limited because of the view shadow. The visibility within the 10-20 kilometre range is limited to the area around Carn Dearg in Kinveachy and Gorton Hill above Grantown. Less than 5 % of the area that is between 10 and 20 km is affected.
36. Between 20 and 35 kilometres away from the farm there is significantly greater area affected, this includes the north/western edge of the mountain core. However, at this distance the proposal site, because of its relative elevation and compact form will be a small element in a much wider landscape.
37. The wildland study shows that the area of the park closest to the site is not particularly strong in wildness terms. The addition of the wind farm would reduce the strength of some of the wild land qualities but the reduction is likely to be small and not significant.

38. There are some cumulative issues with other sites in the vicinity that have actually been built or got consent. These are Paul's Hill and Berryburn. However, the cumulative effect of these sites with Tom nan Clach is not considered significant. The cumulative impacts with wind farms still in planning are significant, in particular Glenkirk is in a higher and more dominant position, closer to the Park and its form is less compact. Consequently, the cumulative impacts with Tom nan Clach are of greater magnitude and the effects more significant. It is worth noting that the area most affected by wind farm visibility is the Cromdale Hills which have views to sites west, east and north of the Park. This means that in terms of existing/consented and proposed wind farms that the number of turbines visible from the Cromdales could be in the hundreds.
39. The main entrance of the Park affected is the B9007. This is a relatively minor road, though one of the wildest entrance points. The view to Tom nan Clach will be extensive. However, the last 5 kilometres to the Park is outwith the view shed. The approach from the A9 is partially affected but here also the last 5 kilometre section does not have a view to the wind farm. The CNPA Landscape Officer does not consider that there are any significant effects upon the entrance points to the Park.
40. In conclusion, the visual effects are generally as stated by the ES. This means that nowhere are the effects judged as major adverse but restricted to moderate or minor. Moderate effects are still of significance. However, in this case the moderate effects are at great distance from the site or very localised. The cumulative impacts are possibly more significant but not for current wind farms, only proposed one's and in particular Glenkirk. The visual impact of Tom nan Clach and Glenkirk would be major adverse.
41. **CNPA Heritage and Land Management (Ecology)** has considered the proposal regarding potential impacts upon bird species that may use both the site and areas within the Park. With regard to Hen Harriers it is noted that one breeding attempt by Hen Harriers was noted during the 2009 survey of the site area. Hen Harriers are a priority species in the Cairngorms Local Biodiversity Action Plan and are considered to be below their carrying capacity in the National Park. The breeding population of the Park is to a large extent dependent upon the immigration of birds from the more robust population in the western highlands. The volume of immigration may be low in number, but significant in terms of species conservation. The wind farm may have some impact upon this movement.
42. With regard to Golden Eagles some similar concerns are raised that have been expressed with regard to Hen Harriers in that the area may be of importance for prospecting and dispersal of sub adult birds. In addition, concern is raised that the use of human observers at the site may result in avoidance behaviour from eagles, leading to the eagle activity in the area being underestimated.
43. With regard to Merlin there is some evidence of breeding activity at the site. The ES states that the wind farm area supports good hunting and nesting opportunities for merlin. The wind farm proposal would reduce the suitability

for nesting in the long term and may also reduce the potential for merlin dispersing from this area into the National Park.

44. The CNPA Ecologist points out that historically the CNP area would have supported populations of white tailed eagle and red kite. Both species became extinct in the Cairngorms through persecution in previous centuries but are now undergoing a recovery in Scotland stimulated by reintroduction projects. It is likely that the CNP continues to support suitable habitat for these species. Re-colonisation of the Park would be likely to occur from extant reintroduced populations of these species from the West and North West of the Park. Increased mortality through collision with wind turbines, or avoidance behaviour could reduce movements of these species to the CNP.
45. **CNPA Economic and Social Development** has looked at the proposal and note that the ES quotes elements of the 2008 'Economic Impacts of Wind Farms on Scottish Tourism' report and concludes that the development is unlikely to have a significant impact for the CNP. However, there are a couple of areas of concern from the planning conclusions of that report that are not picked up by the ES. National research identifies a number of windfarms in sight at any point in time may be undesirable. In addition the loss of value when moving from medium to large developments is not as great as the initial loss. It is the basic intrusion into the landscape that generates the loss of value for tourists. This suggests that from a tourism stand point that, that larger developments are preferable to a number of smaller developments, particularly when they occur in the same general area.
46. The research found that in general, the public did not recognise that some areas had been protected from development. Currently, those tourists who do find turbines an objectionable presence are most likely to move to another area in Scotland. To ensure substitution opportunities it is important that areas are retained where turbine development is limited to supplying local needs in small remote communities.

