

# Paper 2

## APPENDIX 4

### CNPA Internal Specialists Comments

The ecology response from the SLU Directorate of the CNPA focuses on the primary access road and cable route that lie within the CNP and any species that may use the CNP that may be impacted upon by the proposed windfarm. In accordance with the SNH-CNPA case work agreement, SNH will comment on any protected areas within the CNP and any European Protected species.

### **Habitats and Flora**

#### **Access track**

The access road will follow an existing track from the A9 to a conifer plantation on the Dunachton Estate. From there a new access road will be created to the windfarm site adjacent to the CNP boundary. The road traverses habitats that are of European interest and are therefore, listed on Annex 1 of the EC Habitats Directive, namely blanket bog, wet heath, dry heath and dry lichen rich heaths. At a NVC level the majority of the communities associated with these habitats are listed as priority habitats on the Scottish Biodiversity List. This list is created by ministers listing priority species and habitats of principal importance to aid public bodies in fulfilling their biodiversity duty. In addition, blanket bog, dry heath and upland heath are UKBAP and Cairngorms LBAP priority habitats. No plant species of conservation concern was noted during the surveys of the proposed construction within the NP boundaries other than Juniper, which is a UK BAP and Cairngorms LBAP priority species.

The exact area of these habitats to be lost due to creation of the access road within the CNP has not been assessed separately within the EIA, although it is likely to be significant due to the access road being 15 m wide (5 m running width and 5m either side for cuttings/track batters). In addition there is potential for further habitat loss of the blanket bog etc due to the hydrological changes that may occur due to construction of the access road. Passing places and compounds are also proposed to be built along this road within the CNP. The EIA has rated these habitats as medium (regional importance) conservation value.

The cable route largely follows the route of an existing track and will be installed underground, adjacent to the existing track. Reinstatement of the dug material will be undertaken on top of the cable.

The first aim of the NP is to conserve and enhance the natural and cultural heritage of the NP. This proposal in no way fulfils this aim. The habitat will not be conserved and certainly will not be enhanced. The applicant has not made any consideration of compensation habitat. Compensation and enhancement schemes need to be developed to ensure that construction of the access road and cable route within the CNP, adhere to the first aim of the NP.

There is significant risk of pollution to watercourses and bog habitats. If this proposal is granted planning permission in principle it is essential that construction method statements are produced and submitted to the CNPA, SNH, THC and SEPA for approval.

#### **Mammal Species**

The cable route appears to be directly on the top of two potential pine marten dens. This species is legally protected through the Wildlife and Countryside Act 1981

(WCA) and therefore, the disturbance or destruction of its den would be an offence. A more detailed survey should be undertaken of these den locations to ascertain if these are pine marten dens. If so, the cable route should be altered to prevent any disturbance of the den.

There were no water vole burrows recorded along the proposed access road, although there were a couple of latrines recorded along the proposed route of the access road. Water vole are afforded legal protection through the WCA. As such it is an offence to deliberately or recklessly disturb or destroy a water vole burrow. If this proposal is permitted the CNPA's recommendation regarding water voles echo's the advice of SNH relating to water voles outwith the NP: a pre -construction survey will be required to determine the locations of any borrows along the proposed access track and cable route, with the findings submitted to CNPA. If any burrows are found a 30m buffer zone around each burrow should be created, with no machinery or personnel entering this site. No pollution should enter this site.

### Ornithology

CNPA have concerns about the potential impact of windfarms surrounding the CNP based upon the impact upon ornithological interest. As this proposed windfarm is outwith the NP the CNPA can only comment on how the windfarm may impact upon bird populations within the CNP. In relation to this there are very limited studies of bird movements from and to the park. The CNPA partnership project RaptorTrack has satellite tagged several raptors in the vicinity of the proposed wind farm including 3 golden eagles and a peregrine falcon. All of which have been active in the proposed windfarm area to varying extents. RaptorTrack provides crucial information on the importance of this site for raptors, that is free of the inherent errors associated with Vantage point surveys which leads to disturbance created by walking on site and a surveyor being present at a location and the human errors in mapping the data and observing large vantage points. The data provided is obviously limited to the number of the birds tagged in the area and the number of location downloads a day. From this data it and through expert opinion there are actually two golden eagle territories in the area and the proposed windfarm area appears to be a border location between the two territories.

Re – the CNPA/SNH case work agreement SNH lead on the EPS and European protected bird species such as golden eagle. However, the CNPA note that there are several issues with the ornithological data which makes it difficult to assess the true ornithological value of the proposed windfarm site. From the RaptorTrack work and local knowledge there is major omission in the ES as it states there is only one golden eagle territory in the proposed windfarm location, when in fact there are two. The CNPA is still awaiting the wintering vantage point survey results that were undertaken in 2010/11 winter period. There are errors in the vantage point data in that it lists on several occasions that one surveyor was surveying two vantage points at the same time. Also, the timing of the vantage point surveys do not provide a good range, which is necessary for fully evaluating the ornithological interest of the site.

With the information presented in the ES by SLR Consulting Limited , there are few flights of any species within the proposed windfarm area, therefore the calculated

collision risk is low for raptor species. However, this cannot be fully assessed due to the issues with the data as described above. SNH have requested further information from the applicant on these matters.

Windfarms are known to have a barrier effect on some mammal and bird species. In particular golden eagles have been documented as avoiding wind farm areas. The CNPA is concerned with the growing number of windfarms in close proximity to the NP boundary which could create a barrier effect for some raptor species and mammals that in effect creates further habitat fragmentation for these susceptible species such as the golden eagle. This particular windfarm application has provided no compensation measures for the lost habitat from the Golden eagles nesting near the windfarm within the NP.

In the scoping report the CNPA stated that the ES should consider potential impacts for conserving and increasing populations of sea eagles and red kites. This has not been assessed in the ES.

