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## CAIRNGORMS NATIONAL PARK AUTHORITY

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**Title:** **PROPOSED WINDFARM AT GLENESK, TOMATIN**

**REQUEST FOR A SCOPING OPINION UNDER THE ENVIRONMENTAL IMPACT ASSESSMENT (SCOTLAND) REGULATIONS 1999**

**Prepared by:** **NORMAN BROCKIE, PLANNING OFFICER (Local Plan/Policy)**

The proposal is for a scheme of up to 25 wind turbines, each with a capacity of 2.0MW, with a tip height of 107-117m. At this stage we are just being asked for our opinion on issues that we think should be covered by the EIA (Environmental Impact Assessment), which the applicant will carry out prior to their planning application.

The site is approx. 6km east of Tomatin, 12 square km stretched over several hilltops on the Balvraid Estate (but also partly on Forestry Commission land). See Appendix 1 for location map. The site is also on the NW boundary of the Park, and may indeed cross the boundary, something which will need to be carefully checked.

### **Cairngorms National Park**

The proposed scheme is on the boundary of the Cairngorms National Park (CNP). Due regard is therefore required for the National Planning Policy Guidelines (NPPG) 14 (particularly paras 24, 25 and 33) and NPPG6 Renewable Energy Developments (para 22, 35, 36). Renewable energy projects should only be permitted where it can be demonstrated that the objectives and aims of the CNP 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.

The input of the CNPA will differ somewhat from other consultations in that everything is assessed against national and local guidance & policy, but equally importantly we assess proposals for their significance to the four Aims of the Cairngorms National Park, which are:

- (a) to conserve and enhance the natural and cultural heritage of the area;
  - (b) to promote sustainable use of the natural resources of the area;
  - (c) to promote understanding and enjoyment (including enjoyment in the form of recreation) of the special qualities of the area by the public; and
  - (d) to promote sustainable economic and social development of the area's communities.
- Where there is a conflict between the aims that cannot be resolved, the first aim must be given greater weight over the others.

While this proposal is not within the CNP, being on the boundary it can still have a considerable visual impact on the landscape and setting of the Park.

**Comments on the Scoping Option Report;** by Enviros Energy UK Ltd, dated October 2003:

2.5.1 Final para. "Site selection excludes sites where development is likely to have a significant adverse impact on regionally or locally designated sites". There is no mention here of the nationally designated site which the proposal abuts, e.g. the CNP.

2.5.2 "A total of 14 sites (for a windfarm) in Scotland were identified". The EIA should identify these sites and the reasons why they were discounted.

4.2 Final para. The site "lies approx. 6km from the Cairngorms National Park" As noted earlier, the site may actually cross the Park boundary; this would make the planning application open for call-in for determination by the CNPA.

4.4 Construction Details: "After construction the compound (for offices, storage & parking, 50x100m) would be removed and the site cleared of hardcore, with the ground re-graded to a natural profile". The making good of all such sites will require a lot more than just re-grading; full details of landscaping and planting will be required.

6.6 Summary Method of Landscape and Visual Assessment. This section takes no cognisance of the CNP, whose existence will be central to much of this assessment.

6.11 Cumulative assessment. There are two or three other windfarm proposals in this general area, these should all be mapped within the EIA.

Appendix A: Proposed List of Consultees: CNPA should be added to the list of consultees. How many of this proposed list have been consulted on the Scoping Report?

The designation of the CNP as a landscape of national importance should be added to all assessments of/references to designations.

## **Additional Issues for the EIA:**

### **a) Description of the Development:**

All elements of the proposed development should be fully detailed, with diagrams where possible.

**Turbines:** The exact positioning and layout of the turbines is obviously pivotal to their impact on the local landscape, and the Cairngorms National Park.

**Access:** If the existing tracks are to be upgraded (to a standard for construction traffic) then we need to know the extent of this and the proposed materials, and the mitigation measures to be taken. Likewise, for the new tracks we need to know the method of construction and materials proposed. New tracks will also need drainage provision, which will have significant environmental impacts. The visual impact of roads and tracks should be considered as well as the environmental impact.

