

CAIRNGORMS NATIONAL PARK AUTHORITY

**Title: CONSULTATION FROM PERTH AND KINROSS
COUNCIL**

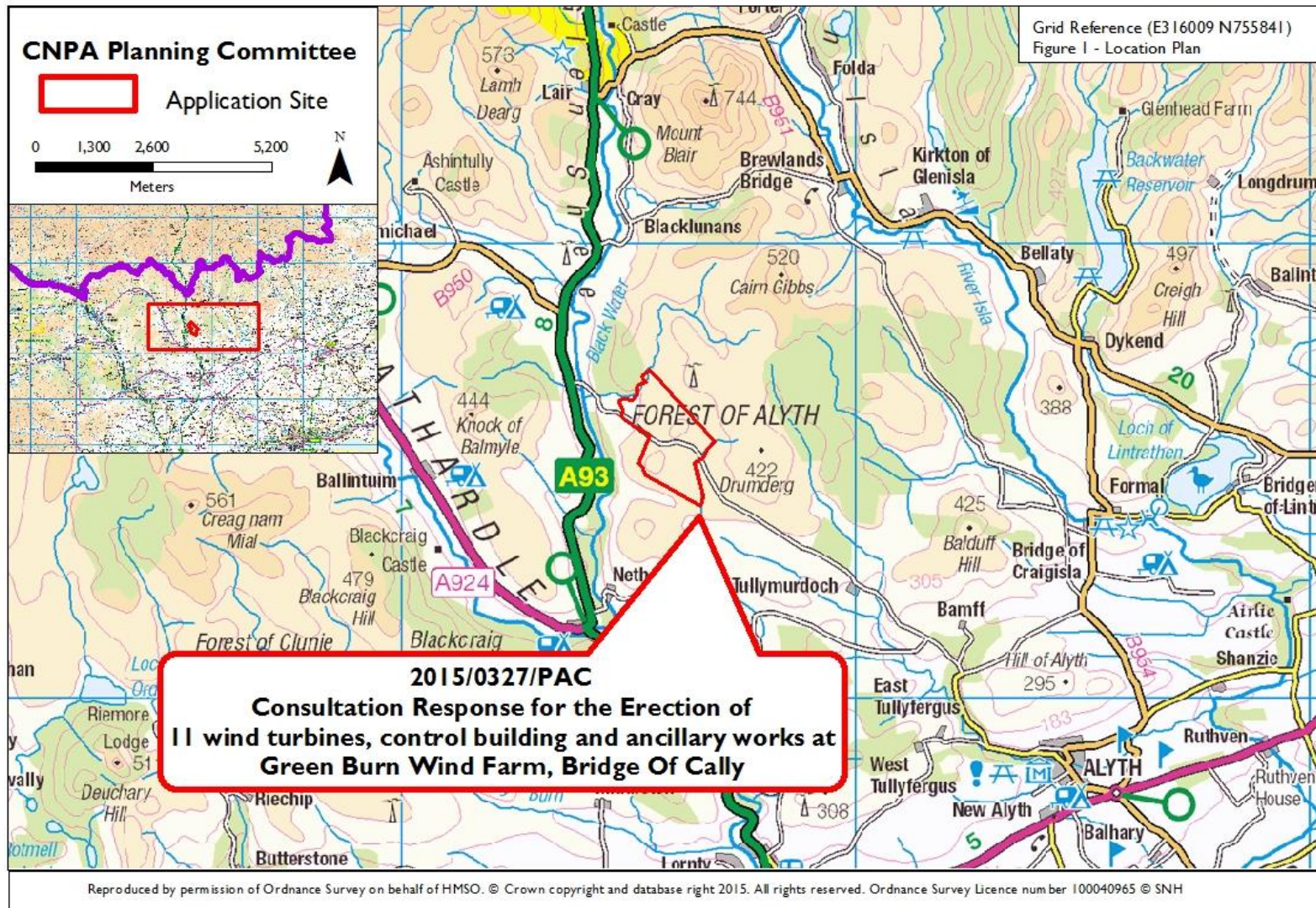
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PLANNING OFFICER
(DEVELOPMENT MANAGEMENT)**

