

AGENDA ITEM 8

APPENDIX 4

2015/0014/PAC

LANDSCAPE OFFICER
ADVICE

Dorenell Extension Wind Farm: CNPA Landscape Comment

1.0 The Development

The Dorenell Wind farm is a proposal for 63 wind turbines; 48 at 150m to blade tip and 15 at 125m to blade tip, with towers of 100m and 75m respectively. The site is north east of the National Park in the BlackWater forest, and it spans the summits and slopes of Thief's Bush Hill, the Hill of Dorenell, Carn Allt a Chlaiginn and Scout Hill.

The closest turbines are 2.25km from the Park boundary. There will be new and upgraded access infrastructure. Access into the site is from the A941. A number of walking routes criss-cross the site including two that originate in Glenlivet and Ladderfoot.

There is an existing consent for this site for 59 125(or 126m) turbines. CNPA objected to this application and led evidence at the PLI in 2010.

As no part of the development as proposed would be constructed within the National Park all effects as described are indirect in nature.

2.0 Environmental Statement Methodology and Visual Material

The analysis and assessment of L&V effects is broadly consistent with LVIA 3.

The submitted materials are not compliant with the 2014 guidance, though the application was submitted before the cut off date.

The approach to assessment of impacts on Special Qualities is welcomed .

CNPA requested in scoping response that all maps include the CNP boundary. The majority of maps including the ZTVs do not include the CNP boundary

When assessing much store is set both in the assessment of character effects and visual effects, on the distracting effect of views towards the Cairngorm massif and the larger hills. Whilst these hills are indeed impressive, it is not my experience, nor is there is no evidence to suggest that viewers will not spend just as much time looking out across the moorland,

3.0 The Cairngorms National Park

3.1 Zone of Theoretical Visibility (ZTV)

The blade tip and hub ZTVs (figures 8.6a and 8.7a) demonstrate that visibility of the proposal from within the CNP will extend to the following areas;

- the Ladder hills and the hills of the connecting Blackwater forest
- the summits and slopes west of Glen Buchat
- the Braes of Glenlivet and hills to the south of the Braes

- the Ben Avon and nearby hills at
- Morven
- Hills of Cromdale
- Meal a Bhuachaille
- there is some visibility around Cairngorm at 35km plus distance

3.2. Landscape Character

The site is in the Uplands (Dorenell unit) Moray LCA. In terms of its landform, landcover and altitude this landscape character unit is a continuation of the North Eastern Hills CNP LCA 2009 ref. Of the LCAs most likely to be affected by this development (ES 8.7.20) two are within the National park, the North Eastern Hills mentioned above and the Braes of Glenlivet (CNP 2009).

3.2.1 The North Eastern Hills

The LVIA concludes that there will be **significant adverse effects** on part of this landscape character area, namely the Ladder Hills to the north of the ridgeline between Letterach, Little Geal Charn and Crespel Hill (8.7.138). Though I concur with this conclusion I consider that both the sensitivity and magnitude of effect (49 to 63 turbines visible at close range 3.5km to 6km) are higher than have been assessed.

Sensitivity (ES assessed as medium/high) I consider the sensitivity to be high given that the LCA is within the NP and the susceptibility of these high rolling landforms to the extent and design of such a large scale development.

Magnitude (ES assessed as medium to high) I consider to be high given 49 to 63 turbines (mostly 150m) visible at close range (3.5 to 6km) with both turbines and access tracks being at variance with the character of the undeveloped open uplands.

There is little difference between the findings of the 2008 and 2014 ES assessments in that there will be significant effects. In my view there will be an increase in intensity of effects owing to altered height and therefore mass of turbines and components.

3.2.2 The Braes of Glenlivet

The LVIA concludes that the effect of the development on the Braes of Glenlivet will not be significant (8.7.121) I do not concur with this assessment.

Sensitivity- This landscape character area is within the CNP. There is no wind farm development in the landscape character area, and very little visibility of any wind farm development. The character of this area is defined by its strong containing landform and a complex post 17th century history, evident in the settlement and field patterns of today. As well as having a strong sense of containment within the steeply rising hills this landscape character area has a pronounced sense of seclusion and secrecy. This area will be very susceptible to the kind of development proposed. For these reasons the sensitivity of the character area should be high.