If this proposal were to be successful a detailed construction method statement would need to be developed to include details of construction timings to prevent disturbance to nesting raptors and other species. This should be agreed with the CNPA, SNH etc.

As windfarms are growing rapidly the impact upon bird species is not fully understood. If this proposal were to be passed the CNPA would recommend a minimum 3 year post construction fatality survey to be undertaken at regularly with the aid of specially trained dogs or radar or other emerging technologies, developed to study the fatality rates.

# Allt Duine Windfarm : Landscape Response

(See also Annex A)

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## 1.0 The Development

The development is for 31 125m high wind turbines located in the Monadhliath, in a high moorland bowl adjacent to the western boundary of the Park. The access road and grid connection are within the Park. The construction will take place over a period of 2 years including winter 'down time'.

## 2.0 Landscape and Visual Effects (Wind Turbines)

Owing to the lie of the land and the site being in an elevated bowl the potential visibility of the wind farm (wind turbines) is limited from the lower ground of the National Park. Some areas will be affected but not the settlements, nor particularly from the busy roads (apart from the junctions on to the A9), but from the woodlands, farmlands and minor roads and local high points where people are likely to go for their quiet enjoyment. The outlying hill groups of the Meal A Buachaille ridge, Cromdales and the hills along the northern edge of the Park will have views of the windfarm and there is a high degree of penetration into areas hitherto little or unaffected; the Giack, Dalnamein and even into Atholl forest with predicted visibility on Beinn a Ghlo. Most affected will be the Monadhliath itself and the slopes, ridges and summits of the Plateau. For a detailed consideration of all areas please see Annex A.

The wind turbines are outside the National Park boundary but the effects would be felt to a very large extent within the National Park. The Environmental Statement (ES) largely concurs with this view and concludes that there will be significant effects on landscape character in parts of the Monadhliaths, the Strathdearn Hills and the Cairngorms Central Massif. (5.715). and significant effects on walkers, climbers and cyclists (and presumably also skiers) at south east corner of Strath Dearn Hills, the summits and shoulders along the north western edge of the Cairngorm massif and some summits within Monadhliath Mountains. (5.722)

The National Park Act (at section 14) spells out the role of the Park Plan in exercising functions so far as affecting the National Park. The Park Plan

strategic objectives relating to landscape are to a) maintain and enhance the distinctive landscapes across the Park and c) ensure development (in and where relevant beyond the Park) complements and enhances the landscape character of the Park. The significant effects as identified in the EIA process and described above means that, in my view, the proposal fails to meet both of these objectives.

The proposal falls within an area in the Highland Council's Renewable Energy Strategy consultation draft with a proposed restrictive policy, recognising the need to protect the ridgeline and protect short distance views from Park and longer views from Cairngorm Mountains.

### **3.0 Special Qualities**

The special qualities of the Park, are described in the National Park Plan and further discussed and developed in 'The Special landscape Qualities of the Cairngorms National park' (SNH Commissioned Report No. 375 2010). A consideration of these qualities should be at the heart of the analysis of how this proposal affects the Park.

Despite not undertaking a systematic assessment of effects on special qualities the ES concludes thus "...The proposed development would be located away from the core of the CNP and related distinctive landscape and overall would not have an adverse effect on the Special Qualities of the CNP."

Those who come to the plateau do so because they have made a decision to go there for the challenge and the experience. They will be on foot or skis moving at a pace where it is possible to take in ones surroundings in some depth. The qualities that make the landscape and scenery of the plateau special are the experience of magnificent mountains towering over moorland, the vastness of space, scale and height, an imposing massif of strong dramatic character, the unique plateau of vast scale, distinctive landforms and exposed boulder-strewn high ground, the drama of deep corries, exceptional glacial landforms, snowscapes, grand panoramas and a great sense of wildness.

The predicted landscape and visual effects are likely to impact upon and substantially dilute the experience of these special qualities.

#### **4.0 Special Qualities -Wildness**

The Cairngorms National Park is characterised by having a substantial area of wild land (wild land - an area where an individual finds the experience of wildness is particularly strong). Recognising and valuing the special quality of wildness and the enjoyment that it can give to the public is core to the strategic management of the National Park. No systematic assessment was made of the effects of this proposal on wildness within the National park.

The Plateau is an area where for many the wild land experience is at its best. In the Monadhliath, walkers, sportsmen and cross-country skiers experience something that is different from the plateau. The Munros are popular but the glens and lesser hills are little-visited and are described by some as a classic wildland area. Both the access road and turbines would affect the Monadhliath.

The predicted landscape and visual effects resulting from this proposal would impact upon the special qualities of the plateau and the Monadhliath, and could undermine and severely compromise the quality of the wild land experience.

The ES fails to adequately consider the strategic objective within the Park Plan, 'to conserve and enhance the sense of wildness in the montane area and other parts of the Park', and does not reflect on the fact that the experiences of residents and visitors enjoying the National park should be of the highest quality (Park Plan 2007 5.3.1).

#### **5.0 Access Road and Ancillary Components**

The principal landscape and visual effects arising in the Strath would be as a consequence of the access road and other ancillary components. Much weight has been put on the routing of the access road as mitigation. The route alignment does use landform and tree cover to shield views but parts of the access road would be open to views within the Strath and from elevated locations.

Along with the road shoulder and drainage ditches, the width of disturbed ground would, at a conservative estimate, range from 7m to 17m depending on the angle of slope. The access track construction details and the draft construction method statement do not reflect the variable terrain and slope, (from rock and scree to peat bog and thin soiled fragile heaths) that occur along the proposed route.

The ES makes judgements based on the comparison of the wind farm access road with other existing estate tracks in the area. The specification of the proposed track is far more substantial and the visual effect likely to be greater.

There would be two site entry points off the A9, one at Dalraddy and one at Leault Farm. The nature and scale of the Leault entry point would be a significant detractor particularly during construction when there would be a high level of vehicle activity.

No specific design mitigation is given in respect of the A9 entry points.