**DEVELOPMENT PROPOSED: Erection of 11 wind turbines, control
building and ancillary works at Land 1200
Metres West of Drumderg Wind Farm,
Bridge of Cally.**

REFERENCE: 2015/0327/PAC

APPLICANT: Green Burn Wind Farm Ltd

RECOMMENDATION: Objection



PURPOSE OF REPORT

1. The purpose of this report is to provide a consultation response to Perth and Kinross Council on the planning application detailing the erection of 11 wind turbines, control building and ancillary works.
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 the wind farm would impact upon the special landscape qualities of the park.
3. Under the agreement on roles in advisory casework between Scottish Natural Heritage (SNH) and Scottish National Parks Authorities, SNH lead on the provision of advice concerning impacts on the National Parks designation of proposals outside the park, and their comments have been received.

SITE DESCRIPTION AND PROPOSED DEVELOPMENT

4. The Green Burn wind farm site is located approximately 11km north of Blairgowrie and 11km northwest of Alyth as shown by **Figure 1**. The closest turbines are approximately 7km from the Park boundary.
5. The development site is surrounded to the north, west and south by a mixture of agricultural land, plantation forest and woodland. The operational Drumderg wind farm comprising 16 turbines is located approximately 930m to the east of the development. The site is bisected by an unclassified road (C446) in an east-west direction.
6. The development site comprises rough grazed open moorland. The Hill of Kingseat, located within the southern extent of the site, is the highest point within the site and located at 389m AOD.
7. The principle components of the development and its layout comprise:
 - a. Eleven wind turbines each with a maximum blade tip height of up to 126.5m and a generating capacity of up to 3 MW;
 - b. Reinforced concrete foundations (approximately 18m diameter) at each wind turbine;
 - c. A crane hard standing (50m x 20m) adjacent to each wind turbine;
 - d. Site vehicular access points;
 - e. On-site access tracks providing access to all wind turbine locations;
 - f. Buried interconnecting electrical cables between the turbines and electrical control building;
 - g. A single-storey electrical control building with associated transformer compound; and
 - h. Two temporary construction site compounds.

8. The internal layout of the proposed development is shown on **Figure 2** with a typical turbine dimensions shown by **Figure 3**.