Magnitude- The ZTV shows that visibility is almost continuous across the central and southern parts of the landscape character area, but not the northern part. 1 -12 turbines are visible in the central low-lying areas of the Braes, with 13 -25 potentially visible in the more elevated southern parts of the LCA. Though actual visibility will be reduced in some places by presence of conifer plantations, parts of these plantations are likely to be felled at some point over the next 25 years, and no STM ZTV has been submitted with the ES to evidence the degree of screening. Turbines will be seen along the horizon of the hill ridge as tips, partial blades, whole blades and hubs and partial towers. These will be seen from 6km distance to 10.5km distance. The diameter of the turbine blades is 100m with a swept area of 7,823m², the moving blades will be clearly visible at these distances. Where tips alone are visible they may go un-noticed. Where partial blades/ blades are visible they will be obvious, as will turbine towers. The slopes and skyline around the Braes is a visually strong line, the eye will be drawn to these structures on the skyline. They will affect the sense of containment and the skyline edge, and alter the perception of scale. The vertical scale of the landform is such that from some locations they may appear to 'hang over' the lower braes (whether or not the bases of the towers are visible.) These structures, be it a few blades as in the Achnascrew Roadend viewpoint, or blades and complete turbines as in viewpoint 14 (Tom Trumper) will substantially change the natural skyline and the experiential characteristics of history, sense of seclusion and secrecy of the Braes.

In my view the sensitivity of this landscape character area is high and the magnitude of change will be medium to high depending on where you are in the Braes, leading to a **significant adverse effect**.

The 2008 ES assessed the effects on the Braes as significant, the 2014 ES as not. This is put down to differing landscape character areas/units being assessed. The ES concludes that "...although there will be some increase to the magnitude of change, essentially the effects will be comparable". In my view the magnitude of change wrought by the proposed scheme compared to the consented scheme, constitutes a step change on the character and experience of the Braes as described above. As well as the increase in height of turbines and the number visible, there is a significant increase in blade dimensions and swept area adding to the 'apparent stature' of the turbines. The Swept area of the consented turbines is 6,362m² and that of the proposed turbines 7,823m².

3.3 Visual Impacts

There are 7 viewpoints assessed within the National park

3.3.1 Viewpoint 19: Morven at 22.6 km. In this view 53 of the 63 turbines will be visible ranging along the Dorenell Hill Ridge. Some will skyline, some will be back-dropped against rising ground. Even when seen in the context of the relatively uniform and extensive uplands this wind farm will appear substantial. Looking towards the wind farm from this view it would be a pronounced feature occupying a large part of the viewing cone. Even at this

distance it is my view that the magnitude of effect would be higher than predicted in the ES leading to a significant visual impact.

The extent of the development in the view is broadly the same as the consented scheme but the increase in height and mass of the turbines makes them more prominent and increases the perceived dominance over the landform.

The Cumulative effect

The additional impacts of Dorenell in addition to the baseline that includes Kildrummy, Clashindarroch and Hill of Towie (and others) is in my view significant. The additional impacts of the current proposal against a baseline that included the consented scheme would not be significant.

3.3.2 Viewpoint 11: Little Geal Charn/Ladder Hills at 6km, a well-visited summit in the Ladder Hills.

The views from here would be similar to those experienced across the northern summits and slopes of the Ladder Hills.

In this view the 54 of the 63 turbines will be visible, most will be seen to their full height some extending above the skyline others seen against a hill backdrop. They appear as one group wrapping around the hill of Cooks Cairn. The scale of development with some turbines in this view appearing almost comparable in scale to Cooks Cairn, constitutes a major change to the view that is not much moderated by the expansive nature of this upland landscape. In my view the magnitude of change is high and not medium to high as in the ES (8.8.178). However, I concur with the conclusion that the effect of the proposed development on hill walkers on Little Geal Charn (and nearby summits and slopes) will be significant.

The horizontal extent of turbines is marginally less than was the case for the consented scheme but with the greater height of turbines more of the skyline is affected and the greater size of turbine blades increases the visual contrast and massing where turbines line up.

