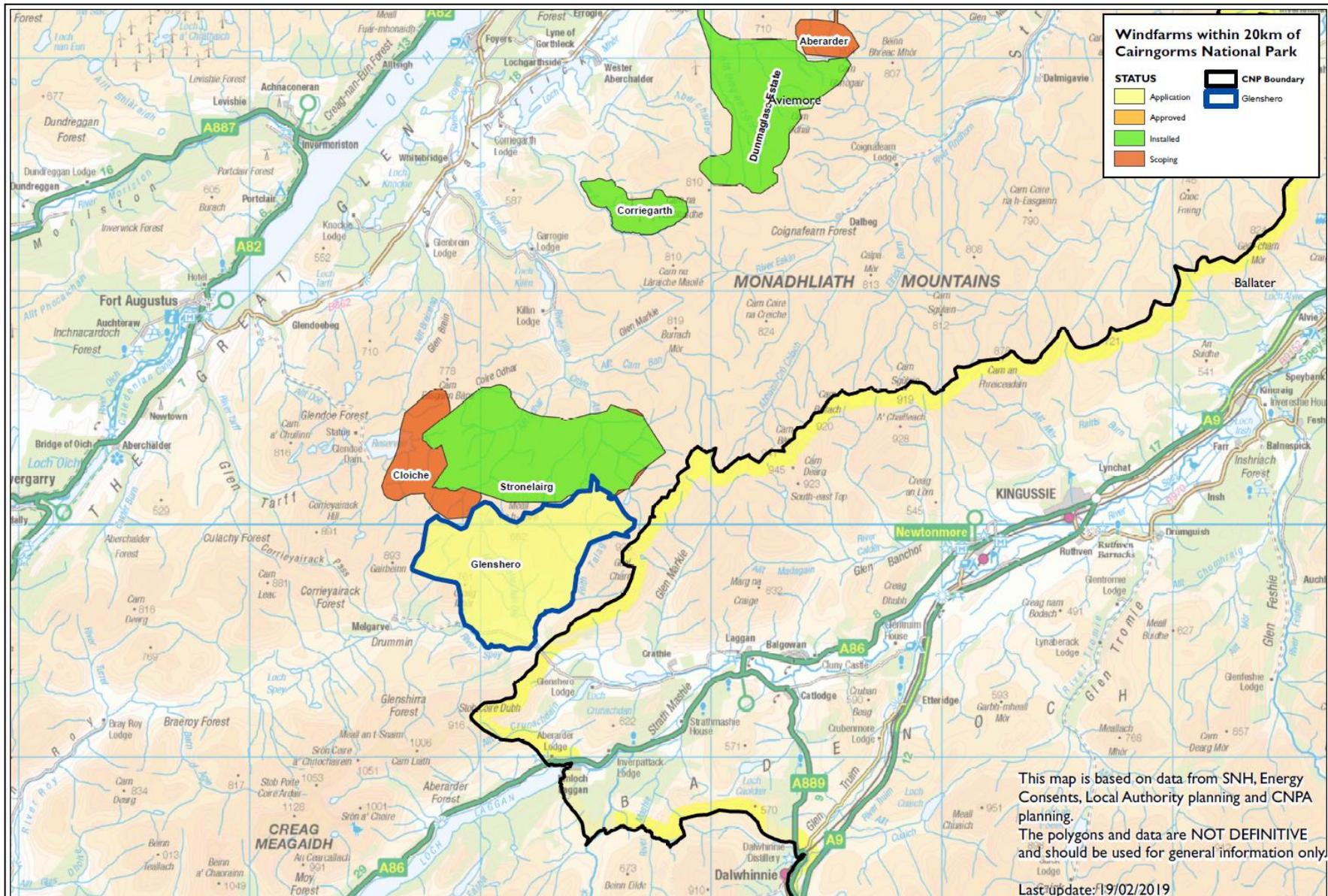

CAIRNGORMS NATIONAL PARK AUTHORITY

DEVELOPMENT PROPOSED:	
Consultation from Scottish Government Energy Consents Unit	
Proposed Glenshero Windfarm, near Laggan, Highlands	
REFERENCE:	2018/0379/PAC
APPLICANT:	Glenshero Wind Farm
DATE CONSULTED:	5 October 2018
RECOMMENDATION:	Objection
CASE OFFICER:	Emma Wilson, Planning Officer

