

CAIRNGORMS NATIONAL PARK AUTHORITY

Title: CONSULTATION FROM SCOTTISH GOVERNMENT ON APPLICATION UNDER SECTION 36 OF ELECTRICITY ACT 1989

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DEVELOPMENT PROPOSED: WINDFARM COMPRISING 59 TURBINES, 126 METRES IN HEIGHT AND ASSOCIATED INFRASTRUCTURE AT HILL OF DORENELL, MORAYSHIRE

APPLICANT: INFENERGY

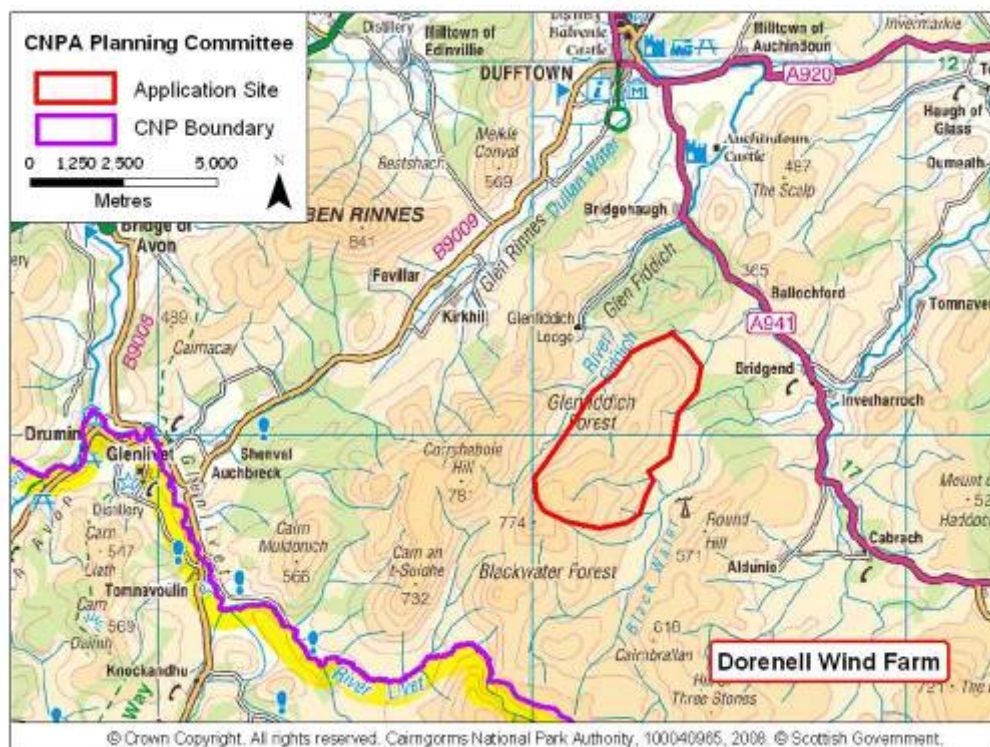


Fig. 1 - Location Plan

SITE DESCRIPTION AND PROPOSAL

1. The site lies in the Moray Council area and consists of some 2,144 hectares being located on the Glenfiddich Estate approximately 3.8 kilometres south west of the nearest settlement, Lower Cabrach, and approximately 8 kilometres south of Dufftown. Access to the site would be gained from the A941 Dufftown to Cabrach Road (outwith the Park). The site is 2.2 kilometres from the boundary of the Cairngorms National Park- the nearest turbine being 2.4 kilometres from the boundary. Each 126m high turbine will have a capacity of 3 MW providing a total of 177 MW. The operational life of the windfarm is proposed as 25 years. The proposal would include the installation of two new wind monitoring masts of up to 85 metres in height. The proposal involves the creation of some 34 kilometres of on-site tracks.
2. The site occupies moorland between the valleys of the Blackwater and Fiddich Rivers. The elevation of the site ranges from approximately 400 metres to 755 metres in height. The most prominent hilltop within the site is Cook's Cairn at 755 metres in the south west part of the site. One public right of way runs to the north of the site from Glen Livet to Glenfiddich. Another from Glenlivet to the Cabrach traverses through the site. The nearest hill range to the site from within the Park is the Ladder Hills. The Park boundary runs below the main ridge line of the Ladder Hills. Between the boundary of the Park and the site the landscape is characterised by rolling moorlands with little sign of infrastructure beyond a couple of tracks.
3. The site is located within an Area of Great Landscape Value in the Moray Local Plan. The River Fiddich drains into the River Spey Special Area of Conservation.
4. The application has been submitted with an Environmental Statement (ES) which covers a wide range of issues including landscape/visual impact, ecology and a carbon balance report.

