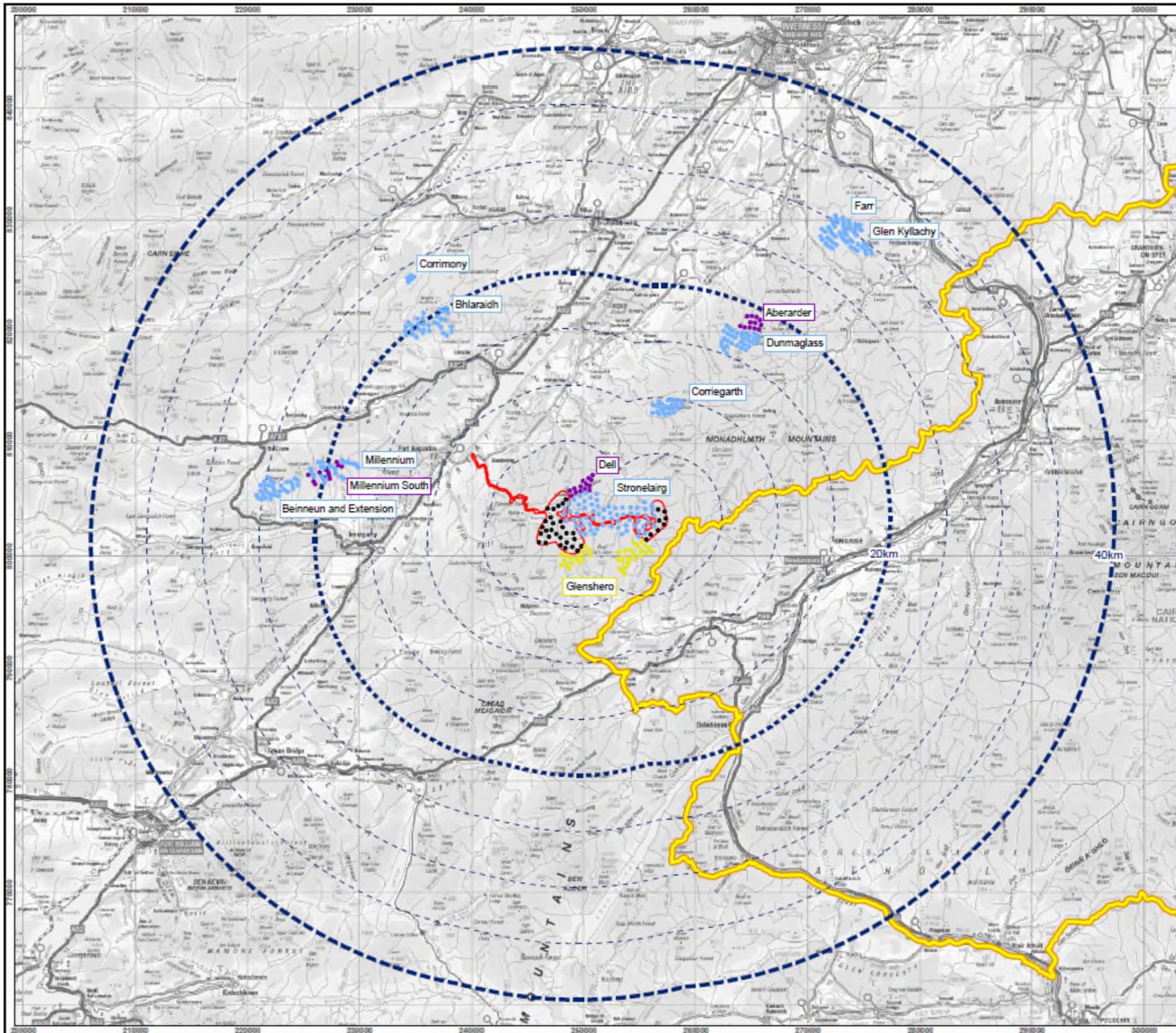


**CAIRNGORMS NATIONAL PARK AUTHORITY**

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|   |                                   |
|---|-----------------------------------|
| <b>DEVELOPMENT PROPOSED: Cloiche wind farm</b>                          |                                   |
| Consultation from Scottish Government Energy Consents & Deployment Unit |                                   |
| <b>REFERENCE:</b>   | 2020/0121/PAC (ECU00002054)       |
| <b>APPLICANT:</b>   | SSE Generation, Cloiche wind farm |
| <b>DATE CONSULTED:</b>  | 5 May 2020                        |
| <b>RECOMMENDATION:</b>  | Objection                         |
| <b>CASE OFFICER:</b>  | Nina Caudrey, Planning Officer    |

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**Key**

- Site Boundary
  - Proposed Turbine
  - 40km Wider Study Area
  - 20km Detailed Study Area
  - 5km Distance Radii
  - Cairngorms National Park Boundary (CNP)
- Cumulative Baseline Sites
- Operational/Under Construction Turbine
  - Consented Turbine
  - Application/Appeal Turbine

0 2 4 6 8 10 km  
 Scale: 1:325,000 @ A3



**Figure 7.7.2**  
 Cumulative Sites included  
 within the Assessment

**Cloiche Wind Farm**  
 EIA Report

## 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 & Deployment Unit (ECDU) 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 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 (formerly Scottish Natural Heritage, SNH) 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 is split into two clusters of turbines, adjoining the west and eastern ends of the existing Stronelairg wind farm in the Monadhliath mountains, as shown in the applicant's ER Figure 7.7.2 on page 2 of this report. As also shown in the figure, in the surrounding area there are numerous existing and consented wind farms, plus a proposed wind farm in the planning system.
5. The proposed development would comprise 36 turbines with a maximum height of 149.9m to the tip of the blade in an upright position (with 8 turbines in the eastern cluster and 28 in the western cluster), approximately 29km of upgraded existing track plus 26km of new track, as well as other infrastructure and works (such as substation, underground cabling, borrow pits, etc). It is expected that the wind farm would have an estimated total installed capacity of around 150MW, dependent on the turbine specification used.
