

## CAIRNGORMS NATIONAL PARK AUTHORITY

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**Title: CONSULTATION FROM SCOTTISH  
GOVERNMENT**

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(DEVELOPMENT MANAGEMENT)**

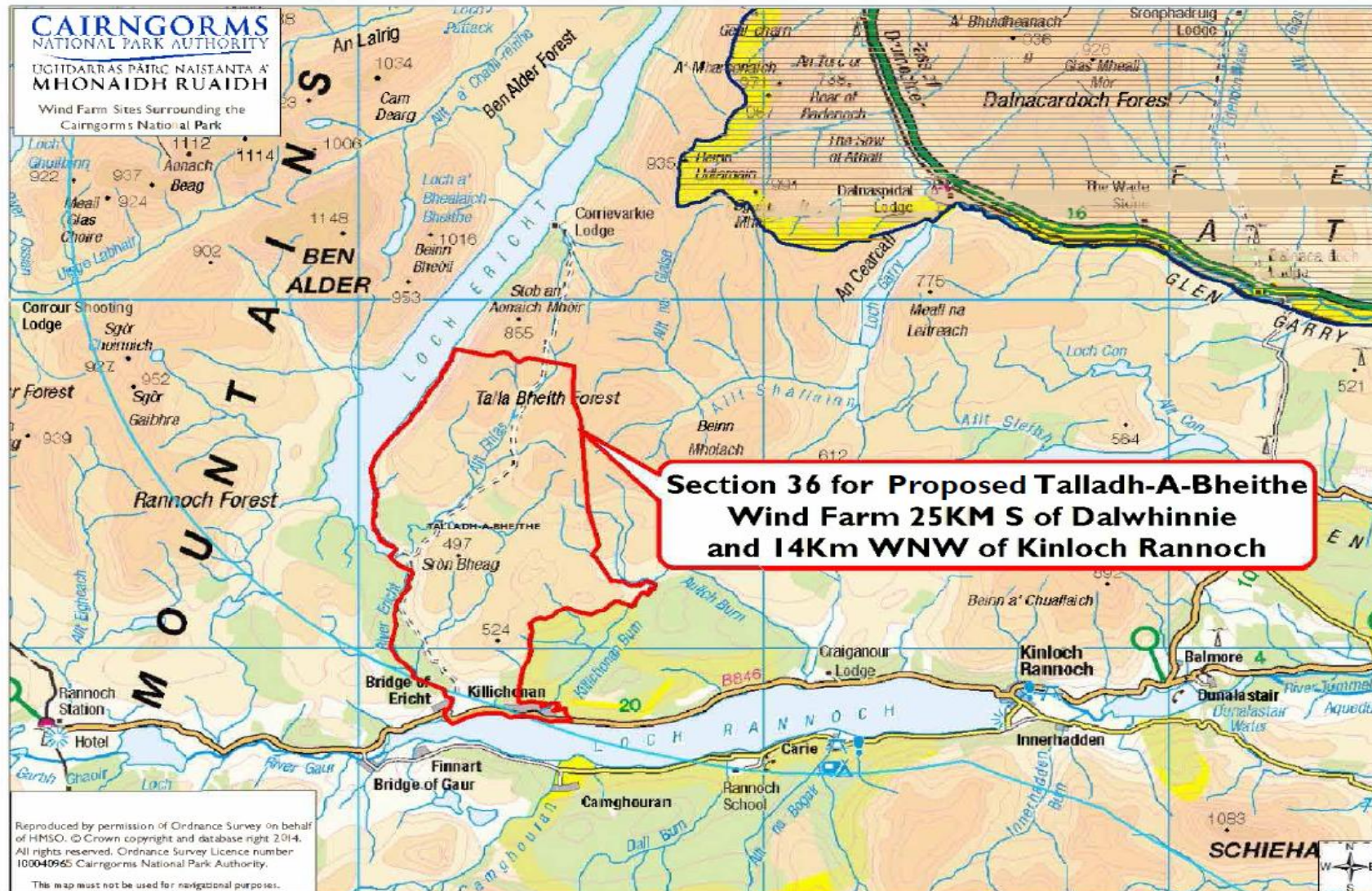
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**DEVELOPMENT PROPOSED: THE ELECTRICITY WORKS  
(ENVIRONMENTAL IMPACT  
ASSESSMENT) (SCOTLAND)  
REGULATIONS 2000 -SECTION 36  
APPLICATION FOR THE PROPOSED  
TALLADH A BHEITHE WIND FARM,  
TALLADH A BHEITHE ESTATE.  
DALWHINNIE**