DEVELOPMENT PLAN CONTEXT

Scottish Government Policy

Scottish Planning Policy 6 (SPP6) March 2007

5. SPP6 sets out Scottish Ministers Targets of generating 40% of Scotland's electricity from renewable resources by 2020. The Scottish Ministers will continue to support the full range of renewable generation technologies.

6. 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.
7. 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.
8. 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.
9. 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.
10. With regard to tourism and recreational interests it is noted that tourism is an important element in the economic, social and environmental and cultural well-being of Scotland. The beauty of Scotland's landscape attracts many visitors and sustainable tourism supports many small businesses and remote rural and island communities. Those areas that have been designated for their scenic importance are covered by other policies in this guidance.

NPPG 14 Natural Heritage

11. ...where a priority habitat or species would be affected, prior consultation with the European Commission is required unless the development is required for public health or safety reasons.
12. In relation to national designations (National Scenic Areas,...National Parks), renewable energy projects should only be permitted where it can be demonstrated that 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 the social and economic benefits of national importance....
13. In many areas of Scotland, tourism and recreation support local economies and to varying degrees such activities depend on the quality of the environment, particularly the landscape. This does not mean that renewable energy developments are incompatible with tourism and recreation interests. Sensitive siting can successfully minimise adverse impacts, particularly visual impacts, but it is unrealistic to expect such developments to have no effect at all. Opinions are divided as to whether some renewable energy developments, such as wind farms or hydro schemes, may themselves be of interest to tourists and the extent to which their existence can be compatible with recreational pursuits such as hill walking.
14. The characteristics associated with wind farms raise a number of issues that require to be considered, and where appropriate addressed. These relate to:
 - **Visual impact** – the size and scale of development and its relationship to the characteristics of the locality and land form in which it is to be built will be a relevant consideration. The visibility of a wind farm may in some circumstances raise concerns, although distance as well as landscape and topography will affect its prominence. Additionally the cumulative impact of neighbouring wind developments may in some circumstances be relevant.
 - **Landscape** – the character of the landscape and its ability to accept this type of development, including associated infrastructure, will be an important consideration...A cautious approach should be adopted in relation to landscapes that are valued, such as National Scenic Areas or National Parks...
 - **Birds and habitats** – the importance of complying with international and national conservation obligations must be recognised...
15. 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 areas which might adversely affect their wild land character.

16. 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 Act or European Directives, or identified as priorities in the UK Biodiversity Action Plan.
17. While conservation of the natural heritage will be a key objective in any National Park, the Government considers that due weight must also be given to the social and economic interests of local communities.planning authorities should take particular care to safeguard the landscape, flora and fauna of Loch Lomond and the Trossachs and the Cairngorms.

