

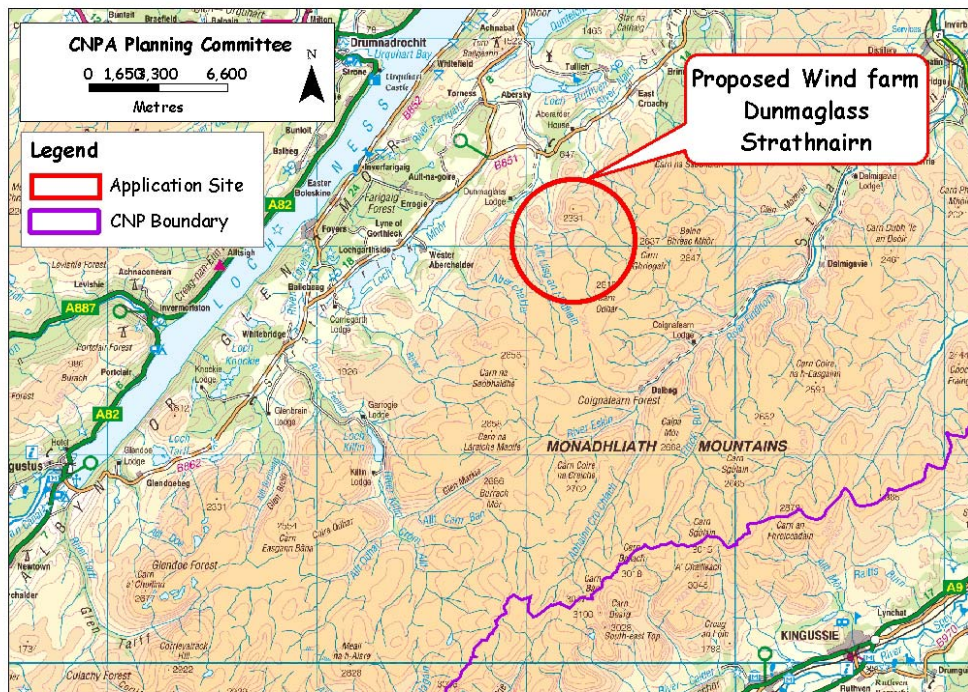
## CAIRNGORMS NATIONAL PARK AUTHORITY

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

**Prepared by:** ANDREW TAIT, PLANNING OFFICER  
(DEVELOPMENT MANAGEMENT)

**DEVELOPMENT PROPOSED:** WIND FARM AT DUNMAGLASS,  
STRATHNAIRN, INVERNESS-SHIRE  
(AMENDED PROPOSAL FOR 33-125M  
HIGH TURBINES)

**APPLICANT:** RENEWABLE ENERGY SYSTEMS  
DEVELOPMENTS LTD.



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**Fig. 1 - Location Plan**

## SITE DESCRIPTION AND PROPOSAL

1. Renewable Energy Systems Development Ltd applied to the Scottish Government for planning permission to construct a wind farm comprising 36 wind turbines on land on the Dunmaglass Estate in the Monadhliath Mountains some 10km north west of the National Park boundary at Meall a Bhothain north west of Newtonmore (see fig 1). Ptarmigan on Cairngorm is some 40km from the site. Access to the site during construction and operation will be from outwith the Park (Strathnairn). The Park objected to this application in June 2005 for the following reasons.

*The outstanding and unique characteristics of the landscape extend beyond the administrative boundaries of the Cairngorms National Park. The proposed development will lead to an unacceptable degree of adverse visual impact upon the character of Cairngorms National Park both from the Dunmaglass proposal itself and cumulatively with other wind farms.*

*It is considered that the impact on protected species within the Cairngorms National Park, specifically the Golden eagle, will potentially be significant and in the absence of a convincing argument that this will not be the case, the precautionary principle should apply.*

*Tourism is central to the economy of the Cairngorms National Park with visitors coming to the area to enjoy the unique character of the environment, especially the landscape. Whether visitors are walking on the Monadhliaths or admiring them from Ptarmigan on Cairngorm Mountain, the proposed development will have an individual and cumulative impact. In the absence of a comprehensive economic assessment that demonstrates to the contrary, it is considered that the precautionary principle should apply and a development that could, with others, have an adverse effect on the local economy should not be permitted.*

2. The development originally comprised 36 turbines at 110m (to tip) height with associated electricity transformers, access tracks, a control building and substation compound, 3 permanent free-standing wind monitoring masts of approximately 65 metres in height and 3 borrow pits. The proposal has now been amended down to 33 turbines of 125 metres in height based upon a more compact layout with two met masts of up to 80 metres in height. Grid connection has been altered and would now be to an

existing pylon line which heads south of Foyers. Expected operational life of the wind farm is 25 years from the date of commissioning.