**REFERENCE: PA-280**

**APPLICANT: TALLADH A BHEITHE WIND FARM  
LTD.**

**RECOMMENDATION: OBJECTION**



## **PURPOSE OF REPORT**

1. The Cairngorms National Park Authority (CNPA) has been consulted in relation to any impacts upon the National Park as the application is accompanied by an Environmental Statement under the terms of the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2011. The planning issues being considered in relation to this consultation are whether there are any impacts upon the qualities of the Park.
2. The purpose of this report is to provide a consultation response to The Scottish Government (the determining Authority for this application) on this proposed wind farm.

## **SITE DESCRIPTION AND PROPOSAL**

3. The site is located approximately 10km to the south west of the Cairngorms National Park Boundary, 4 km to the north-east of Bridge of Gaur, 25 km south of Dalwhinnie and 14 km west-north-west of Kinloch Rannoch and would occupy an area of land which is dominated by a natural bowl in the central area of the Talladh-a- Bheithe Estate. Adjacent is an existing hydro electric facility and estate access road to the east of Loch Ericht. Open grassland and intermittent coniferous plantations are elements in forming the character of this part of the estate which is located partially within the Loch Rannoch and Glen Lyon National Scenic Area (NSA) and includes the Coire Bhachdaidh Site of Special Scientific Interest (SSSI).
4. The proposal seeks to erect a 24 turbine wind farm development generating a total power output of some 75Mw. Each turbine would have a maximum blade height of 125 metres (up to 80 m hub height and 90m rotor diameter) with potential for an annual indicative output of 167,141 MW hours per annum (MWh/p.a), Also included would be associated infrastructure including tracks, hardstanding for cranes and maintenance, control buildings, sub-station, underground cabling and two meteorological masts.
5. Hydro electricity has been produced on the site since the 1930s and this is evidenced by existing hydro energy infrastructure comprising of power buildings, overhead power lines, large diameter pipework and internal roadways being located within the vicinity of the site.
6. Various options are outlined in the submission as being considered with regard to transportation of components. These include the option to utilize a number of transportation methods to deliver the turbine components and construction materials to the Talladh-a-Bheithe site including the option of delivering components by ship to Corpach near Fort William for onward transhipment by rail to Rannoch Station. Delivery from the railhead could be achieved by low-load vehicles to the site via an upgraded access from the

A846. It is also an option that larger component parts including turbine blades, which cannot be readily transported by rail, as well as construction materials, could be loaded onto barges on Loch Ericht and transported to the head of the Loch at Dalwhinnie. Onward transportation would then be effected by abnormal load vehicles (ALVs) via the A9 and the A889. Seven watercourse crossings would be required for the access tracks five of which would require authorisation under Controlled Activities Regulation (CAR) from SEPA.

7. The application is accompanied by an Environmental Statement (ES), and contains an assessment of ecological and landscape impacts. It also includes information on zones of theoretical visibility (ZTV) information, wireline drawings and photomontages together with assessments of cumulative effects with other wind turbines in the area. The ZTV information is provided for both the impacts of the proposed wind farm and also its cumulative impacts with other consented and proposed wind farms in the area.
8. A number of photomontages and wireframe drawings have been provided from various viewpoints with the ZTV showing that there is visibility of 13 to 14 turbines from the A93 road near Lair both within and outside the National Park with the slopes and summits of the Cairnwell and Caenlochan Forest (at approx. 17km to 20km) being affected and, also the Munro summits of the Beinn a Ghlos at approx. 25km and Driesh at approx. 20km. All of these are within areas of Wild Land (SNH 2014).
9. In respect of landscape and visual impacts, the ES assesses that whilst there would be significant effects on landscape character and visual amenity within parts of the Loch Rannoch and Glen Lyon National Scenic Area (NSA) it was considered that there would be no significant effect on any of the other National Parks or National Scenic Areas which are located within the study area. These include the Cairngorms National Park and the Ben Nevis and Glen Coe National Scenic Areas.