PAN 45 Renewable Energy Technologies

18. Scotland has a variety of landscapes. Some will be able to accommodate wind farms more easily than others, on account of their landform and ability to limit visibility. Some are highly valued for their quality. There are no landscapes in which a wind farm will not introduce a new and distinctive feature. Given the Scottish Ministers' commitment to addressing the important issue of climate change and the contribution expected from renewable energy developments, particularly wind farms, it is important for society at large to accept them as a feature of many areas of Scotland for the foreseeable future.
19. This is not to suggest that areas valued for their international or national landscape and nature conservation interest will have to be sacrificed. Nor that elsewhere, attempts to lessen the impacts by integrating the development into the surrounding landscape would not be worthwhile. On the contrary, it emphasises the need to be taken of regional and local landscape considerations. Development that has been carefully sited and tied into the surrounding landscape will still be visible, but the impact will be less than had this effort not been made and the development left less well related to its surroundings.

Moray Local Plan 2000

20. Policy L/ED10 Renewable Energy Proposals considers that proposals for renewable energy will be considered favourably where they meet the following
 - they are compatible with policies to safeguard and enhance the built and natural environment. High design and siting standards will be sought in all new developments
 - they do not lead to permanent loss or permanent damage, to prime agricultural land
 - they are compatible with tourism and recreation facilities
 - they do not interfere with aircraft activity
 - they do not result in unacceptable impact in terms of visual intrusion, noise, electromagnetic disturbance, pollution, traffic generation or damage to the local ecology
 - they do not result in unacceptable cumulative impact
21. Proposals may be required to provide de-commissioning arrangements to illustrate how sites will be reinstated.
22. The site is located within an Area of Great Landscape Value as indicated by the Moray Plan.
23. Policy L/ENV7 Areas of Great Landscape Value considers that development proposals within AGLV's will only be permitted where they incorporate high standards of siting and design for rural areas and where they will not have a significant adverse effect on the landscape character of the area. The Council will require detailed proposals covering site layout, landscaping, boundary treatment, building design and material finishes to be provided with applications. The Council will seek a Direction from Scottish Ministers to restrict the formation of vehicle tracks above the 150 metre level in AGLV's.

24. The Moray Local Plan has been through Inquiry stage and the Council has decided to treat it as a material consideration, although it must be stressed that the 2000 Plan is still the statutory plan for the area. Two key policies are set out below.

POLICY E6: NATIONAL PARKS AND NATIONAL SCENIC AREAS (NSA)

25. Development proposals which adversely affect National Parks or National Scenic Areas will be refused unless the developer demonstrates to the satisfaction of the Planning Authority that:
- a. the overall objectives of the designated area would not be compromised, and
 - b. any adverse impact is significantly outweighed by the national benefits resulting from the development.
26. Development proposals which would have an adverse effect on an Area of Great Landscape Value will be refused unless:
- a. they incorporate the highest standards of siting and design for rural areas,
 - b. they will not have a significant adverse effect on the landscape character of the area,
 - c. they are in general accordance with the guidance in the Moray and Nairn Landscape Character Assessment.

ER1: RENEWABLE ENERGY PROPOSALS

27. Renewable energy proposals will be considered favourably where they meet the following criteria:
- a. they are compatible with policies to safeguard and enhance the built and natural environment
 - b. they do not lead to the permanent loss or permanent damage to, prime agricultural land,
 - c. they are compatible with tourism/recreational interest and facilities, they do not interfere with aircraft activity,
 - d. they do not result in an unacceptable impact in terms of visual appearance, landscape character, noise, electro-magnetic disturbance, watercourse engineering, peat land hydrological impacts, pollution, traffic generation or damage to the local ecology, and
 - e. they do not result in an unacceptable cumulative impact.

28. Proposals are required to provide “decommissioning arrangements” to illustrate how the site will be reinstated if and when the plant ceases to operate. This may be enforced through a section 75 agreement.
29. Commercial wind energy developments should be located within a Preferred Search area identified in the Wind Energy Policy Guidance and meet the above criteria.