3. The proposal is accompanied by a considerable amount of supplementary environmental information that is in addition to the original environmental statement. This new documentation includes chapters on landscape and visual impact, ornithology and a socio-economic assessment. The applicants have tried to address concerns raised by the CNPA by adjusting the layout and by providing a tourism impact statement which while it pre-dates the publication of the recent report by Glasgow Caledonian University on windfarms and tourism has been produced using suggested methodologies. This enables an assessment to show the likely impact on the tourism resource within the zone of theoretical visibility. This demonstrates that any impact would be minimal.

## **DEVELOPMENT PLAN/POLICY CONTEXT**

### **Scottish Government Policy**

#### **Scottish Planning Policy 6 (SPP6) March 2007**

4. 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.
5. 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.
6. 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.
7. 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.

8. 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.
9. 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

10. ...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.
11. 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....
12. 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.
13. 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...

14. 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.
15. 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.
16. 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**

17. 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.
18. 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.

## Highland Structure Plan Policies

### **Policy E1 Distributed renewable energy developments**

19. The Council supports the utilisation of the region's distributed renewable energy resource, including hydro, wind, wave and tidal stream powers. Proposals will be assessed against the provisions of the General Strategic Policy.
20. Approvals for renewable energy developments will normally be for a temporary period only (tied to the life time of a project), with provision where appropriate for the removal and reinstatement of affected areas. Earlier action for removal and reinstatement will be required in the event of premature permanent cessation of energy production.

**Policy E2 Wind energy developments**

21. Wind energy proposals will be supported provided that impacts are not shown to be significantly detrimental. In addition to the General Strategic Policies, wind energy proposals will be assessed in respect of the following:
- visual impact;
  - noise;
  - electro-magnetic interference;
  - roads, bridges and traffic;
  - aircraft flight paths / MOD operations; and
  - cumulative effects.

**Policy E3 Wind farm safeguarding**

22. The Council will seek to safeguard the operational efficiency of approved and constructed wind farms in the consideration of adjacent proposed developments or other land use changes.

**Policy G1 Conformity with strategy**

23. The Council will support developments, having regard to the Plan's sustainable objectives, which promote and enhance the social, economic and environmental wellbeing of the people of Highland.

**Policy G2 Design for sustainability**

24. Proposed developments will be assessed on the extent to which they:
- are compatible with service provision...;
  - maximise energy efficiency in terms of location, layout and design, including the utilisation of renewable sources of energy;
  - are affected by significant risk from natural hazards, ...;
  - are affected by safeguard zones where there is a significant risk of disturbance and hazard from industrial installations, ...;
  - impact on individual and community residential amenity;
  - impact on non-renewable resources such as mineral deposits of potential commercial value, prime quality or locally imported agricultural land, or approved routes for road and rail links;
  - impact on the following resources, including pollution and discharges, particularly within designated areas: habitats, species, landscape, scenery, freshwater systems, marine systems, cultural heritage, air quality;
  - demonstrate sensitive siting and high quality design in keeping with local character and historic and natural environment and in making use of appropriate materials;



- contribute to the economic and social development of the community.

Developments which are judged to be significantly detrimental in terms of the above criteria shall not accord with the Structure Plan.

**Policy G3 Impact assessments**

25. Where environmental and/or socio-economic impacts of a proposed development are likely to be significant by virtue of nature, size or location, the Council will require the preparation by developers of appropriate impact assessments. Developments that will have significant adverse effects will only be approved if no reasonable alternatives exist, if there is demonstrable over-riding strategic benefit or if satisfactory overall mitigating measures are incorporated.

**Policy G4 Community benefit and commitment**

26. The Council will expect developments to benefit the local community and contribute to the wellbeing of the Highlands, whilst recognising wider national interests. The Council will seek to enter into agreements with developers as appropriate...

**Policy G6 Conservation and promotion of the Highland heritage**

27. The Council will seek to conserve and promote all sites and areas of Highland identified as being of a high quality in terms of nature conservation, landscape, archaeological or built environment.

**Policy G8 Precautionary principle**

28. In the relatively rare situation of assessing development proposals where the potential impacts are uncertain, but where there are scientific grounds for believing that severe damage could occur either to the environment or the wellbeing of communities, the Council will apply the precautionary principle.

**Policy T6 Scenic views**

29. The Council will protect important scenic views enjoyed from tourist routes and viewpoints, particularly those specifically identified in Local Plans. There will be a presumption against development in narrow areas of land between roads and railways and open water.