**Buildings:** The Control Building, with a footprint of 50x50m, and the substation (35x20/30m) should be designed & built to high sustainable standards, and with visual impact reduced as much as possible. Building underground/into hillsides should be an option to reduce the visual impact.

**Cable links:** The cable connection to the national grid should be underground for its entire route; details are required for this installation.

**Borrow Pits:** Measures are required to return these to a visually and environmentally acceptable condition.

**Crane Hardstanding Pads:** Adjacent to each turbine is an area of 20x30m where the soft ground is excavated and filled with compacted stone. Are these areas permanent or will they be reinstated?

Will the development lead to support facilities and ancillary developments in the future?

We will require a life-cycle analysis for the scheme and a plan for eventual decommissioning/reinstatement.

There should be a financial appraisal of the whole scheme and its resulting socio-economic effects.

While the environmental impact of this scheme can be addressed in the longer term, the development process itself will have a huge shorter-term impact which must also be addressed.

Mitigation measures for archaeology, traffic & transportation and socio-economic effects need to be included.

While this proposal is not within the CNP, being on the boundary it can still have a considerable visual impact on the landscape and setting of the Park. Of prime importance to the CNPA will be the ZVI (zone of visual influence), which will be a computer-generated map, and photomontages. For the latter there needs to be an agreed methodology for production and presentation; the type of focal length lens used, and the scale of printing, can greatly alter the image produced. The photos in Appendix 2 show that the proposal may be highly visible from the A9 and Spey Valley, as well as the Cairngorms Massif itself.

**b) Description of the Environmental Impacts:**

We would expect a comprehensive description and assessment of all the environmental impacts resulting from the proposed development; Plus

Further information required on:

- the impacts on field sports, especially stalking and grouse shooting.
- the impacts on transportation and access
- the impacts of the proposed developments; e.g. drainage to new access tracks.
- the downstream hydrological impacts of the scheme; flora and fauna downstream of the site should be included in baseline monitoring.
- the impacts on informal recreational pursuits, such as walking, cycling etc.

We would also like a combined impact assessment, e.g. more visitors will have an effect on breeding birds, which could affect raptors...

There should also be a monitoring and auditing plan for the completed scheme's impacts, on at least a bi-annual basis, with remedial actions.

Mitigation measures for ornithology and hydrogeology & hydrology need to be included.

**c) Analysis of Environmental Impact Including Methodology:**

All the issues covered in Section 2 need to be addressed as a minimum under this section. The degree of significance of impact must be pre-agreed to an established set of guidelines, possibly through SNH and ourselves.

**d) Description of Methods to Offset Adverse Environmental Effects:**

This needs to cover nature conservation concerns as well as landscape/visual impact mitigation measures, for all sections of the proposed development.

The actual siting and layout of the proposal will either diminish or increase the visual impact on the Park, e.g. the farther from the southern site-boundary that turbines are sited, the less the visual impact is likely to be.

**e) Non-Technical Summary:**

This should be written in simple non-technical terms to describe the various options for the proposed development, and the mitigation measures against the adverse environmental impacts which would result.

**f) Difficulties in Compiling the Additional Information:**

Any environmental assessment should be undertaken by a qualified and approved body/group. SNH can advise on the types of surveys that are required, the organisations/companies who are qualified to carry-out such work, and the bodies who can advise on other complex issues (such as assessing landscape and visual impact assessment, and access issues).

