

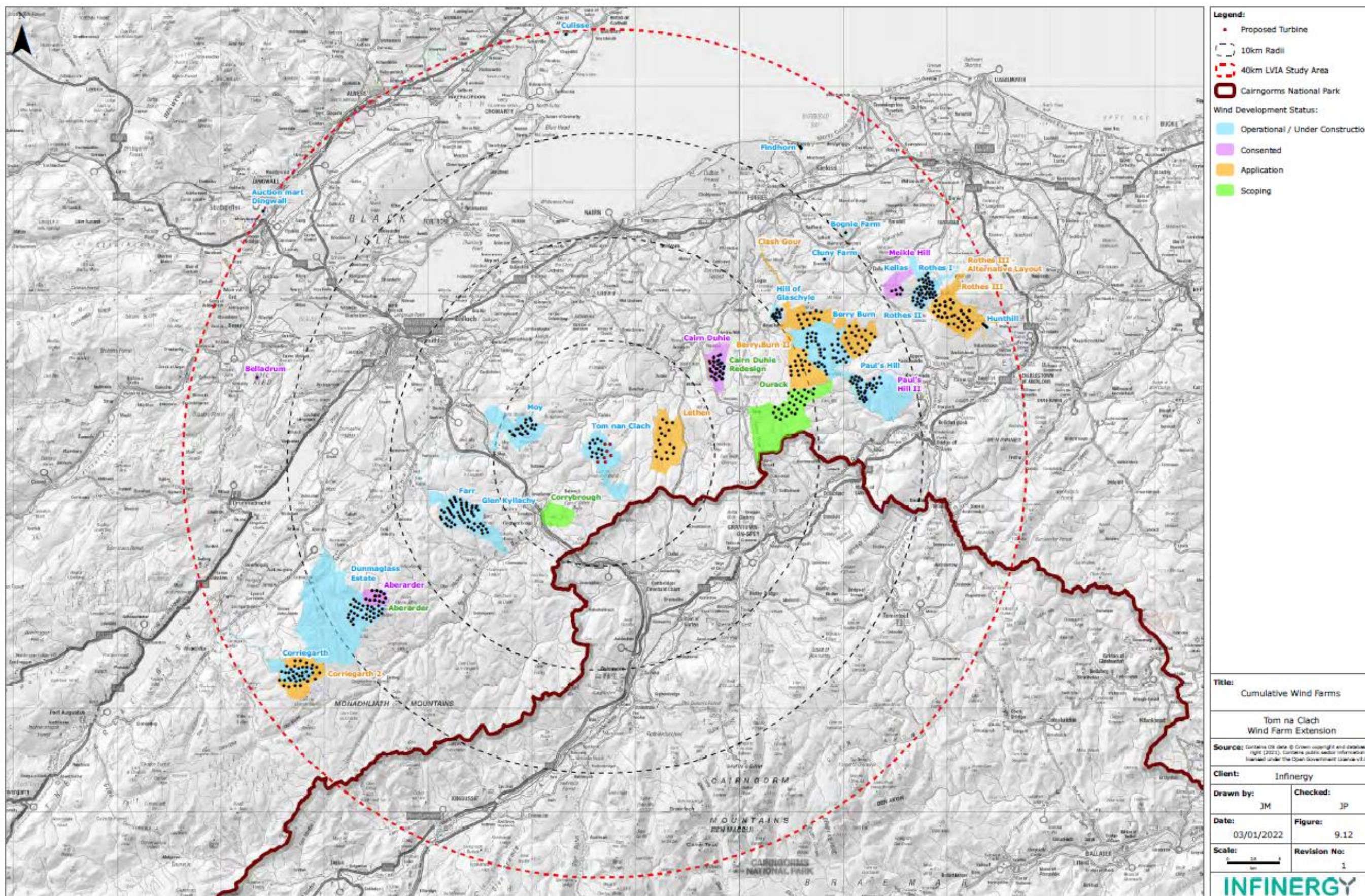
**CAIRNGORMS NATIONAL PARK AUTHORITY**

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<b>DEVELOPMENT PROPOSED: Tom nan Clach wind farm extension</b>	
Consultation from Scottish Government Energy Consents and Deployment Unit	
<b>REFERENCE:</b>	2022/0135/PAC (ECU00003453)
<b>APPLICANT:</b>	Infinergy
<b>DATE CONSULTED:</b>	6 April 2022
<b>RECOMMENDATION:</b>	Split recommendation: No objection to proposal and existing and consented wind farms, but Objection if Lethen wind farm gains consent
<b>CASE OFFICER:</b>	Nina Caudrey, Planning Officer (Development Planning and Environmental Advice)