6. The nearest turbine of the eastern cluster would be around 1.4 km to the north of the closest part of the boundary of the Cairngorms National Park, with the western cluster, tracks and associated infrastructure located further from the Park boundary.
7. Theoretical visibility of the proposed wind farm from within the Park would largely be focussed between 5 and 25 km from the wind farm around the south western corner of the Park, with some visibility at greater distances further into the Park, as shown by the coloured areas in Figure 7.5.1 of the applicant's ER (Appendix 1).
8. When considering the cumulative visual effects with the baseline of existing and consented wind farms in the surrounding area, the proposed wind farm adds to effects

caused by the baseline developments by intensifying the baseline level of development experienced, as well as creating new visibility of a wind farm in areas that do not or would not already see existing and consented wind farms. The new visibility is largely focussed around the south western corner of the Park, as shown by the blue areas in figure 7.8.3 of the applicant's ER (Appendix II).

9. Visualisations from a number of viewpoints (VPs) have been provided in the applicant's ER that demonstrate the level of visibility that would be had (figure 7.5.1, Appendix I), including from within and close to the Park boundary. These include those listed in the table below, which can be found (along with other ER material) on the ECDU website via <https://www.energyconsents.scot/ApplicationDetails.aspx?cr=ECU00002054> and looking under the 'application documents' for documents with a description starting 'Volume 3A – Figure 7.XXX' where XXX is the visualisation title (eg 'Volume 3A - 7.9.9.1 - Viewpoint from Geal Carn (Monadhliath)').