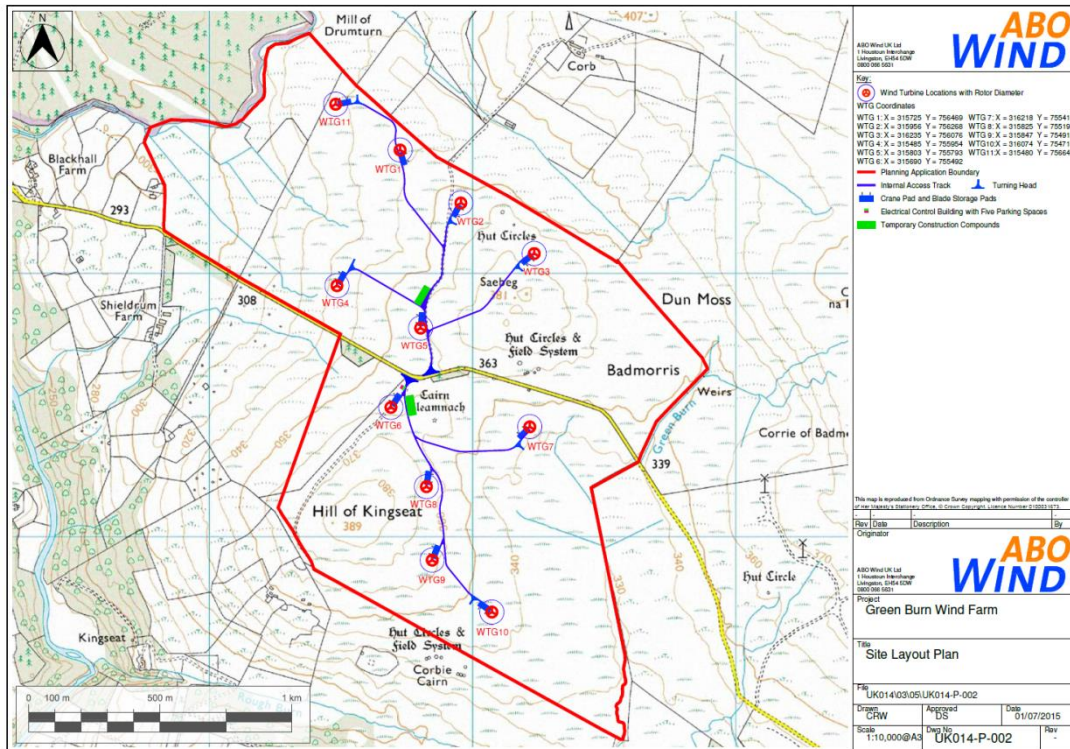


Figure 2: Layout of the wind farm

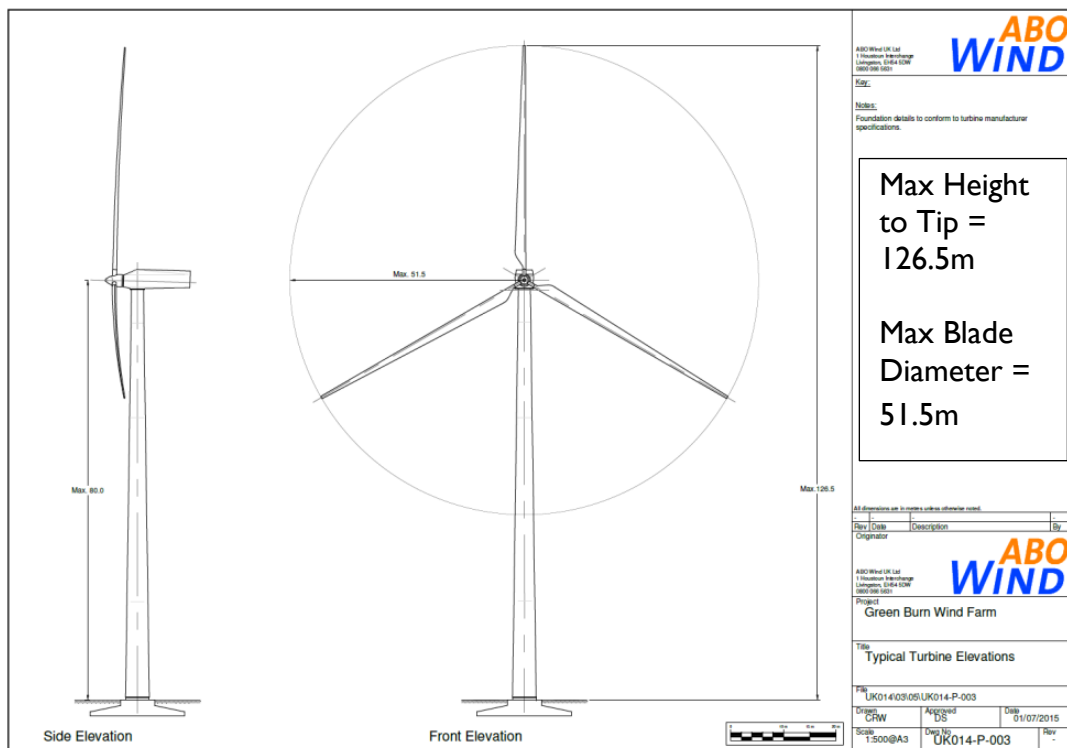


Figure 3: Typical turbine dimensions

9. The planning application is accompanied by an Environmental Statement (ES) which documents the Environmental Impact Assessment (EIA) process and reports the outcomes for the development. It identifies the methodologies used to assess the significant environmental effects predicted to arise as a result of the development. Where appropriate, mitigation measures have also been set out to prevent, reduce and/or offset any significant adverse environmental effects. An assessment of residual effects (those which remain following the implementation of mitigation measures) is also presented. These environmental considerations include that most relevant to the Park being 'landscape and visual impacts'.