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Figure 9.12 Cumulative Wind Farms



## PURPOSE OF REPORT

1. The purpose of this report is to inform the committee decision and subsequent consultation response to the Scottish Government Energy Consents and Deployment Unit (ECDU) on an application submitted under Section 36 of the Electricity Act 1989 for a proposed wind farm located to the north 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 Report (ER), which presents the findings of the applicant's Environmental Impact Assessment (EIA).
2. The planning issues to be considered are confined to the effects of the proposed wind farm on the landscape character and Special Landscape Qualities (SLQs) of the National Park. All other matters, such as ecology, noise, general amenity, etc, are assessed by the decision maker (Scottish Ministers) with advice from statutory consultees.
3. Under the current working agreement on roles in landscape casework between NatureScot and the Park Authority, NatureScot lead on the provision of advice on the effects on the SLQs caused by proposals outwith the Cairngorms National Park. Their advice has been used to inform this report.

## SITE DESCRIPTION AND PROPOSED DEVELOPMENT

4. The proposed wind farm extension would be located immediately south of the adjoining existing Tom nan Clach wind farm, at approximately 5 kilometres (km) north-west of the closest part of the National Park boundary, as shown in the applicant's figure 9.12 on page 2 of this report.
5. The existing wind farm comprises 13 turbines at 125 metres to tip height. The proposed extension would comprise 7 turbines with a maximum height of 149.9m to the tip of the blade in an upright position, and associated infrastructure (such as a borrow pit, underground cabling, substation, battery storage, etc).
6. The proposed development would make use of the existing infrastructure for the existing Tom nan Clach wind farm where possible, including the site entrance and access track from the B9007. Approximately 4km of new access track would be required to install and maintain the extension turbines.
7. The proposed wind farm would have an estimated total installed capacity of around 31.5MW depending on the turbine specification used. (Because the proposed development is an extension to the existing Tom nan Clach wind farm, the combined generating capacity is over 50MW, therefore falling within the threshold for consultation by ECDU/determination by Scottish Government.)
8. Theoretical visibility of the proposed wind farm from within the National Park is shown by the applicant's Zone of Theoretical Visibility figure (**Appendix I**). When considering the cumulative visual effects, the green and blue shown in the applicant's cumulative Zone of Theoretical Visibility figure (**Appendix II**) demonstrates that visibility of the proposed wind farm from within the National Park. Much of where it would be seen from is already influenced by visibility of a number of other existing and consented wind

farms (the combined visibility shown in green). There are some areas (shown in blue) within the National Park where it would introduce visibility of a wind farm where currently there is none.

9. Visualisations from seven viewpoints were provided in the applicant's ER that demonstrate the predicted level of visibility that would be had from within/on the boundary of the National Park:
  - a) VP2 Carn Glas-choire, approximately 5km from the closest turbine.
  - b) VP3 Ptarmigan lodge, Cairngorm mountain, approximately 32km from the closest turbine.
  - c) VP4 Creagan a Chaise, Cromdale hills, approximately 25km from the closest turbine.
  - d) VP7 Geal Charn Mor, Mondahliath, approximately 22km from the closest turbine.
  - e) VP9 Meall a Bhuachaille, approximately 25km from the closest turbine.
  - f) VPI2 Gorton Hill above Grantown, approximately 5km from the closest turbine.
  - g) VPI6 Creag Ealraich, on the A939 approximately 8km from the closest turbine.
  