Cairngorms National Park Plan 2007

30. **The Cairngorms National Park Local Plan includes Section 5.1 on Conserving and Enhancing the Park. Strategic objectives include Objective a) which seeks to maintain and enhance the distinctive landscapes across the Park.** This objective notes that the distinctive landscape character is a result of the interaction of landforms, geophysical processes, habitats species and land management. It is one of the prime reasons people enjoy the Park and is recognised as nationally important. Within the landscape there is dynamic change and evolution but management and development of the Park should retain and enhance the distinctive character and restore areas of degraded landscape. Under Energy in the Conserving and Enhancing part of the plan it is noted that there is considerable opportunity in the Park to develop renewable sources of energy (including heat) such as biomass, wind, hydro, geothermal and solar to serve communities and households. Large scale windfarms are not appropriate in the National Park due to landscape and natural heritage impacts.
31. The plan goes on to mention that the designation of the National Park has highlighted the national importance and coherence of the landscape qualities throughout the area. **Objective b) in conserving and enhancing seeks to conserve and enhance the sense of wildness in the montane area and other parts of the Park.** Large areas of the Park, not restricted to the montane area, are valued for their innate qualities and the experience of wildness that many people come to the area to enjoy. This sense of wildness and current enjoyment should be safeguarded from encroachment by human infrastructure, inappropriate activities or insensitive management and use. New tracks, paths, roads, structures, motorised access, aircraft and organised outdoor events should seek to minimise effects on the experience of wildness. The removal of inappropriate vehicle tracks and the repair of badly eroded paths should be pursued where possible.

32. **Objective c)** seeks to ensure development complements and enhances the landscape character of the Park. All new development and infrastructure necessary to meet the needs of those living and working in the Park should be designed to complement and enhance the landscape character of its setting. The potential impact of public and private roads, masts, utilities, renewable energy developments (in and where relevant beyond the Park) road signs and all other man made artefacts will be assessed to ensure that designs and locations do not detract from the landscape character.
33. **Action point 3h** seeks to increase the populations of native raptors on productive grouse moorlands. Within this initiative is a key point to increase the golden eagle population so that it reoccupies its historic range and realises its potential high levels of productivity.
34. **Strategic Objective a)** under Energy in the plan seeks a contribution to national targets for greater renewable energy production through increasing community, business and domestic scale renewable energy schemes. This objective notes that there is a need to raise awareness of the range of renewable energy sources available and to encourage the necessary supply chains and infrastructure. By supporting small scale schemes within communities, in halls, houses, land-based industries and business, the Park can help Scotland achieve its national targets and work towards an efficient use of energy within the Park. The public sector should also take a lead in using renewable energy in its own facilities within the Park.

CONSULTATIONS

35. The **CNPA Landscape Officer** raises points of concern as follows:
 1. Wide visibility from within the National Park area
 2. Dominant visual impact upon upland areas that are contiguous to landscape character of park thereby affecting landscape character and the setting of the National Park
 3. Impacts upon the strength of wildness especially within the Ladder Hills area.
 4. Cumulative effects from other windfarms upon the landscape character and wildness qualities of the NE edge of the National Park.
 5. Affects upon the wildness qualities of the mountain core within the NSA directly and cumulatively.

6. Interruption of views to and from the National Park to surrounding important locations.
36. The magnitude of impact of the above affects are highly significant to the aims of the National Park and so I would strongly object to this proposal.
37. **CNPA Heritage and Land Management (Ecology)** Comment that impact of this, and other, windfarm proposals in the area on the dispersal movements of golden eagles from, and their nesting potential in, the Cairngorms National Park is a cause for concern.
38. The ES describes how eagle movements on the site were collated through the use of human observers on the site. Given the species' keen senses and wariness of humans, it is possible that the use of human observers at the site causes avoidance behaviour in eagles, leading to the level of eagle activity in an area being underestimated.
39. It is understood that the Dorenell ridge of the Blackwater Forest is used by foraging golden eagles. It is understood that eagles have nested in this area in the past so the area could in future provide a nesting opportunity.
40. In the Cairngorms National Park Plan, Action 3h of the Priorities for Conserving and Enhancing Biodiversity & Landscapes includes:
41. "...increase the golden eagle population so that it reoccupies its historic range and realises its potential high levels of productivity."
42. Observations show that the area is frequented by two subadult eagles. In addition, satellite tracking data shows that Alma, a subadult female eagle which fledged from Glenfeshie in the CNP, is known to have foraged and roosted in the vicinity of the application site. Another satellite tracked young eagle, fledged from an estate in the CNP, is also known to have occurred across the area. It appears that the Blackwater Forest may be an important area for dispersing golden eagles from across the Cairngorms National Park, and has considerable potential to become once more a home range for a residential breeding pair. There is a risk that golden eagles will be displaced from the Dorenell ridge by the windfarm development and will therefore avoid an area of otherwise potentially suitable foraging habitat.
43. **The CNPA Economic and Social Development Group** comment as follows.