RELEVANT PLANNING HISTORY

10. As the development is subject to EIA, the applicant sought scoping opinions from key stakeholders in advance of the formal EIA. In August 2014 SNH had provided a scoping response identifying key issues including "sequential cumulative impacts on key tourist routes" and "possible impacts upon the Cairngorms National Park". CNPA officers were also contacted as part of the scoping exercise and internal specialist landscape advice was provided. In the opinion of the specialist landscape advisor, and from the information provided at that time, it was considered that the location and the relative proximity of the wind farm may result in it affecting the landscape setting of the park (both on its own and cumulatively) and have a significant adverse impact upon the special landscape qualities that can be experienced within the Park. It was recommended that the identified issues and effects need to be fully assessed as part of the EIA process.
11. There are a number of existing and approved wind farms in the vicinity of the application site. These are shown on **Figure 4** which is an extract of a larger plan previously circulated to Members, and which was most recently shown as part of the Tullymurdoch consultation response at the November planning committee. Drumderg is currently operational, with Tullymurdoch and Welton of Creuchies consented, and Macritch and Saddle Hill yet to be determined.
12. As members may recall, the CNPA objected to the Macritch wind farm proposal, offered no objection to Saddle Hill (although raised concerns over encirclement), and did not object to the original proposals for Tullymurdoch or the subsequent change of turbine dimensions. The planning application for Drumderg wind farm, which is currently operational, was approved by Perth and Kinross Council following submission in 2003.