10. The visualisations associated with each view point are available to the public by searching the application documents on the ECDU website <https://www.energyconsents.scot/ApplicationDetails.aspx?cr=ECU00003453> for the relevant figures:
  - a) Vol 3 Figure 9.42 Viewpoint 2 Carn Glas choire
  - b) Vol 3 Figure 9.43 Viewpoint 3 Ptarmigan Lodge
  - c) Vol 3 Figure 9.44 Viewpoint 4 Creagan a Chaise Hills of Cromdale
  - d) Vol 3 Figure 9.47 Viewpoint 7 Geal Charn Mor Monadhliath
  - e) Vol 3 Figure 9.49 Viewpoint 9 Meall a Bhuachaille
  - f) Vol 3 Figure 9.52 Viewpoint 12 Gorton Hill
  - g) Vol 3 Figure 9.56 Viewpoint 16 Creag Ealraich

## **RELEVANT PLANNING HISTORY**

11. **PRE/2021/0014** in April 2021 CNPA responded to a scoping consultation from ECDU for the current application.

## **PLANNING POLICY CONTEXT**

12. The proposed development is located wholly outwith the National Park, therefore the Cairngorms National Park Local Development Plan policies do not apply. However, an assessment of the proposal must have regard to Scottish Planning Policy (SPP) and the National Park Partnership Plan (NPPP).

## National Policy

13. **Scottish Planning Policy** sets out national planning policies that reflect Scottish Ministers priorities for the development and use of land, as well as for operation of the planning system. The content of SPP is a material consideration in planning decisions that carries significant weight.
14. Policy relating specifically to National Parks and development management can be found in paragraphs 84 and 85 of SPP. These re-state the four aims of the National Parks as set out in the National Parks (Scotland) Act 2000, as well as 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 the four aims.
15. Paragraph 85 of SPP also clarifies that the aims and requirements of paragraphs 84 and 85 apply to development outwith a National Park that affects the Park.
16. Paragraph 212 of SPP states that “where development affects a National Park... it should only be permitted where:
  - a) the objectives of the designation and the overall integrity of the area will not be compromised; or
  - b) 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”.

## Strategic Policy

17. The **Cairngorms National Park Partnership Plan (NPPP) 2017 – 2022** is required under section 11 of the National Parks (Scotland) Act 2000. It is the management plan for the Cairngorms National Park approved by Scottish Ministers. The NPPP sets out how all those with a responsibility for the National Park will coordinate their work to tackle the most important issues. There is a duty for decision makers to have regard to the NPPP, a requirement set out in Section 14 of the Act. As such, the NPPP is a material consideration in planning decisions.
18. The NPPP identifies that the landscapes of the National Park are valued by many and underpin the area’s economy. It contains policies to safeguard landscape interests. Of relevance to wind farm development proposals are policies 1.3 and 3.3.
19. Policy 1.3 seeks to conserve and enhance the SLQs. Policy 3.3 seeks to support development of a low carbon economy and increase renewable energy generation where this is compatible with conserving the SLQs. In relation to wind farm development, the policy 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

### NatureScot advice

20. In accordance with the NatureScot/CNPA casework agreement, NatureScot have provided CNPA with advice in relation to the effects on the National Park, of the proposed wind farm both alone and cumulatively with other existing and consented wind farms in the surrounding area.
21. In relation to the Wildness SLQ, NatureScot advise that the surrounding hills (as illustrated from representative viewpoints 2, 12 and 16) demonstrate the range of ridges, summits and plateaux that can be experienced within the Strathdearn hills, all contribute significantly to the wild appearance of this area of the National Park. The landscape here exhibits some of the characteristics of the Wildness SLQ such as a perception of relative remoteness, and while there are numerous obvious signs of management (such as hill tracks, bothies and muirburn, along with roads transecting it, for example the B9007 and the A939), there still remains an overarching dominance of nature in the large scale landscape. This SLQ is moderately well expressed here. Many of these hills are easily accessible from the main roads, with some less accessible. The Strathdearn hills provide the context for the northern extents of the Park, where wildness characteristics of naturalness become increasingly more prevalent as does the perception of remoteness across these hills in a westward direction.
22. From the information available, it appears that the proposed development would be visible across a swath of the north facing slopes, ridge lines and summits of the Strathdearn hills, where it would be viewed in combination with the operational Tom na Clach and Moy wind farms, and the proposed Lethen wind farm.
23. In relation to the Surrounding hills SLQ, NatureScot advise that the proposed wind farm extension would be located in the wilder, broad and rounded hills of the Dava Moor within the Open Rolling Upland Landscape Character Type (LCT). There is a strong connection between this LCT and the rounded hills, long ridges and glens of the Strathdearn Hills within the National Park, which flow into one another over the northern boundary of the National Park and form the context of the National Park in this area. This area exhibits key characteristics of the Surrounding hills SLQ; the smooth rounded form of these heather clad hills with their sudden unexpected crags, screes, gullies, glens and wild appearance, and the relative remoteness experienced from these surrounding hills are attributes which are all well expressed in this area, underpinning this SLQ.
24. While the operational Tom na Clach (125m blade tip) and Moy (126.5m blade tip) wind farms are visible from viewpoint 2 when looking north, they are largely screened from view by the intervening surrounding hills landform and are of a scale which can be absorbed by this highly sensitive landscape. While the proposed development, when experienced from this area, would read visually coherent as a single development with the operational Tom na Clach wind farm, when assessed in combination with the at application Lethen wind farm, a linear pattern of wind farm development would be formed that begins to encroach on the surrounding hills, eroding the experience and perception of the wild characteristics of these heather clad rolling hills, in particular