The Cumulative Effect

I concur with the ES assessment that the effect of adding this proposal will be significant.

3.3.3 Viewpoint 12 : Meall Gaineimh (912m) at 24.8km, one of a number of summits on the Ben Avon ridge. This viewpoint is within Wild land Area 15. The sensitivity of this viewpoint is high. The magnitude of change is assessed as low as a consequence distance, limited extent and containment by landform. Though the wind farm will be visible as a new focus in the landscape I broadly concur with this assessment.

The current proposal will be more of a prominent focal feature than the consented as a consequence of the increased massing of turbines on the skyline.

The Cumulative Effect

I concur with the ES assessment that the effect of adding this proposal will not be significant.

3.3.3 Viewpoint 14 : Tom Trumper at 10km, a hill to the south of the braes of Glenlivet and west of the Ladder Hills. As well as being in the NP the hill is in the AGLV, close to the Heritage trail and Core Path and is on the path from the Well of Lecht. This view looks across the farmed Braes to the dominant and contrasting skyline ridge of the Ladder hills and the hills above Glen Livet. The sensitivity of this viewpoint is assessed as medium to high, in my view it should be high.

27 of the 63 turbines will be visible (6 as tips only). The turbines will appear on the skyline ridge between Carn na Bruar and Carn na Glascoill, some will be part screened by landform others will be visible to their near-full extent. The proposed development will introduce a prominent new feature into the view, close enough for the movement of blades to be distracting. There is considerable overlapping in the group of turbines, the dimensions of towers and blades will increase the visual contrast and massing where turbines line up. The ES assessment considers the relationship with landform to moderate the effect, in contrast I find that the turbines will break the continuity of the dominant skyline edge and alter the perception of scale which is such a key aspect of this and similar views within the Braes. I find that the magnitude of change from a dominant skyline ridge at relatively close range with no structures at all to one with moving turbines is at least medium if not high.

The ES finds that the effect of the proposed development on walkers on Tom Trumper will be not significant (8.8.236). I disagree with this and am of the view that it would be significant.

The current proposal would have a greater magnitude of change than the consented owing to the visibility of at least 5 more turbines, greater visible extent of individual turbines and greater prominence of turbines and blades and movement.

The Cumulative Effect

I concur with the ES assessment that the effect of adding this proposal will not be significant.

3.3.4 Viewpoint 16 : Meal a Bhuachaille at 34.1 km. From this location Dorenell wind farm will appear as a group on the distant horizon. In all but exceptional conditions the wind farm is unlikely to be particularly prominent. I concur with the ES assessment of high sensitivity, low magnitude and visual effects not significant.

The visibility of this proposal will be slightly greater than the consented owing to the increased stature of the turbines.

The Cumulative Effect

I concur with the ES assessment that the effect of adding this proposal will not be significant.

3.3.5 Viewpoint 17 : Carn Eachie/Cromdale Hills at 16.2km. The view from this location on the Park Boundary is likely to be similar to views gained further south on the Cromdale ridge. The proposed development will be seen as two groups (one of turbines and one largely of blades) separated by the intervening hill ridge. The grouping of 10 turbines to the left is quite prominent, the grouping of blades to the right is less so. Whilst each of these groups is in itself not a major feature in the landscape the separation of the groups makes them appear as two separate developments, a confusing relationship to landform .

In my view the magnitude of change is higher than 'low' however I concur with the ES assessment of not significant.

From this viewpoint the consented scheme would be barely discernible with only blade tips breaking the skyline. The proposed development will be much more apparent .

The Cumulative Effect – not significant.

I concur with the ES assessment that the effect of adding this proposal will not be significant.

3.4 The Planning Policy Context

Due regard must be paid to the National Park Plan. The correct plan is the Cairngorms National Park Partnership Plan 20012-17. In relation to landscape matters **policies 1.3 and 2.3** of the National Park Plan are critical. Related SPP guidance is at paragraphs **84, 85, 86 and 213**.

3.5.1 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'.