**Policy N1 Nature conservation**

30. New developments should seek to minimise their impact on the nature conservation resource and enhance it wherever possible. The Council will seek to conserve and promote all sites according to the following hierarchy:

- **sites and species of international importance** – Developments which would have an adverse effect on the conservation interests for which a site has been designated will only be permitted where there is no alternative solution and there are imperative reasons of

over-riding public interest, including those of a social and economic nature. Where a priority habitat or species (as defined in Article 1 of the Habitats Directive) would be affected, prior consultation with the European Commission is required unless the development is necessary for public health or safety reasons.

- **sites of national importance** – Developments will only be permitted where 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 social and economic benefits of national importance.
- **sites of local importance** – Developments will be assessed for their effects on the interests of sites of local conservation importance and will be resisted where these are judged to be unreasonably detrimental.

#### **Policy L4 Landscape Character**

31. The Council will have regard to the desirability of maintaining and enhancing the present landscape character of development proposals, including offshore developments.

#### **Highland Council Renewable Energy Strategy and Planning Guidelines**

32. In May 2006 Highland Council adopted their **Highland Renewable Energy Strategy and Planning Guidelines**. The strategy includes a map showing preferred development areas for windfarms, possible development areas and areas where there is a presumption against.
33. **Policy E5** in the strategy relates to **preferred areas** that have been established for major and national scale onshore wind developments. There are 3 designated areas which contain optimal conditions in terms of planning constraints, energy production, technical feasibility and proximity to grid. The detailed suitability of all prospective sites still needs to be confirmed through the normal planning process. There will, however, be a strong presumption in favour of projects proposed for these designated areas, and developers will be encouraged to come forward with proposals there subject to appropriate community and environmental safeguards.
34. **Policy E6** of the document identified **possible development areas** that have been identified in places where although constraints are relatively light, their limited extent makes them less

optimal than preferred development areas for national scale schemes. In these locations developments will be judged on their merits and will need to show that there is no scope for alternative development within preferred development areas.

35. **Policy E7** of the Strategy considers that elsewhere in Highland there will be a **presumption against** export wind development. Any proposals for national or major projects will have to overcome a precautionary approach to planning approval. Any development would also need to show that there is no scope for alternative development within other preferred and possible development areas.

**The site is located in an area shown as a presumption against area in the strategy.**

## Badenoch & Strathspey Local Plan

### Policy 1.4.3

36. The Council will encourage the sustainable use of the area's resources and a wide distribution of employment opportunities by promoting:-
- Extension of established resource based activities; ....
  - Opportunities in the natural environment.
- Subject to suitable amenity safeguards and adequate servicing arrangements.

### Policy 1.4.4

37. The Council will encourage integrated use and management of resources in the landward area, and will continue to seek a balance between development and the conservation of features which represent the area's outstanding natural and cultural heritage.

## Cairngorms National Park Plan

38. **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.
39. 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.

40. **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.
41. **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

### CNPA Heritage and Land Management Group

42. General comments- The revised scheme changes very little in the way of the impacts upon the National Park. Though there are fewer turbines and they are in a slightly more compact layout they are now significantly taller at 125m.
43. The baseline study considers Farr windfarm which has now been constructed. Generally the report maintains that this has not changed the sensitivity of the area to further changes by additional windfarms. There appears to be no analysis of the landscape capacity for such structures.

### Landscape impacts

44. The direct landscape impacts are of secondary relevance to the park as it is over 10km from the boundary. Clearly there will be little impact upon the landscape resource. However the wildland issues are of relevance and related to the perception of landscape and its character which is of relevance here.

45. The report acknowledges that there will be a substantial adverse impact upon the areas of wildland quality as suggested by the SNH wildland search areas. This has not changed from the original submission. It is interesting to note that the search area referred to lies across the boundary of the CNP to the rest of the Monadhliaths. As a key quality of the National Park wildness play a strong part in the landscape character of an area (or rather vice versa). This underlines the fact that the character of this area is not defined by the park boundary, which follows a ridge line for most of this area. This shows the importance of the setting of the National Park and that a precautionary approach should be given to this area.
46. In addition to the above our recent research shows that much of this area demonstrates strong wildness characteristics. This research study looks at these qualities of the landscape in greater detail than the SNH report and identifies them with greater accuracy. The distribution of the toning shows that it is logical to assume that this quality would be found in some strength beyond the boundary.
47. Several of the high points along the boundary (and within the park) that have a direct view to the application site are Munros and Corbetts. These are target for many hill walkers who seek these features. The sense of wildness is often an important feature in the enjoyment of such groups and it is a key characteristic of the park. Its value is therefore very high.