CAIRNGORMS NATIONAL PARK AUTHORITY
Planning Committee Agenda Item 9 24/05/2019



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PURPOSE OF REPORT

1. The purpose of this report is to provide a consultation response to the Scottish Government Energy Consents Unit on an application submitted under Section 36 of the Electricity Act 1989 for a proposed wind farm located to the south west of the Cairngorms National Park. The Scottish Government are the determining Authority for this application as the output is more than 50 MW. The application is accompanied by an Environmental Impact Assessment (EIA).
2. The planning issues being considered in relation to this consultation are the impacts upon the landscape character and special landscape qualities of the National Park.
3. Under the existing protocol 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 National Park, and their comments are included in this report.

SITE DESCRIPTION AND PROPOSED DEVELOPMENT

4. The application site covers an area of approximately 37.4 square kilometres and is located within the Glenshero Estate approximately 5 km north of the A86 and approximately 8 km west of the village of Laggan.
5. The application site lies approximately 0.5km from the Cairngorms National Park's western boundary at Garva Bridge. The nearest turbine (referenced T35) to the Park's western boundary (north of Geal Charn) will be located a distance of approximately 1.2km.
6. The site comprises higher ground to the north and contains two main watercourses, the Allt Coire Iain Oig and the Allt Gilbe, which run southwards off the highest ground and join the River Spey on the site's southern boundary.
7. There are areas of coniferous plantation woodland located within the central southern part of the site, between the Allt Coire Iain Oig and the Allt Gilbe and on the southern site boundary. The Beauly-Denny 400 kV overhead line ("OHL") intersects the site, on its southern boundary (EIAR Figure I.1), and lies immediately north of an undesignated length of General Wade's Military Road. The majority of the site comprises open moorland used for grazing livestock and for rearing grouse. The nearest residential properties are located to the south of the site, alongside the minor road which leads from Strathmashie to Glenshero Lodge and Garva Bridge. No properties are located within the application site.
8. The recently constructed Stronelairst Wind Farm is located adjacent to the site's northern boundary.
9. The proposal is for a wind farm of 39 turbines, 135m to blade tip with approximately 28km of new access track – the proposal includes using 18.5km of the existing Stronelairst wind farm tracks. The proposed turbines form two distinct clusters of

16 and 23 turbines which collectively extend over an area of approximately 37 square kilometres.

10. Vehicular access will be taken from the B862 to the east of Fort Augustus. This access also serves the existing Stronelairg Wind Farm.
11. The proposed turbines are standard three blade horizontal axis design. The grid connection route to the Melgarve Substation would be by underground cable and would generally follow the route of the existing Stronelairg Wind Farm cable; however, the final location would be subject to a separate application by the relevant network operator
12. A copy of the site location and layout plans is attached in **Appendix I – Plans**. Full details of the development are available on the Scottish Government’s Energy Consent Unit website on this link using reference Glenshero:
<http://www.energyconsents.scot/ApplicationSearch.aspx?T=1>
13. Ancillary infrastructure is proposed as follows:
 - a) Turbine foundations;
 - b) A wind farm control building/substation compound;
 - c) Crane hardstanding area at each turbine base with a maximum permanent area of 1,200 m²;
 - d) total of approximately 28 km of new on-site access track and turning points with associated watercourse crossings (the proposed development would also make use of 18.5 km of existing tracks within Stronelairg Wind Farm);
 - e) Two temporary site entrance offices and layby areas with a maximum total area of 900 m² each;
 - f) Up to three temporary site construction compounds and laydown areas with a maximum total area of 4,000 m² each;
 - g) Underground cabling linking the turbines with the substation;
 - h) Search areas for up to 7 temporary mineral workings, with a total maximum search area of 118,424 m² and a predicted extraction volume of 195,000 m³ identified; and
 - i) A concrete batching plant, and associated ancillary works and engineering operations.
14. The application is supported by an Environmental Impact Assessment Report (EIAR) which includes a chapter on the Landscape and Visual Impact of the development. A Landscape and Visual Impact Assessment (LVIA) has been undertaken which includes visualisations, photomontages and wirelines. Zones of Theoretical Visibility maps (ZTVs) have also been generated. These identify the potential extent of the proposed development’s visibility over a study area. A number of viewpoints have been assessed to illustrate visibility from the Cairngorms National Park and copies of relevant material will be available at the Planning Committee meeting.
15. In terms of potential impacts upon the Cairngorms National Park the EIAR concludes that the majority of the Park would not be subject to cumulative effects. From the relatively small number of areas that would afford views of the proposed wind farm, including the core Cairngorm massif, cumulative effects attributable to the proposed development would be moderate to moderate/minor due to its