- The visual impact from various sites in the Park is significant. The report acknowledges that the development will impact on the quality of experience, particularly for walkers, who are particularly likely to hold negative views about the landscape and environmental impact of windfarms.
- The report (21.94) says that the willingness of tourists to revisit the area will not be affected. However it also states that 8% of visitors felt that the development would have a negative impact on their willingness to re-visit (as against 6% positive impact). In my view, this will have a negative economic impact.
- Tomintoul & Glenlivet Highland Holidays have raised concerns, detailed in the report, about the effect of the development on their USPs - Walking, Wildlife & Whisky. I would echo these concerns.

APPRAISAL

44. The Scottish Government will consider a wide range of factors in determining the application including the view of consultees.. As previous proposals for windfarms outside of the Park the scheme will be considered based upon its implications for the statutory aims of the Park.
45. The developers Environmental Statement (ES) has considered the siting and design of the proposal from a number of viewpoints within the Park.

IMPLICATIONS FOR THE AIMS OF THE NATIONAL PARK

Conserve and Enhance the Natural and Cultural Heritage of the Area

46. As with previous windfarms there can be concerns about how such proposals may impact upon the landscape of the National Park and how they may impact visually.



Fig 2 View of site from Ladder Hills, turbines in front and to side of hill (Cook's Cairn) in middle of shot.



Fig 3 View towards Cook's Cairn from Cairn Dulack (above Well of the Lecht)

47. In terms of landscape character the significance of landscape impacts as estimated by the ES are slight or negligible for many of the landscape character types in the area. This is perhaps because the siting and design of the windfarm mitigates views of

it from many of the lower landscape character types such as agricultural and forestry areas which tend to be located in the straths. However, the higher landscapes in the vicinity of the windfarm are simple upland and plateau hills and moorland and forest. The ES identifies these character types as being subject to substantial landscape impacts. Given the location of the windfarm in an upland area that is contiguous in character with the land within the Park boundary the effects on this character type of land would also be likely to be substantial. This is noted by your Landscape Officer and is a key concern as it effects the landscape character and setting of the Park. This opinion is ably illustrated by fig 2 of this report which shows no difference in the character of the land between the viewpoint for the photograph (within the Park) and the site itself. This also has implications regarding whether the proposal can be considered to accord with the Moray Council policy on Areas of Great Landscape Value. This designation covers the site and much of the Moray area of the Park. Consequently I would recommend raising concerns with regard to this issue.

48. With regard to visual impact a range of viewpoints from within the Park have been considered in the analysis of the proposal.
49. Because of the location and siting of the turbines taken together with the topography the views of the turbines from lower ground within the Park are limited, However, there more widespread occurrences of visibility on middle and higher ground. From the Braes of Glenlivet where there will be some visibility. The ES classifies the impact as slight adverse. A viewpoint has been included from Tomintoul. However the ES considers there to be no impact due to the topography and land cover between village and the site.
50. A view point has been taken from Meall Gaineimh (Ben Avon) which is assessed as being subject to a slight adverse impact and is perhaps representative of the eastern side of the higher Cairngorm Mountains. A viewpoint analysis has also been taken from Morven on Deeside which would be subject to a moderate adverse visual impact. However, it is important to note that this viewpoint is only rated by the ES as being of medium sensitivity. Other ES's have rated this viewpoint as being of high sensitivity which could increase the level of visual impact in the analysis.
51. The closest main range of hills to the site within the Park are the Ladder Hills. A viewpoint analysis has been made from Little Geal Charn at the eastern end of the range from where a substantial visual impact is identified. As with other proposals I