### **Visual impacts**

48. The report considers three view points from within the National Park and judges that from all of them the level of significance is the same as before. These are:
49. View point 11 – Carn Sgulain (a Munro) - **substantial adverse**  
View point 12 – Geal Charn (a Munro) - **substantial adverse**  
View point 15 – Ptarmigan station - **moderate adverse**
50. As this has not changed the effects of mitigation have not achieved anything from the point of view of the park.
51. Comparing the ZVIs shows that the area within the park that has a view to the turbines has changed very little. Though the number of turbines has been reduced their height has increased and this seems to have had a 'compensatory' effect. This is surprisingly extensive and it includes parts close to the boundary from the tops of the mountains. It also includes extensive areas further away in the central core as well as areas around



Granttown-on-Spey and Nethy Bridge, though in the latter case they are within forestry areas and so views may be limited to opening and rides/easements.

### **Cumulative impact**

52. The cumulative impacts are very significant for the National Park as they have increased considerably since the initial submission. Farr has now been built and so the Dunmaglass application must be seen in conjunction with this. In addition there is the application at Glen Kirk which has yet to be determined. Finally there is an application at Coriegarth.
53. The cumulative impacts are significantly greater than before because of these additional applications, of which Glen Kirk has the greatest. There are of course at least two other possible proposals including Tom nan Clach and Balavil (Allt Duine).
54. View points 11 and 12 were previously assessed at substantial adverse, the highest rating, and these remain at this level. However from Ptarmigan station which was moderate adverse, the rating is now **substantial adverse**. This clearly shows that the potential impacts are more severe to the park than previously.

### **Sequential impacts**

55. The sequential effects of the original application were slight as there is no clear route to the park from the application site. However the report does not address the approach and entrance to the park from the A9 and this should be highlighted. There will now be some effect because of the new windfarm at Farr and the potential one at Glen Kirk. There could easily be a sequence of views to and from Inverness due to these windfarms. This might have an impact upon the experience of entering or leaving the national Park and the perceptions of it.

### **Conclusion**

56. It is clear that in terms of landscape and visual impact upon the National Park the revised application does not improve the situation. The direct landscape impacts remain the same though we are now clearer about the implication for the wildness qualities of the area. The visual impacts also remain at least as severe as previously suggested. Finally the cumulative impacts are more severe than before. It is clear therefore that the original objection should be maintained.

### **CNPA Heritage and Land Management (Ecology)**

57. The cumulative impact of this, and other, windfarm proposals in the Monadhliath on the long-distance dispersal movements of

several vulnerable and protected raptor species which inhabit, or could recolonise, the Cairngorms National Park is a cause for concern.

58. The Monadhliath Mountains is an important area for the Scottish golden eagle population, especially for dispersing and prospecting sub-adult birds. Indeed, several wildlife tourism operators, some of which are based in the Cairngorms National Park, take guests up Strathdearn to observe golden eagles and other raptor species. Although the site itself is not considered to currently support a breeding pair, this species has nevertheless been frequently recorded for the ES from vantage points in the study area, especially compared to other upland species. The total number of individuals recorded has been considerable, particularly during the breeding season of March – August. The species has been observed for the third greatest amount of time after the raven and pink-footed goose and a significant proportion of flights have occurred at rotor height.
59. 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. That golden eagles from the Cairngorms National Park overfly the site of the proposed windfarm at Dunmaglass is evidenced by recent radio-telemetry data provided by a satellite-tracked juvenile golden eagle which fledged in Glen Feshie in 2007. The CNPA is a partner in this research project, having funded the purchase of the satellite tracking equipment, it was felt that more knowledge was required on how juvenile golden eagles use the landscape. On two occasions in 2008 (in late April and early May) this bird flew across the windfarm site as she moved back and fore between the Cairngorms and North West Highlands.
60. Hen harriers, a priority species for the Cairngorms LBAP, are considered to be far below their carrying capacity in the Cairngorms National Park, despite the occurrence of large areas of potentially suitable habitat, mainly through persecution. The productivity of the population is therefore low and continued occurrence of a breeding hen harrier population in the National Park is to a large extent dependent on the immigration of birds from the more robust population in the Western Highlands. Clearly, the Monadhliath is an area that colonising hen harriers would need to move across in order to replenish populations in

the National Park. Such movements would likely be low in volume but significant in terms of species conservation.