In contrast to the ES it is my view that the level of disturbance arising from the access road and associated developments would constitute a significant level of impact on the landscape fabric and landscape character of parts of the National Park and would have an adverse effect on views from the A9, within the Strath and from elevated locations. In respect of Policy 6 (Landscape) of the Local Plan, the level of effect would be such that the development would fail to complement and enhance the character of the Park.

## **6.0 Cumulative Discussion**

To date the effects of constructed and operational windfarms (Rothes and Paul's Hill) affect the Cromdales, Meal a Buachaille, and the northern part of the massif including Caringorm, Breariach, Macdui and Ben Avon at distances of approx. 36 to 53km. Berryburn (consented) will have a similar effect. Farr affects the Cromdales and a similar part of the massif at approximately 36km. Farr and Pauls hill also theoretically affect lower-lying parts of Abernethy and Strath Spey.

Dunmaglass and Corriegarth (both consented) will similarly affect Meal a Buachaille and the Cromdales at approximate distances of 35km to 50+km, both affect the north western corner of the plateau (at approx. 35km to 43km) and Dunmaglass extends the windfarm effect further south into the Feshie Forest and Giack (at approximately 30km to 35km)

Should Glenkirk and Tom nan Clach be built they will add to the effect experienced on the Cromdales (at approx. 20 to 25Km) and on the Meal a Buachaille and on that part of the plateau that includes Cairngorm, Braereach, Macdui (at 27 to 30km) and the hills on the northern and north western boundaries of the Park. Glenkirk would also be visible at 45km from Giack.



Allt Duine would extend the effect west and south with extensive visibility at distances of 13 to 22km from the plateau summits and ridges, from the Feshie forest and from the north-facing slopes of the Giack forest and at approximately 32km from some parts of the Dalnamein forest. There will be intensive visibility from distances of less than 1 km along the western boundary of the Park in the Monadhliaths. It would contribute to the now marked encircling effect of wind farms around the northern and western side of the National park.

## **7.0 Conclusion**

Careful attention has indeed been given to the design and layout of the proposed turbines and other components of the proposed windfarm which has resulted in reducing potential landscape and visual effects. However, the fact remains that the number, location and intensity of the remaining landscape and visual effects of the windfarm, both on its own and cumulatively, fall principally within the National Park and upon those experiencing the special qualities of the National Park. These effects are significant and largely non-mitigable and as a consequence the proposal fails to meet the first and third aims of the Park.

Frances Thin

4/5/2011

# Annex A

## Allt Duine Windfarm: Landscape Comment

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### 1.0 The Development

The development is for a 3 | 125m high wind turbines located in the Monadhliath in a high moorland bowl adjacent to the western boundary of the Park. The access road and grid connection are within the Park. The construction will take place over a period of 2 years including winter 'down time'.

### 2.0 Methodology and Visual Material

In general the LVIA is thorough and the visual materials of a high quality. However, there are a number of specific points I would like to make below;

- There is minimal reference to Special Landscape Qualities and their relationship to landscape character and enjoyment. In particular no systematic assessment is made of effects on wildness qualities other than comment relating to the SAWLs.
- ZTV summary is helpful but does not mention anything about the access road or on-site roading. The ZTV work undertaken for the access road should have been included in the ES.
- A 10km study area for landscape character and visual amenity effects was used for the access road, this should have been 10km from all points on the track and not 10km from the windfarm site (5.59).
- Viewpoints are located so as to illustrate the effects of the wind turbines and not the access road so that it is 'cut out' of views i.e. just off shot.
- Where the access road is shown in visuals it is inadequately rendered. (Compare to nearby tracks and recent forestry fence.)
- No visuals of access on to A9

### 3.0 Impacts Affecting Different Part of the Park

In the following section I examine the material submitted in the ES Landscape and Visual section and also consider the effects on special qualities and wildness. I have structured this according to the different parts of the Park affected.

### 3.1 Effects on The Lower ground within the Park

#### 3.1.1 Effects on Landscape Character

Viewpoint No.	Viewpoint	Effect on Landscape Character (ref table 5-2)	Comment
6	Carrbridge Railway Station	None	agree
11	Ord ban	Mod/minor	No turbines visible effect is due to ancillary components. Agree*
14	B970 Tombain	Minor	agree
19	Loch Insh	Minor	No turbines visible effect is due to ancillary components. Agree*
21	Creag Far-Leitre	Mod/ Minor (minor cum effect)	Agree
23	Glen Tromie Road	Minor	agree

#### 3.1.2 Effects on Visual Amenity

Viewpoint No.	Viewpoint	Effect on Visual Amenity	Comment
6	Carrbridge Railway Station	None	agree
11	Ord ban	Moderate/minor	No turbines visible effect is due to access. Agree*
14	B970 Tombain	Minor (cum negligible)	Agree
19	Loch Insh	Minor	No turbines visible effect is due to access. Agree*
21	Creag Far-Leitre	Mod/minor (cum minor)	No turbines visible effect is due to access. Agree*
23	Glen Tromie Road	Minor/negligible (cum Minor)	Agree

\*Owing to the lie of the land and the site being in an elevated bowl the potential visibility of the wind farm (wtbs) is limited from the lower ground of the National Park. The principal effects arising in this area are as a consequence of the access road and other ancillary components. From the lower ground the track will be seen in the context of a fairly diverse

landscape and a number of other hill tracks. However, wind farm access roads can be 3 times or more as wide as the average land rover track

### **3.1.3 Settlements**

There is potential visibility from the northern edge of Carrbridge and Feshiebridge and scattered properties and farmsteads. Views of wtbs from these settlements are considered unlikely because they are surrounded by woodland. None the less periodic woodland management works may open up views in the future.

### **3.1.4 Road and Rail**

A9 - Very limited predicted visibility but what there is includes potential views of up to 5 wtb just south of the Carrbridge junction. From here Glenkirk would also be visible in the other direction. NB no assessment of access-related developments.