would raise concern that such a level of impact upon an area within the Park is not one that should be considered lightly and is an obvious concern of the CNPA Landscape Officer.

52. Figure 2 shows little by way of human infrastructure between the park boundary and the site leading to concern for potential reduction in the wildness values of this area by the introduction of such large structures. Concern is also raised by the Landscape Officer with potential effects of the proposal upon the wildness value of the mountain core within the National Scenic Area.
53. Cumulative impact of this proposal in combination with other applied for proposals is also an issue. The cumulative analysis considers the effects of the proposal in combination with the Kildrummy (Hill of Snowy Slack) scheme which is currently the subject of a planning appeal. The proposal does not consider Clashindarroch as it has been dismissed at appeal. However, it is entirely possible that this proposal could re-appear in some form. The Cushnie Windfarm proposal on Pressendye has been excluded from the analysis despite being a current application. The Dorenell, Kildrummy, Clashindarroch and Cushnie windfarm proposals would all be readily visible from the viewpoint at which the figure 2 photograph is taken. If all of these windfarms were to be developed then in my view the Ladder Hills would be subject to substantial cumulative visual impacts.
54. An issue raised by the CNPA Landscape Officer relates to views towards the Park. A visual analysis from Ben Rinnes shows that many of the turbines would be visible from that viewpoint leading to a substantial adverse impact from that viewpoint which by definition of being a popular hill for walkers is a key viewpoint towards the Park.
55. The concerns of the CNPA Ecologist are set out in the consultations section of the report. It would appear that the area holds the potential for future populations of golden eagle and there is clear evidence of eagles using the site. Concern has also been raised that the use of human observers for the ES could cause avoidance behaviour in the raptors. As noted the "...increase the golden eagle population so that it reoccupies its historic range and realises its potential high levels of productivity is an action point in the National Park Plan. Consequently points are raised at the end of the report that the proposal may conflict with this intention.

Promote Sustainable Use of Natural Resources

56. At a fundamental level the use of wind power is contributing to a reduction in green house gas emissions and can be described as a sustainable use of natural resources. It could be argued that it would be more sustainable if facilities of this scale are sited closer to the large centres of population where most of the power generated will be consumed. In tandem with this the view could be taken that smaller developments servicing local communities would be the most sustainable.
57. Given Government policy on the issue of wind farms the proposal may contribute to renewable energy in the widest sense. There have been some concerns about the carbon outputs of constructing windfarms, particularly on peaty soils. In this instance the ES includes a carbon balance report. The CNPA would welcome this and would request that the Scottish Government consider this as part of determining the proposal.

Promote Understanding and Enjoyment/Promote Sustainable and Economic and Social Development of the Area

58. The quality of the environment of the Park and its setting are clearly important in terms of promoting understanding and enjoyment of the area.
59. The CNPA would again welcome that in this instance a tourism impact assessment has been carried out. The assessment also considered cumulative impact with other proposals. It was considered that the proposal would be unlikely to deter tourists from visiting the area. However, for a few tourists, some walkers and hillwalkers in particular the proposal would reduce the quality of their experience and this is confirmed by the CNPA Economic and Social Development Group. Again, as with the landscape and visual assessment the addition of the Cushnie and Clashindarroch windfarm proposals would potentially have a more significant effect and this is raised as a direct concern at the end of the report.
60. With many previous proposals the CNPA have taken the view that if the landscape and visual impact of a proposal raised concerns then there would be likely to be a consequent implication for understanding and enjoyment. However, since these responses the Glasgow Caledonian University report on the Economic Impacts of Windfarms on Scottish Tourism has been published. In line with the general recommendations of the report an assessment has been made in the ES of the tourism resource within the area including an element of direct research where a range of tourism providers and visitors have been asked