61. Historically, the Cairngorms National Park area would have supported populations of white-tailed eagle and red kite. Both these species became extinct in the Cairngorms through persecution in previous centuries but are now undergoing a recovery in Scotland stimulated by reintroduction projects. It is likely that the Cairngorms National Park continues to support suitable habitat for these two species, and as former native species of the area whose extinctions were caused by human agency, their return would be desirable on ecological grounds. Currently the re-colonisation of the National Park by these species would be most likely to occur from extant reintroduced populations to the west and north-west of the Park. Increased mortality through collision with wind turbines, or avoidance behaviour could reduce movements of these species across the Monadhliath to the Cairngorms National Park, thus inhibiting recolonisation. Given the rarity of these two species, and that their core ranges lie outside the Monadhliath, movements across the vicinity of the site would be relatively low in number, but could nevertheless be potentially significant for the populations' conservation in Scotland. It is not clear if these two species have not been considered in the ES simply because they were not observed as part of the ornithological survey. However, both species are regularly recorded in the Monadhliath.

**CNPA Economic and Social Development Group**

62. The applicant has conducted very thorough socio-economic and tourism assessments, which is to be welcomed.
63. Key points to note from the socio-economic assessment are that –
- The contracting strategy would seek to maximise the use of local businesses;
  - It is estimated that more than 57,000 man days would be required from the pre-construction period through to the decommissioning, with the majority of these being local or regionally sourced employees;
  - RES has worked with the 3 communities in the immediate vicinity of the proposed development to progress plans for a local Community Fund;
  - RES will be discussing with the community the potential for establishing links between renewable energy, the local community and training opportunities. They hope to set up

specific schemes in parallel with construction of the wind farm;

- Potential impacts on the local field sports economy have been examined and the report suggests that there is no indication that significant numbers of visitors would be deterred by the development. This has been substantiated by both previous reports and experiences of other wind farms in the vicinity of sporting estates, and also by land managers and sporting agents that are operating in the local area and Highland Region.
64. The tourism assessment recognises the value and significance of tourism in the area but concludes that the great majority of tourism resources would not be affected by the proposed development, while for those that would be, the impact would be minimal.
  65. In relation to these findings, it is worth considering the recent Glasgow Caledonian University report on 'The Economic Impacts of Wind Farms on Scottish Tourism' that was commissioned by the Scottish Government.
  66. The conclusions in relation to visitor attitudes to wind farms and likely effects on visitation behaviour seem consistent with the applicant's tourism assessment. The bulk of visitors (75%) are either positive or neutral about wind farms. Around 25% were negative (including 10% who were strongly negative).
  67. However, there is also clear evidence, particularly in the literature review, that the impact of wind farms is perceived to be greater on remoter, wilder landscapes. The report recognises that the local economies in these areas also tend to be very fragile and tourism extremely important.
  68. The report goes on to recommend that Scotland's National Scenic Areas and National Parks (and their buffer areas), could provide an appropriate framework for protection, not only from wind farms but also from other even less desirable intrusions such as Grid Lines and Pylons. It does not clarify what might be considered appropriate as a 'buffer area' for the National Parks, although the associated map shows a 10km buffer area around the NSAs.
  69. This seems a sensible recommendation that recognises the higher proportion of visitors to National Parks that are attracted by the landscape value. It also allows for retaining areas of wild land quality, so that Scotland continues to have destination

options for visitors who no longer wish to visit areas where wind farms are developed. Tourism revenues might therefore be displaced at a local level but would not be lost to the national economy.

## APPRAISAL

70. There is a range of detailed issues relating to this proposal which will be determined by the Scottish Government. The Scottish Government has formally sought CNPA's views on the proposal. This appraisal is written upon the basis of the proposal's effect upon the aims of the Park with aims 3 and 4 taken together.

71. The environmental statement accompanying the application covers a range of potential impacts of the proposal, but the ones most relevant to the National Park are considered to be:

- Impact on the landscape resource (an in particular wildness)
- Impact on visual amenity i.e. views of the landscape;
- Ornithological impact;
- Socio-economic impact.

### Applicant's Environmental Impact Assessment

72. The EIA identified a range of landscape characters in the study area, 3 within the Park and all judged to have a **high** sensitivity to change. 4 viewpoints were selected within the Park:

- Layby on A9 Daviot , 22 km to windfarm centre: slight adverse impact identified (original scheme showed that this viewpoint would be unaffected).
- A9 south of Tomatin 19 Kilometres to windfarm centre: slight adverse impact identified (original scheme showed that this viewpoint would be unaffected).
- Carn Sgulain, (Munro) in the Monadhliath Mountains, 14 km from windfarm centre: **substantial** adverse impact identified.
- Geal Charn, (Munro) in the Monadhliath Mountains 22 kilometres from windfarm centre: **substantial** adverse impact identified.
- Ptarmigan Restaurant Terrace, Cairngorm Mountain: **moderate** adverse impact identified.