distance relative to other wind farms, and its proximity to the existing Stronelaig array. There will be significant localised effects at a small number of summits adjoining the western boundary of the National Park (e.g. at Geal Charn and Carn Dearg). These effects would affect the amenity of recreational users and their perceptions of the wildness and natural forms. Whilst the proposed wind farm will often be seen in the context of the existing Stronelaig Wind Farm, it will often be more prominent or be seen to introduce a sideways extension to this. In locations within the Adverikie and Spey Headwaters areas of the Park, the proposed development will introduce turbines to aspects currently without such features. However, given the geographically limited extent of the Park, subject to potentially significant cumulative effects, their location on the outer extents of the Park where there is already the influence from existing wind farm developments, the effects on the Cairngorms National Park is not considered to be significant, and its integrity would not be undermined.

16. Key viewpoints within the National Park are identified as:
- a) **Viewpoint 9** – Meall Chuaich located 19.93 km from the nearest turbine.
 - b) **Viewpoint 10** – Corrieyairack Pass (Garva Bridge) located 5.2 km from the nearest turbine.
 - c) **Viewpoint 11** – Dun-da-Lamh located 9.1 km from the nearest turbine.
 - d) **Viewpoint 12** – Geal Charn 4.1 km from the nearest turbine.
 - e) **Viewpoint 14** – Aberarder Forest on the Public Right of Way 9.5 km from the nearest turbine.
 - f) **Viewpoint 16** – Loch na Lairige 8.7 km from the nearest turbine.
 - g) **Viewpoint 17** - Doire Duibhe 13.1 km from the nearest turbine.
 - h) **Viewpoint 19** - A'Mharconaich 24.9 km from the nearest turbine.
 - i) **Viewpoint 20** – Carn na Gaim 23.4 km from the nearest turbine.
 - j) **Viewpoint 22** - Leathad an Taobhain off summit 32.3 km from the nearest turbine.

RELEVANT PLANNING HISTORY

17. **PRE/2017/0031**- CNPA provided comments in relation to a proposal for 54 turbines each with a maximum tip height of 149.9m which informed Highland Council in their pre – application response.
18. **PRE/2017/45** – CNPA provided comments at the scoping stage in January 2018 relating to a proposal at that time for 40 turbines of height up to 135 metres to tip.
19. **PRE/2018/0025** – CNPA provided comments in relation to the ‘Gatecheck’ stage of the pre-application process for 39 turbines.
20. There are a number of other wind farms in the area to the north west and north east of the site, further away from the National Park. These are shown on the applicants’ Figure 4.6 ‘Cumulative Context’ which is included in **Appendix 2**. The wider context of wind farms around the National Park is illustrated in **Appendix 1**.

PLANNING POLICY CONTEXT

21. The development proposal is located wholly outwith the National Park, therefore the Cairngorms National Park Local Development Plan (2015) policies are not applicable. However, an assessment of the proposal must have regard to Scottish Planning Policy and the National Park Partnership Plan (NPPP). The NPPP is a material consideration with section 14 of the National Parks Act 2000 expressly setting out that the Scottish Ministers, a National Park authority, a local authority and any other public body or office-holder must, in exercising functions so far as affecting a National Park, have regard to the National Park Plan as adopted.

National Policy and Guidance

22. **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. 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.
23. 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.
24. 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.
25. 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.
26. 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.

27. SPP also highlights in paragraph 85 that these aims and requirements apply to development outwith a National Park that affects the Park.