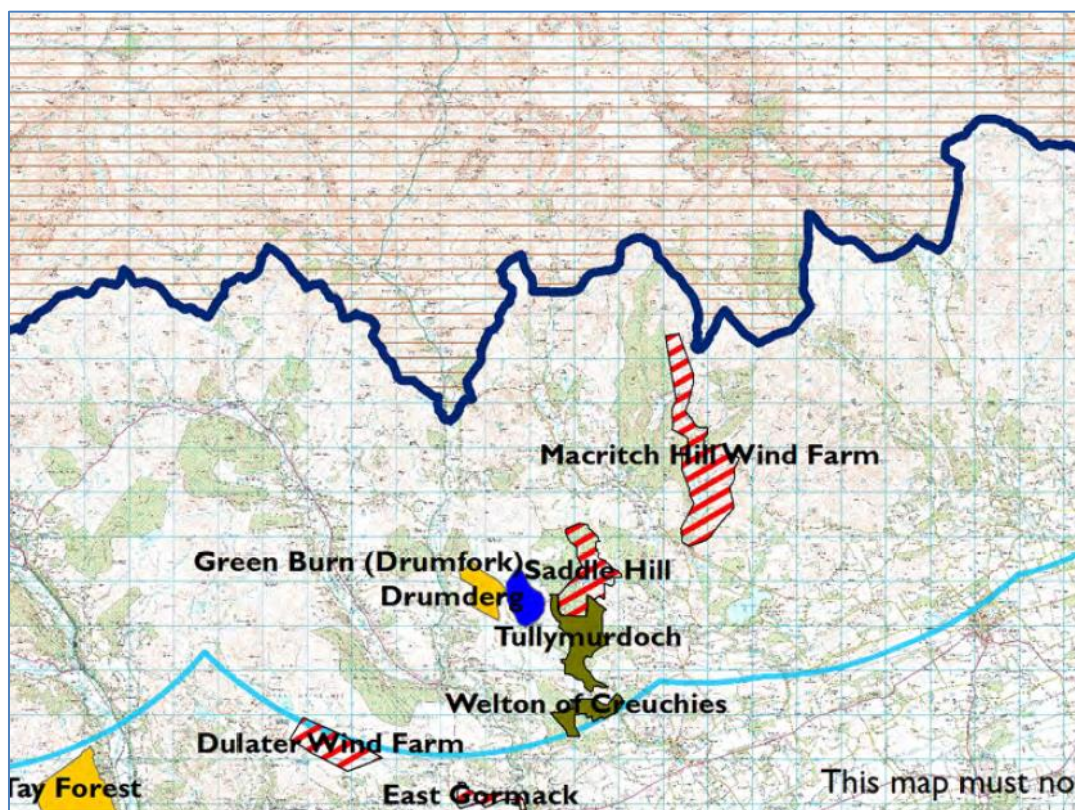


Figure 4: Wind farm developments south east of the Park boundary (Green Burn marked as 'yellow', between Saddlehill and Drumderg)

DEVELOPMENT PLAN CONTEXT

National Policy and Guidance

13. **Scottish Planning Policy (SPP, revised 2014)** sets out national planning policies that reflect Scottish Ministers priorities for the operation of the planning system and for the development and use of land. Under planning law, planning applications must be determined according to the development plan unless material considerations indicate otherwise. The content of SPP is a material consideration in planning decisions that carries significant weight. The SPP promotes consistency in the application of policy across Scotland while allowing sufficient flexibility to reflect local circumstances.
14. SPP specifically sets out that the planning system should support the transformational change to a low carbon economy, support the development of a diverse range of electricity generation from renewable energy technologies, and guide development to appropriate locations. In paragraph 154, it sets out the Scottish Government's commitment to increasing the overall amount of energy generated from renewable sources to 30% by 2020 with the equivalent of 100% of electricity demand being met by renewable sources by this date. In terms of policy principles, paragraph 154 requires the planning system to guide renewable energy development to appropriate

locations and to advise on the issues that would need to be taken into account when specific proposals are being assessed.

15. Paragraph 169 sets out the issues to be considered when considering energy infrastructure development proposals including the need to consider likely cumulative impacts and landscape and visual impacts, including effects on wild land. Further advice on wind energy is contained in the Scottish Government online information note on “onshore wind turbines” which outlines the issues to be considered and references the range of SNH publications and guidance on wind energy and planning.
16. National Parks are highlighted in paragraphs 84 – 86 of the SPP under the “promoting rural development” section. These paragraphs re-state the aims of the National Parks and 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 these aims.
17. Paragraph 212 of the SPP highlights that where development affects a National Park it 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 impacts on the qualities for which the area has been designated are clearly outweighed by social, environmental or economic benefits of national importance.
18. SPP also highlights in paragraph 85 that these aims and requirements apply to development outwith a National Park that affects the Park.
19. Wild Land Areas are addressed in paragraph 200 of the SPP which are identified as being very sensitive to any form of intrusive human activity and have little or no capacity to accept development with the requirement set out for Plans to identify and safeguard the character of areas of wild land as identified in the Scottish Natural Heritage 2014 map of wild land areas. In relation to development management, it is highlighted in paragraph 215 that development may be appropriate in some circumstances, and further consideration is required to demonstrate that any significant effects on the qualities of these areas can be substantially overcome by siting, design or other mitigation.

Strategic Policy

Cairngorms National Park Partnership Plan 2012-2017

20. The Cairngorms National Park Partnership 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.

21. Three long term outcomes for the Park are set out as follows:
 - 1) A sustainable economy supporting thriving businesses and communities
 - 2) A special place for people and nature with natural and cultural heritage enhanced and
 - 3) People enjoying the park through outstanding visitor and learning experiences
22. 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.
23. Specific policies of the Plan seek to promote and enhance the special qualities of the Park. In particular Policy 1.3 sets out that large scale commercial wind turbines (defined as more than one turbine and more than 30 metres 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.
24. Also relevant is Policy 2.3 which seeks to conserve and enhance the special landscape qualities of the National Park, with a particular focus on conserving and enhancing wildness qualities and enhancing opportunities to enjoy and experience the landscapes of the Park.