A938 - Between A9 and Dulnain Bridge there is predicted intermittent visibility of up to 5 wtbs and no cumulative visibility.

B9007 - There is predicted visibility of up to 5wtbs right on the Park Boundary where the road emerges between the craggy hills of Carn na Leitre and Creag Ealraich. The chosen viewpoint (v pt. 4 is south of this area of predicted visibility) This is an important Park gateway.

B970 - Predicted visibility in vicinity of Feshiebridge of up to 5 wtbs. Effects discounted owing to tree cover.

Glen Feshie Road - Predicted visibility of up to 5 wtbs along most of 7km route when travelling out of the glen, though it is considered that this will be limited by tree cover.

Rail – visibility over a short section at Slochd.

Designed Landscapes – There are minor effects on the designed landscapes of Kinrara and Doune of Rothiemurchus.

### **3.1.5 Special Qualities**

The qualities that make the landscape and scenery of the lower areas special are a landscape of layers from inhabited strath to remote uninhabited upland, the surrounding hills, broad farmed straths, dark and venerable pine forest, light and airy birch woods, Parkland and policy woodlands, layers of receding ridgelines, grand panoramas and framed views. The predicted effects though limited and sometimes fleeting (as one travels along the road) and sometimes unexpected (across an area of felled woodland perhaps) could undermine some of the subtle interplay and richness of these qualities. These will be experienced not from the settlements, nor particularly from the busy roads (apart from the junctions on to the

A9), but from the woodlands, farmlands and minor roads and local high points where people are likely to go for their quiet enjoyment.

### 3.1.6 Wildness

- no specific consideration

### 3.2 Effects on the Mid Slopes and lower hills including Meal a Buchaille and Cromdales

As one climbs from the lower ground up the north and west-facing slopes of the Cairngorm massif and on to other lesser summits the visibility of the windfarm quickly increases. At these heights woodland cover is sparse or non-existent and potential visibility as assessed on the ZTV, accepting local land form variation, will be actual.

#### 3.2.1 Effects on landscape Character

Viewpoint No.	Viewpoint	Effect on Landscape Character	Comment
8	Meall a' Bhuachaille	Negligible (cum negligible)	Agree
9	Glenmore minor road/ski road	Minor/negligible (cum minor/negligible)	agree
10	Rothiemurchus lodge	Mod/minor (cum mod/minor)	Agree
13	Lairig Ghru	Moderate (cum moderate)	agree
15	The Argyll stone	Major (cum major)	(cum effect from proposed glenkirk, Tom nan Clach and Dunmaglass check cum visuals plus Stronelarig (currently at Scoping))
20	Glen Feshie	Moderate	agree
22	Carn Dearg Beag	Major/mod (cum Minor /mod)	Agree
24	Meallach Mhor	Mod/minor (cum mod/minor)	Agree
25	Meall Chuaich	Mod/minor (cum minor/negligible – minor)	Agree

#### 3.2.2 Effects on Visual Amenity

Viewpoint No.	Viewpoint	Effect on Visual Amenity	Comment
8	Meall a'	Negligible (cum	Agree

	Bhuachaille	negligible)	
9	Glenmore minor road/ski road acr park	Minor/negligible- minor (cum minor negligible – minor)	Agree
10	Rothiemurchus lodge	Mod/minor (cum mod/minor)	Agree
13	Lairig Ghru	Mod (cum mod)	Agree
15	The Argyll Stone	Major (Cum Major)	(cum effect from proposed glenkirk, Tom nan Clach and Dunmaglass check cum visuals plus Stronelairig-currently at scoping)
20	Glen Feshie	Moderate	Agree
22	Carn Dearg Beag	Major /Mod (cum mod/minor)	Agree
24	Meallach Mhor	Mod/minor (cum mod/minor)	Agree (but Stronelairig?)
25	Meall Chuaich	Mod/minor(cum minor – mod/minor)	Agree (but Stronelairig)

From the west-facing mid slope viewpoints there is variable visibility of the wind farm with wtbs being seen as separate clusters, often partial views of towers, hubs and blades with a landform backdrop. These kind of views may also be experienced from the southern end of the Cromdales (where no viewpoints were assessed) and the slopes of Meall a' Bhuachaille just south of the view point where there is some visibility of up to 5 wtbs.

From the more north and north-west facing midslope viewpoints there is greater visual penetration of the site, more turbines are visible and more of each turbine. These views are likely to be typical of the many high level footpaths on to the plateau from the Lairig ghru, Feshie and Tromie.

### 3.2.3 Ski Road

There is redicted visibility of up to 15 wtbs at distances of 19.5km to 20km. More visibility from higher up in vicinity of ski centre. Visible in combination with Berry Burn, Farr, Pauls Hill and GlenKirk if built.

### 3.2.4 Special Qualities

The qualities that make the landscape and scenery of the mid slope areas special are the experience of magnificent mountains towering over moorland, forest and strath, vastness of space scale and height, a landscape of layers, from inhabited strath to remote, uninhabited upland, an imposing massif of strong dramatic character, the surrounding hills, of the dominance of natural landforms, extensive tracts of natural vegetation, of the iconic animals, a sense of wildness, layers of receding ridgelines (some out with Park) and grand panoramas. There are no through roads in these areas those who end up on the lower hills and footslopes of the plateau do so because they have made a decision to go there, for the

challenge, the experience. They will generally be on foot moving at a pace where it is possible to take in one surroundings in some depth. They will be in a zone that gets increasingly wild with altitude where there are fewer and fewer man made artefacts. They could be moving freely along the lower ridges, following a foot-worn path or one of the 3 core paths along the Tromie, Feshie or through the Lairig Ghru. The predicted effects could dilute the clarity of these qualities, undermine the expectation and compromise the quality of the experience.

### 3.2.5 Wildness

No specific wildness assessment made.