| <b>VP number and location</b>       | <b>Within the Park?</b>         | <b>Closest visible turbine to VP</b> | <b>ER visualisation titles</b>                               |
|-------------------------------------|---------------------------------|--------------------------------------|--|
| VP9,<br>Geal Charn<br>(Monadhliath) | on boundary                     | 2.7 km                               | 7.9.9.1 -2<br>Viewpoint from Geal Carn<br>(Monadhliath)      |
| VP8,<br>Carn Dearg<br>(Monadhliath) | yes                             | 6.2 km                               | 7.9.8.1 - 3,<br>Viewpoint from Carn Dearg<br>(Monadhliath)   |
| VP18,<br>Loch na Lairige            | yes                             | 11.1 km                              | 7.9.18.1 – 3<br>Viewpoint from VP18 Loch na Lairige          |
| VP12,<br>Glen Shirra                | yes                             | 11.2 km                              | 7.9.12.1 – 3<br>Viewpoint from VP12 Glen Shirra              |
| VP19,<br>Cam na Caim                | yes                             | 22.7 km                              | 7.9.19.1 – 3<br>Viewpoint from VP19 Carn na Caim             |
| VP10,<br>Braeriach                  | yes                             | 38.1 km                              | figures 7.9.10.1 – 7.9.10.3<br>Viewpoint from VP10 Braeriach |
| VP11,<br>Cam Liath                  | approximately<br>2.5 km outwith | 10.3 km                              | 7.9.11.1 – 3<br>Viewpoint from VP11 Carn Liath               |
| VP6,<br>Glen Markie                 | approximately<br>6 km outwith   | 7.4 km                               | 7.9.6.1 – 3<br>Viewpoint from Glen Markie                    |
| VP5,<br>Carn Dubh                   | approximately<br>10 km outwith  | 5.5 km                               | 7.9.5.1.1 – 3<br>Viewpoint from Carn Dubh                    |

## RELEVANT PLANNING HISTORY

10. **PRE/2019/0019** CNPA responded to a scoping consultation from ECDU for a different number and size of turbines in the same location (up to 40 wind turbines of height 175 metres to tip) on 25 October 2018. This deferred to the advice of NatureScot, but highlighted the sensitivity of the location and the need for careful consideration of cumulative effects.

11. CNPA attended a pre-application meeting with Highland Council, the applicant and statutory consultees on 27 November 2019, where verbal advice was given to the applicant. Written advice was produced by Highland Council in December 2019 after the meeting.

## PLANNING POLICY CONTEXT

12. The development proposal is located wholly outwith the National Park, therefore the Cairngorms National Park Local Development Plan (2015) 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** (revised 2014) 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:
  - 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”.

### 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 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.
20. 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

21. NatureScot have provided CNPA with advice in relation to the effects on a range of landscape interests, including the Park, of the proposed wind farm both alone and cumulatively with other existing and consented wind farms in the surrounding area.

#### ***Effects on the SLQs***

22. Following the method for assessment of effects on SLQs, NatureScot have focused their analysis on the SLQs that they consider that the proposed development is likely to have significant adverse effects. Some of the SLQs have been grouped where they share many of the same underpinning landscape characteristics. The groupings of SLQs (in *italics*) are those that NatureScot consider are most relevant and sensitive to likely significant effects from the proposal.
23. *Strong juxtaposition of contrasting landscapes & Grand panoramas and framed views* There is a strong juxtaposition between the settled and managed landscapes along the lower glens of Glen Shirra , Glen Mashie and the Upper Spey, and the higher ground uplands of the South Monadhliaths where natural processes dominate in this relatively small intimate part of the Park. The upland hills create a simple backcloth that emphasises the landscape pattern within the straths as well as their spatial containment and sense of place, seeming high, massive and extensive in scale.
24. The introduction of the proposed wind turbines in an exposed upland landscape setting (such as viewed from representative viewpoint 18, Loch na Lairige, and from the hill fort of Dùn-da-Lamh) will contrast with the existing character where human elements tend to be contained within the strath floors and lower slopes. Currently the landscape seems undeveloped, simple and there is a relatively untouched horizontal emphasis, whereas the proposal will indicate the presence of incongruous human-made vertical structures both in front of and over the horizon. By being seen as large, rotating structures on the upland hill skyline, the larger 28 turbine western array of the proposal would appear to encroach into the glen landscape of the Upper Spey and breach the existing hill edge. The proposal would have **some significant adverse effects** on these SLQs in addition to the effects of the existing Stronelaig wind farm, which forms

part of the baseline conditions, because it would typically appear much more prominent and imposing upon the surrounding straths.