Strategic Policy

Cairngorms National Park Partnership Plan 2017- 2022

28. The Cairngorms National Park Partnership Plan (NPPP) is the National Park Plan required under section 11 of the National Parks (Scotland) Act 2000. It is the management plan for the Cairngorms National Park that is approved by Scottish Ministers. It sets out how all those with a responsibility for the Park will coordinate their work to tackle the most important issues. As noted earlier the National Park Act sets out that decision makers must, in exercising functions so far as affecting a National Park, have regard to the National Park Plan as adopted.
29. The NPPP sets out the vision and overarching strategy for managing the National Park, guiding the work of all public bodies and other partners to achieve the aims of the Park which are set out in the NPPP and legislation. The vision is for an outstanding National Park enjoyed and valued by everyone, where nature and people thrive together.
30. Three headline long term outcomes for the Park are set out as follows:
 - a) **Conservation** - A special place for people and nature with natural and cultural heritage enhanced.
 - b) **Visitor Experience** - People enjoying the Park through outstanding visitor and learning experiences.
 - c) **Rural Development** - A sustainable economy supporting thriving businesses and communities.
31. The Plan also explains that the landscapes of the National Park are valued by many and underpin the area's economy. The NPPP contains policies to deliver these outcomes. Key policies in relation to the current proposals are policies 1.3 and 3.3.
32. Policy 1.3 seeks to conserve and enhance the special landscape qualities with a particular focus on conserving and enhancing wildness qualities; maintaining and promoting dark skies; enhancements that also deliver habitat improvements; enhancing opportunities to enjoy and experience the landscapes of the Park and applying a presumption against new constructed tracks in open moorland.
33. Policy 3.3 seeks to support development of a low carbon economy and states that: *“large scale wind turbines are not compatible with the landscape character or special qualities of the National Park. They are inappropriate within the National Park, or where outside the Park they significantly adversely affect its landscape character or special landscape qualities”*

CONSULTATIONS

34. The Scottish National Park Authorities have agreed a protocol arrangement with Scottish Natural Heritage (SNH) on respective roles in advisory casework. The agreement 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 in a supporting role. The protocol also sets out that National Park Authorities and SNH with others share a responsibility for delivering National Park Partnership Plans and safeguarding the integrity of the National Parks and their special qualities.
35. Set against this background, SNH's landscape advisor has assessed the landscape and visual impacts of the development, including the impacts upon the National Park.
36. In summary SNH advises that they object to the proposals on the following grounds:
 - a) Due to the significant adverse effects on the Special Landscape Qualities (SLQs) of the Cairngorms National Park.
 - b) Due to the significant adverse effects on Wild Land Area (WLA) 19 Braeroy, Glenshirra and Creag Meagaidh.
37. They state that the removal of the western array would likely remove this objection.
38. In terms of the impact on the Cairngorms National Park, both the National Park (Scotland) Act 2000 and the SPP recognise that the Park has Special Landscape Qualities that are of outstanding national importance. The Park is not homogenous in its landscape character, but is diverse with 90 different Landscape Character Areas (LCAs) identified. Although each area is distinct there is consistency between them in terms of topography, land uses, history, settlement and development patterns and the way the landscape is experienced. The LCAs inform the SLQs of the Park which go beyond the boundaries of each LCA and the Park as they seek to capture the experiential qualities of the Park.
39. An assessment of the likely impact on the SLQs has been undertaken based on work submitted by the applicants and additional field and desk based work undertaken by SNH and CNPA.
40. It has been identified that the areas of the Park likely to be significantly affected are principally within approximately 20km of the proposed windfarm. Adverse effects are predicted across various high points within the Park – South Monadhliath, Southern Uplands and Ardverikie Hills and the lower levels around Upper Strath Spey. The area is experienced by a variety of users (hill walkers, cyclists, etc.) and communities.
41. Three SLQ groupings have been identified which were considered to be most relevant and at risk from some significant effects. These are as follows with an explanation of the significant effect on the appreciation of these SLQs:
 - a) Strong juxtaposition of contrasting landscapes and Grand panoramas and framed views - from the Glen Shirra and Upper Spey area, close to the proposal (around 7km) on the current strong appreciation of contrasting

landscape, places where settled and managed landscape along lower glens juxtapose with the higher ground where natural processes dominate.