### 3.2.6 Cumulative Effects

Overall the additional effect of Allt Duine (in addition to constructed, consented and proposed on both character and visual amenity is in the region of mod/minor with the combined effects of Corriegarth, Farr, Dunmaglass, Glenkirk and Tom nan Clach along with Allt Duine.

## 3.3 The Plateau and other summits from which no viewpoint assessment was made

### 3.3.1 Effects on landscape Character

Viewpoint No.	Viewpoint	Effect on Landscape Character	Comment
12	Ptarmigan	Moderate (cum moderate)	Agree
16	Braeriach	Moderate (cum moderate)	Disagree. In my view this should be assessed as major or major/moderate (cum major /mod) *
17	Sgoran Dubh Mor	Major/mod (cum major/moderate)	Agree
18	Sgor Gaoith	Major moderate (cum major/moderate)	Agree

\*Breariach is within the Cairngorms Central massif character area. An assessment of landscape character as experienced from this viewpoint is dominated by the drama and immense scale of landforms, the variety of glacial and post-glacial features, the strong sense of remoteness, the relative inaccessibility of the plateau. The views out to the Monadhliath contribute a sense of overlook, distance and setting. In this strongly remote upland context introducing a substantial windfarm will constitute at the very least a moderate if not

substantial change (5.36 moderate change “partial loss or alteration to one or more key elements/features/characteristics of the landscape”).

### 3.3.2 Effects on Visual Amenity

Viewpoint No.	Viewpoint	Effect on Visual Amenity	Comment
12	Ptarmigan	Moderate (cum moderate)	Agree
16	Braeriach	Moderate (cum moderate)	Disagree. In my view this should be major/moderate * (cum major/moderate **)
17	Sgoran Dubh Mor	Major/mod (cum major/mod)	Agree
18	Sgor Gaoith	Major/moderate (cum major moderate)	Agree

\*One can argue that there is back clothing and perhaps a degree of balance in the array, but the extent of the development in the view is significant, as is the degree of contrast. The visual effect of Allt Duine on this view are very similar to that from Sgoran Dubh Mor (v pt 17) and Sgor Gaoith (v pt 18) Allt duine would add to the expanse of the arrays of windfarms visible in the views west and north from Braeriach. It would be in front of and stretch wider across the landscape than Dunmaglass. It's nearer position and greater clarity would draw attention to other more distant wind farms. (Stronelairg??)

### 3.3.3 Special Qualities

The qualities that make the landscape and scenery of the plateau special are the experience of magnificent mountains towering over moorland, the vastness of space, scale and height, an imposing massif of strong dramatic character, the unique plateau of vast scale, distinctive landforms and exposed boulder-strewn high ground, the drama of deep corries, exceptional glacial landforms, snowscapes, grand panoramas and a great sense of wildness. Those who have come to the plateau do so because they have made a decision to go there, for the challenge, the experience. They will be on foot or skis moving at a pace where it is possible to take in ones surroundings in some depth. For most they will be in wildland – an area where an individual finds the experience of wildness is particularly strong. The predicted effects could dilute the clarity of these qualities, undermine the expectation and severely compromise the quality of the experience.

### 3.3.4 Wildness



The potential visibility from the Cairngorms SAWL is predicted within the ES as very limited (fig 5.3). No assessment is made on effects on the sense of wildness as assessed and mapped by CNPA. Wildland is a declining resource in Scotland. CNP is characterised by having a substantial area of wild land at its 'heart' (ref NPP 2007). Recognising and valuing this wildland and the enjoyment that it can give to the public is core to the strategic management of the NP. More recently CNPA has undertaken to develop this thinking and has mapped wildness across the Park from the settled straths and glens to the central massif. This is now subject of draft SPG which is currently out to consultation.

### 3.3.5 Cumulative

Overall the additional effect of Allt Duine (in addition to constructed, consented and proposed on both character and visual amenity) is predicted as major/moderate with the combined effects of Corriegarth, Farr, Dunmaglass, Glenkirk and Tom nan Clach along with Allt Duine.

## 3.4 Edge Hills North (Strathdearn Hills) 3 (Slochd) 4 Dava road

### 3.4.1 Effects on landscape Character

Viewpoint No.	Viewpoint	Effect on Landscape Character	Comment
3	Corn name Bain-tighearna	Maj/mod (cum maj/mod)	agree
4	B9007	Mod/minor	I agree with the assessment for this viewpoint but it is worth noting that the low rugged hills to either side of the road at this point (on the Park boundary) have significantly more visibility with an effect probably somewhere between v pt 3 and v pt 5 *

### 3.4.2 Effects on Visual Amenity

Viewpoint No.	Viewpoint	Effect on Visual Amenity	Comment
3	Carn nam Bain-tighearna	Major (cum major)	
4	B9007	minor	I agree with the assessment for this viewpoint but it is worth noting that the low rugged hills to either side of the road at this point (on the Park boundary) have significantly more visibility with an

			effect probably somewhere between v pt 3 and v pt 5 *
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\*The northern edge of the Park is characterised by small often rugged hills within easy access of the road.

### 3.4.3 Special Qualities

The qualities that make the landscape and scenery experienced in the Strathdearn hills special are extensive moorlands, layers of receding ridgelines, dominance of natural landforms, landscapes both cultural and natural, an accessible wildness and views of magnificent mountains towering over a midground of moorland, forest and strath. These hills form part of a well-defined escarpment, a dramatic transition between the moorland plateau to the north and the straths to the south. The views from these hills are often channelled southwards to the open aspect and panoramic views of the massif. The Allt Duine wind farm will particularly impinge upon the context for these latter views.

### 3.4.5 Wildness Accessible wildness

### 3.4.6 Cumulative

The additional effect of Allt Duine (in addition to constructed, consented and proposed on both character and visual amenity is major/moderate and major in conjunction particularly with Farr.