CONSULTATIONS

25. The Scottish National Park Authorities have agreed an arrangement with Scottish Natural Heritage (SNH) on respective roles in advisory casework. This sets out that SNH will take the lead role in considering the impacts on the National Park designation of proposals outside the Park, with the National Park Authority supporting. Accordingly the views of SNH, in so far as they relate to landscape and visual impact and the setting of the Park, are presented below.
26. **Scottish Natural Heritage (SNH)** considers that Green Burn would extend the existing pattern of wind farms in the area but that the addition of Green Burn to this baseline would not result in a significant exacerbation of the existing cumulative impacts.
27. When assessing the likely affects from the proposal on the Cairngorms National Park, SNH consider that Green Burn would introduce views of a wind farm to lower altitude ground within upper Glen Shee, including the A93, a popular gateway to the Park, and the Catearan Trail, one of Scotland's Great Trails. Additionally it would add to wind farm visibility from several popular mountain summits in the Park.

28. There would be patches of visibility along the A93 up to 2.5km within the Park and also from two stretches of a combined length of around 1km along the Cateran Trail within the Park, both at around 8km distance. There is currently no visibility of the neighbouring consented developments from these areas of the Park. Parts of some turbines would be visible on the southern skyline and this prominent location increases their effects. South-bound travellers on the A93 leaving the Park and users of the Cateran Trail would have partial, and probably intermittent, views of hubs and some the blades but SNH consider that the approach to and setting of the Park would not be affected. They also consider that part of these effects could be mitigated by amendments to the layout.
29. Green Burn wind farm would be seen from several popular summits in the National Park such as Beinn A'Ghlo, Creag Leacach and Driesh. Views from these summits include Drumderg and would include the neighbouring consented wind farms. Visualisations from these mountains show that the addition of Green Burn wind farm would not result in an additional significant cumulative impact because it is in a similar landscape context to Drumderg and is more associated with the transition to the settled lowlands.
30. In summary, it is the view of SNH that the proposed Green Burn would extend the existing pattern of wind farms in the area. The addition of Green Burn to this baseline would not result in a significant exacerbation of the existing cumulative impacts. The proposal would introduce wind farm visibility into areas of the Cairngorms National Park currently unaffected by any of the nearby developments. This will include the A93, an important gateway to the National Park, and the Cateran Trail, one of Scotland's Great Trails. Adverse impacts on these receptors would be limited in extent and could be partly mitigated by amendments to the design of the proposal. SNH note there is scope to improve the layout to allow a more consistent design with the neighbouring developments and to improve views from within the National Park.

APPRAISAL

31. As the development proposal is located outwith the Park boundary, the key planning issue for consideration is that of the visual and landscape impact on the special landscape qualities of the National Park including wildness and wildland, views into and out of this part of the Park and how the proposal might affect the opportunities to enjoy and experience the landscapes of the Park. All other matters, including ecology, noise, and general amenity etc., are assessed by Perth and Kinross Council with advice from statutory consultees.
32. The development site (at the closest turbine) is located approximately 7km from the Park boundary. The site is located within an upland area and is very similar to and broadly continuous with, the character type found within the Park, 'The Angus Glens Uplands' in the CNP Landscape Character Assessment 2009.