## **DEVELOPMENT PLAN CONTEXT**

### **National Policy and Guidance**

10. Scottish Planning Policy (2014) (SPP) sets out Scottish Government's principal policy approach in respect of supporting a growing transition to a low carbon economy, creating a sustainable, natural and connected place and; introduces a presumption in favour of sustainable development. It sets out the Scottish Government's commitment in paragraph 154 to increasing the overall amount of energy generated from renewable sources to 30% by 2020 with the equivalent of 100% of electricity demand being met by renewable sources by this date. In terms of policy principles, paragraph 154 requires the planning system to guide renewable energy development to appropriate locations and to advise on the issues that would need to be taken into account when specific proposals are being assessed.

11. The importance of particular landscapes such as National Parks are addressed in the SPP with the aims of the Scottish National Parks set being set out in paragraph 84. These are to:
  - Conserve and enhance the natural and cultural heritage of the area;
  - Promote sustainable use of the natural resources of the area;
  - Promote understanding and enjoyment of the special qualities of the area by the public, and;
  - Promote sustainable economic and social development of the areas communities.
12. Paragraph 85 advises that these aims are to be pursued collectively but where there is conflict between the first aim and any of the others then greater weight must be given to the first aim.
13. Planning decisions are expected to reflect these aims and weighting and, as such, comply with paragraph 212 in ensuring that the objectives of National Park designation and the overall integrity of the park are not compromised. In respect of development outside of the Park boundaries that affect the National Park, paragraph 213 requires that this development be consistent with the requirements of paragraphs 84 and 85 (detailed above).
14. Wild Land Areas are addressed in paragraph 200 of the SPP (2014) which are identified as being very sensitive to any form of intrusive human activity and have little or no capacity to accept development. Furthermore, paragraph 215 states that development may be appropriate in some circumstances. Further consideration is required to demonstrate that any significant effects on the qualities of these areas can be substantially overcome by siting, design or other mitigation.

### **Strategic Policy**

#### **Cairngorms National Park Partnership Plan 2012-2017**

15. The Cairngorms National Park Partnership Plan sets out the vision and overarching strategy for managing the Park and provides focus and priorities at a time of limited financial resources. The Plan also provides a strategic context for the Local Development Plan and shows how the four aims of the National Park can be achieved together. It sets out the strategic direction and priorities for the Park.
16. Three long term outcomes for the Park are set out as follows:
  - A sustainable economy supporting thriving businesses and communities;
  - A special place for people and nature with natural and cultural heritage enhanced; and
  - People enjoying the park through outstanding visitor and learning experiences.



These outcomes address the interaction of the three main characteristics of the National Park these being that the Park is an internationally important area for nature conservation; a fragile rural economy, and an internationally known tourism destination. Recognising the relationship of these outcomes is at the heart of the National Park. A series of work programmes to help deliver the outcomes is set out in the Plan.

17. Policy 1.3 of this Plan states that large scale commercial wind turbines (defined as more than 1 turbine, and more than 30m in height) are not compatible with the special qualities of the National Park and are not considered to be appropriate within the National Park or “*where outside the Park they affect its landscape setting.*” Also relevant is Policy 2.3 which seeks to conserve and enhance the special landscape qualities, with a particular focus on conserving and enhancing wildness qualities.

## **CONSULTATIONS**

18. **The CNPA’s Landscape Advisor** has assessed this application and a copy of the response is attached as **Appendix I**. Key points from this assessment have guided the Appraisal of the proposals set out below.

## **APPRAISAL**

19. In appraising the proposed wind farm, the key issue is whether the proposals have an impact upon Cairngorms National Park. In this respect the following aspects, as identified in the Landscape Advisor’s assessment, are considered: Setting and Landscape; Wildness and Wild Land; and Integrity of Special Landscape Qualities of the Park.

### **Setting and Landscape**

20. Policy 1.3 of the Cairngorms National Park Partnership Plan (2012-2017) supports the development of the low carbon economy by the use of renewable energy generation that is compatible with conserving the qualities of the National Park and maintaining the integrity of designated sites. However, large scale commercial wind turbine developments are not seen as being an appropriate form of development either within the park or outside of the park boundaries where they would adversely affect its landscape setting. Reference should be made to the map of wind farms outside the National Park boundaries, included in **Appendix 2**.
21. Viewpoint 24 located on Beinn Udlmain is the only viewpoint given in the ES that indicates significant visual impacts from the Park. It is sited 10.1km from the nearest turbine where the hubs and towers of 14 turbines and a further 4 blade tips would be visible. Similar views are also likely to be experienced from Sgairneach Mhor where the wind farm would appear to sit on the moorland. Both of these hills are Munros and therefore popular with visitors.