25. *Landscape of layers & Layers of receding ridge lines & Vastness of space, scale and height.* In the elevated and open landscapes of the Park, including the South Monadhliath (from approximately 5km from the proposal), Upper Glen Truim, Dalwhinnie and the Cairngorm Massif (between 8km and 20km from the proposal), the sense of expansiveness, openness and space created by the layer upon layer of receding ridgelines is well expressed in all directions. In these locations, landform horizons form a key visual element, the convexity of the rolling slopes often screening the straths and glens that divide neighbouring hill ranges so the landscape seems even more expansive than its physical dimensions may suggest.
26. Within the South Monadhliath, the proposed turbines would typically be seen in addition to the existing Stronelaig turbines. Nonetheless, they will appear to have greater effects on people's experience of the SLQs from the Monadhliath plateau and tops due to their greater proximity and perceived imposition, partly due to appearing to breach the shallow bowl that contains much of the Stronelaig development (mitigation was put in place as part of the Stronelaig application to secure this containment).
27. The spread of the proposed wind turbines will appear very extensive within the landscape. From locations within the Monadhliath hills, despite the existing Stronelaig wind turbines having adverse effects, these turbines appear separate from viewers by a visible extent of open space in-between as well as appearing less prominent due to their lower elevation. In contrast, the proposed Cloiche wind turbines (in particular the eastern array) would be so close and high in relation to some parts of the Monadhliath plateau that they would appear immediately behind the foreground landform horizon. This would result in the proposal diminishing the perceived vastness of space and scale, and contrasting to the strong horizontal emphasis which is a key element of this part of the Park (representative viewpoints 9 Geal Charn and 8 Carn Dearg) however these effects are **not considered to be significant** due to the existing prominence of the Stronelaig turbines and the effects on these qualities.
28. The proposed wind turbines will introduce a feature in distant views from the upper reaches of Glen Truim, the Southern Hills and the Cairngorm Massif (represented by viewpoints 10 and 19) which seems to interrupt the successive landform horizons and perceived vastness of space and scale that contribute to this SLQ. These effects would, however, be **unlikely to be significant**, principally due to the distance of the proposal and effects of existing wind farms, including Stronelaig, Millennium, Corriegarh, and Dunmaglass.
29. *Dominance of natural landforms & Wildness.* The dominance of nature at the broad scale along with the notable lack of obvious development is well expressed across the Upper Glen Truim and Dalwhinnie and to a lesser extent South Monadhliaths area. At present any notable human activity is typically within the glen floors and lower slopes, with the surrounding uplands predominately uninhabited, natural in form, extensively covered by moorland vegetation, with a sense of wildness.

30. Where Stronelaairg is visible, Cloiche would appear as a notable extension much closer to the currently remote South Monadhliath hills and, as such, increase the prominence, extent and influence of human structures whilst simultaneously diminishing the dominance of natural landforms and perceived wildness. Unlike Stronelaairg, there is no apparent physical containment to Cloiche therefore it appears to 'spill over' into the wider, wilder landscape. From Upper Glen Truim and Dalwhinnie where Stronelaairg tends to be less visible due to its containment, Cloiche will add to the more distant wind farms which already interrupt and compete with the dominance of natural landforms. The proposal would have **significant adverse effects** on these SLQs in addition to the effects of the existing Stronelaairg wind farm given the high sensitivity and people's experience of the SLQs and landscape character in this open landscape.