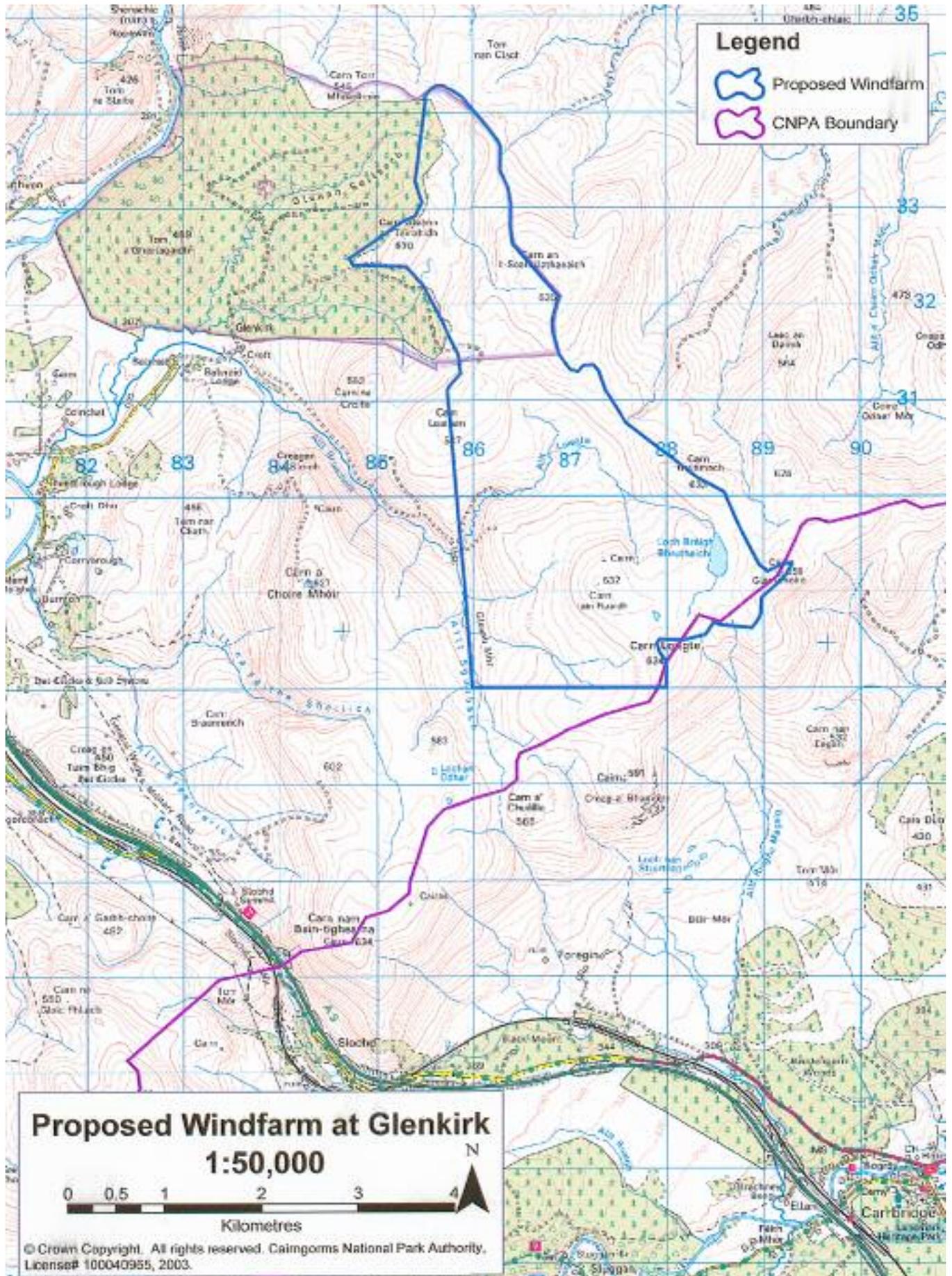
**Conclusions:**

While this application is not within the Park boundary (subject to confirmation) it will still have an impact on the landscape and setting of the Park, which is after all a landscape designated for its national importance.

**Norman Brockie**  
**Planning Officer (Local Plan/Policy)**  
**CAIRNGORMS NATIONAL PARK AUTHORITY**

**17th November 2003**

APPENDIX 1: LOCATION MAP OF PROPOSAL SITE.



APPENDIX 2: PHOTOGRAPHS.



Looking towards the Lairig Ghru from the proposed site.



Looking towards the site from near Carrbridge.



Looking towards the site (horizon, centre-right) from near Dulnain Bridge.