## 3.5 Monadhliath Hills (27 , 26, 7 Geal carn Mhor)

### 3.5.1 Effects on landscape Character

Viewpoint No.	Viewpoint	Effect on Landscape Character	Comment
7	Geal-Charn Mor	Major/moderate (cum major/moderate)	Disagree with medium sensitivity should be high and therefore major effect. *
26	Creag Mhor	Major/moderate (cum major/moderate)	Agree
27	Carn Sgulain	Major (cum major)	Agree

\*This location is within the National Park and the topography within the larger bowl is quite diverse and sensitive to the unifying effect of a windfarm. Over-riding landform is significant because it is the key landscape characteristic in these relatively simple landscapes. This would make the effect on landscape character major.

### 3.5.2 Effects on Visual Amenity

Viewpoint No.	Viewpoint	Effect on Visual Amenity	Comment
7	Geal-Charn Mor	Major (cum major)	Agree
26	Creag Mhor	Major (cum major)	Agree
27	Carn Sgulain	Major (cum major)	Agree

### 3.5.3 Special Qualities

The qualities that make the landscape and scenery experienced in the Monadhliath special are the dominance of natural landforms, emphasised in winter by expansive snowscapes, extensive tracts of natural vegetation, wildlife (hares, grouse) a vastness of space with few scale registers, a great sense of wildness and views out across inhabited strath to the uninhabited and imposing plateau. Walkers, sportsmen and cross-country skiers experience something here that is different from the central Massif. Away from the Munros, the glens and lesser hills are little-visited and are described by some as a classic wildland area, a landscape that can prompt reflection and exhilaration at the same time. On the hills that range along the National park boundary you are at the cusp of that experience, looking east to the imposing massif with its distinctive landforms, looking west into the remote high rolling hills of the Monadhliath. Both access road and turbines would impact upon this transition and the wildness qualities of the Monadhliath.

### 3.5.4 Wildness

On the edge of a significant tract of wild land (SNH SAWL fig 5.3) and high wildness character.

### 3.5.5 Cumulative

The additional effect of Allt Duine (in addition to constructed, consented and proposed on both character and visual amenity) is major and major/moderate. In all cases this level of impact is significant. (It is worth noting that Stronelairg would add significantly to this.)

## 4.0 Ancillary Components

Of all the various ancillary components it is the access road to the site that will have the most significant effects for the wider Park.

### 4.1 On-site Ancillary Components

The 5 on-site borrow pits, on-site access roads, hard standings and construction compound will have significant impact on views from along the Park's western boundary, particularly during construction. Post-construction the impacts of ancillary components will result from the roading, transformer cabins, and the control building. The latter is the closest

component to the Park boundary, though it is planned to site the building so that it will be screened from views within the Park.

## **4.2 Cabling and OHL**

The cabling to take power from the site will be buried along the route of the Alvie estate track and then on an overhead wood pole line from the substation at Wester Delfour. This will be subject to a separate Section 37 application.

## **4.3 Access Road**

The access road will have a minimum running surface of 5m widening on bends and passing places to accommodate large articulated vehicles. The route of the access road to the site and on-site roading has been subject to a process of modelling, visualisations and site walkovers (2.67). This material has not been submitted as part of the ES. Along with the road shoulder and drainage ditches, the width of disturbed ground will, at a conservative estimate, range from 7m to 17m depending on the angle of slope. The ES states that the disturbed ground along the edges of the access road will be reinstated as soon as practicable, but no indication is given of when that might be. It is expected that the road would be constructed primarily from material excavated in forming the road (3.27), implying that there will be considerable cut in places. The access track construction details (fig 3-6) and the draft construction method statement (App 3.1) do not reflect the variable terrain and slope, (from rock and scree to peat bog and thin soiled fragile heaths) that occur along the proposed route.

The ES makes judgements based on the comparison of the wind farm access road with other existing estate tracks in the area. The specification of the proposed track is far more substantial and the visual effect likely to be greater. It would also add to the clutter of tracks already in existence in the NP.

Much weight has been put on the routing of the access road as mitigation. The route alignment does use landform and tree cover to shield views but parts of the access road will be open to views within the Strath and from elevated locations. The access road albeit following the route of existing tracks in places is a substantially larger construction and will owing to its size and construction be more visible than other estate tracks even when the vegetation has re-established along the margins.

The assessment of effects is made on the basis of perfect restoration and reinstatement. There is no mention that the access track will hold snow and may be more visible at certain times of year.

Should this application be permitted we would require location specific construction, restoration and reinstatement details responding to the full range of slope, soils, hydrology, altitude and aspect.

There will be two site entry points off the A9, one at Dalraddy and one at Leault Farm. The route of the access road from the Dalraddy entry point to the substation site follows the existing access track. The route from the Leault entry point follows the farm access for the first 100m or so and then runs north of the farm across fields before re-joining the route of the existing access track. This open grazed area contrasts with the generally enclosed experience of the A9. The hummocky glacial-fluvial deposits that overlay these south-facing slopes with their scattered birch and juniper and outcropping rock, have a varied and attractive character, and the rectilinear 18<sup>th</sup>/19<sup>th</sup> century improved fields enclosed in places by dykes are a particular feature. The nature and scale of the Leault entry point will be a significant detractor in this context particularly during construction when there will be a high level of vehicle activity.

No specific design mitigation is given in respect of the A9 entry points.

### **5.0 Proposed Mitigation**

The layout of the turbines on the site has been subject to a design optimisation process; this has resulted in reduced visibility from the Strath but makes little difference from elevated viewpoints.

Three wtbs will have height restrictions of 110m (5.711) to avoid blade tip visibility from parts of Strathspey including parts of Glen Tromie, Glen Feshie and shores and surface of Loach Morlich.

The access track route has been modelled in order to reduce adverse effects and the route of existing tracks will be used in places.

The Site control building will be sited so as to be screened from CNP.

The Substation will be located close to an existing sawmill and would be partially screened from valley floor.