22. From these elevated viewpoints, the Grampian Highlands constitute a continuous mountainous landscape where the peaks and ridges form natural focal points. The turbines would be clearly visible at this distance with the wind farm positioned on an area of moorland within this landscape, creating a new and prominent focal feature here. Due to the prominence of colour, texture and pattern contrast, the magnitude of visual change would be high and not 'medium' as stated in the ES, leading to a substantial level of effect.
23. Viewpoint 24 of the ES indicates that the proposal would therefore have a significant effect on a number of landscape characteristics and adversely affect the landscape setting of the Park. The wider moorland landform around Talladh a Bheithe is relatively flat and within this landscape context, 125m high turbines would be clearly visible within the wider landscape. This would result in a prominent additional feature within this landscape, providing a new shape that affects understanding and appreciation of the landform, and indeed, the wider chain of mountains. There would also be a pattern to the arrangement of turbines and the movement of blades that, in the opinion of the Landscape Officer, would provide a scale register in a landscape which is largely devoid of other scale registers.
24. The magnitude of change to the character of the Talladh A Bheithe landscape from Viewpoint 24 and other viewpoints nearby within the National Park would be high resulting in an unacceptable and significant adverse impact on landscape character contrary to the requirements of Policy I.3 of the Cairngorms National Park Partnership Plan.

### **Wildness and Wild Land**

25. Scottish Planning Policy (SPP) seeks in paragraph 200 to safeguard the character of areas of wild land identified on the 2014 SNH map of wild land areas, the landscape characteristics and qualities which may be found both within and outside the boundary of the Park. Policy 2.3 of the Cairngorms National Park Partnership Plan seeks to conserve and enhance the special landscape qualities, with a particular focus on conserving and enhancing wildness qualities.
26. The proposed wind farm is within Wild Land Area 14 Rannoch, Nevis, Mamores and Alder which extends well into the National Park and includes Munros from where there would be clear visibility of the wind farm. Whilst paragraph 215 of the SPP recognises that development may be appropriate within areas of wild land in some circumstances, any such development would need to clearly demonstrate that any significant effects upon the qualities of these areas can be substantially overcome by siting, design or other mitigation.
27. The mountains of the Cairngorms National Park are recognised as one of the wildest places in Britain and beyond the mountain core lie many places characterised by their remoteness and ruggedness, where the vegetation is near natural with little evidence of human structures which set the special

quality of wildness. Locations outside of the Park where these characteristics occur also contribute to the experience of wildness within the Park, and can be identified as those areas of Wild Land that cross the boundary.

28. Views out from the National Park onto the Grampian Highlands offer an arc of wind farm-free panoramic views as far south as Ben Nevis. Of all the views out from the National Park it is the one to the south west that allows the viewer to appreciate the CNP as part of the Grampians; one of the three major mountain ranges in Scotland, one that includes, Ben Nevis and Ben Macdui, the highest mountains in the British Isles. This is a Wild Land Area that would be very sensitive to any form of intrusive human activity.
29. Given the visual presence of this wind farm, it is highly likely that the landscape and visual effects of the proposal would adversely affect the special landscape qualities of this part of the Park, and of wildness in particular. The adverse effect that this proposal would have on people's experience of the Wild Land Area that stretches from the Cairngorms National Park in the north to Ben Nevis and the Mamores in the south, cannot be overcome by siting, design or other mitigation. The proposal would therefore fail to meet the guidance in Scottish Planning Policy (paragraphs 200 and 215) and Policy 2.3 of the Cairngorms National Park Partnership Plan in maintaining the integrity and character of the surrounding area of wild land.