Environmental Statement – Landscape and Visual

33. The application was submitted accompanied by an Environmental Statement (ES) containing the findings of the Environmental Impact Assessment. Chapter 6 of the ES considers the significant environmental effects which are predicted to occur as a result of the proposed development and concludes that there would be no significant effects on designated landscapes in the study area.
34. In respect of Landscape Character, the ES considers that from the majority of the study area the proposed development would be seen in conjunction with the Drumderg turbines. However, it recognises that the proposed development would extend the visibility of turbines further north along Glenshee, with limited areas of additional visibility where only the proposed development turbines would be seen. The proposed turbines would be larger than the Drumderg turbines, with the difference in height mainly being perceived from closer to the development.
35. In terms of landscape character, significant effects are predicted from the proposed development with the operational and consented wind farms on the part of the Highland Summits and Plateaux landscape where the proposed development would be located. Additionally, parts of the adjacent Middle Highland Glens are also predicted to experience significant effects such as VP21 (within the Park) situated on the A93 close to Lair. These significant effects would arise from Green Burn Wind Farm in addition to the Drumderg Wind Farm as well as other nearby consented wind farm developments. Additionally the proposed development would be seen on its own within the Glenshee LCU of Middle Glens LCT where it would give rise to a significant effect. These effects are anticipated to occur at distances of up to approximately 10 km.
36. Of the twenty six viewpoints assessed, eight are predicted to receive a significant effect of major or major-moderate. This includes Viewpoint 21 (VP21) which is located within the Park. Visualisations for VP21 can be accessed via the following link: http://planningapps.pkc.gov.uk/online-applications/files/25182ECF4539C26F06EE820A3AB47310/pdf/15_01691_FL_M-ES_VOLUME_4_-_FIGURES_PART_15_15_01691_14_-762446.pdf. Unfortunately, given the large size of these images, and the need to maintain them as presented, it has not been possible to include them within the body of this report, or to attach them as appendices. However, this key viewpoint and visualisation will be available to view on display at the committee meeting.
37. Viewpoint 21 would receive close views of the proposed development and some partial view of a single operational turbine (Corb) but with Drumderg wind farm out of view from this location. It is seen that the Green Burn proposal would be viewed on its own from some parts of Glenshee. Receptors affected would include walkers on Mount Blair (VP1); the Cateran Trail (VPs 4, 8, and 12), the A93 road (VPs 15, 17, and 21); residential properties (VPs 15, and 18) and visitors (VP17) which would all experience

localised effects as a result of the proposed turbines. No significant effects on the remaining twenty viewpoints are predicted with effects ranging between moderate and negligible.

38. Of the forty two sequential routes assessed, one is predicted to receive a significant effect, the A93 road. This would be due to the close views of the proposed turbines on sections within Glenshee where the turbines would be prominent and result in a moderate magnitude of change and a major/moderate significant effect.
39. Whilst SNH consider that additional mitigation may be available from changes to layout, the ES asserts that mitigation for the potential landscape and visual impacts from the proposed development has been fully implemented through the design of the proposed development to minimise significant effects. The Design and Access Statement outlines further information on the design process applied and concludes that the final design presents “a balanced and visually cohesive appearance from key views.”

Assessment of the impacts on Special Landscape Qualities (SLQs)

40. In addition to a review of the findings of the ES, and the consultation return from SNH, CNPA officers have undertaken an assessment of the impacts on the special landscape qualities including wildness and wild land.
41. Special Landscape Qualities that are relevant in this part of the Park include:
 - a. Vastness of space, scale and height;
 - b. Surrounding hills;
 - c. Extensive moorland;
 - d. Dominance of natural landforms;
 - e. Wildness;
 - f. Grand panoramas and framed views.

From elevated areas within the Park

42. From elevated areas within the National Park as represented by Viewpoints 2, 20 and 22 (Creag Leachach on south side of Caenlochan Forest, Beinn A’Ghlo and Driesh,) the landscape characteristics that underpin the SLQs include the sense of expanse experienced from the undulating plateau, reinforced by the openness of the rounded summits and the smoothness of the moorland that extends out to the south across the boundary of the National Park which is not visible. From the scraped rounded summits of the plateau, the rocky tops and corries of Gaenlochan, and the Beinn a’ Ghlos the overlapping distinct foothills dip towards the Strath More, there is a dominance of natural landform in the view. Distances from the public roads and settlements are in places significant and there is a great sense of wildness (the upland viewpoints in the Park are all in Wild Land areas).
43. Within this landscape the windfarm will be a distant and small scale addition to the landscape seen alongside other developments, it is unlikely to affect

the experience of these special qualities. Furthermore Green Burn will be visible at some distance in the foothills, associated with other wind farms and seen against a backdrop that also includes obvious blocks of forestry. The wind farm is unlikely to affect these special landscape qualities.