### **6.0 Cumulative Discussion**

To date the effects of constructed and operational windfarms (Roths and Paul's Hill) affect the Cromdales, Meal a Buachaille, and the northern part of the massif including Caringorm, Breariach, Macdui and Ben Avon at distances of approx. 36 to 53km. Berryburn (consented) will have a similar effect. Farr affects the Cromdales and a similar part of the massif at approximately 36km. Farr and Pauls hill also theoretically effect lower-lying parts of Abernethy and Strath Spey.

Dunmaglass and Corriearth (both consented) will similarly effect Meal a Buachaille and the Cromdales at approximate distances of 35km to 50+km, both affect the the north western corner of the plateau ( at approx. 35km to 43km) and Dunmaglass extends the windfarm effect further south into the Feshie Forest and Giack (at approximately 30km to 35km)

Should Glenkirk and Tom nan Clach be built they will add to the effect experienced on the Cromdales (at approx. 20 to 25Km) and on the Meal a Buachaille and on that part of the

plateau that includes Cairngorm, Braereach, Macduie (at 27 to 30km) and the hills on the northern and north western boundaries of the Park . Glenkirk would also be visible at 45km from Giack.

Allt Duine will extend the effect west and south with extensive visibility at distances of 13 to 22km from the Massif summits and ridges, from the Feshie forest and from the north-facing slopes of the Giack forest and at approximately 32km from some parts of the Dalnamein forest. And there will be intensive visibility from distances of <1 km along the western boundary of the Park. It would contribute to the now marked encircling effect of wind farms around the northern and western side of the National park.

## **7.0 ES Conclusions**

The conclusions of note are in bold below.

### **7.1 A moderate and non-significant effect on the landscape fabric of the application site (5.713).**

Comment: Approximately 16km of access road within the Park with an average disturbance corridor of some 10m width constitutes a development of some 160,000 square metres (a conservative estimate). Compared to the extent of construction required on the windfarm site this may be low but in the context of the National Park landscape it is a large development with a significant effect on landscape fabric.

### **7.2 Significant effects on landscape character predicted to occur in parts of the Monadhliaths, the Strathdearn Hills and the Cairngorms Central Massif. ( 5.715).**

No comment.

### **7.3 Significant effects on walkers, climbers and cyclists (and presumably also skiers) at south east corner of Strath Dearn Hills, the summits and shoulders along the north western edge of the Cairngorm massif and some summits within Monadhliath Mountains. (5.722)**

No comment.

**7.4 There would be some significant effects on both landscape character and visual amenity within the CNP. The proposed development would be seen in the context of existing windfarms visible from these summit areas, being the closest windfarm seen from the Southern part of the CNP... .. the proposed development would be seen out with the CNP contained within a bowl and back-clothed by the simple skyline . The proposed development would be located away from the core of the CNP and related distinctive landscape and overall would not have an adverse effect on the Special Qualities of the CNP. (5.716).** this conclusion is used to form the argument for policy acceptance.

For the majority of observers the fact that the wind turbines are located outside the CNP boundary is unlikely to make a difference as there is no clear landscape character differentiation. Elements of the proposed development are within the NP and will be clearly seen as such. Great store is placed on the concept of back-clothing. This concept as an aspect of LVIA has been most tested in relation to power line pylons where the lattice structure when back-clothed becomes more recessive in the view. In the case of the solid towers of wind turbines the beneficial /mitigating effects are likely to be less marked and less consistent. The reference to the 'core' of the National Park suggests a differential values across the Park, nowhere in policy terms or otherwise has this been accepted. The conclusion relating SQs is a judgement made without detailed consideration of the special qualities.

**7.5 Careful attention has been given to the design and layout of the proposed turbines and other components of the proposed windfarm which has resulted in reducing potential landscape and visual effects. The number and location of significant effects from the proposed windfarm on its own and cumulatively with existing, consented and proposed wind farms, is limited.**

Whilst the approach to site location and design has limited the landscape and visual effects of the windfarm in comparison to some other windfarms, it is clear that the majority of the remaining significant effects following mitigation efforts impact on character and experience of the National Park more so than anywhere else. The special qualities of the National park would be severely compromised, including those experienced within the Monadhliath and the Strathdearn hills. There seems to be an assumption that going through a thorough design process and attempting to reduce the adverse effects necessarily makes the proposal acceptable.

### **8.0 Conclusions (in addition to points above)**

The landscape and visual effects of Allt Duine on the Monadhliaths, the Strathdearn Hills and the Cairngorms Central Massif are assessed as significant (major or major/moderate effect) at 9 of the 17 viewpoints in the Park that have visibility of the windfarm. This level of significance is both in addition to those windfarms already in the landscape now, and those consented and proposed. Viewpoints are chosen to facilitate assessment and assist in the design process and so may not always be representative, but here with little or no vegetation cover, this level of effect is in my view representative of a broad swathe of the summits, slopes and ridges of the plateau and the Monadhliath.

These landscape and visual effects will have a consequent effect on the experience and perception of the special qualities of the Park and particularly on wildness.

There is a high degree of penetration into areas hitherto little or unaffected, the Giack, Dalnamein and even into Atholl forest with predicted visibility on Beinn a Ghlo.

This proposal would contribute to the now marked encircling effect of wind farms around the northern and western sides of the National park.

A piece of work undertaken by Leeds University has allowed CNPA to map wildness in the Park. This work has fed into the formulation of the draft SPG on wildness which is currently out to consultation. Taking this as the baseline assessment of wildness in the Park we have overlaid the viewshed map of the Allt Duine windfarm. This exercise reveals that the areas that get most visibility of the wind farm coincide with areas of the plateau and the Monadhliath that register the highest level of wildness on the CNPA typology scale.