### **Integrity of Special Landscape Qualities of the Park - Layers of Receding Ridgelines and Panoramic Views**

30. Layers of receding ridgelines is a visual quality that occurs where undulating and ascending ridgelines appear to form a series of interlocking layers, giving great depth to the landscape. The locations where areas outside the Park contribute to the experience of this special quality within the Park are limited to the north-west, west, south west and south and in these situations are best appreciated from an elevated location. The proposed wind farm would introduce a new and distracting feature into the mountainous landscape of the Grampian Highlands.
31. Extensive panoramic views are frequent throughout the Park and from higher elevations; many extend way beyond the boundary. These are generally uninterrupted views across an often rocky and sparsely vegetated foreground, a mid-ground of moorland, glens, straths and lesser hills to a horizon of rugged peaks (south through to north west) or distant farmland (south through to south east through to north). The proposed wind farm would introduce a new and distracting feature into the mountainous landscape of the wider Grampian Highlands that would be detrimental to the special landscape qualities of the Park.

### **Conclusion**

32. The proposal would have a significant effect on a number of landscape characteristics and adversely affect the landscape setting of the Park. The



proposal would fail to meet Policy I.3 of the Cairngorms National Park Partnership Plan.

33. The landscape and visual effects of the proposal would adversely affect the special landscape qualities of this part of the Park, and of wildness in particular. The adverse effect that this proposal would have on the experience of the Wild Land Area that stretches from the Cairngorms National Park in the north to Ben Nevis and the Mamores in the south, cannot be overcome by siting, design or other mitigation. The proposal would therefore fail to meet the guidance in SPP (paragraphs 200 and 215) and Policy 2.3 of the Cairngorms National Park Partnership Plan.
34. Though the proposed Talladh A Bheithe wind farm would not significantly affect the physical integrity of the National Park, it would however affect, in terms of proximity and visual impacts, the special qualities for which it was designated in a number of areas in the south west of the Park. The proposed wind farm would introduce a new and distracting feature into the mountainous landscape of the Grampian Highlands. The proposal would fail to meet the national designation test in the SPP (paragraph 212).
35. In conclusion, it is recommended that the advice to the Scottish Government should be in the form of an objection to the development for the reasons given below. Such objection should be accompanied by the detailed consultation response from the CNPA Landscape Advisor (as included as **Appendix I**).

## **RECOMMENDATION**

**That Members of the Committee OBJECT and recommend to the Scottish Government that the proposed Talladh A Bheithe Windfarm, Dalwhinnie be REFUSED for the reasons below:**

- I. The proposed wind farm would affect, in terms of proximity and visual impacts, the special qualities for which the Cairngorms National Park was designated in a number of areas close to the south western boundary of the Park. It is considered that magnitude of change to the character of the Talladh A Bheithe landscape from Viewpoint 24 and other viewpoints nearby within the National Park would be high resulting in an unacceptable and significant adverse impact on landscape character contrary to the requirements of Policy I.3 of the Cairngorms National Park Partnership Plan (2012-2017). The proposal would therefore fail to meet the aims of the National Parks contained within paragraphs 84 and 85 of the Scottish Planning Policy (2014) (SPP) which requires that the objectives and overall aims of the National Park designations such as the Cairngorms National Park will not be compromised and; paragraph 213 of the SPP which requires that these paragraphs (84 and 85) apply to development outwith of a National Park that affects the Park.

2. The landscape and visual effects of the proposal would adversely affect the special landscape qualities of this part of the Park, particularly in terms of its wildness. This would adversely impact upon the experience of the Wild Land Area that stretches from the Cairngorms National Park in the north to Ben Nevis and the Mamores in the south and it is considered that this impact cannot be overcome by siting, design or other mitigation. The proposal would therefore fail to meet the guidance in Scottish Planning Policy (paragraphs 200, 212 and 215) and Policy 2.3 of the Cairngorms National Park Partnership Plan (2012 – 2017) in maintaining the integrity and character of the surrounding area of wild land.

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**19 August 2014**

The map on the first page of this report has been produced to aid in the statutory process of dealing with planning applications. The map is to help identify the site and its surroundings and to aid Planning Officers, Committee Members and the Public in the determination of the proposal. Maps shown in the Planning Committee Report can only be used for the purposes of the Planning Committee. Any other use risks infringing Crown Copyright and may lead to prosecution or civil proceedings. Maps produced within this Planning Committee Report can only be reproduced with the express permission of the Cairngorms National Park Authority and other Copyright holders. This permission must be granted in advance.