From the Ladder hills the upland character of the landform and landcover and altitude remains consistent as it crosses the Park boundary and extends into the Blackwater and Glenfiddich forest. The area is a key contributor to the setting of the NP around its north eastern edge and in views from the Park the wind farm appears very much within those uplands that extend out from the Park. The Dorenell windfarm will sit within this area and 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 immediate landscape setting of this part of the Park also contributes to some of the Special Qualities experienced within the Park, qualities which will be significantly impacted upon as described in table 8.6.

3.5.2 Special landscape Qualities (SLQs)

At pages 8-63 to 8-67 the ES contains an assessment of the impacts of the proposed development on the SLQs of the NP with a focus on the following special landscape qualities;

- the surrounding hills
- extensive moorlands, linking farmland and woodland, dominance of natural landforms
- wild land and wildness
- grand panoramas and framed views

The assessment concludes that the proposed development will have adverse effects on all 5 of the SQs listed, but only in the area of the Ladder Hills. I concur with this assessment in respect of the upland areas that extend across the park boundary in the vicinity of the development. However, the ES assessment of effects on special qualities is restricted to those special qualities of the uplands. As a consequence it does not assess the Special landscape qualities which are more relevant to the settled parts of the Park potentially affected by the wind farm and the Braes of Glenlivet in particular.

- a landscape both cultural and natural

Contained within the surrounding hills, the abandoned farmsteads, the field systems, the marginal pastures and the former seminary of Scalán, evoke historic periods and events and a complex post 17th century history. The conifer plantations, though poorly designed are a function of land tenure and the continued presence of farming families in a remote and dramatic natural environment.

The proposed development would introduce large, moving, sky-lining, industrial structures into a landscape where it would adversely affect the balance of the cultural and natural components of this landscape. In my view there will be places within the Braes and the surrounding slopes where the presence and movement of turbines will impinge on the special qualities to a significant degree. In my view there will be an adverse effect on the experience of a place which though not 'classically scenic' is a visible record of the historic relationship that people have had, and continue to have, with this landscape where nature, weather and human tenacity dictate what is possible. Either proposal would have a significant adverse effect on these special qualities.

The proposed development will have a significant effect on some of the special landscape qualities that can be experienced in the Ladder Hills and the Braes of Glen Livet, and will fail to meet policy 2.3 of the NPPP

3.5.3 Integrity of the Designation and the Qualities for which it was designated (SPP para 212)

Whilst the Dorenell wind farm Extension would be experienced from a number of locations in the northern and north eastern parts of the Park, it could not be said to significantly affect the integrity of the National Park. However, it is my conclusion that this wind farm would have a significant adverse effect on some of the special landscape qualities in areas close to the wind farm (as described in 3.5.2 above) and for which the Park was designated, to the extent that it would fail to meet SPP guidance at para 212.

3.5.4 Wild Land (SPP 200) and Wildness (NPPP policy priority 2.3)

Whilst I concur with the ES wild land assessment at 8.7.200 to 8.7.216 which concludes that there would be no significant effect on the Cairngorms WLA 15, there are areas of high wildness within the Ladder hills (SNH mapping and CNPA mapping) where the special qualities of wildness /experience will be compromised, if not lost.

3.8 Conclusion

The Proposed Development on its own

The proposed large wind farm development is sited close to the National Park in an area where the landscape character is consistent and contiguous with that within the Park. It will impact significantly on the landscape setting on this side of the NP and will fail to meet policy 1.3 of the NPPP.

The proposed development will have significant adverse landscape and visual impacts on the Ladder Hills and the Braes of Glen Livet and Morven. In the cases of the Ladder hills and the Braes there will be resultant adverse effects on the special landscape qualities. The Proposed development will fail to meet SPP para 212.

The Proposed development in relation to the Consented Development

In the case of the Ladder Hills, the increase in scale of turbines and the increase in the swept area of the blades result in additional skyline impacts. The greater visual mass/density of the wind farm increases the masking of the underlying landform. The resulting magnitude of change, landscape and visual effects, and effects on the SLQs experienced in the National Park, beyond that of the consented scheme, are in my view significant.

In the case of the Braes there is a substantial increase in number and visual presence (stature/mass/movement/swept area) of turbines individually and collectively between the consented and the proposed schemes which results, in my view, in additional adverse effects to the SLQs experienced in the National Park, which are significant.