REPRESENTATIONS

47. A number of individual representations have been received. Several are copies of objections to the scheme that have been set direct to Highland Council as the determining authority. However, there are three letters direct to the CNPA which are attached at the back of this report. These letters have also been forwarded to Highland Council.

APPRAISAL

48. There are a range of detailed issues relating to this proposal, which will be considered by Highland Council who are seeking the CNPA's response on the application with regard to the National Park's interest.

49. As with previous reports of this kind the proposal will be assessed against the aims of the Park. However, firstly the report will summarise the findings of the Environmental Statement with regard to the National Park.

The Applicant's Environmental Statement (ES)

50. The ES submitted with the application considers a wide range of issues. In terms of the Park's interest the key issues relate to landscape and visual impact, ornithology and tourism.
51. The methodology adopted to assess the landscape and visual impact sets out a range of terms from no impact, negligible, slight through to moderate, then substantial. In terms of the ES where impacts are identified as moderate or substantial these impacts should be considered as having a significant effect. Accordingly, no impact, negligible and slight are considered not significant.
52. The ES contains a specific section on the implications of the proposal for the Park and takes account of the aims of the Park and National Park Plan. The ES notes that the Park is a national designation has a high sensitivity to the proposed wind farm. The ES points out that the wind farm would have visibility from some parts of the Park, but that this visibility is relatively limited. The ES notes that the site would not be visible from large areas of the Park which fall within the study area. The areas that the site would be visible from are limited to elevated areas along the north and north western boundary of the Park and to elevated locations along the northern part of the central mountain massif and the Cromdale Hills.
53. With regard to the first aim the conclusion of the ES is that there are no direct impacts but there are slight indirect impacts because the wind farm can be seen from some parts of the Park which would result in a slight diminution of natural and cultural qualities but would not significantly compromise this aim.