### ***Cumulative effects***

31. NatureScot provided advice in relation to the effects of Cloiche in combination with existing and consented wind farms. Their advice is that existing and consented wind farms across the Monadhliaths have significantly affected nationally important landscapes including the Park, intensifying the existing developed character of this part of the Rolling Uplands of the Monadhliaths. In relation to the Park, Cloiche would significantly add to these effects for the reasons described above. It is on this basis that the appraisal and recommendation in this report is made.
32. However, as an adjoining development, the proposed Glenshero wind farm, is currently in the planning system at appeal, additional consideration was given by CNPA officers as to whether the cumulative effects would alter should Glenshero gain consent.
33. Comparison of the cumulative ZTV for Cloiche, existing and consented wind farms (Appendix II) with the cumulative ZTV for Cloiche, existing and consented wind farms plus Glenshero (Appendix III) shows the coincidence of visibility between Glenshero and the proposed Cloiche wind farm. Where the visibility coincides, the blue areas with only visibility of Cloiche in Appendix II turn green in Appendix III indicating visibility of both Cloiche and Glenshero. The visualisations produced by the applicant also aide consideration, particularly the wirelines that distinguish between the different wind farm developments.
34. It is considered that the cumulative effects would change should Glenshero gain consent: the addition of Glenshero to the baseline of existing and consented wind farms would significantly diminish the significance of the effects of Cloiche on the Park. This is due the magnitude and spread of the effects of Glenshero as described in committee report Planning Committee Agenda Item 9 24/05/2019 (available via <https://cairngorms.co.uk/resource/docs/boardpapers/24052019/Item9AAGlensheroWindfarm20180379PAC.pdf>), which would be greater than those predicted for Cloiche. As there is significant overlap in the areas that would be affected by Cloiche and Glenshero, should Glenshero gain consent and become part of the baseline, then the addition of Cloiche would not significantly add to the level of effects that would be caused by Glenshero, existing and consented wind farms.

## APPRAISAL

35. The policies of the NPPP and SPP set out how proposals outwith the boundaries of the National Park should be considered in terms of effects on the Park.
36. Policy 3.3 of the NPPP sets out a test for considering effects on the 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.
37. Paragraph 212 of SPP sets out that “development that affects a National Park... should 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, environmental or economic benefits of national importance.”
38. 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.
39. There are a number of existing and consented wind farms in the area surrounding the proposed wind farm, as shown on page 2 of this report. There is also a nearby wind farm in the planning system that has not yet been determined, Glenshero wind farm (also shown on page 2).
40. In relation to effects on the SLQs of the Park, Nature Scot conclude that the proposed Cloiche wind farm would encroach significantly on some of the landscape character, SLQs and people’s experience of these, principally due to its siting and extent that would breach the shallow bowl that contains much of the Stronelaig development, undoing the mitigation that was put in place as part of the Stronelaig application to secure this containment. It would diminish existing qualities of: *Strong juxtaposition of contrasting landscapes, Grand panoramas and framed views, landscape of layers, Dominance of natural landforms & Wildness*. The proposal would have significant adverse effects in addition to the existing Stronelaig wind farm that forms part of the baseline conditions, particularly because it would appear from many sensitive areas to significantly add to the extent and proximity of the Stronelaig wind farm and perceived encroachment.
41. When considered against the baseline of existing and consented wind farms, the addition of Cloiche would have significant adverse effects on the several SLQs and landscape character of the Park, adding to the existing level of effects in some areas and introducing new effects in others.

42. The extent and level of significant adverse effects caused by the addition of Cloiche to the baseline of existing and consented wind farms is therefore considered to fail to meet the requirements of NPPP policy 3.3 (and so 1.3). As a result, CNPA should **object** to the proposed Cloiche wind farm in combination with existing and consented wind farms.

## RECOMMENDATION

**That Members of the Committee support a recommendation that CNPA OBJECTS to the proposed Cloiche wind farm in combination with consented and existing wind farms, due to significant adverse effects on some of the Special Landscape Qualities and landscape character of the Park causing it to fail to meet the requirements of Policy 3.3 (and so policy 1.3) of the Cairngorms National Park Partnership Plan 2017 – 2022.**