for their view on the proposal. This tends to indicate that visitors would not be deterred from the area as a result of the scheme. However, the analysis recognises that the enjoyment of the area by hillwalkers and those taking part in traditional sporting activities would be reduced. In addition, with regard to traditional sporting activities there is a recognition that a small proportion of this core group is expected to be significantly affected by the development to move elsewhere and not return to Glenlivet. An estimate is given that this may reduce tourism activity by 2.5%. However, the ES considers this negligible overall. The response from the CNPA Economic and Social Development Group considers that there will be some negative impact and this is raised in the recommendation.

61. A key factor of relevance in the report as pointed out in the past by the CNPA's Economic and Social Development Group points to clear evidence in the study that the impact of windfarms is perceived to be greater on remoter, wilder landscapes. The report also recognises the importance of tourism to such areas and that local economies in such areas can tend to be fragile.

62. There is a recognition that Scotland's National Scenic Areas (NSA's) and National Parks (and their buffer areas) could provide an appropriate framework for protection, not only from windfarms but also from other intrusive forms of development such as grid lines and pylons. The report does not consider what might be an appropriate buffer area for a National Park, although the associated map shows a 10km buffer around NSA's. The Economic and Social Development Group has previously recognised that this may be a sensible recommendation that recognises the higher proportion of visitors to National Parks that are attracted by the landscape value. This, consequently would allow for retaining areas of wild land quality so that Scotland continues to have destination options for visitors who do not wish to visit areas where wind farms are developed.
63. The construction of the proposal would be likely to have a significant positive economic impact but it is difficult to assess whether this would accrue in any significant way to the communities of the National Park given that the site and routes into it fall outside of any of the Park's villages.

RECOMMENDATION

64. That members of the Planning Committee support a recommendation to **OBJECT** to the proposal for a windfarm at Dorenell raising the following points:
 1. The CNPA would raise concern with regard to the proliferation of windfarm proposals in the vicinity of its boundary. It is clear that the potential cumulative impact of windfarms is of great concern for the quality of the National Park and its setting. The combination of a number of proposals close to the Park boundary would be likely to result in a substantial detrimental visual impact upon the National Park that would be contrary to both NPPG14 and the Cairngorms National Park Plan 2007.
 2. The CNPA would raise concern about the potential impacts of the proposal upon wild land value on and adjacent to the CNPA boundary and within the central mountainous area. The proposal would be contrary to strategic objective b) under Conserving and Enhancing of the National Park Plan which seeks to conserve and enhance the sense of wildness in the montane and other areas of the National Park. The proposal would also be contrary to elements of NPPG 14 on Natural Heritage which recognise that mountain 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 areas which might adversely affect their wild land character”.

3. The CNPA would raise concerns about the potential impacts of the proposal upon populations of golden eagle which may use areas within the National Park and the application site. The Cairngorms National Park Plan 2007 as approved by Scottish Ministers includes an action to “...increase the golden eagle population so that it reoccupies its historic range and realises its potential high levels of productivity.”
4. The CNPA welcome the fact that the proposal includes a tourist impact assessment including original research. However, some concern is raised regarding the potential economic impacts in the reduction of the quality of experience for walkers and those taking part in traditional sporting activities. This is also an issue with regard to the overall cumulative impact of windfarm proposals in the area and consequently, their potential effect on the tourist resource.
5. The CNPA welcome the inclusion of a ‘carbon balance report’ in the ES and would request that the Scottish Government satisfy itself regarding the carbon footprint balance between the construction of the scheme and the energy benefits it offers.

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Date 28 August 2008

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