when experienced along the ridge line of the Strathdearn hills, from within the National Park (demonstrated by representative viewpoints 2 and 12).

25. As illustrated by the visualisations for viewpoint 2, there would be a c.120 degree experience of wind farms within the immediate setting of the National Park (around 5km), with the proposed turbines numbered 1-3 and 6 extending the physical presence of wind farm development over a series of ridgelines which form the panorama north towards the at application Lethen wind farm. The introduction of the proposal alongside Lethen would reinforce wind farm influence in the area and erode the perception of natural landforms and wildness dominating. The resultant cumulative effect would be the experience of wind development encroaching on the context of the National Park in this area, visually emphasising the invisible mapped boundary in physical form.
26. As a result of paragraphs 21 – 25, NatureScot advice is that the proposal itself, when viewed as an extension to and in combination with the operational Tom na Clach wind farm, would not result in significant cumulative effects on the above SLQs. However, when considered in combination with the at application stage Lethen wind farm, significant adverse cumulative effects on the Surrounding hills and Wildness SLQs would be experienced from along the ridgeline of the surrounding hills, which form the northern extents of the National Park.
27. The nature and significance of the in combination effects with Lethen wind farm are however such that NatureScot advise that the integrity of the National Park would not be compromised.

## **APPRAISAL**

28. The policies of the NPPP and SPP set out how proposals outwith the boundary of the National Park should be considered in terms of effects on the National Park.
29. Policy 3.3 of the NPPP sets out a test for considering effects on the landscapes of the National Park, in that large scale wind turbines are inappropriate outside the Park where they ‘significantly adversely affect its landscape character or special landscape qualities’. If a proposal fails policy 3.3, it would also be in conflict with policy 1.3, which seeks to conserve and enhance the SLQs.
30. Paragraph 212 of SPP sets out that “development that affects a National Park... should only be permitted where:
  - a) the objectives of designation and the overall integrity of the area will not be compromised; or
  - b) any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by social, environmental or economic benefits of national importance.”
31. In the policy context of the NPPP and SPP, consideration is required of the effects of the proposed development, on landscape character and the SLQs, both alone and cumulatively with other wind farms in the surrounding area.

***Proposed wind farm with existing and consented wind farms***

32. When considered in combination with existing and consented wind farms, it is considered the CNPA should **not object** to the proposed extension to Tom nan Clach wind farm in combination with existing and consented wind farms. This is because the extension would not have significant adverse effects on any of the SLQs, and therefore would comply with NPPP policies 3.3a and 1.3, as well as Scottish Planning Policy paragraph 212.

***Proposed wind farm with existing and consented wind farms plus Lethen wind farm***

33. When considered with existing and consented wind farms plus Lethen wind farm (should it gain consent), there would be significant adverse effects on two SLQs and so the proposed development would conflict with the NPPP policies 1.3 and 3.3a. Therefore it is considered that CNPA should **object** to the proposed wind farm development in combination with existing and consented plus the proposed Lethen wind farm.

**RECOMMENDATION**

**That Members of the Committee confirm:**

- That CNPA do not object to the application for the proposed Tom nan Clach wind farm extension in combination with existing and consented wind farms, but
- should the application stage Lethen wind farm gain consent, CNPA object, due to the cumulative significant adverse effects on the Surrounding hills and Wildness Special Landscape Qualities that would arise.