- extensive recent visitor research has confirmed the importance of scenery and landscape to Park's visitors.
5. One piece of important context missing from the Socio Economic Assessment is mention of the Sustainable Tourism Strategy for the National Park. This provides the strategic guidance for the management of tourism. The Cairngorms were the first National Park to be awarded the European Charter for Sustainable Tourism in Protected Areas (ECSTPA) in 2005, based on the submission of a Sustainable Tourism Strategy that had been developed by the tourism sector. This was a valued and important piece of work that shaped much of the early work around tourism in the National Park.
  6. The ECSTPA lasts for 5 years and a new Strategy has been completed during 2010, led by and with extensive engagement from, the tourism industry. The broad forum that provides leadership and direction (the Sustainable Tourism Forum) has a number of prominent tourism business leaders but also has representation from communities, environmental bodies and land managers (including NFUS and SRPBA).
  7. The new strategy has 6 strategic objectives, one of which is:  
  
***Environmental Impact:** To minimise negative environmental impacts from tourism and gain support for the conservation, management and enhancement of the Cairngorms' natural resources and heritage.*
  8. At a more detailed level the Strategy has a number of actions to support these objectives including:  
  
***4a Guard against damaging and intrusive development:** Consultation revealed concern about a variety of types of development in the Cairngorms, some related to tourism but many only indirectly or not at all, that have spoilt or are threatening the special qualities of the Park and so could adversely affect the area's appeal to visitors. These include housing developments, roadways and tracks in the mountains, windfarms, powerlines and various other developments.*
  9. The Sustainable Tourism Strategy reinforces the importance of the Park's special qualities and the need to respect and care for them. The extracts noted above provide further backing for the detailed landscape comment being provided by the CNPA Landscape Advisor.

## **Economic Impact – Wider Considerations**

10. The Assessment does note the important positive impact the development could bring to the local economy. In particular:
  - a. **Short Term (construction phase).** It would appear that reasonable opportunity may be given to local construction firms to bid for work. Local businesses (accommodation, catering, retail, services) all have opportunity to benefit from increased trade during the construction phase.
  - b. **Medium Term (operational phase).** A modest number of full time maintenance and operational jobs may be provided during the lifetime of the site. The local community may also benefit should any community benefit fund be confirmed.
  - c. **Long Term (legacy).** The individual estates and land holdings on which the development is proposed will benefit from a new income stream that will help diversify their enterprise, potentially enable further business development, and help strengthen long-term economic viability.
11. The mitigation measures proposed to limit disturbance to local events during the construction phase are noted and welcomed. The impact of construction traffic on visitor traffic flow on the A9 is covered in a separate study. Little mention is made of this in the socio-economic assessment and this may be worthy of more detailed scrutiny.

## Conclusion

12. Despite the thorough presentation on the importance of tourism in the Assessment a degree of unease remains that the deeper and longer term consequences of this development, and others of a similar nature, are not being fully explained or captured during consultation. Such effects may often be intangible and can be difficult to comprehend if not presented in a comprehensive manner. The analysis of the likely direct impacts on tourism attractions and businesses appears fair; the key issue being the visual impact from routes, paths and viewpoints for which separate comment is being provided.
13. However, of particular note is the apparent lack of discussion with visitors and businesses on the cumulative effect of multiple windfarm developments on the landscape of the Park. The true and long-term impact on the visitor experience of such creeping large scale developments on the periphery of the Park has not been fully explored. The comparative research from elsewhere, on which much of the

analysis and conclusions are based, also does not appear to include this issue in any detail.

14. There are likely to be a number of positive impacts in the short, medium and long term that are to be welcomed. Diversifying and broadening the economy in the Park is important, however, it should be done with due regard for, and in balance with, the other aims of the National Park.

## MEMORANDUM

**To:** Andrew Tait, Development Management Officer

**From:** Adam Streeter-Smith, Outdoor Access Officer      **Date:** 4<sup>th</sup> April 2011

**SUBJECT:** ALLT DUINE WINDFARM- ELECTRICITY WORKS (EIA)  
(SCOTLAND) REGULATIONS 2000. SECTION 36 APPLICATION  
FOR THE PROPOSED ALLT DUINE WIND FARM, NORTH  
KINGUSSIE

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Andrew

Having reviewed the documentation associated with the above plans we do wish to make a number of comments in relation to on-site impacts and omissions from the off site assessment.

### On site impacts on recreation resources

The report in section 12.169 refers to 32 promoted routes within the assessment area. This is inaccurate as there are a number of others. There is at least one promoted route on site which is described in the Cicerone guide *Backpackers Britain: Volume 4 Central and Southern Scottish Highlands* it details a 2 day route from Aviemore to Kingussie that crosses the site at Carn an Fhuarain Duibh (NH812115) descends along the access track to the Dulnain and exits the site at NH764121.

The report in section 12.171 states that the Dunachton and Alvie tracks have limited popularity in terms of numbers of users. We would disagree with this statement on the following grounds:

- The Alvie track provides access to the popular bothy at NH762112;
- Both tracks are used by long distance horse riders and cyclists;
- Both tracks were identified as being important during the first round of consultation into the Core Paths Plan;

Likewise we would disagree with the statement in 12.175 as outlined above we believe that both routes are used by horse riders. Notwithstanding existing access issues on the routes these routes have been identified to us in a recent meeting of long distance horse riders.

Off site impacts on recreation resources

There are a number of clusters of promoted routes that have been omitted from the assessment these are the:

- Nordic ski and mountain bike trails around Carn Bad nan Luibheanear the Slochd;
- Mountain bike trails around Feshie Bridge and;
- Promoted paths around Newtonmore and Kingussie.

Likewise the report has failed to identify the Nordic Ski Centre at the Slochd, appendix 12-6, as a visitor attraction in its own right.

Appendix 12-7 is missing Carn Glas-choire, a Graham, located at NH892292 near Carr Bridge. From the maps it would appear that you would be able to see 16-20 turbines from this summit which would be a significant impact.

Happy to discuss further

**Adam Streeter-Smith**  
**Outdoor Access Officer**