- b) Landscape of layers and Layers of receding ridge lines and Vastness of space, scale and height – from more distant locations (around 20km) across the upper reaches of Glen Truim and the Southern Hills where the turbines would interrupt the current openness and space created by the layer of receding ridgelines.
- c) Dominance of natural landforms and Wildness – from limited locations along the Park boundary within the South Monadhliath the proposal would introduce obvious human modifications into the uplands having a notable influence on how qualities of wildness and where natural forms dominate are experienced. These effects are to a greater degree than existing effects as a result of Stronelairg wind farm.
- d) The advisor concludes overall that the proposed windfarm will have a significant adverse impact on the SLQs of the National Park. They state that the significant effects identified from greater distances (around 20km) and those from very close to the proposal along the Parks boundary are challenging to mitigate given the geographical spread of the proposed turbines and the overall visibility of the proposal.
- e) Effects from Glen Shirra and the Upper Spey area however could be substantially reduced if turbines in the western array were removed as this is the grouping which is most prominent especially from the glen floor and will result in the greatest effects on how the SLQs are appreciated in this part of the Park.
- f) The combination of these significant effects identified as a result of the proposed application will result in adverse effects across a part of the National Park in particular for the area around Glen Shirra and the Upper Spey which is an important, popular and well visited entry and exit point through the Park from the west. These impacts of the proposed Glenshero wind farm are of national interest and warrant an SNH objection as it fails both SPP paragraph 212 and the Cairngorms National Park Partnership Plan (CNPPP) Policy 3.3.
- g) The applicant has been advised if the western array of turbines was removed then the significant effects would remain, although these would no longer likely to fail the relevant SPP policy test. However, the advisor states that a tension would still remain with the policies as contained within the CNPPP but on balance this would not warrant an SNH objection.
- h) They go on to comment on the impact on Wild Land Area 19 Braeroy, Glenshirra and Creag Meagaidh and conclude that the proposed wind farm will result in significant adverse effects on 4 qualities of WLA 19 which cannot be readily mitigated.
- i) They state that the removal of the western cluster of 16 turbines would result in a substantial reduction in magnitude of both landscape and visual impacts across a wide range of areas and receptors (including WLA 19) resulting in a more cohesive wind farm design and reducing the cumulative effects of wind farm development across the Monadhliath mountain range. If mitigation were in place to remove these turbines, then although significant effects would remain elsewhere within WLA 19, these would not warrant an SNH objection.

APPRAISAL

42. As the development proposal is located outwith the Park boundary, the key planning issue for consideration is that of the landscape and visual impact, and in particular whether the proposal will significantly adversely affect the landscape character and special landscape qualities of the National Park. All other matters, including ecology, noise, and general amenity etc. are assessed by the decision maker (Energy Consents Unit) with advice from statutory consultees.
43. The National Park Partnership Plan (NPPP) and Scottish Planning Policy set out how proposals outwith the boundaries of the National Park should be considered in terms of impacts upon the Park. The NPPP sets out in policy 3.3 a test for considering this, explaining that large scale wind turbines are inappropriate outside the Park where they *significantly adversely affect its landscape character or special landscape qualities*. Similarly Scottish Planning Policy (SPP) sets out, as noted earlier, 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.
44. Set against this background the key consideration is the landscape and visual effects upon the south west corner of the National Park arising from introducing wind turbines into the landscape closer to the National Park and visible from popular recreational routes both at high points within the Park - the South Monadhliath, Southern Uplands and Ardverikie Hills - as well as any effects at popular lower level areas around Upper Stath Spey and the route from Laggan up to Garvamore and Garva Bridge. A key entry point to the Park is just beyond Garva Bridge – the Corrieyairack Pass and General Wade’s Military Road. This has all been fully assessed by SNH’s landscape advisor whose comments have informed our assessment of this case.
45. The low lying managed landscape of the glens of Glen Shirra and the Upper Spey, approximately 7km from the proposal, are clearly juxtaposed with the higher more natural landscape of the South Monadhliaths. The proposed wind farm will introduce man-made features large in scale and vertical in form into an exposed upland landscape setting where there has been no previous intervention and which has a horizontal emphasis. In terms of the Special Landscape Qualities experienced here – strong juxtaposition of contrasting landscapes and grand panoramas - it is considered that this intervention will diminish the contrasting landscapes which in turn will have a significant effect on the appreciation of these particular SLQs.
46. A key feature of the Park here is dominant landforms expressed through the sense of expansiveness, openness and the space created by the layering of receding ridgelines. The proposed turbines will be visible from the upper reaches of Glen Truim and the Southern Hills, interrupting the horizon to the north-west approximately 20km away and breaking the ridgeline in clear weather conditions.
47. The proposed wind turbines will be read in conjunction with some of the Stronelairg turbines, although the Glenshero turbines will be an additional feature of greater