73. The original scheme illustrated that the turbines would not be visible from the selected A9 viewpoints. The re-arrangement of them results in slight adverse impact from both viewpoints. While this area is important as the approach to the Park the impacts described are to my mind not a basis to raise objection to the scheme in isolation when analysed from these viewpoints. However, potential sequential views of Dunmaglass in

combination with Farr and the potential windfarm at Glenkirk could be a cause for concern on the approach to the Park and it is recommended that some consideration is given to this issue.

74. The EIA has also addressed the cumulative visual impact of Dunmaglass and other windfarms/proposed windfarms. It is considered that the addition of Dunmaglass to Glen Morriston and Corriegarth would be likely to result in higher levels of impacts than would arise from either of these developments alone or together- i.e that Dunmaglass would contribute to cumulative impacts.
75. Assessment of the cumulative impacts also identified both Carn Sgulain and Geal Charn as being subject to substantial adverse impacts. Consequently, since the consideration of the original proposal for Dunmaglass it is considered that potential cumulative impacts have increased. This is due to the fact that Farr is now built and there is also an application at Glenkirk, one at Corriegarth and consideration of one at Ton nan Clach (immediately next to Glen Kirk). A scheme has recently reached the scoping stage for a windfarm close to the Park boundary on hills to the north of Kingussie.
76. The assessment of the A9 and railway concludes that the only stretch where there would be any impact is between Carrbridge and Tomatin. There will be intermittent views of perhaps one blade tip at Dunmaglass and three blade tips at Farr. The EIA therefore judges the individual and cumulative impact to be **slight adverse**.
77. With regard to the National Park the EIA concludes:
- "The impact on the visual amenity of the National Park has been assessed as moderate adverse. In considering cumulative impacts on the National Park, it is considered that the addition of Dunmaglass to Glenmorriston and Corriegarth would be likely to result in higher levels of impact than would arise from either of these developments alone or together- i.e. that Dunmaglass would contribute to cumulative impacts. It is also considered likely that the addition of Dunmaglass to Glenkirk or the addition of Dunmaglass to Glenkirk and any other windfarm would be unlikely to increase the level of impact of Glenkirk and other combinations of windfarms."*
78. The CNPA objected to the application last time on grounds of landscape and visual impact. The layout of the turbines has been compacted and is much less strung out than the original proposal. However, the turbine heights have been increased to 125 metres in height and as noted by our Landscape Officer this compensates in visibility terms for the compacting of the layout. The visual assessment from the key viewpoints within the Park has

not changed as a result of the proposal. In addition, the overall impact of the proposal on the National Park has been assessed as moderate adverse (this is the same as the earlier version of the proposal). Consequently, it is logical for the CNPA to maintain its objection. Of greater concern is the addition of a number of proposals since the original Dunmaglass proposal went before the Committee. The addition of schemes such as Glenkirk, Ton nan Clach, Balavil and Corriegarth raises more concern than before with regard to the cumulative impact of this scheme in combination with the other proposals and to some extent this is accepted by the EIA.

79. The CNPA Landscape Officer has looked at the proposal from the point of view of the wild land resource. The applicant's ES recognizes that there will be a substantial adverse impact upon the areas of wildland as suggested by Scottish Natural Heritage's wildland search areas. Again, this has not changed since the original proposal. As noted by your Landscape Officer the wildland area referred to lies across the boundary of the National Park. The fact that this wildland character effectively leaches across the boundary emphasises that a precautionary approach should be adopted with this area.
  
80. In addition to the above the committee will be aware of the wildland work that has been carried out by the Park. This work demonstrates that much of the area along the boundary demonstrates a strong sense of wildness. The Park study has looked in greater detail at the qualities of landscape character and identifies them with greater accuracy. The distribution of characteristics from the produced maps would tend to indicate a strong presence of this wildness both on and beyond the boundary. NPPG 14 on Natural Heritage identifies Scotland's remoter mountain and coastal areas as "possessing 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". Given the emphasis NPPG 14 places on this taken together with the wildland work being carried out by the Park, in my view a precautionary approach should be taken with regard to the proposal and this is raised as a concern at the end of the report. In addition, it is important to note that both Carn Sgulain and Geal Charn as viewpoints are Munros where walkers may be seeking the kind of experience identified by NPPG 14. Consequently, the fact that these viewpoints are rated as being



subject to substantial adverse impacts from the windfarm would, consequently impact upon the wild land character of the area.