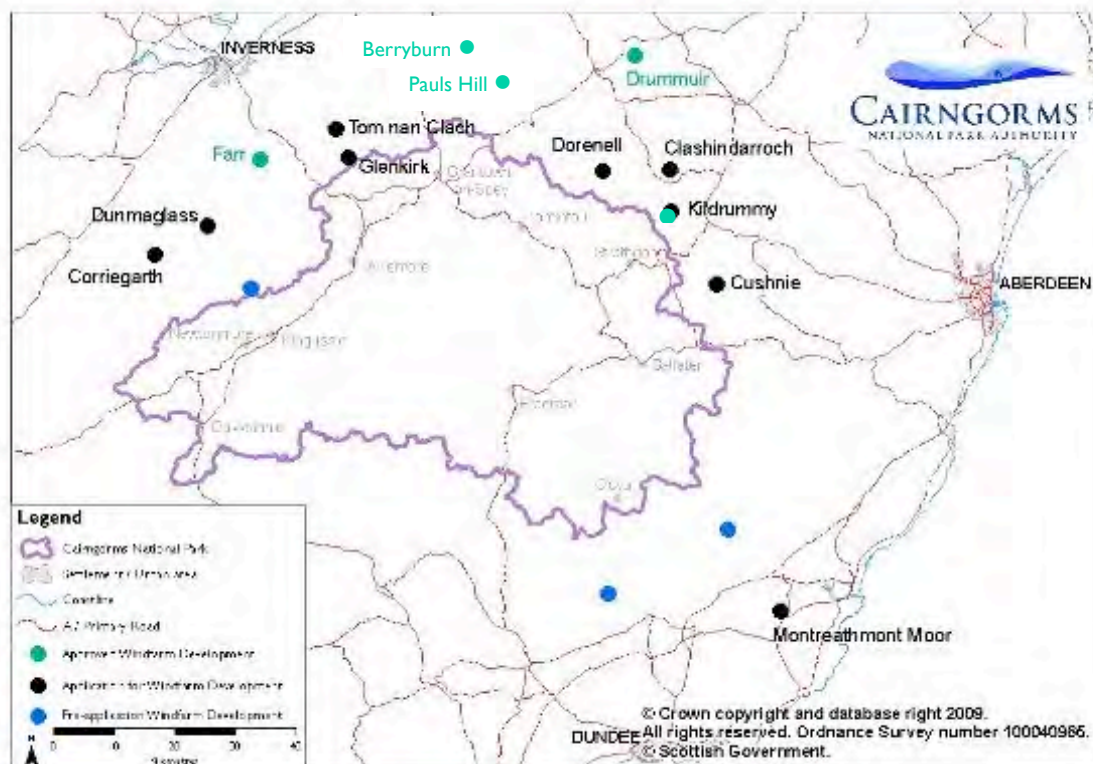


Figure 3 Map showing current wind farm consents/application/pre application around Park boundary.

Conserve and Enhance the Natural and Cultural Heritage of the Area

54. A key natural heritage issue with regard to such proposals relates to the potential landscape and visual impacts. The CNPA Landscape Officer has considered the proposal and agrees that there are no direct landscape or visual impacts given that the site is located outside of the Park boundary.
55. Given the scale of the development proposed there are indirect landscape and visual effects to consider. The CNPA Landscape Officer has considered the visibility of the proposal from various distance ranges within the Park. Less than 5% of the Park area within 10-20 km of the site would be affected. Further out between 20 and 35 km there is more visibility but at this distance, relative elevation and compact form would mean that the wind farm would be a small element in a much wider landscape backed by moorland. Consequently, accordingly with the applicant's ES the visual effects are not considered to be of a significance that would warrant an objection.
56. With regard to wildland the CNPA Landscape Officer considers that the CNPA/SNH study shows that this area of the Park is not particularly strong in wildness terms. While the wind farm would reduce the strength of some of the qualities of wildness on the boundary any reduction in these qualities is likely to be small and not significant. Further away the area of greatest wildness relates to the high mountain parts of the Park and the northern corries in particular. Any

effect from this proposal is likely to be small when compared with the effects of other proposed schemes.

57. In terms of cumulative impact there are a number of wind farms, consented or actually built these include Berryburn (consent), Pauls Hill and Farr (constructed). The cumulative effect of Tom nan Clach with these sites is not seen as significant.
58. The cumulative effects of Ton nan Clach in combination with wind farms at the planning stage are considered significant (see fig 3). This relates in particular to Glenkirk which the CNPA raised objection to some time ago. The CNPA Landscape Officer notes that Glenkirk is in a higher and more dominant position, closer to the Park and its form is less compact. Consequently, the cumulative effects with Tom nan Clach are more significant. Particular concern is raised by the Landscape Officer with regard to how many turbines could be visible from the Cromdale Hills.
59. Overall, it is concluded that the visual effects of the proposal on the Park are minor to moderate adverse. Of importance in this consideration though is that these are at great distance (25km) from the site or very localised to small areas of the Park. The cumulative impact is significant but not for constructed/consented wind farms. Greater concern occurs when considering Tom nan Clach with other proposed wind farms and in particular Glenkirk. The addition of Tom nan Clach to Glenkirk would worsen the negative impacts of the Glenkirk proposal which the CNPA has already objected to.
60. The CNPA Ecologist has raised concerns about a range of bird species, including golden eagle as summarised in the consultation section of the report. The key concern relates to the ability of a range of raptors to repopulate the Park area. In-migration of birds would be likely to come from the West and North West and the addition of turbines could increase potential for collisions with turbines. The cumulative impact of a number of wind farms would be likely to result in greater concern with regard to this issue and this is raised at the end of the report.