prominence than Stronelairst given their location on a more prominent ridgeline within this layered landscape. The proposal will have the effect of shortening the depth of the landscape in a north-westerly direction with the introduction of elements of scale into the wide, currently uninterrupted panorama. These effects, at times additional to those of Stronelairst are considered to be significantly adverse on these SLQs – landscape of layers and layers of receding ridgelines and vastness of space, scale and height.

48. The proposed development has been considered in terms of its impact on the Park's south western and western boundary. Natural landforms dominate here with no obvious development along the Upper Glen Truim, Dalwhinnie and South Monadhliaths area - development being limited to the bottom of the glens. These upland areas are predominantly uninhabited and extensively covered in moorland which gives a strong sense of wildness to this corner of the Park.
49. The proposed turbines will be seen when looking outwards from the Park and these will be viewed as two separate arrays, in particular from Upper Glen Truim and Dalwhinnie area. The larger western array, which lies further away from the Park boundary, will be read as a single group from this high point with only the occasional blade of the smaller eastern array visible. The eastern array will be seen as clearly separate from the larger western array.
50. Notwithstanding SNH are of the opinion that the removal of the western array would pass the relevant SPP test and overcome the grounds for their objection, significant effects would still remain, and as such conflict with the policies contained within the CNPPP.
51. The eastern array does become more visible along parts of the South Monadhliath on the western boundary of the Park. The existing Stronelairst wind farm is visible from here and already effects the SLQs of this part of the Park. The additional effects of Glenshero however, will be limited to the ridgeline given the topography and location of the proposed turbines.
52. Therefore in terms of the impact on the western boundary of the Park, the proposed wind farm will introduce development into these upland areas where the qualities of wildness and natural forms are experienced. This development will further diminish these qualities that have already been effected by the Stronelairst wind farm and will consequently result in a significant effect on the appreciation of these SLQs.

CONCLUSION

53. The proposed Glenshero wind farm will impact on the SLQs of the National Park. A number of effects have been identified across three broad areas, collectively impacting on different SLQs in varying degrees.
54. It is considered that the development as proposed, will significantly adversely affect the landscape character and special landscape qualities of the National Park. As such the development conflicts with national planning policies and the policies of the National Park Partnership Plan in terms of impacts upon the National Park.

55. It will not conserve and enhance the special qualities of the National Park contrary to Policy 1.3 of the Cairngorms National Park Partnership Plan in terms of conserving and enhancing wildness qualities and enhancing opportunities to enjoy and experience the landscapes of the Park. It will significantly adversely affect the landscape character and Special Landscape Qualities of the Cairngorms National Park in contravention of policy 3.3 of the Cairngorms National Park Partnership Plan. Furthermore the development is considered to compromise the objectives of the designation and the overall integrity of this part of the Park given the distance from the Park's boundary and the significance of the impacts. Accordingly is recommended that the CNPA raise objection to the proposals.

RECOMMENDATION

That Members of the Committee confirm that the CNPA OBJECTS to the application for the proposed Glenshero Wind Farm for the following reason:

- I. The proposed development is contrary to Policy 3.3 of the Cairngorms National Park Partnership Plan 2017 - 2022 due to the significant adverse effects on the Special Landscape Qualities (SLQs) of the Cairngorms National Park.

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.