81. A key layer of policy is embodied in the National Park Plan. Under Conserving and Enhancing b) policy seeks to conserve and enhance the sense of wildness in the montane area and other parts of the Park. This section goes on to note that " 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." This is a key CNPA statement and is directly relevant to this proposal given the areas of wildland identified on the boundary of the Park that would be affected by the proposal. The scheme may well reduce the quality of the wildland resource and therefore discourage people seeking solitude from visiting the area who are seeking that particular experience.
82. The CNPA raised concern about the original version of the proposal with regard to golden eagles which may use the site and the National Park. The response from your ecologist raises concern about the long distance dispersal movements of several vulnerable and protected raptor species which inhabit, or could recolonise the National Park. The Monadhliath are an important area for the Scottish golden eagle . It is noted that wildlife tourism operators within the National Park take clients to Strathdearn to observe eagles and other raptors.
83. The ES describes how eagle movements on the site were collated through the use of human observers on the site. However, it is possible that human presence on the site resulted in avoidance behaviour by the eagles, this could in turn lead to eagle activity in the area being underestimated. Golden eagles from the National Park area do overfly the site of the proposed windfarm and this is evidenced by data provided from a satellite tracked juvenile Golden eagle. On two occasions this eagle overflew the site in April and May 2008 as it moved back and forth between the Cairngorms and the Western Highlands.
84. Some concern is raised regarding other species and in particular hen harriers and the dependence of the Park area on the

immigration of birds from the Western Highlands. Such birds may have to move across the site to replenish populations in the Park. While the number of movements may be low in volume the movements would be significant in terms of species conservation. Historically the Cairngorms have supported white tailed eagle and red kites. It would appear that the National Park supports suitable habitat for these species and re-colonisation would be likely to come from areas to the west and north-west of the Park. The CNPA ecologist is unsure why these two species have not been considered by the ES simply because they were not observed as part of the survey. However, both species are regularly recorded in the Monadhliath.

85. The CNPA ecologist has clear concerns with regard to the species mentioned and there is now clear evidence that an eagle using the National Park has also been present at the site of the application. I would recommend that these concerns are raised with the Scottish Government.

#### **Promote Sustainable Use of Natural Resources**

86. 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.

87. Given Government policy on the issue of wind farms the proposal may contribute to renewable energy in the widest sense. However, there is increasing concern about the carbon outputs of constructing windfarms, particularly on peaty soils and in line with comments made on other schemes I would recommend that the CNPA comment on this scheme that clear research should justify the carbon benefits of the scheme taking into account the carbon inputs of the construction process.

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

88. The additional environmental information now includes a Tourist Impact Assessment. While published before the recent research findings of the Glasgow Caledonian University report on the Economic Impacts of Windfarms on Scottish Tourism. the assessment has been produced in line with suggested methodologies.
89. The CNPA Economic and Social Development Group has commented on the proposal and welcomes the thorough socio economic and tourism assessments provided. In summary the assessment recognises the tourism value of the area around the site and this includes the National Park. A range of analysis has been carried out tourism attractions in the area from fixed attractions and the extent to which the windfarm would be visible from well known walking routes/areas. The effects on the traditional sporting economy have also been estimated and it is considered that there is no indication that a significant number of visitors would be deterred. While recognising the value and significance of tourism in the area it is concluded that the great majority of tourism resources would not be affected by the proposed development. The study also points out that the contracting strategy will seek to maximise the use of local businesses.
90. In relation to the findings of the assessment it is important to note that the conclusions reached in the applicant's study seem generally consistent with the recent Glasgow Caledonian University report on the Economic Impacts of Windfarms on Scottish Tourism.
91. A key factor of relevance in the report as pointed out by the 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.

92. 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 recognises 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.

## Conclusion

93. In the past the CNPA has considered that if a proposal was deemed to have an unacceptable visual impact then consequently objection would be raised regarding potential impacts on the promotion of enjoyment and understanding of the Park by tourism and study visits with this resulting in a potential impact on the local tourism economy. There was little other substantive evidence to base this upon. However, the state of the Park Report published in 2006 included survey information showing that 46 % of respondents identified beautiful views and scenery being a feature most liked by visitors. The next highest 'likeable' factor was the hills/wide spaces and rugged mountains.
94. From the aspects of the Environmental Statement that relate to visual impact it is clear that the situation in relation to the impact of Dumnaglass has not changed significantly. Therefore, I recommend that the CNPA continue to object on the basis of visual impact. However, in terms of the cumulative impact of Dumnaglass in combination with other potential windfarm developments the situation has deteriorated from a CNPA perspective in that the potential cumulative impacts are a much greater threat than they were the last time this proposal was aired. It is recommended that this is emphasised as part of the visual impact objection.
95. With regard to wild land as an issue the applicant's ES admits that the SNH Search Area for Wildland will be subject to