Promote Sustainable Use of Natural Resources

61. With regard to this aim the ES points out that that wind energy production per se is a sustainable use of a resource which the Park and its surrounding area has in abundance. It is considered that utilising this resource in a sustainable manner is considered to be consistent with this aim.
62. Given Government policy on the issue of wind farms it is concluded that the proposal contributes towards this aim in the widest national sense. However, it is important to note that in carrying out its duties in relation to this aim the National Park Authority is seeking to promote a more sustainable use of natural resources through all the policy and individual planning decisions that it makes.

Promote Understanding and Enjoyment

63. The ES considers that given the distance of the site from the central mountain massif at around 30 kilometres away it is considered that such visibility of the wind farm would not seriously affect the recreational enjoyment of the area by the public.
64. The CNPA Economic and Social Development group has considered the proposal and point out that a number of wind farms visible from any one point at a time may be undesirable. It is also noted that larger developments are preferable to a number of smaller developments. The research also notes that it is important that there are some areas that remain free from turbines apart from schemes for local community needs. A desk study has been carried out by the developer with regard to walking routes and hills in the area in an attempt to gain information about the levels of recreational use. However, the study contains little original direct research on which to base its position.

Promote Sustainable Economic and Social Development

65. The CNPA Economic and Social Development Group have raised some points set out above from the conclusions of national research on wind farms and tourism. Much of this research is based upon the perceptions of tourists. In this case the Tom nan Clach wind farm is some distance away from the most popular areas for walking in the Glenmore area. In addition the wind farm would not be visible from many areas of the Park as set out by the Landscape Officer's response. Some desk work has been carried out with regard to tourism. However, there is little primary research contained within the ES upon which to reach a definitive conclusion. However, there is more concern certain when taking into account the cumulative impact of other wind farms in the area and in particular Glenkirk. It is recognised that there will be positive economic benefits from the project but there is no clear expectation that these would accrue to communities within the Park.

Representations

66. Unusually, the Park has received direct representations with regard to this proposal. However, it must be made clear that this report is intended to inform the CNPA's position on the proposal. Highland Council are the determining authority for the scheme and will take account of views raised by objectors.

Conclusion

67. Overall, the proposal is not considered to lead to impacts of a level that would justify the CNPA objecting outright to the scheme being put forward in isolation. The ES has been considered and its findings are generally acceptable. However, the scheme is not seen in isolation and I would express serious concern with

regard to the potential cumulative impacts of wind farms that are built/consented and at planning stage. Consequently, a recommendation of objection is put forward raising concerns about the cumulative impact of windfarms. There is particular concern regarding the combination of Glenkirk and Tom nan Clach which would worsen what are considered to be significant adverse impacts from Glenkirk alone. Given that the Tom nan Clach wind farm is being considered by Highland Council and Glenkirk by the Scottish Government the CNPA response will be sent to both parties.

RECOMMENDATION

68. That based on the information submitted in the form of the application and accompanying Environmental Statement it is recommended that the Cairngorms National Park Authority raises **OBJECTION** on the grounds of cumulative impacts as set out below.
- A) While there may be less concern about this proposal in isolation the CNPA has serious reservations that if wind farms at Tom nan Clach and Glenkirk received permission this would lead to a major adverse visual impact upon the Park. Consequently, such an impact may be likely to impair the enjoyment of those residents and visitors to the Park who take part in recreational activity within the area. The combination of Glenkirk and Tom nan Clach wind farms would be considered to have unacceptable impacts upon the first aim of the Park to conserve and enhance the natural and cultural heritage of the area.
 - B) The CNPA would raise concern with regard to the cumulative impact of wind farm proposals to the north and west of the Park boundary with regard to the ability of raptors to colonise the Park from areas outside of the CNPA area. The Park has suitable habitat for a range of species including golden eagle, merlin, red kite and white tailed eagle. Increased numbers of turbines would cumulatively result in greater collision risk and/or avoidance behaviour that could hinder the ability of populations of bird species outwith the Park to reinforce those populations in the Park area.

NOTE

A copy of this response will be sent to Highland Council and the Scottish Government Energy Consents Unit.

Andrew Tait

5th October 2009

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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.