From within Glen Shee as represented by Viewpoint 21 (A93)

44. The SLQs that are relevant in this part of the Park relate to a landscape which is both cultural and natural, the juxtaposition of contrasting landscapes, with framed views and dark skies. The landscape characteristics that underpin the SLQs refer to the glen of the Shee water, contained between distinct and rocky summits, having been continuously settled for millennia. Pre-improvement and 18th/19th century farmsteads located on drier ground, with walled fields, farms and woodland fit around the hummocky glacial-fluvial terrain and run up on to the rugged heather-clad slopes. The result is a richly diverse and integrated landscape. Views to the hills are framed to north and south by the steep sides of the glen.
45. Within this landscape the proposed development would introduce large, moving, skylining, industrial structures into a landscape currently without structures of this size and nature. All would skyline and be seen in a dip on the prominent ridge on the eastern side of Glen Shee. It is considered that the wind farm would adversely affect the balance of the cultural and natural components of this landscape. There will be places within Glen Shee where the presence and movement of turbines will impinge on the experience of these special qualities to a significant degree.

Principle transport route

46. The A93 in this area is one of the principle transport corridors to, from, and through the National Park. This is a key tourist route with a high number of visitors and will shortly be promoted through a government initiative as a National Scenic Route (The Snow Road). The understanding and enjoyment of the park by residents and visitors to the area, in so far as it may be affected by the proposal, is an important consideration.

CONCLUSION

47. It is considered that the submitted information demonstrates that Green Burn wind farm would not have a significant adverse effect on the special landscape qualities experienced in the more elevated parts of the National Park and areas of Wild Land. However, it is considered that the proposal would have a significant adverse effect on the special landscape qualities experienced within Glen Shee, and especially from the A93 a key and well used route into and out of the National Park (approximately 3km) with continuation across the boundary for a further 3km. The sequential landscape and visual impact along this route has been assessed as significant in the ES, and is recognised as being adverse by SNH (although SNH consider

the localised nature, and potential for mitigation through design layout as limiting the affect).

48. The effect results from the presence of the wind farm, the prominent skyline location, the scale of the turbines relative to landform and the juxtaposition with an integrated natural/cultural landscape, and it is high. It is unlikely that micro-siting or design changes would effectively alter this. Furthermore, the ES confirms that the submitted layout was as a result of design evolution and so it is not clear what further capacity for change is available.
49. Therefore, and in respect of CNPA interests, it is considered that the proposal conflicts with the aims of the National Park as referred to in para 84 and 85 of SPP in that the proposal does not conserve and enhance the natural and cultural heritage of the area. This view reflects the weight given to the first aim and is applicable to developments outwith the National Park. It is considered that the objectives of designation and the overall integrity of the area will be compromised and it is not demonstrated that adverse effects on the qualities for which the area has been designated are clearly outweighed by social, environmental or economic benefits of national importance.
50. In respect of specific policies contained in the Cairngorms National Park Partnership Plan 2012-2017 in particular Policy 1.3, it is considered that the proposal is not compatible with the special qualities of the National Park and is not considered to be appropriate in this location outside the Park due to the effect on the Parks landscape setting. The opportunity to enjoy and experience the landscape quality in this park would be compromised by the proposal.

RECOMMENDATION

That Members of the Committee support a recommendation of OBJECTION to the planning application for Erection of 11 wind turbines, control building and ancillary works at Land 1200 Metres west of Drumderg wind farm, Bridge of Cally.

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2 December 2015

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.