substantial adverse impact. This is of crucial interest as the CNPA's more detailed study into wild land within and adjacent to the Park boundary which indicates the ridgeline of the Monadliaths as having a high wild land value. This includes the viewpoints (Munro summits) in the applicant's ES that are described as experiencing a substantial adverse impact. This is the first time that the CNPA has held a tool which allows some level of objective judgement to be applied in relation to this issue. It would appear that based upon the criteria used to search for such wild land value the windfarm, if built, would reduce the wild land value of the Monadliath ridgeline to a significant extent. The combination of this and the ready admittance from the developers ES that the proposal would have a substantial adverse impact upon the SNH Search Area for Wild Land is in my view reason for objection on this basis.

96. The combination of concerns about cumulative visual impact and impact upon wildland bring us back to what may be the consequential impact from a visitor point of view. The applicant's tourism study is in my view very thorough and a useful aid to assessing the tourism/economic impacts of the scheme. However, my main concern would relate to cumulative impact because the study only covers the impacts of Dunmaglass and not the overall impacts of Dunmaglass being consented in tandem with a combination of one or more other windfarms in the vicinity. This links to the Glasgow Tourism study which points out that it is important that visitors who do not wish to visit windfarms have an alternative destination to areas that accommodate windfarms. The idea of NSA's and National Parks together with their buffer zones is mentioned. However, conversely, SPP6 on Renewable Energy states clearly that planning authorities should not impose additional zones of protection around areas designated for their landscape or ecological value.
97. I would not recommend that the CNPA object to the proposal in terms of potential impacts upon tourism of Dunmaglass alone. However, it is clear that there other proposals around the western and north western boundaries of the Park that if granted could result in a landscape overall that it may be difficult to describe as one that would be attractive to visitors who wish to spend time in an area with an absence of windfarms. NPPG14 on Natural Heritage points out that a cautious approach should be adopted in relation to valued landscapes such as National Parks. This is also supported by the stance of the National Park Plan which seeks to conserve and enhance the distinctive landscapes of the Park.

98. With regard to ecological issues the National Park is in a position where we now have some information that a golden eagle using the Park has overflowed the windfarm site twice this year. The CNPA raised concern about potential impact upon birds that use both the Park and the windfarm site and I am recommending that such concerns are reiterated.

## RECOMMENDATION

99. That members of the Planning Committee support a recommendation to **OBJECT** to the proposal for a windfarm at Dunmaglass raising the following concerns:
1. The CNPA welcomes the developers direct attempts to reduce the visual impacts of the proposal. However, from the accompanying environmental information it is clear that the visual impact from individual viewpoints is showing the same level of impacts as the previous application. In addition the overall visual impacts of the proposal are rated as moderate adverse from the National Park, again this has not changed from the earlier version of the application. This is considered contrary to aims of the National Park as embodied in the National Park Plan 2007.
  2. The CNPA would raise concern with regard to the proliferation of windfarm proposals in the vicinity of its boundary. Since the earlier version of this proposal was assessed a number of additional proposals have been submitted for scoping or as detailed applications. It is clear that the potential cumulative impact of windfarms is of even greater concern than it was previously and the combination of a number of proposals 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.
  3. The CNPA would raise concern about the potential impacts of the proposal upon wild land value on and adjacent to the CNPA boundary. The Monadhliath Hills show a high wild land value in recent research carried out by the CNPA. 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".

4. 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. Concern is also raised that the proposal may discourage the re-colonisation of the Cairngorms National Park by bird species that while historically resident in the National Park but are currently not in the area.
5. From a tourism and economy perspective the CNPA welcomes the thorough tourism assessment that has been carried out in part to address the CNPA's previous concerns. From the study provided it would appear that the proposal would only result in very limited impacts upon the tourism and economy resource. However, the study takes no account of the potential cumulative impacts of the proposal being approved in tandem with a combination of other proposals around the Park. Given the importance of the tourism economy to the Park the CNPA would recommend that research is carried out that takes account of potential cumulative impacts upon the tourist resource.
6. The CNPA 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.
7. The CNPA note that the site is located outside of the preferred areas illustrated by the Highland Council Renewable Energy Planning Guidelines for major onshore developments and that this issue should be thoroughly taken account of in any final decision making process. The CNPA would not wish to see any positive decision on the scheme as setting a precedent for further proposals outside of the preferred areas adjacent to the Cairngorms National Park boundary.

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